## THE CITY OF



## **WORLD HERITAGE SITE**

Submission Draft: This draft has been endorsed by Full Council on 16 November 2010 and by Single Cabinet Member Decision on 29 December 2010

Supported by

**Bath & North East Somerset Council** 



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## The City of Bath World Heritage Site Management Plan

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# **Foreword**

[Text to be added to final document]

# **Preface**

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# **Long Term Vision**

Bath will maintain and enhance the Outstanding Universal Value of the City of Bath World Heritage Site.

It will practise and promote sustainable management, understanding the World Heritage Site's unique qualities and its world-wide significance.

It will be a centre of excellence for urban heritage management and conservation, founded on partnerships of local, national and international communities and organisations.

Bath will conserve and safeguard the cultural assets of the World Heritage Site for this and future generations.

Bath will be accessible and enjoyable to all; a site that understands and celebrates its Outstanding Universal Values and atmosphere.

Bath will continue to be a thriving living city which uses its status as a World Heritage Site to support and further the vitality of the local community.

# **Executive Summary**

The City of Bath World Heritage Site was inscribed in 1987. The reasons for inscription, or attributes of Outstanding Universal Value, can be defined as:

- 1. Roman Archaeology
- 2. The hot springs
- 3. Georgian town planning
- 4. Georgian architecture
- 5. The green setting of the City in a hollow in the hills
- Georgian architecture reflecting 18th century social ambitions

Bath is a complex site, encompassing an entire living city where modern life co-exists alongside historic cultural and natural assets of global significance. Achieving balance between conservation and community needs is the constant challenge which this plan addresses.

This plan replaces the first site plan of 2003. It follows that document in explaining site significance, management, pressures and challenges facing the site, and how to address these. There are important changes in this plan, notably a new draft statement of Outstanding Universal Value defining site significance in World Heritage terms, which underpins all World Heritage management decisions.

There have also been significant events since the production of the previous plan. Thermae Bath Spa has opened, re-establishing the connection between the Hot Springs and health and well being on which so much of Bath's history is founded, and the new Southgate Shopping area has remodelled a significant area of the City centre. New national guidance has come forward, including Planning Policy Statement 5, and new agendas have come to the fore, especially the increasing need to address climate change.

A buoyant economy during the previous plan period lead to development pressures unseen in the city for a generation. Debate regarding new developments was intense, and a UNESCO Mission visited the site in 2008 to study proposals and share advice. The UNESCO Mission documents are included in this plan, as are actions to address the points raised.

The UNESCO Mission concluded that both the overall state of conservation and management of the site were good. However, despite this welcome commendation there are always challenges to face. The World Heritage Site Steering Group, who are responsible for production of this plan, have considered the many comments made during consultation on this document and produced the following six key priorities:

- Funding and management of World Heritage. Placing consideration of Outstanding Universal Value at the heart of key decision making.
- **Transport**. Developing a comprehensive response the City's traffic pressures.
- Buffer Zone and Setting. Continuing to explore ways to preserve the setting of the Site.
- **Planning Policy**. Providing a robust and comprehensive planning policy to ensure new development does not harm the values for which the site was inscribed.
- **Public Realm**. Addressing the need to improve the public realm through existing and new measures.
- **Interpretation**. Ensuring the reasons for inscription and the story of the site are more effectively told.

Despite the new plan emerging at a time when the finances are under pressure and many aspects affecting the site such as regional planning are dynamic, all partners involved in managing Bath World Heritage Site remain committed to ensure that the City of Bath, as a masterpiece of human creative genius, continues to be conserved for the benefit of this and future generations.

## Introduction



## 1 Introduction

## 1.1 The City of Bath World Heritage Site

- 1.1.1 World Heritage Sites are recognised by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) through the 1972 World Heritage Convention, which was ratified by the UK Government in 1984. The World Heritage system is managed by the UNESCO World Heritage Committee which consists of 21 representatives from the 186¹ State Parties to have ratified the Convention.
- 1.1.2 The City of Bath has been a World Heritage Site since 1987, 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 inspired by its hot springs and natural landscape setting. The story of the city settlement extends over six millennia, from its earliest days when the hot springs were a place of worship for the Britons, to the contemporary city, which is an international icon of heritage and a thriving community.
- 1.1.3 Spread across the Site are extensive remains from all eras of the city's development:
  - archaeological evidence of pre-Roman use of the hot springs;
  - archaeological remains of the Roman thermal and religious spa and settlement;
  - Saxon and medieval remains, including parts of the central city street layout, parts of the city wall, the East Gate and the Abbey Church, as well as extensive archaeological deposits;
  - the 18th century 'Georgian' city and associated villages with their dwellings, social and civic buildings, parks and gardens, streets and public open spaces;
  - the stone mines and associated works, transport systems and communities;
  - the natural landscape setting;
  - the hot springs, associated buildings and systems, and their continued use for health and leisure;
  - Brunel's Great Western Railway Paddington to Bristol line with associated buildings and structures;
  - 19th, 20th and 21st century developments, including presentation and interpretation of the historic environment through museums and other services; and
  - extensive collections of artefacts and archives. The collections at the Roman Baths, Fashion Museum and Bath Record Office are all 'Designated' by Government as being of national / international importance.

#### **A Living City**

- 1.1.4 Bath is home to a living community. It is also an international tourist destination attracting over four million visitors each year. The city is regional centre for commerce and recreation, and lies on strategic road and rail transport routes. It is the largest urban settlement, and the commercial, cultural and recreational heart, of Bath and North East Somerset (B&NES). It has two universities, and is a major centre of sporting excellence with a highly successful rugby team. The City of Bath is a blend of history and contemporary life that is continually changing, growing and adapting.
- 1.1.5 The Sustainable Community Strategy (2009-2026)<sup>2</sup> covering Bath outlines drivers for change, which are relevant to this plan and a useful insight into the living City. Climate change is one such driver, which has increased in prominence since the previous plan was compiled and poses significant challenges. Bath has a high number of historic buildings which may not be adequately adapted for changing energy needs, and the site sits on the River Avon which poses a flood risk.

- 1.1.6 Bath's population of approximately 89,000 has grown slowly from 80,000 in the 1950s, and this increase is predicted to continue with the population of the wider district increasing by 18% by 2026. Bath has a high proportion of retired people, and the very elderly population (over 80's) is forecast to increase by 16% by 2026.
- 1.1.7 Changes in lifestyle leading to greater single occupancy of houses will also lead to a need for growth in housing and employment. Accommodating this need will impact upon the World Heritage Site and require careful management. The continuing growth of the working age population also contributes to commuting, and counteracts efforts to reduce carbon emissions. Provision must be made for 5,700 new jobs (net) in Bath, which has implications for planning, commuting and public transport. Bath's desirability, high quality of life and high housing costs (in the 5% least affordable housing areas in the country) have created serious shortages of affordable housing. Combined with the area's low wage economy, this contributes to commuting to work from outside the area.
- 1.1.8 Despite the relative wealth of the city and low unemployment compared to the national average, there are some pockets of high deprivation. The Twerton/Whiteway area of Bath falls within the top 20% of the most deprived wards in the country<sup>3</sup>.
- 1.1.9 The economy of the city is an important consideration, as this provides the wealth to ensure the continued protection of the cultural assets. Bath has a wide range of businesses and industries. The service sector, which includes tourism, retailing and leisure, supports 79% of local jobs. Other significant employers are: public administration and health; two universities, banking, finance and insurance; distribution, hotels and restaurants. Manufacturing accounts for less than 8% of jobs in the city. Most businesses are small, with less than 1% employing more than 200 people lower than average for the South West Region<sup>4</sup>.
- 1.1.10 The whole of the city is a World Heritage Site, and this brings both opportunities and challenges. The city's unique and much-celebrated heritage generates the economic and cultural vibrancy that is essential for its long-term protection. But whilst heritage is one of Bath's key strengths in attracting clients and employees, this may also inhibit investment in contemporary buildings and the growth of businesses and employment.

## 1.2 The Management Plan

- 1.2.1 The Management Plan describes the Site and sets out its special significance. It identifies management issues and objectives for addressing them, and sets out an Action Plan.
- 1.2.2 The Plan sets out a framework to conserve the Site's cultural heritage assets. This wide remit includes: protecting and enhancing the archaeology, architecture and planning and their urban and landscape settings; improving understanding of the Site, its interpretation and use as a resource for learning; supporting the cultural and economic vitality of the local community.

#### **Status**

- 1.2.3 The Plan is a partnership document. It provides guidance for organisations and individuals operating within the Site. It meets government requirements for World Heritage Site Management Plans as set out in Planning Policy Statement 5 (PPS 5) and Circular 07/2009, and advice contained in the UNESCO Operational Guidelines<sup>5</sup>.
- 1.2.4 The Plan represents the consensual view of the members of the World Heritage Site Steering Group (see Appendix 6), and has been developed in consultation with the local community and relevant organisations and agencies. The successful implementation of the Plan, and the achievement of its aims, will depend to a large extent upon participation and partnership. The Plan was been endorsed for submission to UNESCO by Bath and North East Somerset Council on 16 November 2010.
- 1.2.5 The issues and objectives within the Plan are expected to retain their relevance for at least five to ten years, some for much longer. However, to ensure continued relevance, a formal review of issues and objectives is desirable at least every six years.

- 1.2.6 The World Heritage Convention has been ratified by the UK Government, although the designation is not yet recognised in UK law beyond being included as a "Heritage Asset" in PPS 5. The Site is primarily protected by UK planning laws and specific planning guidance. PPS 5 (2010) lays down the principles for protection, and Circular 07/2009 clarifies that World Heritage Site status is a 'key material consideration' in planning terms. The Plan has not previously been adopted as a Supplementary Planning Document, but the Action Plan contains an aspiration to achieve this by adopting a summary version. Locally, protection is currently (2010) via the B&NES Local Plan, adopted in October 2007. Designations including listed buildings and conservation areas, and scheduled monuments also offer statutory protection. Section 3.4 gives more detail on the planning and policy framework, and Appendix 5 contains the relevant Local Plan policy. Non-statutory designations also exist, such as the English Heritage Register of Historic Parks & Gardens.
- 1.2.7 In terms of status, the plan sits within a framework of strategies at local level. Chief amongst these is the Sustainable Community Strategy (2009-2026). Required by law<sup>6</sup> and produced by the Local Strategic Partnership, this sets out an over-arching 15 year vision for the district and City. This Management Plan helps to deliver the vision, ensuring a distinctive place that maintains and enhances its outstanding built and natural environment, which has a dynamic low carbon economy, achieves connectivity and has world class arts and culture. The Plan supports, and is supported by, a large number of other strategies and programmes which cover areas including traffic, transport, housing, public realm, commercial property, heritage, conservation, archaeology, tourism, education, access and planning policy. Documents relating to these are listed in Sections 3.4.16 and Appendix 11, although this list is not comprehensive.

#### Geographical Scope

1.2.8 The boundary of the Site follows the former municipal boundary of Bath City as it was in 1987 (see 2.2 and Appendix 1). The Plan recognises that factors beyond the boundary of the Site will influence it. Consequently, the area covered by the Plan is the City of Bath and the landscape setting which has a visual and contextual link to it. The City Of Bath World Heritage Site Setting Study (2009) (see Appendix 10) helps to explain the extent of the landscape setting and the geographical scope of the Plan.

#### **Need for the Plan**

1.2.9 UNESCO expects all Sites to have a Management Plan. This is also UK government policy, and all 28 UK sites (2009) have Plans. In Bath, the management and ownership responsibilities lie with many thousands of individuals, groups and organisations, and so this Plan is a necessary and valuable tool for strategic coordination.

#### **Preparation**

1.2.10 Bath and North East Somerset Council ('the Council'), as predominant steward of the Site, has taken a leading role in preparing the Plan through its World Heritage Manager. This work was overseen by the World Heritage Site Steering Group (see Appendix 6), with detailed contributions from a sub-committee.

#### Revision of the 2003 Plan

1.2.11 This World Heritage Site Management Plan 2010-2016 is the first revision of the original 2003 Management Plan. The drafting of the 2003 Plan was a two-year process involving wide consultation with local residents and local and national interest groups covering business, transport, environmental conservation, regeneration, heritage, tourism and education. The revision of the 2003 Plan required a less extensive approach. A stakeholder workshop in December 2009 reviewed themes, issues and actions, and this was followed by full public consultation of the draft document in Summer 2010.

- 1.2.12 The approach to the revision of the 2003 Plan has been to: review its performance; remove completed actions and carry forward relevant actions; review issues that have emerged since 2003; incorporate and respond to the recommendations of the 2008 UNESCO Mission (see Section 1.3 and Appendix 7).
- 1.2.13 The Long Term Vision and the management framework of the 2003 Plan remain largely unchanged. The 2010 Plan builds on aspects of the previous system which worked well, and addresses those that could be improved. It identifies issues and opportunities that have arisen since the Site's designation in 1987 or that have not previously been addressed. It seeks to simplify the management structure, and update the policy context and Action Plan.
- 1.2.14 The size and complexity of the Site made the production of the 2003 Plan a significant achievement in itself. It has been referred to as a model for the development of other World Heritage Site Management Plans around the world. Whilst it was a successful first attempt at providing a management structure, it has provided a number of generic lessons for improvement.
- 1.2.15 The 129 actions would have benefited from a more clearly identified means of delivery. Also, care needs to be taken not to include in the Plan any aspects of the city's management which are not directly related to its World Heritage status. Such difficulties have been identified in the management of other Sites (see also the Jurassic Coast World Heritage Site Management Plan<sup>7</sup>). Delivery of plan actions has not so far been underpinned by a specific budget and currently relies on co-ordinating and influencing other agendas. Active management and clearly defined actions and objectives are therefore essential.

#### Progress against the Aims of the 2003 Plan

1.2.16 This section reviews progress against each of the aims of the 2003 Plan. These aims are carried forward with minor amendment onto this new plan (see Section 4: Vision and Aims). A detailed review of all 129 actions has been carried out, and is available on the Council's website. The review shows that 36% of the 129 actions have been achieved, 38% partially completed, and 26% not completed. It is acknowledged that many of the actions listed were carried out within the lifetime of the plan, but not as a direct result of it. But with any co-ordinating and influencing document, such as this, it is impossible to identify specifically those actions which would have happened anyway without it. Assessment of Actions in the 2003 Plan had few associated monitoring indicators, which made assessment difficult. This new Plan addresses this issue.

#### Aim 1: Promote sustainable management of the Site

1.2.17 The UNESCO / ICOMOS Mission Report (June 2009, based on November 2008 visit - see Section 1.3 and Appendix 7) assessed the management of the Site as being good. Since 2003 the Site management has undergone change and improvement. In 2002 a full-time World Heritage Coordinator post was established by the Council, with funding assistance on a decreasing scale from English Heritage. This post was established within the Council's Planning Service and depended upon engagement with, and influence on, relevant decision making at a higher level. The post holder left in December 2007 and whilst the post was vacant no Steering Group meetings occurred throughout 2008. The opportunity was taken to create a new full-time World Heritage Manager post in August 2008, funded solely by the Council, at a more appropriate level of seniority, and requiring higher levels of qualification and experience. Changes were also made to the Steering Group which was previously chaired by English Heritage from 2001 to 2008. An independent Chair was appointed in 2009 - a highly experienced and influential local candidate with in-depth knowledge of the Site. Although a stipend is attached to the position, the current Chairman donates this to the World Heritage Site Enhancement Fund. The Steering Group was reformed in 2009 with a smaller membership and more specific terms of reference.

#### Aim 2: Ensure that the unique qualities and outstanding universal values of the Site are understood and are sustained in the future

- 1.2.18 Understanding of the Site has increased since 2003, but needs further work. Research continues, but requires co-ordination. A Research Group was established in 2010 as a sub-group of the Steering Group. Education in schools has been addressed, but has focused on one-off initiatives rather than on the kind of sustained programme needed to reach successive years of students. The employment of a full time Education and Audience Development Officer by the Bath Preservation Trust has been a great step forward, although funding for this post is dependent upon external sources.
- 1.2.19 Mission report concluded that there was 'good overall state of conservation ... of the property'. However, inappropriate development remains a significant risk to the OUVs and has recently become an issue in the Site's landscape setting. Risk to the setting was also noted in the UNESCO Mission Report, and so this Plan includes the words 'and its setting' to strengthen aim 2. This Plan is also supported by the recent Setting Study (see Appendix 10).

# Aim 3: Sustain the outstanding universal values of the Site whilst maintaining and promoting Bath as a living and working city which benefits from the status of World Heritage Site

- 1.2.20 The physical elements contributing to the Site's OUVs remain in good condition, sustained by the buoyant economy during the period of the 2003 Plan. No listed buildings were demolished in the period 2003-2009 and the number of listed buildings at risk remains low. Some significant improvements to the physical fabric have been made, most notably the £154.6m stabilisation programme at the Combe Down Stone Mines.
- 1.2.21 Balancing conservation against growth has been a significant challenge. Large scale developments of contemporary architecture have come forward, and provided important lessons on how to handle such applications. New developments such as Thermae Bath Spa (opened 2006) have proven that high quality, contemporary architecture can be entirely compatible with Bath's status. If potential investors in the city are not to be deterred, decision makers within the development process need to appreciate, understand and properly interpret Bath's status. This requires continuous support and regular reinforcement.
- 1.2.22 The recent (opened 2009) £200m regeneration of Southgate Shopping Centre has replaced the unsightly old complex providing an economic boost and aesthetic improvement, as has the £15.8m Milsom Place complex which integrates many listed properties.

# Aim 4: Improve physical access and interpretation, encouraging all people to enjoy and understand the Site

- 1.2.23 Notable improvements in physical access have occurred. The new Bus Station, next to the railway station, was opened in 2009. There have also been improvements to high priority bus routes, and there are plans for increased capacity at 'Park and Ride' sites. Bus passengers increased by 8% from 2001/02 to 2005, and from 2000 to 2005 the number of week-day cycle trips across the district rose by 31%.<sup>9</sup>
- 1.2.24 Positive steps towards a dramatic improvement of the public realm have been made with the Council's endorsement of the Public Realm and Movement Programme (PRMP). There are still many measures to complete, and this Plan supports the implementation of measures outlined in the PRMP.
- 1.2.25 Physical access for those with restricted mobility has been improved. An excellent example is at the Roman Baths, where improvements include installation of two new lifts and a ramp which provide access to around 60% of the below ground level site and the whole of the ground floor, plus new handrails, powered doors, better lighting a British Sign Language tour by personal mobile device and wheel chair friendly circulation space. The new shopping complexes described in 1.2.22 have also addressed difficult issues of level changes to provide significant improvements in

easy accessibility and plans for providing disabled access to 1 Royal Crescent are in the early stages but should be brought to completion within the lifetime of this Plan.

# Aim 5: Improve public awareness of, and interest and involvement in, the heritage of Bath, achieving a common local, national and international ownership of World Heritage Site management

1.2.26 Various 'interest and involvement' initiatives took place during the life of the 2003 Plan, and elements of community involvement have strengthened with the formation of initiatives such as the 'Better Bath Forum'. Interpretation of the Site remains a challenge, as highlighted by the UNESCO Mission Report. It is proposed to strengthen this aim by developing an Interpretation Strategy. Work on this is underway, together with practical initiatives such as an annual World Heritage Day, working parties of volunteers and briefing of 'tourist ambassadors' to give visitors consistent messages about the Site.

#### 1.3 UNESCO / ICOMOS Mission, November 2008

- 1.3.1 In the lifetime of the 2003 Plan, the buoyant UK economy created a climate for the highest levels of potential development in Bath for decades, causing concern amongst some commentators that the character and appearance of the Site was threatened. Proposed developments included the Bath Western Riverside scheme (housing etc), the Dyson Academy (specialist secondary school), the Holburne Museum of Art extension and the new Southgate Shopping Centre. At its World Heritage Committee 32nd Session in Quebec, in July 2008, UNESCO responded to concerns with a request that 'the State Party invite a joint World Heritage Centre / ICOMOS¹0 reactive monitoring mission to the property to consider its overall state of conservation and particularly the possible impact of the Bath Western Riverside development and the Dyson Academy on the Outstanding Universal Value and integrity of the property'¹¹.
- 1.3.2 The Mission visited Bath from the 5-7th November 2008, and reported back to the World Heritage Committee's 33rd session in Seville in June 2009. The Terms of Reference of the Mission are shown together with the Mission Report in Appendix 7. In summary, the Committee's decision was to:
  - I. Note the Mission Report of the good overall state of conservation and management of the property;
  - II. Express satisfaction that the Dyson Academy Project has officially been withdrawn;
  - III. Strongly recommend the submission of a revised plan showing that all necessary social facilities are included in the first Phase of the Bath Western Riverside project;
  - IV. Urge the State Party to submit a time-bound revised plan for the second and third phases of the Bath Western Riverside project, including revised density and volume, so as not to impact on the Outstanding Universal Value of the property, its integrity and on important views;
  - V. Recommend enhancement of the protection of surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property;
  - VI. Invite the State Party to embark on a reinforced, integrated and homogenous interpretation of the property;
  - VII. Request submission of the draft revised management plan, including the Tourism Management Plan, the Public Realm and Movement Programme, and Traffic Control Plan, by 1 February 2011.
- 1.3.3 The responses to these recommendations can be read in full at Appendix 7.

## Description and significance of the site



# 2 Description and significance of the site

#### 2.1 Location

2.1.1 The City Of Bath is situated in Bath and North East Somerset, within the South West Region of England. A map and location details are in Appendix 1.

### 2.2 Boundary

- 2.2.1 The boundary of the site is the former municipal city boundary. This covers the entire city an area of approximately 29 square km (see Appendix 1 for boundary of the Site and of the Conservation Area). The 1987 nomination papers did not specify a boundary, but the issue was resolved, and the boundary confirmed, by a letter (dated 17 October 2005) from the UNESCO World Heritage Centre, thus fulfilling Action 31 of the 2003 Plan.
- 2.2.2 The wider landscape setting lies beyond the Site boundary. There is no formal buffer zone. However, the setting is identified through the Setting Study (see Appendix 10), and protected through planning policy (see Section 3.4).

### 2.3 Description of the Site

- 2.3.1 In order to protect the Site, it is essential to understand what it is that warrants protection. This section summarises the Site, its history and cultural and natural assets. Bath's history is well documented, and a selected bibliography is at Appendix 11. A fuller description of the Site's history is at Appendix 2. An inventory of selected key elements is at Appendix 4.
- 2.3.2 Bath sits in a landscape created by the River Avon cutting through the limestone plateau of the southern Cotswold Hills. Narrow, flat land in a curve of the valley provides a settlement site above the flood plain, near to the hot springs and a river crossing point. The hills have limited the city's physical expansion and created a dramatic backdrop, contributing to the feeling of a compact settlement. The countryside stretches into the city in several places, and there are views of the surrounding hills from the city centre.
- 2.3.3 The stone of the surrounding hills has been mined and quarried, in many places in open-cast pits. Bath Oolite limestone is an excellent building material a 'free-stone' which can be cut into blocks or used in rough rubble form. It is durable and easily carved. It has been mined since Roman times and continually used as the Site's principal building material, and this has given the city its unusually strong visual homogeneity.
- 2.3.4 Bath's hot springs are the only ones in Britain. A quarter of a million gallons of water every day are forced up through rock strata along the Pennyquick Fault. There are three main springs the King's Spring (46°c), the Hetling Spring (48°c) and the Cross Bath Spring (41°c).
- 2.3.5 The hot springs have played a central role in every stage of the city's development, creating a unique social history and continuing culture. The city has regularly used the springs as a regeneration tool, rebuilding the structures and culture of bathing and drinking the waters for health and recreation. This culture continues to the present day with the opening of the new Thermae Bath Spa in 2006.
- 2.3.6 The Romans built a bathing complex and temple dedicated to Sulis Minerva in 65-75 AD. These were developed over the next 300 years and became an international destination for pilgrims. Some of the remains of this complex are presented and interpreted at the Roman Baths, and the technology they installed to control the water is still in use.

- 2.3.7 A Roman settlement named Aquae Sulis grew around the temple and bathing complex.

  Archaeology continually adds to our understanding of the extent and composition of the settlement and its population, how it interacted with the temple / bath complex, and the presence of the Roman army.
- 2.3.8 After the battle of Dyrham in 577 AD, the Saxons took the city. The Roman complex fell into disuse and became buried, but Bath continued to be an important religious centre. A Saxon monastery was built on the site of the current Abbey Church. Here King Edgar was crowned first king of all England in AD973. In the 11th century the Saxon church was replaced by a great Norman cathedral, which in turn was succeed by the present Abbey Church in 16th century. Today, neither the formal cathedral nor the monastic quarter is visible, except in street patterns around Abbey Green. The extensive monastic history of Bath is symbolised by the Abbey Church (1499-1611), an iconic and important piece of architecture in its own right. The Abbey Church and the Roman Baths complex are the strongest reminders of pre-Georgian Bath.
- 2.3.9 Medieval Bath was an important regional trading centre based on the wool and cloth trades, and during that time the Roman complex remained undiscovered and the hot springs ran to the river unused. At the end of the 17th century Bath was a small city within defensive walls. The hot springs remained important, attracting the sick and convalescing due to beliefs in their healing properties.
- 2.3.10 In the 18th century the city was re-invented as a fashionable health resort. It expanded dramatically beyond its walls, largely through speculative development, and very few early buildings and urban arrangements remained unaltered. Cramped, jumbled medieval streets were transformed into a spacious and beautiful classical city, where architecture and natural landscape complemented each other. The Georgian city, renowned for its architecture and curing waters, became patronised by the highest society, including royalty from across Europe.
- 2.3.11 Three men led this re-invention: the architect John Wood the Elder; the patron and entrepreneur Ralph Allen who quarried the Bath stone; and the social animateur Richard 'Beau' Nash. Their vision, ambition and innovation created a unique atmosphere and the conditions for some of the most inspirational and influential Palladian architecture and town planning in Britain.
- 2.3.12 Grand public buildings, such as the Assembly Rooms (John Wood the Younger, 1769-1771) and the Pump Room (John Palmer, 1790-1795), were meeting places for the transient upper classes who flocked to the city. These buildings were complemented by outdoor entertainment in pleasure gardens, such as Sydney Gardens, or by 'parading' on broad streets laid out for the purpose. Housing was designed in monumental ensembles, such as Queen Square (1728- 1736), the King's Circus (1754) and the Royal Crescent (1767- 1775). Many buildings were extremely innovative in their design and construction, making Bath one of the most architecturally exciting cities in 18th century Britain. For more details of these, and other, buildings and gardens see Appendix 4.
- 2.3.13 Use of the hot springs continued in Georgian Bath. The Hot Bath and Cross Bath provided facilities for bathers from all classes of society who came for treatment. St John's Hospital, a medieval foundation (see Appendix 4) which had been using the hot water to treat the sick since the 12th century, had its city centre complex partially remodelled by John Wood the Elder in 1726-8. The medieval King's Bath attached to the Pump Room was also remodelled in a classical style. Bath increasingly became a social setting where high society came for entertainment, particularly gambling. The Mineral Water Hospital, the first hospital in the country to offer treatment to patients from outside the local area, attracted scientists and doctors of renown because of the opportunities the hospital offered for research.
- 2.3.14 The Site includes far more than a collection of outstanding 18th century monumental architecture and town planning. There is also an extensive stock of smaller housing and other developments, such as Pulteney Bridge (Robert Adam, 1764-1774), and a range of later villas extending well beyond the city centre.

- 2.3.15 Many of the streets, walkways and open spaces date from the 18th century in fabric and plan form, as well as historical association, and are integral to a comprehensive understanding of the city's social history. Bridges, alleyways, parks, gardens, cemeteries and stone mines all combine to reveal the numerous interdependencies of city life and reflect the values, beliefs and ambitions of Georgian society. The vast majority of these cultural assets remain in active use, many fulfilling original functions.
- 2.3.16 The homogeneity of Bath's architecture, in terms of age, style and materials, belies the way in which it developed. Much of 18th century Bath evolved through speculative development of individual buildings, streets or squares. There was no city wide plan, and the new city grew incrementally upon its success in attracting wealthy visitors. Developments started from the city, breaking out of the medieval walls and stretching uphill to Lansdown. In time, the buildings within the old city were largely replaced or remodelled in the Palladian style, with timber framed buildings being almost entirely lost. The City Corporation facilitated the expansion of the city by providing wider streets and open spaces.
- 2.3.17 Ralph Allen's extensive mines to the south of the city, including those at Odd Down and Combe Down, provided building stone. His activities as entrepreneur and patron fuelled much of the rebuilding, particularly through his association with the Architect John Wood the Elder. Allen's town-house in Lilliput Alley is notable, and Prior Park is outstanding, built specifically to showcase the quality of Bath Oolite.
- 2.3.18 The stone mines, accompanied by workers' settlements and the remains of industrial processes cover an extensive area in and around the Site. Allen devised many innovative, influential industrial processes for working and transporting stone, and these were closely connected to national transport improvements. The use of local stone in the city contributes to an intimate link between its townscape and landscape. The visual homogeneity provided by building materials is increased by the dominance of the neo-classical architectural style.
- 2.3.19 Unlike Georgian interventions, Victorian developments generally extended the city without rebuilding it. The 19th and 20th century suburbs largely filled in the landscape between the city and its satellite villages, but stayed within the river valley. Many surrounding villages were closely associated with the city and their 18th century buildings reflect the activity in Bath at that time, forming an important element of the Site. The use of Palladian style continued after 1825, but new Victorian styles increasingly influenced the city's architecture.
- 2.3.20 Archaeological evidence of Roman Bath had been found in 1727, 1755 and 1790, but major excavations in the late 19th century led to the discovery of many more remains of the thermal spa complex. The Victorians presented these for the first time since the complex fell into disuse in the Saxon period. The Baths became famous once more as a social centre, a bathing facility and a tourist attraction.
- 2.3.21 Despite being a major structural change, the introduction of the Kennet and Avon Canal (John Rennie) and the Great Western Railway (Isambard Kingdom Brunel see 2.3.28) in the 19th century was undertaken in a largely sympathetic manner, contributing some new, high quality architecture.
- 2.3.22 World War II bombing raids (April 1942) caused extensive destruction, with around 19,000 buildings sustaining some degree of bomb damage. The 1942 City Engineer's records identify 115 Georgian buildings destroyed. Post war, during the 1950s and 60s the City Council demolished historic buildings for housing improvements. The successful conservation movement formed to resist the so-called 'Sack of Bath' also helped to influence national attitudes to the conservation of historic buildings.
- 2.3.23 Bath's suburbs continued to expand in the 20th century and the decline of manufacturing industry in the late 20th century also changed the city's landscape and economy. However, the city's extensive remains form a unique and outstanding ensemble that continues to support a thriving 21st century community.

#### **Cultural Assets**

- 2.3.24 World Heritage Sites are designated as either 'cultural' or 'natural' Sites. Whilst The City of Bath is a cultural Site, its cultural assets are inspired by, and entwined with, its natural assets of hot springs and landscape setting. The cultural assets of the Site also include some which are not of Outstanding Universal Value, but are part of the rich tapestry of 2000 years of change and development. A summary description of these assets follows.
- 2.3.25 The built heritage of Bath is extensive and spread across the Site. The city centre is largely Georgian in character, though some buildings were refaced and contain earlier fabric. A few notable buildings from the 16th and 17th centuries remain. In addition to the structural fabric of buildings, many historic interiors survive from different periods. Surviving Georgian elements comprise not only buildings, but also infrastructure elements such as parks and gardens, streets and footways, bridges, subsurface vaults, and cemeteries.
- 2.3.26 Some Georgian developments around the city, such as Bathwick, Larkhall, Weston and Widcombe, were originally separate villages. These have an unexpectedly rural feel to them, and still retain much of their original village character. In addition to this, frequent countryside views from urban areas emphasise the compact country town atmosphere of the city. Surrounding countryside, particularly on historic approach roads, contains many Georgian buildings that were related to the city.
- 2.3.27 There are extensive 19th and 20th century suburbs which were developed between the 18th century city and its surrounding villages. Amongst later Georgian and Victorian architecture are many structures of national importance, not least those associated with the canal and the railway.
- 2.3.28 Brunel's Great Western Railway (London, Paddington to Bristol) dates from the 1830s and is regarded as the world's most complete early railway. Many of its associated structures survive largely intact. The inclusion of the railway on the UK's 1999 Tentative List for World Heritage Sites signifies its potential significance. The main structures along the line as it passes through the city are Bath Spa Station, the bridges over the River Avon, the tunnels and viaduct at Twerton, and the cutting and bridges in Sydney Gardens. The Kennet & Avon Canal opened in 1810, completing a through route from London to Bristol. Its elegant structures, including bridges and neo-classical aqueducts, are considered to be exceptionally fine examples of canal architecture.
- 2.3.29 Some historic architecture contains post 1942 interventions, necessitated by reconstruction following the World War II bombing raids.
- 2.3.30 Bath's numerous parks, gardens and cemeteries are key features of its character, contributing to a rural feel in the most unexpected places. Many principal parks and cemeteries have strong historical links, such as Prior Park Landscape Gardens (1733 1750), Sydney Gardens (1795), Royal Victoria Park (1829), Abbey Cemetery (1843 1844) and Lansdown Cemetery (see Appendix 4). Gardens and green open spaces are also integral to some architectural ensembles, such as the Royal Crescent and Lansdown Crescent, where the open land in front of the buildings was a key component of the picturesque design concept. These open spaces are both evidence of the historical development of the Site and a valuable modern amenity. For more details on gardens and buildings see Appendix 4.
- 2.3.31 The City's archaeology is diverse and reflects its long history and the unique presence of hot springs. Remains from the Roman period are particularly important as they represent the first (known) major development of the springs. There are remains from most other periods of the city's development, although some are better represented than others. There is still significant potential for finding further archaeological remains, particularly of the Roman, medieval and industrial periods. Discoveries since the inscription of the Site have already led to major changes in the understanding of Bath, and highlight the potential for further finds. Archaeological excavations carried as part of the Southgate redevelopment have revealed evidence of Mesolithic (Middle Stone Age) and Iron Age occupation immediately to the south of the historic city on the River Avon flood plane.

- 2.3.32 Archaeology can also contribute to a greater understanding of 18th and 19th century life. The study of buried deposits, demolished artisans' housing, gardens and ancillary structures, provides a useful context for assessing documents and maps from Bath's more recent past. The Combe Down stone mines stabilisation work was accompanied by a programme of detailed archaeological recording, which revealed significant new information about the way in which Bath Stone was quarried in the 18th century. During the Southgate excavations an insight has been gained into the city's industrial past from the medieval period to the 19th century, including a fulling mill, possible tannery and clay tobacco pipe manufactory.
- 2.3.33 While Bath's physical remains are outstanding and form a unique ensemble, there are also intangible associations and traditions which contribute to Bath's significance. The culture of worship, bathing and healing associated with the hot springs is several thousand years old and continues today. This culture has inspired the development of the outstanding physical elements of the Site. Bath also has rich associations with prominent people from all periods, particularly the 18th and 19th centuries: royalty, politicians, aristocracy, artists, writers, and musicians. It has played a long-term role as a national and international place for large-scale social interaction. In the 18th century Bath was central to the development of society, particularly the upper classes.

#### **Natural Assets**

- 2.3.34 As previously described, the natural environment is very important to the status of the Site.

  Geology gives Bath its hot springs and limestone. The surrounding landscape has influenced and inspired the architecture and growth of the city, and was deliberately used as a setting for some buildings. The countryside extends right into the city in places such as Widcombe and Primrose Hill, and the close proximity of green hillsides contributes strongly to the character of the city, giving it a country town feel which is as highly valued now as it was in the 18th and 19th centuries.
- 2.3.35 The natural crossing points of the River Avon in Bath were used by the Romans, and as ferries were replaced by bridges have continually influenced the city's development. The river, together with associated water meadows and gravel terraces, is an important landscape element and wildlife corridor cutting through the heart of the city.
- 2.3.36 The predominant natural habitat in the Site is broadleaved woodland and unimproved calcareous grassland. The grasslands hold particular significance. They are fairly common locally, but less so nationwide. Parks, gardens and cemeteries also provide important habitats. Trees and woodlands, some ancient, provide a significant contribution to the landscape character and the local distinctiveness of the city and skyline. In some areas, such as at the centre of the Circus, trees have grown up since the 18th century and caused significant alterations to the views and character of the earlier city. Tree management is therefore related to the OUVs and included as an issue in this Plan.
- 2.3.37 In terms of biodiversity, notable protected species include the Horseshoe Bat, found in the disused stone mines of Combe Down, and Bath Asparagus, or Spiked Star of Bethlehem (*Ornithogalum Pyrenacium*), a nationally scarce plant found in its greatest numbers around the Bath area. One theory is that it was a Roman food crop. Another rare species is the Peregrine Falcon, recently found nesting in St John's Church Tower.

## 2.4 Significance of the Site

#### **Outstanding Universal Value**

- 2.4.1 As a signatory to the World Heritage Convention, the UK Government is committed to the protection, conservation, presentation and transmission to future generations of Sites in order to sustain their Outstanding Universal Value (OUV). This is defined in the UNESCO Operational guidelines as being 'cultural and / or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'.
- 2.4.2 Today, statements of OUV are adopted by UNESCO when a site is inscribed. These statements should contain:
  - a) Brief synthesis
  - i. Summary of factual information
  - ii. Summary of qualities (values, attributes)
  - b) Criteria (values and attributes which manifest them)
  - c) Integrity (all sites)
  - d) Authenticity (criteria i-vi)
  - e) Protection and management and protection requirements
  - i. Overall framework
  - ii. Specific long-term expectations
- 2.4.3 The Statement of OUV is the basis for the future protection and management of the Site. Also, the WH Committee and its Advisory Bodies are increasingly seeking identification of the attributes which carry the Outstanding Universal Value of the property. These are tangible or intangible characteristics of the property on which the impact of proposals for change can be measured. It is the ensemble of attributes as a whole which convey Outstanding Universal Value.
- 2.4.4 Early World Heritage Sites, including Bath, did not have formal statements of OUV when inscribed. The Committee's judgement of what constituted the OUV of a particular property has, therefore, to be inferred from their decision at the time of inscription and documentation considered by them, normally the opinion of the Advisory Body contained in its evaluation of the nomination. Since Outstanding Universal Value is the basis for the management of any World Heritage property, this position is unsatisfactory.
- 2.4.5 The Committee has therefore asked that retrospective Statements of Outstanding Universal Value be submitted for all properties on the World Heritage List. These statements should cover all the items set out in 2.4.2 above, based as far as possible on the original documentation considered by the Committee. It is recognised that the description of management and protection should be based on the current position, and that the assessment of authenticity and integrity may also have to be based on the present day if they were not assessed at the time of inscription.
- 2.4.6 The summary of the Committee's determination of Outstanding Universal Value must be based on their decision at the time, since any change to it would require a re-nomination of the property. An intermediate position in the development of this policy was to ask for the submission of Statements of Significance covering only the first items ie items a) and b) above in para 2.4.2. Such a Statement was agreed for Bath in 2008.

#### Statement of Significance

- 2.4.7 The World Heritage Committee agreed the City of Bath Statement of Significance at its meeting in July 2008<sup>12</sup>. This statement sets out why the Site was put on the World Heritage list and will guide the management of the Site for the foreseeable future.
- 2.4.8 The Statement of Significance is derived from the ICOMOS evaluation of the nomination considered by the World Heritage Committee when Bath was originally inscribed on the World Heritage List. The longer description which formed part of the original site nomination dossier is still however important reference for Site management and is included in Appendix 3. The agreed Statement of Significance says:

The Roman remains, especially the Temple of Sulis Minerva and the baths complex (based around the hot springs at the heart of the Roman city of Aquae Sulis, which have remained at the heart of the City's development ever since) are amongst the most famous and important Roman remains north of the Alps, and marked the beginning of Bath's history as a spa town;

The Georgian city reflects the ambitions of John Wood Senior, Ralph Allen and Richard "Beau" Nash to make Bath into one of the most beautiful cities in Europe, with architecture and landscape combined harmoniously for the enjoyment of the spa town's cure takers;

The Neo-classical style of the public buildings (such as the Assembly Rooms and the Pump Room) harmonises with the grandiose proportions of the monumental ensembles (such as Queen Square, Circus and Royal Crescent) and collectively reflects the ambitions, particularly social, of the spa city in the 18th century;

The individual Georgian buildings reflect the profound influence of Palladio, and their collective scale, style and the organisation of the spaces between buildings epitomise the success of architects such as the John Woods, Robert Adam, Thomas Baldwin and John Palmer in transposing Palladio's ideas to the scale of a complete city, situated in a hollow in the hills and built to a Picturesque landscape aestheticism creating a strong garden city feel, more akin to the 19th century garden cities than the 17th century Renaissance cities.

**Criterion (i):** Bath's grandiose neo-classical Palladian crescents, terraces and squares spread out over the surrounding hills and set in its green valley, are a demonstration par excellence of the integration of architecture, urban design and landscape setting, and the deliberate creation of a beautiful city. Not only are individual buildings such as the Assembly Rooms and Pump Room of great distinction, they are part of the larger overall city landscape that evolved over a century in a harmonious and logical way, drawing together public and private buildings and spaces in a way that reflects the precepts of Palladio tempered with picturesque aestheticism.

Bath's quality of architecture and urban design, its visual homogeneity and its beauty is largely testament to the skill and creativity of the architects and visionaries of the 18th and 19th centuries who applied and developed Palladianism in response to the specific opportunities offered by the spa town and its physical environment and natural resources (in particular the hot springs and the local Bath Oolitic limestone). Three men – architect John Wood Senior, entrepreneur and quarry owner Ralph Allen and celebrated social shaper and Master of Ceremonies Richard "Beau" Nash – together provided the impetus to start this social, economic and physical rebirth, resulting in a city that played host to the social, political and cultural leaders of the day. That the architects who followed were working over the course of a century, with no master plan or single patron, did not prevent them from contriving to relate each individual development to those around it and to the wider landscape, creating a city that is harmonious and logical, in concord with its natural environment and extremely beautiful.

Criterion (ii): Bath exemplifies the 18th century move away from the inward-looking uniform street layouts of Renaissance cities that dominated through the 15th-17th centuries, towards the idea of planting buildings and cities in the landscape to achieve picturesque views and forms, which could be seen echoed around Europe particularly in the 19th century. This unifying of nature and city, seen throughout Bath, is perhaps best demonstrated in the Royal Crescent (John Wood Younger) and Lansdown Crescent (John Palmer). Bath's urban and landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically, and that visually (and at times physically) draw in the green surrounding countryside to create a distinctive

garden city feel, looking forward to the principles of garden cities developed by the 19th century town planners.

Criterion (iv): Bath reflects two great eras in human history: Roman and Georgian. The Roman Baths and temple complex, together with the remains of the city of Aquae Sulis that grew up around them, make a significant contribution to the understanding and appreciation of Roman social and religious society. The 18th century re-development is a unique combination of outstanding urban architecture, spatial arrangement and social history. Bath exemplifies the main themes of the 18th century neoclassical city; the monumentalisation of ordinary houses, the integration of landscape and town, and the creation and interlinking of urban spaces, designed and developed as a response to the growing popularity of Bath as a society and spa destination and to provide an appropriate picturesque setting and facilities for the cure takers and social visitors. Although Bath gained greatest importance in Roman and Georgian times, the city nevertheless reflects continuous development over two millennia with the spectacular mediaeval Abbey Church placed beside the Roman temple and baths, in the heart of the 18th century and modern city.

- 2.4.9 As noted above, the World Heritage Committee is now seeking identification of attributes of Outstanding Universal Value. For the City of Bath, these can be defined as:
  - Roman Archaeology
  - The hot springs
  - Georgian town planning
  - Georgian architecture
  - The green setting of the City in a hollow in the hills
  - Georgian architecture reflecting 18th century social ambitions

#### Wider significance

- 2.4.10 In addition to the OUV outlined above, which gives the site international significance, there are other national and local values which have to be taken into account in management decisions, although the primary objective of the Management Plan must remain the protection of the Outstanding Universal Value.
- 2.4.11 As well as being of historic importance, Bath is a beautiful, atmospheric city. Whilst the architecture, history and landscape are highly valued attributes in their own right, their harmonious combination gives Bath a unique and renowned atmosphere and beauty, attracting both residents and visitors alike. Those locating to the city for business, residential or tourist purposes continually state that the beauty and history were key attracting factors.
- 2.4.12 Bath is a living city as well as being a globally renowned heritage centre. The welfare of those living in the site and the conservation of the fabric of the city are dependent upon a healthy local economy. The city's economy is relatively strong, with low levels of unemployment and high educational achievement when compared nationally. Limited manufacturing industry remains and there is a reliance on the public sector and tourism. The city is a popular and successful regional shopping destination. Many businesses operate from protected historic buildings. One of the central management challenges of the site is to guide the regeneration requirements essential to maintaining the economy without compromising the OUV of the site.
- 2.4.13 Bath's popularity, particularly (but not exclusively) in the 18th century, attracted some of the most influential members of society including artists, writers, actors, scientists, and Royal families from across Europe. Bath has been immortalised in the literature of Jane Austen (1775-1817) who lived in the city between 1801 and 1806, and it has been painted by some the world's finest artists, such as JMW Turner (1775-1851). Bath's residents and visitors were largely recorded by Thomas Gainsborough (1727-88) who lived in the city between 1759 and 1774. Such associations for a small provincial city are significant and enrich the history of Bath.

- 2.4.14 Bath has been a centre of pilgrimage throughout the City's known history. The Roman settlement of Aquae Sulis, centred on the hot springs, included a temple complex and attracted worshippers from across the empire. Archaeological research has shown one Roman burial to include Middle Eastern remains. Throughout the Mediaeval period the Abbey Church was of regional significance, being the administrative centre for a wide area. The hot springs have continued to be a focus of worship and pilgrimage, and the steaming baths are still an extraordinary and moving sight.
- 2.4.15 Bath is one of the UK's top destinations for both domestic and overseas visitors, and the importance of tourism needs to be taken into account in managing the site. The city receives approximately 846,000 staying visitors each year, and approximately three and a half million day visitors. Visitors identify the heritage, museums, shopping and the special atmosphere of the city as key to their enjoyment of it. The tourism industry is worth over £349m each year and supports many thousands of jobs both directly and indirectly. This wealth is essential to the conservation of the Site, and helps to support the whole district of B&NES.
- 2.4.16 Bath is an internationally significant resource for world heritage education and research. This is due to the nature and extent of the Site (the whole city boundary), its diverse elements, social history, quantity and quality of historical sources, archaeological remains, historic landscapes, built heritage physical remains and museums, and the complexity of its management issues.
- 2.4.17 The Roman Baths constitute one of the most popular destinations outside London for educational visits, and the city attracts many foreign students to its two universities and to private English language schools.
- 2.4.18 Bath's close proximity to other World Heritage Sites Stonehenge and Avebury, the Jurassic Coast of Dorset and East Devon, Ironbridge Gorge and Blaenavon Industrial Landscape makes it an important centre for studying world heritage themes and issues. With excellent transport links to London, Bath has potential to be a significant venue for international events in the field of world heritage.
- 2.4.19 Although much of the historic environment is recognised as internationally significant in the OUV of the Site, Bath contains far more features of local and national significance. The set piece architecture provides iconic structures which define the city's image and cultural identity. Architecture and engineering from periods not recognised in the OUV are important, especially Victorian contributions including the railway and canal. The high number of protected buildings demonstrates the extent of significance, and the historic environment extends to many elements of infrastructure beyond the buildings themselves and protected by area designations such as conservation areas. The richness and diversity of the historic environment is highly valued by citizens and a key element in the civic pride of the city.
- 2.4.20 The landscape surrounding the city provides the setting to the Site and as such is highly significant. The city sits in the hollow of the river valley and surrounding hills offer views across the site. Skylines, vistas and panoramas are therefore significant elements, as are approach routes, waterways, trees and woodlands. The stone from which the City is built was mined from the surrounding hills, creating an important physical relationship between the geology and the appearance of the City. The surrounding countryside is important and attractive in its own right, much of it being designated as the Cotswolds Area of Outstanding Natural Beauty. The setting is described and defined in the emerging Setting Study (Appendix 10). Biodiversity within the site is also an important management consideration, with elements such as the River Avon providing important habitat in the heart of the city.

#### Preparation of a Statement of Outstanding Universal Value

2.4.21 As discussed in 2.4.6, the Bath Statement of Outstanding Universal value is only partially complete. The World Heritage Committee has asked that a draft full Statement of Outstanding Universal Value should be submitted to UNESCO by 1 February 2011 for consideration at its meeting in July 2012. This needs to cover all the items set out in 2.4.2 above. Text for parts a) and b) of this Statement is already agreed and should not require revision. To this needs to be added brief assessments of authenticity and integrity, and of the current arrangements for protection and any management and protection requirements. These aspects are discussed next, and a full draft Statement of Outstanding Universal Value is proposed at the end of this section.

#### **Authenticity and Integrity**

2.4.22 As discussed in 2.4.5, authenticity and integrity were not considered by the World Heritage Committee when Bath was inscribed. These concepts are however important in the management of the site. Authenticity is defined in UNESCO Operating Guidelines as concerning the truthfulness and credibility of the evidence for the site's OUV, while integrity concerns the wholeness of the WHS. The statements below build on those in the 2003 Plan.

#### **Authenticity**

- 2.4.23 The Operational Guidelines suggest that authenticity should be assessed through use of general attributes such as 'form and design' or 'materials and substance'. Due to the size and complexity of the site these are useful reference points, but can only be applied at a general level. It will also be helpful to use the specific attributes for the City of Bath identified above. The extent, significance and state of preservation of the Sites buried Roman archaeology and visible remains has been examined as part of the forthcoming Bath Archaeological Assessment (see 5.3.16), and will inform future archaeological management strategies for the Site.
- 2.4.24 The development of the Georgian City is comparatively recent in terms of historical sites, and an extensive body of literature survives showing the original layout, form and construction of the many thousands of buildings which form a key part of the OUV. Contemporary accounts are supplemented by good records of subsequent change, partly instigated by the early introduction of building codes and regulations in the UK. The truthfulness and credibility of the site in this respect are therefore high and the evolution of the City of Bath is exceptionally clear. Management measures in place through the planning system are intended to ensure that changes are faithful to original designs and are recorded.
- 2.4.25 Together with the body of historic records, the level of surviving original structures is high and in a good state of preservation (see UNESCO Mission Report, Appendix 7). The authenticity is therefore evident both through fabric and supporting records. Later changes, such as shrapnel marks in stonework following World War II bombing raids, are often evident and visible in the building fabric, and are both recorded and protected as part of the city's evolving history. Due to the high number of historic buildings, changes can also be seen by comparing original buildings with those with later alterations. Window glazing patterns provide a good example.
- 2.4.26 Infrastructure surrounding the Site and developed as part of the city's construction can also be seen. Combe Down Stone Mines, to the immediate south of the city, were developed to provide building stone from Roman times onward, and the recent stabilisation programme has included historic research and interpretation. Other infrastructure such as roads and canals also survives and is visible and recorded. The whole story of the city is therefore largely evident and visible, adding to authenticity.

- 2.4.27 The landscape surrounding the Site remains generally undeveloped, despite development pressure and retains its historical visual links with the architecture. The interpretation of the city is still possible by visiting (horse or carriage) rides, walks and vistas which were enjoyed in the eighteenth century, thus adding to the authenticity of the Site. The parks and gardens of the site also make and important contribution to the OUV.
- 2.4.28 There is still much to be discovered about the Roman settlement. Continuing research adds to the knowledge base and recent discoveries regarding outlying buildings away from the centre has lead to interpretation material being re-drawn in order to portray an accurate and authentic picture.
- 2.4.29 Some buildings of pseudo-historical design have been added, most notably in the Southgate Shopping Centre (opened November 2009). These later examples did not, however, involve the loss of historic fabric. It is important to note that the use of the local stone in contemporary design contributes to the harmonious aspect of the ensemble of Bath's buildings.

#### Integrity

- 2.4.30 Assessments of integrity are asked to examine the extent to which the Site:
  - I. Includes all elements necessary to express its OUV;
  - II. Is of adequate size to ensure the complete representation of the features and processes which convey the property's significance;
  - III. Suffers from adverse effects of development and/or neglect.
- 2.4.31 There are undoubtedly some elements connected with the OUV which lie beyond the site boundary and, conversely, some elements within the site, which are not of great significance. However, the boundary is both generous in size and has been the subject of recent confirmation (see 2.2). It is considered, therefore, that the site boundary is adequate and protection of elements beyond the boundary can be addressed by the emerging setting work, associated planning policy and consideration of a buffer zone.
- 2.4.32 With regards to development and/or neglect, this matter was fully considered by the 2008 joint UNESCO / ICOMOS Mission which found the site to have a 'good overall state of conservation' (see 1.3). Management measures are outlined in this plan to ensure that remains the case, and the integrity of the site remains intact.

#### **Protection**

- 2.4.33 The UK national planning system provides the main means of protection for most of the individual elements of World Heritage Sites through statutory designations such as conservation areas, listed buildings and scheduled monuments. The protection for World Heritage Sites as a whole is achieved through local development plans as advised in PPS 5, which states that World Heritage Site status should be a key material consideration in the consideration of planning applications. Section 3.4 contains more detail on the planning and policy framework.
- 2.4.34 The full draft statement of Outstanding Universal Value, to be submitted for approval to the UNESCO World Heritage Committee July 2012, is shown below.

# City of Bath World Heritage Property Statement of Outstanding Universal Value

Date inscription: 1987

Criteria: i, ii, iv Date of SOUV: 2010

The City of Bath is of outstanding universal value for the following cultural attributes:

- The Roman remains, especially the Temple of Sulis Minerva and the baths complex (based around the hot springs at the heart of the Roman city of Aquae Sulis, which have remained at the heart of the City's development ever since) are amongst the most famous and important Roman remains north of the Alps, and marked the beginning of Bath's history as a spa town.
- The Georgian city reflects the ambitions of John Wood Senior, Ralph Allen and Richard "Beau" Nash to make Bath into one of the most beautiful cities in Europe, with architecture and landscape combined harmoniously for the enjoyment of the spa town's cure takers.
- The Neo-classical style of the public buildings (such as the Assembly Rooms and the Pump Room) harmonises with the grandiose proportions of the monumental ensembles (such as Queen Square, Circus and Royal Crescent) and collectively reflects the ambitions, particularly social, of the spa city in the 18th century.
- The individual Georgian buildings reflect the profound influence of Palladio, and their collective scale, style and the organisation of the spaces between buildings epitomises the success of architects such as the John Woods, Robert Adam, Thomas Baldwin and John Palmer in transposing Palladio's ideas to the scale of a complete city, situated in a hollow in the hills and built to a Picturesque landscape aestheticism creating a strong garden city feel, more akin to the 19th century garden cities than the 17th century Renaissance cities.

#### Criteria

Criterion (i): Represents a masterpiece of human creative genius

Bath's grandiose neo-classical Palladian crescents, terraces and squares spread out over the surrounding hills and set in its green valley, are a demonstration par excellence of the integration of architecture, urban design and landscape setting, and the deliberate creation of a beautiful city. Not only are individual buildings such as the Assembly Rooms and Pump Room of great distinction, they are part of the larger overall city landscape that evolved over a century in a harmonious and logical way, drawing together public and private buildings and spaces in a way that reflects the precepts of Palladio tempered with picturesque aestheticism.

Bath's quality of architecture and urban design, its visual homogeneity and its beauty are largely testament to the skill and creativity of the architects and visionaries of the 18th and 19th centuries who applied and developed Palladianism in response to the specific opportunities offered by the spa town and its physical environment and natural resources (in particular the hot springs and the local Bath Oolitic limestone). Three men – architect John Wood Senior, entrepreneur and quarry owner Ralph Allen and celebrated social shaper and Master of Ceremonies Richard "Beau" Nash – together provided the impetus to start this social, economic and physical rebirth, resulting in a city that played host to the social, political and cultural leaders of the day. That the architects who followed were working over the course of a century, with no master plan or single patron, did not prevent them from contriving to relate each individual development to those around it and to the wider landscape, creating a city that is harmonious and logical, in concord with its natural environment and extremely beautiful.

**Criterion (ii):** Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town planning or landscape design.

Bath exemplifies the 18th century move away from the inward-looking uniform street layouts of Renaissance cities that dominated through the 15th-17th centuries, towards the idea of planting buildings and cities in the landscape to achieve picturesque views and forms, which could be seen echoed around Europe particularly in the 19th century. This unifying of nature and city, seen throughout Bath, is perhaps best demonstrated in the Royal Crescent (John Wood Younger) and Lansdown Crescent (John Palmer). Bath's urban and landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically, and that visually (and at times physically) draw in the green surrounding countryside to create a distinctive garden city feel, looking forward to the principles of garden cities developed by the 19th century town planners.

**Criterion (iv):** Be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.

Bath reflects two great eras in human history: Roman and Georgian. The Roman Baths and temple complex, together with the remains of the city of Aquae Sulis that grew up around them, make a significant contribution to the understanding and appreciation of Roman social and religious society. The 18th century re-development is a unique combination of outstanding urban architecture, spatial arrangement and social history. Bath exemplifies the main themes of the 18th century neoclassical city; the monumentalisation of ordinary houses, the integration of landscape and town, and the creation and interlinking of urban spaces, designed and developed as a response to the growing popularity of Bath as a society and spa destination and to provide an appropriate picturesque setting and facilities for the cure takers and social visitors. Although Bath gained greatest importance in Roman and Georgian times, the city nevertheless reflects continuous development over two millennia with the spectacular mediaeval Abbey Church sat beside the Roman temple and baths, in the heart of the 18th century and modern day city.

#### Integrity (2010)

Remains of the known Roman baths, the Temple of Sulis Minerva and the below grounds Roman remains are well preserved and within the property boundary as are the areas of Georgian town planning and architecture, and large elements of the landscape within which the city is set. Despite some loss of Georgian buildings prior to inscription, the Georgian City remains largely intact both in terms of buildings and plan form. An extensive range of interlinked spaces formed by crescents, terraces and squares set in a harmonious relationship with the surrounding green landscape survive. The relationship of the Georgian city to its setting of the surrounding hills remains clearly visible. As a modern city, Bath remains vulnerable to large scale development and to transport pressures, both within the site and in its setting that could impact adversely on its garden city feel, and on views across the property and to its green setting.

#### Authenticity (2010)

The hot springs, which are the reason for the City's original development, are of undoubted authenticity. The key Roman remains are preserved, protected and displayed within a museum environment, and the Roman Baths can still be appreciated for their original use. The majority of the large stock of Georgian buildings have been continuously inhabited since their construction, and retain a high degree of original fabric. Repairs have largely been sympathetic, informed by an extensive body of documentation, and aided by a programme of restoration in the late twentieth century. More vulnerable is the overall interaction between groups of buildings in terraces, crescents and squares and views to the surrounding landscape that contributed to the city's visual harmony. There is a need for new developments to respect the planning of the Georgian terraces, to respect the scale and rhythm of its structures, and to contribute to picturesque views.

#### Management and Protection (2010)

The UK Government protects World Heritage Sites in England in two ways. Firstly individual buildings, monuments, gardens and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 1979 Ancient Monuments and Archaeological Areas Act and secondly through the UK Spatial Planning system under the provisions of the Town and Country Planning Act 1990.

National guidance on protecting the Historic Environment (Planning Policy Statement 5) and World Heritage (Circular 07/09) and accompanying explanatory guidance has been recently published by Government. Policies to protect, promote, conserve and enhance World Heritage Sites, their settings and buffer zones can be found in regional plans and in local authority plans and frameworks.

The Bath and North East Somerset Local Plan contains a core policy which states that development which would harm the qualities which justified the inscription of the World Heritage Site, or its setting, will not be permitted.

All UK World Heritage Sites are required to have Management Plans which set out the OUV and the measures in place to ensure it is conserved, protected, promoted and enhanced. Relevant policies carry weight in the planning system. World Heritage Sites should have Steering Groups which are made up of key local stakeholders who oversee monitoring, implementation and review of the Management Plans.

The World Heritage Site Management Plan aims to address the key tensions between development and conservation of the city wide site. The plan proposes supplementary planning documents of the Summary Management Plan and of the Setting Study.

The main pressures currently facing the site are large scale development and the need for improved transport. New development will continue to be assessed against the policy framework listed above. Transport improvements are based principally around a bus based network and pedestrianisation, outlined in the Management Plan. There is a need for development to be based on a greater articulation and understanding of the distinctiveness of the Georgian city, in order that new developments may reinforce the attributes that convey outstanding universal value.

## Management of the site



# 3 Management of the site

## 3.1 Management and Ownership

3.1.1 Management and ownership of the site are interdependent. This is due to the size and complexity of the Site, and because most historic property is in private, individual ownership. Effective management of the Site relies upon the actions of many thousands of individual owners. This is reflected in the 'Issues' identified in this Plan.

#### 3.2 Governance

- 3.2.1 The City of Bath World Heritage Site Steering Group provides advisory direction for managing and overseeing the Site and the production of this Plan. It meets approximately 3 times per year. Details of the Group's membership can be found in Appendix 6. It is important to note that the Group contains representatives from both Central Government and local organisations. The Department for Culture, Media and Sport (DCMS) has lead responsibility for all UK World Heritage Sites, and sets national policy. Their statutory advisors on the historic environment, English Heritage, give guidance, and the International Council on Monuments and Sites (ICOMOS UK) is a Non Government Organisation deriving its standing from the fact that it is the national committee of ICOMOS international which is a statutory advisory body to the UNESCO World Heritage Committee. All of these bodies are represented on the Steering Group, which therefore sets both strategic priorities and local actions.
- 3.2.2 The Steering Group has an independent Chairman. The current Chairman has established an Enhancement Fund and a Volunteer Group to support small scale enhancement projects in the Site.
- 3.2.3 The predominant steward of the site and the body responsible for delivery and funding of most actions of this Plan is Bath and North East Somerset Council. This is a unitary authority responsible for all aspects of local government. It is the local planning authority, responsible for receiving and determining planning applications. It is also responsible for local highway provision and maintenance, and for primary and secondary education. The administrative area of Bath and North East Somerset Council is larger than the site, and there is no tier of local government solely responsible for Bath alone. Daily management of the Site is provided by the World Heritage Manager, a full time employee of the Council, who co-ordinates actions across the range of council services, including the Culture, Leisure and Tourism Directorate, Planning Services, Heritage Services, Property Services (see 3.3.2), Transportation, Parks and Open Spaces, Archives and Libraries, and Education. The Mayor's Office and Council jointly partake in World Heritage events on behalf of the city, especially civic events such as visits or information exchanges with other Sites world-wide. It should be noted that the Mayor's role is largely ceremonial, rather than the executive role played by the directly elected Mayor of London and his counterparts in Europe.
- 3.2.4 The Council also provides local political direction, operating a cabinet system of governance, with the Cabinet member for Development and Major Projects having responsibility for World Heritage matters. The Council also has a Heritage Champion member who, as the title suggests, champions this work across the range of Council services.
- 3.2.5 Tourism management is the responsibility of Bath Tourism Plus, a public/private sector partnership organisation which runs the Tourist Information Centre, organises promotional events, runs marketing for the city and manages the official tourism internet site www.visitbath.co.uk. Founded in 2003, it is a not for profit private company funded partly by the Council (approximately 30%) and by commercial activities (70%).

3.2.6 The Urban Regeneration Panel was established in 2004, and is made up of six highly respected national and international experts drawn from the fields of heritage, urbanism, architecture, development, sustainability, transportation and housing. It was established by the Council to guide, review and challenge new development proposals for the city.

### 3.3 Ownership

- 3.3.1 A small number of organisations hold large amounts of property, notably the Local Authority, Housing Associations, National Trust, Universities and St John's Hospital charity.
- 3.3.2 Bath & North East Somerset Council owns around 60% of city centre property, much of which is historic. However, many properties are leased out and the level of direct Council control varies greatly. In a few cases, such as the Roman Baths, Pump Room complex and the Guildhall, the Council owns, occupies and manages (through its Heritage Services) the property, and therefore has complete control over it. The Council owns and has responsibility for the hot springs. In most cases, however, the Council has only minimal management responsibilities.
- 3.3.3 Council owned properties are managed by Property and Legal Services as commercial ventures. The Council currently holds leases for some buildings, such as the Assembly Rooms which are owned by the National Trust. In this case, the Council has full responsibility for the management and conservation of the property, which houses the Fashion Museum. The Council also has a role in maintaining and improving the public realm.
- 3.3.4 Somer Housing Community Trust was created in 1999 to take over the Council's role as social housing provider. It owns and manages around 700 properties, including 46 grade 1 listed buildings which contain 129 separate dwellings. The Trust undertook a full stock condition survey on all its historic buildings in 2009 and has an active asset management strategy which takes account of the particular requirements of these properties.
- 3.3.5 The National Trust has owned the Assembly Rooms since 1931 but they are currently leased to the Council which is responsible for the management and conservation of the property.
- 3.3.6 In 1993 the Prior Park Landscape Gardens were given to the National Trust by the Christian Brothers and Prior Park College. The mansion is still in the ownership of Prior Park College and the National Trust is fully responsible for the restoration and management of the gardens.
- 3.3.7 The National Trust owns and manages over 500 acres of land to the east of the city, between the A36 Warminster Road and Claverton Down Road, on which it has created the Bath Skyline, a country walk with views of the city. The land is protected as part of the setting of the city and includes Bathwick Wood, Smallcombe Wood, Rainbow Wood Farm and Fields and Prior Park Landscape Gardens.
- 3.3.8 The Bath Preservation Trust was formed in 1934 to protect the architectural heritage of the city. The Trust has been active in saving many historic buildings from demolition and has also fought against schemes that have threatened the wider character of the city. The Trust owns and manages a number of important historic, listed buildings, including No1 Royal Crescent, operated as a museum and headquarters of the Trust, and the Countess of Huntingdon's Chapel, housing the Building of Bath Collection. The Trust is sole trustee of Beckford's Tower, and is a trustee of the Herschel Museum of Astronomy. The Trust provides small grants for the repair and conservation of historic buildings in Bath, and administers the World Heritage Enhancement Fund. 2
- 3.3.9 The University of Bath is sited at Claverton Down, on a large site at the edge of the Green Belt. The complex is very self-contained with accommodation, shops and entertainment in addition to the educational facilities and the National Institute of Sport. The University has started a limited expansion into the city centre, for small accommodation sites such as at Pulteney Street, Bathwick Hill and a new site at Carpenter House, Southgate Street. The University has approximately 13,950 students (2009).

- 3.3.10 St John's Hospital, founded in 1174, and the Trustees of the Bath Municipal Charities own and manage a number of historic properties in and around the city, including the St John's Hospital complex and Abbey Church House between Westgate Buildings and Bath Street, St Catherine's and Bellot's hospital on Beau Street and the historic Beauford Square. In 2004 the Trust constructed a new almshouse at Combe Park, Weston.
- 3.3.11 Bath Spa University has two campuses, one situated around Sion Hill, on the northern slopes of the city, and the other at Newton Park, just to the west of the city. Several of the buildings occupied by the University are listed and Newton Park is on English Heritage's Register of Historic Parks and Gardens. The University has approximately 5,500 students (2009).
- 3.3.12 Network Rail owns and operates Britain's railway infrastructure, including the rail network that passes through the Site. This line, was included on the UK government's 1999 tentative list for World Heritage Sites and is therefore of potential international significance.
- 3.3.13 British Waterways owns and manages the Kennet & Avon Canal, which enters on the eastern side and joins with the River Avon in the centre of the Site. The Environment Agency is responsible for the river and its floodplains. Above Pulteney Weir, the Avon is subject to the ownership of the Riparian Owners whose properties border the river.
- 3.3.14 Gardens and green open spaces are integral to some of the architectural ensembles, such as the Royal Crescent and Lansdown Crescent where land at the front is covenanted against development. Responsibility for many of these spaces lies with the residents.
- 3.3.15 The Cotswolds Area of Outstanding Natural Beauty (AONB) is managed by The Cotswolds Conservation Board. This comprises local, regional and national organisations representing farmers, landowners, communities, the tourism sector, government agencies, local authorities and wildlife trusts. Its remit includes managing landscape and local heritage features, implementing recreation and sustainable transport projects and raising awareness and support. Bath sits at the southern tip of the Cotswolds AONB, which surrounds the city on its north, south and east sides. The Cotswold Way long distance footpath and national trail starts / ends at the great west doors of Bath Abbey.

## 3.4 Planning, Policy and Legislative Framework

3.4.1 The spatial planning system is the primary method of protection of World Heritage Sites in the UK, and has changed considerably since the 2003 plan was compiled. This section gives an outline of the planning and policy framework relevant to the Site, and is supplemented with further details in Appendix 5.

#### The County of Avon Act

- 3.4.2 The County of Avon Act (1982) is an Act of Parliament giving Bath and North East Somerset Council powers to take reasonable measures to protect the water supply of the hot springs. Under the provisions of this Act, there are three concentric zones within the city where excavation deeper than 5m requires the prior consent of the Council. Beyond these central areas the critical depth extends to 15m, with an extension beyond the city to Batheaston at 50m. The Council employs a trained officer to deal with these matters, and retains a consultant geologist to assess prior consent applications. Applications are also submitted to a hydro-geologist at the Environment Agency.
- 3.4.3 The hot spring water is continually monitored at source for flow and content by the Council, on a fifteen minute basis. As a precautionary measure, deep quarrying in the surrounding region is monitored, with Whatley Quarry, some 15 miles south of Bath, entering into legal agreements through the planning process to monitor potential impacts. Through the Act, major developments in Bath such as the underground car park of the Southgate development are also closely monitored.

#### **National Planning Policy**

- 3.4.4 Although the WH Convention<sup>13</sup> has been ratified by the UK Government, the designation is not yet recognised in primary legislation. However, policy guidance increasingly recognises the significance of WHS status.
- 3.4.5 Planning Policy Statement 1(PPS 1): Delivering Sustainable Development (2003) is the corner stone of Government Planning Policy. It gives a commitment that those areas with national and international designations should receive the highest levels of protection.
- 3.4.6 Planning Policy Statement 5: Planning for the Historic Environment (PPS5) was published in March 2010 and replaced Planning Policy Guidance Notes 15 (Planning and the Historic Environment, 1994) and 16 (Archaeology and Planning 1990). PPS5 sets out national planning policy on the historic environment, including World Heritage Sites, and is consistent with the UK Government's obligations under the 1972 World Heritage Convention. PPS policies are material considerations which must be taken into account in local development management decisions.
- 3.4.7 PPS5 clarifies that World Heritage Sites are designated Heritage Assets. Paragraph HE 9.1 states that:

'There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be'.

#### And that:

- 'Substantial harm to or loss of designated heritage assets of the highest significance, including... World Heritage Sites, should be wholly exceptional'.
- 3.4.8 Policies within PPS5 are supplemented by the Planning for the Historic Environment Practice Guide, produced by English Heritage (March 2010).
- 3.4.9 Further Government policies on housing (PPS3, 2006), sustainable growth (PPS4, 2009), biodiversity and geological conservation (PPS 9, 2005), transport (PPG 13, 1995), tourism (PPG 21, 1992), renewable energy (PPS 22, 2004) and flood risk (PPS, 25) are particularly relevant to this Site.
- 3.4.10 More detailed policy guidance on World Heritage is provided by Circular 07/2009: Circular on the Protection of World Heritage Sites (July 2009). This Circular explains the national context and Government objectives for the protection of sites, the principles underpinning those objectives and the actions necessary to achieve them. Again there is accompanying English Heritage Guidance (July 2009) supplementing and supporting the Circular.
- 3.4.11 There are a number of other references to World Heritage Sites in national planning guidance. These include a requirement in some circumstances for an Environmental Impact Assessment to accompany proposals. Also, all Sites in England are now included in Article 1(5) of the General Permitted Development Order which limits the range of permitted development within them.

#### **Local Planning Policy**

3.4.12 Local and regional planning policy for Bath is made up of a number of documents collectively know as the Development Plan. The local element of the Development Plan currently consists of the Bath and North East Somerset Local Plan, adopted October 2007. The Local Plan is also saved under transitional arrangements, and is due to be replaced by the Core Strategy at the end of 2011. The Local Plan contains policies on a wide range of topics affecting the Site including economy, tourism, recreation, shopping, health and safety, housing, waste, transport, built and historic environment and natural environment. There is a single World Heritage policy (BH.1), and all applications for development should be made in accordance with this. In transferring this policy to the Core Strategy, the opportunity will be taken to replace the words 'qualities' with 'Outstanding Universal Values'. Policy BH1 reads:

Development which would harm the qualities which justified the inscription of Bath as a World Heritage Site or which would harm the setting of the World Heritage Site will not be permitted.

- 3.4.13 There is a perceived need for Supplementary Planning Documents (SPD) to supplement this policy in the Local Plan and the forthcoming Core Strategy. There is also a need to clarify the qualities justifying the inscription of the Site, and the Action Plan proposes this is achieved by adopting a summary of the Management Plan as SPD. This is especially important given the emerging draft Statement of OUV outlined in 2.4.21. There is also a need to define the setting and what might harm it, and the action for this is adoption of the Bath WHS Setting Study (Oct 2009) as an SPD. Further SPDs, such as a building heights strategy, will also follow.
- 3.4.14 The UK's cultural and natural heritage is protected by a number of statutory designations. With the Local Plan, these form the principal statutory protection tools for the Site.
- 3.4.15 The designations (statutory and non statutory) for the built environment, such as listed buildings and scheduled monuments, are designed to protect the nationally important historic and archaeological fabric of buildings and structures, and in the case of listed building and conservation area designations their immediate context and setting. Bath's designations cover a large proportion of the city's urban fabric, reflecting the scale and importance of the historic environment in the city. For the wider landscape there are a number of designations, including those mainly designed for development control, such as Green Belt, and specific designations for landscape and nature conservation. Further details of these designations can be found in Appendix 1 but the main ones are shown below:
  - I. One Conservation Area covering two thirds of the city
  - II. 4980 Listed Buildings (635 Grade I and 55 Grade II\*)
  - III. Five Scheduled Monuments covering 1.4 hectares (approx. 13% of central area)
  - IV. One Area of Recognised Archaeological Potential covering most of the city centre protected in 1997 Local Plan
  - V. The Bath & Bristol Green Belt, surrounding the city on all sides
  - VI. The Cotswolds Area of Outstanding Natural Beauty (AONB), surrounding the city on its north, east and south sides
  - VII. Ancient woodland sites within the city with others on or close to the boundary
  - VIII. 9 entries in English Heritage's Register of Historic Parks and Gardens
  - IX. 23 Local Parks and Gardens of Historic Interest, protected in 2002 Draft Local Plan
  - X. 1 entry in English Heritage's Register of Historic Battlefields
  - XI. 7 Important Hillsides, within the urban area, protected in the Local Plan
  - XII. 2 Sites of Special Scientific Interest (SSSIs)
  - XIII. Approximately 100 wildlife areas protected in the Local Plan
  - XIV. 16 geological sites protected in the Local Plan

- 3.4.16 In addition to the designations and the Local Plan, there are a large number of documents and strategies that are relevant to the management of the Site. This plan takes account of these documents, and works in accordance with them. The following list gives a few examples, and more can be found in Appendix 11:
  - I. Bath and North East Somerset Local Strategic Partnership Sustainable Community Strategy 2009 2026
  - II. Bath and North East Somerset Tourism Strategy September 2001
  - III. Bath and North East Somerset Ten Year Economic Development Plan (Draft Economic Strategy) 2003-2013
  - IV. Bath and North East Somerset Community Safety Plan 2009 2012
  - V. Bath and North East Somerset Cultural Strategy (adoption due November 2010)
  - VI. Bath and North East Somerset Roman Baths and Pump Room Conservation Statement 2000
  - VII. Bath and North East Somerset Landscape Character Assessment 2003
  - VIII. Bath and North East Somerset Western Riverside Supplementary Planning Guidance 2008
  - IX. Bath and North East Somerset Local Transport Plan (statutory) Twenty Year Vision for the Principal Transportation Networks 2002
  - X. Bath Urban Archaeological Strategy
  - XI. Archaeology in the City of Bath Supplementary Planning Guidance 2004
  - XII. Cotswold AONB Management Plan 2008-2013
  - XIII. National Trust Prior Park Landscape Gardens Conservation Plan
  - XIV. National Trust Bath Skyline Conservation Plan (emerging)
  - XV. University of Bath Master Plan 2009-2020

## Visions and aims



## 4 Vision and aims

### 4.1 Long Term Vision

Bath will maintain and enhance the Outstanding Universal Value of the City of Bath World Heritage Site.

It will practise and promote sustainable management, understanding the World Heritage Site's unique qualities and its world-wide significance.

It will be a centre of excellence for urban heritage management and conservation, founded on partnerships of local, national and international communities and organisations.

Bath will conserve and safeguard the cultural assets of the World Heritage Site for this and future generations.

Bath will be accessible and enjoyable to all; a site that understands and celebrates its Outstanding Universal Values and atmosphere.

Bath will continue to be a thriving living city which uses its status as a World Heritage Site to support and further the vitality of the local community.

## 4.2 Aims of the Management Plan

- 4.2.1 The aims of the Plan are to:
  - I. promote sustainable management of the Site;
  - II. ensure that the Outstanding Universal Values of the Site and its setting are understood, protected and sustained
  - III. maintain and promote Bath as a living and working city which benefits from World Heritage Site status:
  - IV. improve physical access and interpretation, encouraging all people to enjoy and understand the Site;
  - V. improve public awareness of, and interest and involvement in, Bath's heritage, achieving a common local, national and international ownership of the Site's management.

## Pressures, issues and objectives



## 5 Pressures, issues and objectives

#### 5.1 Introduction

- 5.1.1 This section sets out the pressures and issues facing the City of Bath World Heritage Site, followed by the objectives identified to address them. The objectives address the Site's management in accordance with Article 4 of the UNESCO 1972 World Heritage Convention concerning the Protection of the World Cultural and Natural Heritage: protection, conservation, presentation and transmission to future generations.
- 5.1.2 To achieve comprehensive management, it is essential to have a thorough understanding of the Site, its vulnerabilities and threats, and the opportunities arising from its status. This will enable the city to manage change whilst ensuring that the significance of the Site survives.
- 5.1.3 Change and growth are inevitable, and can be both desirable and a threat. Uncontrolled or inappropriate change can be a threat to Bath's values and authenticity, but appropriate change is needed to improve the condition and presentation of the Site and to maintain a healthy economy.
- 5.1.4 The Site's status offers many opportunities, including: improving the management and condition of the Site; improving its accessibility and use; contributing to the cultural and economic vibrancy of local and visiting communities.

#### Identifying the Issues

5.1.5 The issues have been identified from a review of the 2003 – 2009 Plan, and other documents, and through consultations with local and national interested parties. Details of these consultations and documents can be found in Appendix 9 and Appendix 11.

#### **Grouping the Issues**

- 5.1.6 The issues have been grouped under the following headings:
  - Managing Change
  - Conservation
  - Interpretation, Education and Research
  - Physical Access
  - Visitor Management
- 5.1.7 These groups relate to ideas rather than geographical areas of the Site. This is due to the size, complexity and diversity of the Site, and the need to avoid biased or misleading impressions of its character and requirements.
- 5.1.8 Similarly, inclusion of an issue in the Plan is not to suggest that no work is being carried out to address it, rather it is to acknowledge that there is more work to do. The numbering of the issues does not indicate prioritisation.
- 5.1.9 Issues relating to each heading are listed at the start of the appropriate section, followed by discussion on these issues and objectives to address them.

## 5.2 Managing Change Issues and Objectives

#### **Managing Change Issues**

- Issue 1: The Plan's aims, objectives and desired outcomes need to be achieved effectively, and benefits of WH status optimised
- Issue 2: There is a need to establish clearer and more consistent leadership for the Site, political and otherwise
- Issue 3: There is a need to secure the long-term provision of appropriately qualified staff to manage the Site through the planning system
- Issue 4: There is a need to develop opportunities to transfer learning between WH Sites
- Issue 5: There is a need to access alternative funding sources, and re-invest funds generated from heritage into management and conservation, so that responsibility for funding for the Site does not fall disproportionately upon the Local Authority
- Issue 6: There is a need to clarify the relationship between cultural heritage and the economy, and better to measure, understand and appreciate financial and other benefits
- Issue 7: There is a risk that all relevant policies, strategies and other plans, both at a national and at local level, may not take account of the values of the Site and are not applied effectively
- Issue 8: There is a need to undertake periodic risk identification, assessment and monitoring, and ensure mechanisms for prevention and/or mitigation for all risks are in place
- Issue 9: There is a need to ensure that the known risks of flooding and fire have prevention mechanisms in place
- Issue 10: There is a need to manage the complexity of the Site, and co-ordinate significant amounts of information held by various different organisations
- Issue 11: There is a need to monitor the Site's general condition regularly, and assess the implementation of the Management Plan
- Issue 12: There is a need to raise the local community's awareness of the value and relevance of the Site, particularly beyond the historic core, and to promote the opportunities and responsibilities the Site brings, and to enable property owners to make informed decisions
- Issue 13: There is an opportunity to realise the potential benefits of greater community involvement, and the opportunities that the Site's status brings for regeneration, education, culture, and civic pride
- Issue 14: There is an opportunity for greater engagement of the local business community in the management of the Site
- Issue 15: There is a need to manage any tensions between conservation and development
- Issue 16: There is a need to minimise the threat of inappropriate development, and to ensure that decisions fully consider the impacts of development proposals, and are based on a thorough understanding of the Site's Outstanding Universal Values
- Issue 17: There is a need to minimise the potential damage caused to the fabric, authenticity and character of the Site by incremental change
- Issue 18: There is a need to address the challenges of integrating contemporary design within the Site, and to encourage high quality development schemes
- Issue 19: There is a need to address sustainability issues, including climate change, and to manage the permanent, inherent tensions between the needs for adaptation and conservation
- Issue 20: There is a need for further research into the relationships between sustainability and conservation, and to disseminate learning through education, training and public information

- 5.2.1 This section is concerned with ensuring that mechanisms are in place for dealing with managing change issues within the Site. The main themes in the managing change category are:
  - Administration
  - Funding
  - · Local Planning Policy and Practice
  - Risk Management
  - Tall Buildings
  - Flooding
  - Climate Change
  - Tall Buildings
  - Information Management
  - Monitoring
  - Local Community
  - Development Management
  - Contemporary Development
  - Sustainability
- 5.2.2 Managing change is one of the most significant pressures on the site. Bath is a large and complex modern city, involving many thousands of people in its ownership and management, and its cultural assets are integral to the life of the modern city. The integration of the built heritage with the landscape makes the cultural assets vulnerable to large scale development, within both the site and the setting. Over four million visitors each year bring their own management challenges and opportunities.
- 5.2.3 While it is necessary to ensure that adequate protection and management mechanisms are in place to avoid change that would be detrimental to the Site, change also brings potential opportunities. Appropriate and high quality development can improve the Site's condition, presentation and accessibility for residents and visitors. Use of the planning development management system and tools, such as development briefs, design briefs, supplementary planning guidance, Article 4 directions and sound urban design principles, is central to Site management.

#### Administration

- 5.2.4 The role of the City of Bath World Heritage Site Steering Group is essential in ensuring delivery of actions, as experience has shown that without close monitoring of delivery actions slip and achievement rates can fall. This monitoring takes place through the Steering Group, and it is essential that it remains effective and meets regularly. It also needs to be recognised as an influential body. At present its profile is not as high as it should be.
- 5.2.5 Delivery of actions should be structured, and an annual work programme set. Whilst this was included in the 2003 Plan, it requires improvement.
- 5.2.6 One method of supporting the annual programme of work, as well as raising the profile of the Steering Group and improving interpretation of the Site, is to produce regular newsletters.

#### **Funding**

- 5.2.7 It is neither possible nor appropriate for the local authority to be the sole funder. Additional funding partners are required continually to deliver actions across the full range of activities, from small scale funding for Enhancement Fund projects, to multi-million pound European funding for transport improvements.
- 5.2.8 There are possible opportunities to re-invest money generated through heritage attractions, especially those core to the OUVs, into heritage protection and enhancement, and to generate funds through a local precept in the manner of rural parishes. Such mechanisms require further exploration.

#### **Local Planning Policy and Practice**

- 5.2.9 As identified in 3.4.1, the primary method of physical protection for the Site is achieved through the UK planning system. The planning system alone, however, cannot provide all the protection that the Site requires, and should be used alongside measures such as risk assessment and mitigation, and awareness raising amongst those who are involved in, or impact upon the condition of, the Site.
- 5.2.10 The emerging Council Local Development Framework (LDF) will provide an opportunity to revisit, revise and enhance the effectiveness of local planning policy relating to the site. High level policy within the Core Strategy will be supplemented by more detailed advice. This Management Plan, the setting study, etc may adopted by the local authority as supplementary planning documents (a component of the LDF). As a consequence there will be an expectation that the LDF and this Plan inform the variety of other types of plans, strategies and actions prepared by the Council and others which may have an impact on the OUVs of the site.
- 5.2.11 Individual planning applications will be determined in accordance with the LDF and national planning policy. To ensure the effective application of these policy expectations ongoing training to support local authority development management officers and councillors will be required.

#### Risk Management

5.2.12 Risk assessment is a key mechanism for ensuring that the aim of protecting the Site is achieved. At present, risks to the World Heritage Site are generally handled by individual organisations and risk planning relates to individual parts or topics, such as the Bath & North East Somerset Council's City Centre Evacuation Plan and the Avon Fire and Rescue Service's Integrated Risk Management Plan. In a city site, this is the most pragmatic way forward as it would not be possible to formulate one plan that accounted for all the possible risks. However, it is important to ensure that the individual plans relate to one another where appropriate, and that they consider the whole Site, its needs and associated risks. A formal, city-wide risk assessment is therefore not proposed, but a list of current provisions will assist in identifying any gaps.

#### **Flooding**

- 5.2.13 Flooding has been an issue in Bath since Roman times. The form of the Roman and later medieval settlement clearly follows the contour of the flood plain, and there is archaeological evidence in the Roman Baths of attempts to combat the problem. The street levels of Georgian developments near the river, such as North and South Parade and Great Pulteney Street, were deliberately raised up above the level of likely flooding.
- 5.2.14 It may have been flooding that was responsible for the collapse in 1800 of one of the piers supporting Pulteney Bridge. However, those major historic buildings at risk appear to be particularly resilient given the frequency of flooding throughout Bath's history. Photographic evidence of serious flooding exists for 1894, 1907, 1910, 1920, 1932, 1947, 1960, 1964 and 1968 (see Bath in Time website: http://www.bathintime.co.uk/). The last three episodes led to the installation of a new weir and sluice gate system in 1972, since when the river has remained contained in its banks even at times of flood, except where it spills on to designated flood plain such as the Bath Recreation Ground. The design of the new weir also enhanced the river and views of Pulteney Bridge.

- 5.2.15 Following extraordinary weather events in 2007, which lead to some major floods in the UK, Bath & North East Somerset Council's Emergency Management Unit arranged Flood Awareness Days on 4 March 2008 and 29 June 2010 in Bath. Level 1 and Level 2 Strategic Flood Risk Assessments (2008) showed that a number of potential regeneration and development areas are at risk of flooding today, or are likely to become at risk in the future if climate change increases the severity and frequency of storms and causes a rise in sea levels. Bath is at risk of flooding from rivers, the impact of the River Avon water table, sewers, surface water, artificial sources and, to a lesser degree, from groundwater (springs).
- 5.2.16 Consultants were commissioned in spring 2009 to prepare a Flood Risk Management Strategy for Bath and North East Somerset Council. This is expected to be adopted later in 2010, and will support the emerging Core Strategy, which also identifies flooding as a key issue.
- 5.2.17 Many options have been considered, including upstream and downstream water storage, raised defences, cumulative storage in development areas, sluice adjustments, bypass tunnel and pumping station, channel widening and deepening. The only technically feasible, comprehensive, strategic solution is the raising of defences along the river channel throughout the city of Bath, with compensatory storage downstream. However, this would cost more than 3 times the economic value of the damages avoided, making it unviable by industry guidelines. The favoured option is the installation of flood defence measures at individual development sites, with compensatory storage area/s upstream of Bath.
- 5.2.18 An interdisciplinary research project, led by the University of Bath, will monitor and predict the impact of floods and driving rain on historic buildings. The 2007 flooding in the South West and the 2009 flood in Cumbria have shown that substantial structural damage can be caused by such events to heritage buildings and infrastructure.
- 5.2.19 The PARNASSUS project brings together engineers and conservationists from the University of Bath, archaeologists from the University of Southampton, and geographers and material engineers from the University of Bristol. Researchers will survey the effects of past floods and use flood and climate change modelling tools to assess the risks of future flooding for heritage sites selected by the National Trust, Historic Scotland and English Heritage.

#### Climate change

5.2.20 Issues relating to climate change and biodiversity are interdependent, and are considered to be the most serious, long-term global issues which will impact upon the Site. Clearly, they have implications across all the themes in this Management Plan – for example:

Managing Change: the increasing need to manage uncertainty, complexity and risk; growing tensions between short-term and long-term investment. The large number of historic dwelling houses in the site will need to be adapted for future needs, and permitted development rights now allow many changes to (non-listed) historic structures without the need for planning permission. Guidance is required (see action 9a) to direct home owners toward measures which will not compromise the integrity of the site. The introduction of renewable energy generation may also affect aspects of the WHS and the setting. Wind turbines are being considered, and pose both an opportunity for clean energy and a threat to visual appearance.

**Conservation:** shifting conservation priorities from local to global; increasing pressures on local archaeology, architecture, planning and landscape.

**Interpretation, education, research:** increased need for research into sustainability and historic buildings/environment; growing need for national/international learning partnerships; need for improved education and public understanding locally.

**Physical Access:** increased pressure on the Site from infrastructure requirements of more sustainable form of transport.

**Visitor Management:** need for more sustainable tourism; pressures on tourism revenues (and, hence, on conservation spending).

5.2.21 In the short to medium term, our aims, objectives and actions in relation to climate change and bio-diversity are to adapt without compromising the Outstanding Universal Values of the Site. However, it may be that in the long-term, and particularly in relation to living cities such as Bath, increasing pressures may lead to changing value systems, difficult choices and unforeseeable compromises. Such times are beyond the horizon of this six-year Management Plan.

#### Tall buildings

5.2.22 Information sharing with other Sites has highlighted risks, including what UNESCO describes as 'aggressive development'. Identification of this risk has led to the instigation of a Tall Buildings Study in Bath, due to be completed in late 2010. The proposed action is to complete this work and take it forward as a Supplementary Planning Document to ensure that it becomes a practical planning tool (see action 5b).

#### **Information Management**

- 5.2.23 Networking with other Sites should be maintained in order to share best practice and realise opportunities. Bath is currently a member of the Local Authority World Heritage Forum and the Organisation of World Heritage Cities, although any expense incurred here must continue to be closely justified against benefit gained. Because Bath is a city wide site with an established management system, it attracts visitors from other sites seeking to learn from our experience. In the past two years, Bath has worked with international visitors from sites in Morrocco, Uzbekistan, Oman, China, Norway, Germany and Uruguay amongst others.
- 5.2.24 Due to several factors, including the size and complexity of the site and the fact that it has attracted famous and literary figures, there is a wide range of written historical records. However, these records are held by a number of bodies and there is no central index. This makes new research inefficient, does not highlight gaps in knowledge, and may lead to possible duplication. A research group is the proposed means of addressing this.
- 5.2.25 The 'listing' of buildings and their associated protection is a key mechanism for protecting the Site. The list itself is, therefore, an essential working tool in Site management. A review of the Bath list has been underway for many years, and the existence of a draft, new list alongside the statutory existing list is problematic in day to day working. The new list needs to be completed.
- 5.2.26 The development of the Sites and Monuments Record into the Historic Environment Record (HER) will produce a more comprehensive database which will be a vital tool in the management of the Site. However, the amount and complexity of the data makes the development and maintenance of HER a difficult task, and this needs support.

#### **Monitoring**

- 5.2.27 Monitoring is an increasingly important tool for protection and management. UNESCO has implemented 6-yearly Periodic Reporting to assess the condition of all Sites and arrangements for their management at national and local level. However, monitoring at the local level is also required on an annual basis, both to prevent deterioration in the condition of the Site and to ensure the successful implementation of the Plan. Monitoring also increases the knowledge base and enables a better understanding of the Site and its requirements.
- 5.2.28 Review of the 2003 plan was hampered by the lack of monitoring information available alongside the actions, and made it therefore difficult to assess levels of achievement. It is an essential element of any management plan to be able to monitor progress, and indicators have therefore been built into the Action Plan and will be used for annual assessment.

#### **Local Community**

5.2.29 The importance of the local community in Site protection and management cannot be overestimated. The vast majority of Bath's cultural assets are in private individual ownership, and each individual property has an impact on the condition and presentation of the Site. Community engagement in management, as well as in optimising the benefits of WH status, is important to the success of the Plan. It is also vital that Bath remains an attractive place to live for private individual owners and their families, taking into account all aspects of everyday city life. Too much pressure on those in the city centre could result in houses reverting to multiple occupation, with consequential effects on the quality and amount of money invested in their conservation. Residents' Associations should be encouraged, as a source of strength, advice and civic pride.

#### **Development Management**

- 5.2.30 Individual developments, of whatever scale, can have a significant impact upon the Site. It is therefore necessary to ensure that World Heritage is properly considered in deliberation of all relevant applications. The methods proposed for achieving this are for guidance to be produced for planning officers, training for elected council members (especially when new committees are formed) and the inclusion of appropriate policy provision in the Core Strategy.
- 5.2.31 There are several notable new developments which are coming forward at the time of writing. A new park and ride site at Batheaston, immediately outside the boundary of the site to the east, has gained Planning permission and is awaiting government funding decisions on funding as part of the Bath Package (see 5.5.9). Bath Western Riverside also has permission but is yet to be implemented. The change in UK Government and abandonment of the Regional Spatial Strategy has removed the immediate prospect of large scale housing developments on the edge of the Site, but will increase the pressure to make best use of housing land within the city. Recreational land is also facing pressure. Bath Rugby Club play at the Recreation Ground in the heart of the city and their presence provides civic pride and identity, plus a boost to the economy (especially in winter months when tourist numbers are low). The rugby club are looking to increase their capacity to accommodate spectators, and provide a new stadium either on their current site or elsewhere within the city.

#### **Contemporary Development**

5.2.32 The inclusion of contemporary architecture in the Site is challenging, due to the strong uniformity of the city created by widespread use of local stone and the sheer quantity of historic building stock. Since the production of the 2003 Plan there are now some notable examples of contemporary architecture within the site, including the Thermae Bath Spa, the Bus Station, Milsom Place and the Holburne Museum. Previous references in this Plan and the UNESCO Mission report have indicated that high quality contemporary architecture is a desirable method of design for new buildings.

#### Sustainability

- 5.2.33 The Local Government Act 2000 places a duty on local authorities to prepare community strategies to promote economic, social and environmental well-being, and to promote sustainable development. The Bath and North East Somerset Sustainable Community Strategy (SCS), 2009-2026, links specifically to the WHS Management Plan. It sets out what type of place B&NES should become, and contains actions in relation to Economic Development & Enterprise, Environmental Sustainability & Climate Change, Children & Young People, Health & Wellbeing, Stronger and Safer Communities.
- 5.2.34 Sustainable development is central to this Plan's long term vision and aims, which in turn lend support to the English Heritage Sustainable Development Strategy (2006) and the Government's wider sustainable development objectives.

- 5.2.35 The preservation of historic buildings and environments contributes inherently to sustainable development, in that it maximises the use of existing materials and infrastructure, retains considerable embedded energy and reduces waste. It also maintains historic character which, in turn, provides social and economic benefits. To this extent, cities such as Bath should be seen as a sustainability benefit rather than a heritage burden.
- 5.2.36 By pursuing the process of sustainable development in this context the plan aims to prevent the erosion of Bath's historic environmental capital and to increase its stock through new discoveries and conservation. Crucially, this means continually seeking new ways to do this which reduce the impacts on other capitals, in particular natural capital.
- 5.2.37 Sustainability can only be a human capacity to continue indefinitely (it cannot be an ideal end-state there are no end states) which includes our capacity indefinitely to conserve natural and cultural heritage. Building and maintaining this capacity requires continuous social learning about how to deal with important issues (such as climate change) as they emerge, and as the future unfolds.
- 5.2.38 Bath & North East Somerset Council supports such learning through, for example, its support for education for sustainable development in schools. This is through Resource Futures, which manages projects such as Climate Change Connection, Grow it Global and Eco-schools.
- 5.2.39 In 2009, the University of Bath's Accommodation and Hospitality Services won a national award for its outstanding environmental initiatives. It was the first university department in the country to gain a gold standard from the Green Tourism Business Scheme (GTBS) and the first business in Bath to obtain the gold standard rating.

#### **Managing Change Objectives**

5.2.40 Managing Change issues are addressed primarily through objectives 1, 2, 3, 4, 5, 6, 7, and 8.

**Objective 1:** Ensure that management and administrative arrangements are appropriate for the effective implementation of the Plan, encourage community involvement, enable partnership working and secure the required funding

**Objective 2:** Ensure that risk management plans for the protection of the Site, including the fabric and relevant archives, are undertaken and periodically updated, and resulting actions identified and undertaken

**Objective 3:** Ensure that research and information about the Site is produced, collected, archived and analysed, and made available to partners in ways that assist implementation of the Plan

Objective 4: Ensure periodic monitoring of the condition of the site

**Objective 5:** Ensure that the Site and its setting are taken into account by all relevant planning, regulatory and policy documents (statutory and non-statutory) and by any future changes to the planning system

**Objective 6:** Ensure that the Site and its setting are taken into account in all relevant decisions taken by the Local Authority and other management partners

Objective 7: Ensure that architecture, which enhances the values of the site, is encouraged

**Objective 8:** Ensure that adaptation to address climate change is made and promoted with any harm to the heritage asset balanced against the public benefit.

### 5.3 Conservation Issues and Objectives

#### **Conservation Issues**

Issue 21: There is a need to promote co-ordination and responsibility across complex ownership patterns

Issue 22: There is a need for effective management of all elements of the Site's historic environment, to protect the authenticity and integrity, based on a thorough understanding of the Outstanding Universal Values

Issue 23: There is a need to manage disused or damaged buildings, structures and sites, which deteriorate faster than those in use, and quickly bring them back into productive, economic use

Issue 24: There is a need to address the long-term availability of materials and skilled craftsmen to maintain the fabric of the Site

Issue 25: There is a need to safeguard the Site's historic buildings and archaeological structures, ensure they remain in general good condition, and protect them from inappropriate and/or inadequate maintenance

Issue 26: There is a need to ensure that the Site's extensive and vulnerable landscape setting is recognised, interpreted, protected and managed to prevent incremental damage

Issue 27: There is a need to ensure that Bath's parks and open spaces are seen to be integral to the Site's landscape setting and managed appropriately

Issue 28: There is a need to promote understanding that the River Avon and Kennet and Avon Canal are integral to the Site's landscape setting and a need to ensure they are managed appropriately

Issue 29: There is a need to identify and safeguard important views, both within and beyond the Site and manage them appropriately

Issue 30: There is a need to base tree and woodland management of the Site upon an understanding of the Outstanding Universal Values

Issue 31: There is a need for continued research into the archaeology of the Site, so that it is better understood and is effectively used in the maintenance and management of the Site

Issue 32: There is a need to secure the necessary capital investment to realise opportunities to improve the quality and maintenance of the Site's public realm

- 5.3.1 This section is concerned with ensuring that mechanisms for conservation, care and maintenance of the Site are in place. The main themes within conservation are:
  - Ownership
  - Historic Environment
  - Buildings
  - Landscape
  - Archaeology
  - Public Realm
- 5.3.2 It is essential that the Site survives in the best condition possible and that the reasons for its inscription are maintained. Bath is generally in good condition, and benefited greatly from a forty-year historic building repair grants programme, funded jointly by central and local government, which ended in 1995/6. This work needs to continue indefinitely.
- 5.3.3 Other elements, however, have received less attention and are undervalued. This particularly applies to industrial elements, waterways, parks and gardens and the public realm. There is a need to improve their condition and presentation, and to ensure that they are fully incorporated into the values and management of the Site.

#### **Ownership**

5.3.4 Responsibility for maintaining and conserving much of the Site now rests primarily with individual property owners, and is dependent on their enthusiasm and understanding, and the support and resources available to them. Long-term conservation also requires continuing education and awareness about materials, techniques and quality.

#### **Historic Environment**

- 5.3.5 There is a need to maintain protection for the hot springs through the planning system, by inclusion in the emerging Core Strategy and through the County Of Avon Act (see 3.4.2).
- 5.3.6 The Conservation Area (CA) for Bath is a key method of protection for the Site. The amalgamation of the CA into one large area has meant that amendment of the boundary or production of CA assessments has become a large administrative undertaking requiring significant resource. There are areas beyond the current Bath CA boundary, most notably by the riverside and at Oldfield Park, which may warrant inclusion.
- 5.3.7 The level of guidance produced for those living or operating within the Site is low. Guidance has previously been offered on issues such as windows, stone, shop-fronts, shop-front security, living in a CA and owning a listed building. Availability of this guidance has decreased, and a list of new guidance is required, including topics such as stone cleaning, energy conservation and ironwork. This needs to be built into the annual Action Plan.
- 5.3.8 Official guidance is supplemented by public lectures and other learning opportunities offered by organisations such as the Bath Preservation Trust, the University of Bath and the Bath Royal Literary and Scientific Institution. These are important contributions to public understanding, and to be encouraged. They also need to be monitored and recorded so that gaps and overlaps in provision can be identified.
- 5.3.9 The availability of craft skills and materials to maintain the Site continue to be issues carried forward from the 2003 Plan. Actions to address them are particularly difficult, but need to be developed.

#### **Buildings**

- 5.3.10 Buildings at risk represent the possible loss of historic fabric from the Site, which is contrary to the aims of the Plan. The Council has powers to address such structures, and this Plan supports any action required to protect such buildings. Monitoring needs to include buildings that are important both locally and nationally. The support of the wider Steering Group, especially through bodies such as the Bath Preservation Trust and English Heritage, is important.
- 5.3.11 The recording of buildings at risk does not currently extend to non-listed structures, and it is common for street furniture not to be included. Railings, lamp standards, walls, kerb details etc, remain as part of the historic fabric and are often directly associated with the Outstanding Universal Value, and these need to be protected and recorded.

#### Landscape

- 5.3.12 The Setting Study (see Appendix 10) should be brought forward as Supplementary Planning Guidance in order to make it a useful Site management tool. Because the study deals predominantly with issues beyond the Site boundary, important views need to be identified and given planning protection.
- 5.3.13 Trees and woodlands have a direct influence on the Outstanding Universal Value of the Site in a variety of ways. There are a number of key cultural assets, such as the Circus and Queen Square, where trees have been introduced at a later date and do not allow the spaces to be read in the way that was originally intended. Also, views from other key assets such as Royal Crescent have been partially obscured by trees, as have numerous Georgian vantage points which were integral to the function of the Site as a resort.

- 5.3.14 The skyline, which contributes to the character of the City, is dependent upon tree cover and this requires managed replacement. Beechen Cliff is one of the key elements in the landscape setting of the Site. Immediately south of the city centre, it provides the backdrop to the urban centre and affords views back across it. The wooded hill-side is currently in the ownership of the Council, but may be more effectively managed by the National Trust which owns adjoining land. Discussions and feasibility studies are under way to progress the idea of transferring ownership.
- 5.3.15 As trees age, decisions have to be taken as to whether it is appropriate to replace them. It is considered better to address this issue through a strategy to pre-empt and guide events, rather than to react to them.

#### **Archaeology**

5.3.16 Modern archaeological techniques provide aids to assist in the understanding of the Site's authenticity and integrity, and thereby assist development of appropriate conservation strategies for the Site as a whole, its different elements and below ground archaeology. The Bath Urban Archaeological Assessment has consolidated our current knowledge about the extent, significance and state of preservation of the Site's Roman archaeology and visible remains, as well as looking at other periods. This was a joint English Heritage and BANES project, which is due to be published in 2011 and will inform the future archaeological management strategies such as a revised Supplementary Planning Document.

#### **Public Realm**

- 5.3.17 The public realm is the streets and spaces between the buildings. Bath's public realm has direct relevance to Outstanding Universal Value of the Site due to the fact that many features such as broad pavements and public squares were designed for promenading through the Georgian City, and are an integral part of the Georgian City retaining much authentic fabric.
- 5.3.18 Bath's public realm has declined gradually over decades, with resources aimed predominantly at buildings rather than spaces, and traffic pressures causing damage. However, the Project Realm and Movement Programme (PRMP) project initiated by B&NES Council aims to address this. The PRMP aims to make Bath the UK's most walkable city, and sets out a long term (10-20 year) framework for the creation of a network of pedestrian friendly streets. The four key components of the PRMP are addressing the transport network to ensure cyclists, pedestrians and public transport have priority over the car, refashioning identified streets and riverside spaces in consistent high quality materials, installing a new wayfinding and information system and facilitating a range of outdoor cultural and community events.
- 5.3.19 Street lighting within the Site has proved contentious during the 2003 plan period. Whilst elements of this are detached from protection of the Outstanding Universal Value, the issue is however linked to comprehensive Site management. The lack of an adopted strategy means that there is no agreed path forward and resources to address this are not in place. It may be that this is addressed in the PRMP but this needs to be clarified.

#### **Conservation Objectives**

5.3.20 Conservation issues are addressed primarily through objectives 9, 10, 11, 12, 13, and 14.

**Objective 9:** Ensure that owners and users of historic properties/sites within, or impacting upon, the Site and its setting, are aware of the requirements for care and maintenance, and have access to appropriate guidance, advice & craft skills

**Objective 10:** Encourage the use of, and where appropriate prepare, programmes for planned maintenance, management and/or conservation

**Objective 11:** Ensure that damaged and disused structures within the Site are monitored, repaired, maintained and, where appropriate, re-used

**Objective 12:** Ensure that landscape and natural elements of the Site and its setting, including heritage sites and their associated remains, are protected, acknowledged, understood and managed alongside the Site

**Objective 13:** Ensure that awareness and understanding of the archaeological remains are increased, and improve the range and accessibility of the associated artefacts and information

**Objective 14:** Ensure that the public realm is seen as, and understood to be, a significant, historic and cultural element of the Site, and that alterations are of a high standard to take this into account

# 5.4 Interpretation, Education and Research Issues and Objectives

#### Interpretation, Education and Research Issues

Issue 33: WH status needs to be seen as being a positive factor, which is conducive to change and economic growth

Issue 34: There is a need to make the message and branding of the Site consistent

Issue 35: There is a need to enrich the 'story' of the Site in its interpretation, improve communications, in particular web presence, and to increase public awareness of Bath's WH status

Issue 36: There is a need to explore the need for and feasibility of an interpretation centre or City Museum that tells a comprehensive story of the Site

Issue 37: There is a need to enhance use of the Site as a learning resource, and to extend this to other sectors of education and training, and to sustain such initiatives

Issue 38: There is a need for research that extends and improves understanding of the Site, and supports its successful management

Issue 39: There is a need to ensure that historic buildings are understood in the context of their surroundings and the values of the Site, and remain a valuable resource for enjoyment and learning

- 5.4.1 This section is concerned with making the Site as comprehensible as possible to all, optimising its potential for learning, and broadening and deepening the knowledge base. The main themes are:
  - Interpretation
  - Education
  - Research
  - Buildings
- 5.4.2 Enhancing understanding for all residents, workers, visitors, distance learners etc is complementary to the work of protecting and conserving the Site, and is intimately connected to managing physical access and the appearance of the public realm. The Site has enormous potential as resource for learning in all sectors of education and training, locally, nationally and internationally. Much of this potential has still to be realised.
- 5.4.3 Libraries, local study centres, universities, archives, special interest groups, statutory record keepers and museums all have a valuable role to play in the management of the Site by protecting and conserving artefacts and archives, making such resources available for research, or by carrying out research themselves.
- 5.4.4 The Council archives are a key component in the storage and provision of records relating to the Site. The current accommodation for the archives in the Guildhall basement does not suit the expanding collection, and better provision is desirable. This is an action carried forward from the 2003 plan, and resolution is likely to rest with wider development opportunities which may arise. Whilst currently unfunded, this action remains valid.

5.4.5 The current web site for the Site is provided by the Council. It is located within the standard corporate web site provision alongside the wide range of other services provided by that body. An independent web site would be beneficial, and would help address many other actions in this Plan including raising the profile of the Steering Group, improving interpretation and providing guidance.

#### Interpretation

- 5.4.6 The interpretation of Bath benefits from its topography. The surrounding hills have provided important viewpoints for cartographers and admirers throughout history. Jane Austen describes a lecture on the picturesque from the top of Beechen Cliff in Northanger Abbey (1798-9). Such views and viewpoints are less recognised and appreciated than they should be.
- 5.4.7 As noted above in the UNESCO Mission Report findings (1.3.2), interpretation of the Site has not been strong enough and it remains possible for visitors to stay in the city without realising it has World Heritage Status. Actions to address this, including the training of 'visitor ambassadors', increased signage, consistent use of a new publication style and the celebration of UNESCO World Heritage Day are already in place. However, an Interpretation Strategy to co-ordinate these and future actions is required.
- 5.4.8 The Corps of Mayor's Honorary Guides was established in 1934 and provide free walking tours of the historic city every day, morning and afternoon. There are more than fifty active Guides who entertain over 30,000 visitors each year. The cost to the city in 2009-10 was £21,000. Bath is one of the few places in the world to provide such a cost-effective service free of charge to the user.
- The training of visitor ambassadors in World Heritage matters has included Tourist Information staff, Roman Baths staff, The Mayor's Honorary Guides, Bath Abbey Guides and several other groups. Training of Council street cleaning staff in general visitor assistance has also happened separately. These processes should be rolled out to other groups and refreshed periodically.
- 5.4.10 Bath stages a number of major, annual festivals, including the Bath International Music Festival, Bath Literature Festival, Bath Festival of Children's literature and the Jane Austen Festival. It is well known as being a leading centre of heritage, and the opportunity exists for this to be developed into a Heritage Festival.
- 5.4.11 Heritage Open Days (September), Heritage Open Week (October) and World Heritage Day (April) activities also contribute to interpretation and education in their broadest sense. These events are supported by B&NES Heritage Services and Planning Services, Bath Preservation Trust, the Mayor's Honorary Guides and many private property owners.
- 5.4.12 A number of Bath's key heritage attractions including the Roman Baths, No 1 Royal Crescent, the Assembly Rooms and Prior Park Landscape Garden, explore issues cited in the OUVs while not necessarily explaining them or connecting them with the WHS.
- 5.4.13 UNESCO World Heritage Day was celebrated in April 2009 and 2010 and proved very popular. It provides an opportunity for education, interpretation and for celebration amongst local people, who may not always be the focus of World Heritage actions.

#### Education

- 5.4.14 Bath Preservation Trust Learning provides public lectures and events across its four museums, an education programme for schools, and online learning resources. The quality of its learning provision at the Building of Bath Collection has recently been recognised by a Learning Outside the Classroom Quality Badge.
- 5.4.15 A World Heritage education pack has been provided to all schools within the Site. The aim is to promote and support learning about World Heritage within the curriculum. The materials will need to be promoted periodically to encourage continued use. A poster an A-Z of World Heritage was also distributed in Spring 2010 with the aim of raising awareness.
- 5.4.16 In recent years, the education service at the Roman Baths has enhanced its support for local and visiting educational institutions, including schools, colleges and universities, and produced new materials to support teaching and learning.

- 5.4.17 Existing materials supporting the study of Roman history in schools (Key Stages 1-4) have been supplemented by new cross-curricular activities linked to Science, developed in 2008. New materials to support GCSE History have also been developed and piloted in partnership with Oldfield School, Bath. These will be launched and distributed to teachers and advisers in B&NES and Wiltshire in autumn 2010. The education service is also developing its support for courses in heritage, history, archaeology and anthropology at local universities and colleges.
- 5.4.18 The Mayor of Bath's Honorary Guides also provide free walking tours to local and visiting groups of pupils and students.
- 5.4.19 However, such initiatives would benefit from more strategic approaches to heritage education involving wider partnerships within the city.

#### Research

- 5.4.20 The success or failure of Site management depends on the extent to which the Site is understood and appreciated. Improving understanding and appreciation is underpinned by focused research and dissemination. There is a need to encourage research generally, and to establish focused research agendas and priorities.
- 5.4.21 There are good links between the Higher Education sector and those involved in Site management. The Department of Architecture and Civil Engineering at the University of Bath has courses on the history of architecture and an MSc on the Conservation of Historic Gardens and Cultural Landscapes. Bath Spa University has courses in heritage and tourism management, and is developing research initiatives in Bath's heritage and the historic environment.

#### **Buildings**

- 5.4.22 The UNESCO Mission Report also refers to an interpretation centre. The Site has a number of museums dedicated to different phases of history, but no City Museum or World Heritage Site interpretation centre. No immediate solution can be offered at time of writing by this Plan. The only museum explicitly considering the OUVs is the Building of Bath Collection, but this is located away from the main visitor route. The issue however remains current, and therefore the action to explore feasibility is included in order to keep this on the agenda and realise opportunities which may occur.
- 5.4.23 Interpretation, education and research are supported in many ways, particularly through the work of the Roman Baths, Bath Preservation Trust, No.1 Royal Crescent, Building of Bath Collection, Museum of Bath at Work, Jane Austen Centre, Herschel Museum of Astronomy, Abbey Vaults Museum and Bath Postal Museum. This work is also supported by programmes at the Bath Royal Literary and Scientific Institution, which has its roots in the 18th century.
- 5.4.24 Interpretation and presentation of Bath's archaeological remains began in the 19th century. The Roman Baths now receive approximately 880,000 visitors per year, and is one of the most popular destinations outside London for educational visits.

#### Interpretation, Education and Research Objectives

- 5.4.25 Interpretation, Education and Research Objectives are addressed primarily through objectives 15 and 16.
  - **Objective 15:** Ensure that the current provision of interpretation is established, and provide high quality, accessible facilities and materials that present a comprehensive view of the Site's values and management issues
  - **Objective 16:** Ensure that the Site is used widely and effectively as a resource for learning in all sectors and phases of education and training

## 5.5 Physical Access Issues and Objectives

#### **Physical Access Issues**

Issue 40: There is a need to manage the volume of traffic passing through and around the city, the negative impacts this has on the Site, and the extent to which this impedes the management of other issues

Issue 41: There is a need to encourage greater use of public transport, improve the service, and allow for more effective management of other forms of transport

Issue 42: There is a need to establish mechanisms and processes by which integrated transport systems for the Site can be explored and developed

Issue 43: There is a need to encourage walking and cycling in order to control and reduce car journeys

Issue 44: There is a need for pedestrians to be able to navigate the site easily, safely and enjoyably

Issue 45: There is a need to address tensions between conservation and the desirability of providing physical access to the Site to as many people as possible

Issue 46: There is a need to provide clear and efficient transport alternatives, and encourage their use, in order to reduce traffic congestion in and around the Site

- This section is concerned with the physical accessibility of the Site to residents, workers and visitors, and the need to ensure that access arrangements take into account the sensitivity and vulnerability of the Site's cultural assets. The main themes within physical access are:
  - Traffic
  - Public Transport
  - Pedestrians and Cycling
  - Access for All
  - Travel Planning and Awareness
- Managing access is fundamental to site management. Access issues impact particularly on the Site's condition and conservation, on people's ability to navigate, understand and enjoy it, and on its viability as a living city. Bath needs to be accessible to a variety of transport modes. It must provide appropriate facilities car parks, coach parks, delivery access, signs all of which must be integrated into the Site without detracting from its values. This is one of the most challenging areas in the Plan. Bath's physical access issues are complex and long-term.

#### **Traffic**

- 5.5.3 There are physical limits to the city's ability to accommodate growing traffic requirements without detriment to the historic environment. The landscape and countryside surrounding the city is of outstanding natural beauty and integral to the values of the Site, and the hot waters below the site are vulnerable to major excavations. Because of these factors there is no easily achievable underground or above ground road by-pass to the city.
- Traffic can intrude on the enjoyment of Site, damage the built fabric, inhibit free movement of pedestrians and create pollution. Air pollution and the weight and vibration of the vehicles are threats to those who live in Bath and visit it, and to the historic buildings, townscape and landscape. Over 20,000 work journeys by car are made into the City every day causing pollution and congestion which is estimated to cost in the order of £50m a year<sup>14</sup>. Solutions will involve an area much wider than the Site itself, and require comprehensive actions which may take many years to implement.

- 5.5.5 The City has no direct link to the motorway network, with the M4 route to London and Cardiff being 10 miles to the north. The closest airport is Bristol, 20 miles to the west. Bath is served by a main line railway station (Bath Spa), plus a secondary stop at Oldfield Park. Journey times to Bristol are 12 minutes and London 90 minutes, with frequent services on week days. Bath is also liked by rail to the South Coast ports of Weymouth Portsmouth and Southampton, the last two via the historic city of Salisbury.
- 5.5.6 In 2007 the Council worked with four other historic European cities to submit a bid to the European Commission's CIVITAS Plus programme. The successful bid secured €3.975m to implement new transport options in Bath. With the Council's own contribution and partner funding, the programme will invest £5.15m into the city. The four year programme began in September 2008, and includes several projects. A freight trans-shipment depot will be set up on the edge of Bath to consolidate the shipment of retail goods and reduce heavy goods vehicles entering the city. Hybrid vehicles will be introduced in the City Car Club as well as cycle hire initiatives such as park and cycle involving conventional and powered bikes. A trial for 'green' fuel hybrid buses will be introduced, as will demand management of goods and other vehicles entering the city centre. An area of the central shopping street will be improved as a demonstration project, and a study into a personal rapid transit system for the centre will be undertaken. Finally, satellite bus-tracking technology designed to provide real-time information using EC Galileo technology will be introduced.

#### **Public Transport**

- 5.5.7 Improved public and integrated transport can help alleviate traffic congestion in Bath. Public Transport planning for Bath is covered by the Joint Local Transport Plan (JLTP)<sup>15</sup>, produced by the local authorities of B&NES, Bristol City, North Somerset and South Gloucestershire. The current JLTP (March 2006) extends until 2011. The five aims of the JLTP are to tackle congestion, improve road safety for all users, improve air quality, improve accessibility and improve the quality of life. There are a number of initiatives developed from the JLTP which address public transport provision within the site.
- 5.5.8 Bus travel is the logical choice for public transport provision in Bath. One major initiative resulting from the JLTP is the Greater Bristol Bus Network (GBBN)<sup>16</sup>. B&NES Council, and JLTP partners have worked with bus operator First Group to develop this major bus improvement scheme. Funding of £69.8 million has been secured, made up of £42.3m from the Department for Transport, £20m from First Group, £1.8m from local authority contributions and £5.7m from developer contributions. 10 bus route corridors are to be improved, including two (the A4 Bath Bristol and the A367 Bath Radstock) serving Bath. Improvements recently completed include the widening of the A367 Wellsway in Bath, and work to improve bus stops with raised kerbs and new shelters is on-going. The on-going actions of the GBBN address action 24 of the Action Plan.
- 5.5.9 A second initiative under the JLTP is the £54m Bath Package scheme. The package includes expanding the City's three existing Park & Rides and creating a new Park & Ride to the east of the City, thereby increasing Park & Ride capacity from 1,990 to 4,510 spaces. It will create a Bus Rapid Transit (BRT) route, including a 1.4km section of "off-street" dedicated bus route which will remove Park & Ride buses from congestion for a significant amount of their journey. In the city centre, a more pedestrian and cyclist-friendly environment will be created through the introduction of access changes on a number of streets and the expansion and enhancement of pedestrian areas. Nine bus routes will be upgraded to Showcase standard, including raised kerbs for better access, off-bus ticketing to speed up boarding and real-time electronic information for passengers. Finally, an active traffic management with real-time information to direct drivers to locations where parking spaces are available will be introduced.
- 5.5.10 The Bath Package scheme will deliver major benefits. The reduction of cars entering the city is estimated at 1.5 million a year, with a reduction of 5 million km in car travel undertaken within the city each year. Public transport journeys will increase by 2.2million per annum, with an annual emission savings of 1,500 tonnes of CO\_. Park and Ride parking spaces will increase by 125%, and 321 accidents are predicted to be avoided over the next 60 years, including 3 fatalities and 35 serious casualties.

- 5.5.11 The programme for implementation of the Bath Package requires Department for Transport funding, and is currently on hold pending the Government's spending review. The Government will aim to provide a firm indication on the way forward later in 2010 once the spending review is complete, and Bath and North East Somerset Council remains committed to the proposal.
- 5.5.12 There are proposals for electrification of the main Bristol London rail line passing through Bath, which are likely to be progressed during the life of this plan. This would bring benefits of decreased journey times and a cleaner energy source, but it may potentially compromise the appearance of some architecturally important infrastructure and will require careful management possibly including a live rail solution rather than overhead wires through the Site.

#### **Pedestrians and Cycling**

- 5.5.13 The best way to explore and appreciate the Site, and the many details which make it so special, is on foot. Walking should be a safe and enjoyable experience, but the intrusion of traffic often spoils this.
- 5.5.14 Cycling in Bath, despite the steep hills, is a viable transport alternative. National Cycle Route 4 passes through the city, and makes use of the river corridor, along with the Bristol and Bath Railway Path and Kennet and Avon Canal Route. These east-west routes are to be supplemented by a southern route using disused railway tunnels. The 'Two Tunnels' project is part of a national initiative by the charity Sustrans, supported by B&NES Council. The new walking and cycling route will use the Combe Down tunnel, the longest unventilated tunnel in the UK at 1 mile, 69 yards long, and the 447 yards long Devonshire Tunnel. This flat route will open up a recreational and communter route between Bath and settlements to the south.

#### Access for All

- 5.5.15 Bath is not an ideal city for those with differing mobility requirements. Steep hills, sensitive historic buildings and street environments, busy through-routes and traffic throughout the city can impede the ability of people to explore widely.
- 5.5.16 The provision of adequate facilities can conflict with the need to protect the appearance of historic buildings and sensitive streetscapes. A balance must be achieved between meeting the needs for physical access and protecting the values of the Site.
- 5.5.17 This has been successfully achieved at the Roman Baths where improvements to physical access in recent years include the installation of two new lifts and a ramp providing access to roughly 60% of the site below ground level, including the Great Bath. The ground floor is now fully accessible. New hand rails have been installed throughout large parts of the site. These have been designed for use by people with reduced mobility, as well as children. A power operated door has been installed for better wheelchair access with improved lighting wheelchair friendly circulation. A British Sign Language tour of the Roman Baths, for use on personal mobile devices, has also been introduced, and a loop system for the hard of hearing was installed when the main shop was refurbished.
- 5.5.18 One of the aims of this plan is to 'improve physical access and interpretation, encouraging all people to enjoy and understand the Site' (see 4.2.1). The historic environment is often constructed of steps, uneven surfaces and muted colours. Enabling access for less mobile people in such an environment can often be challenging.

#### **Travel Planning and Awareness**

5.5.19 Bath has worked with the three other World Heritage Sites in the region – Cornwall and West Devon Mining Landscape, the Jurassic Coast, Stonehenge and Avebury – and with South West Tourism to promote more sustainable transport. The partnership has created a website (www. worldheritagesouthwest.org.uk) to help residents and tourists to visit all Sites using more sustainable transport. The website features an interactive Google map showing train, bus and cycle routes, itineraries, walks, information about 'green' accommodation and nearby attractions, and there is potential to expand upon this work.

#### **Physical Access Objectives**

5.5.20 Physical Access issues are addressed primarily through objectives 17, 18, 19, 20, and 21.

**Objective 17:** Ensure that all traffic, transport and pedestrian management schemes enhance the values of the Site

**Objective 18:** Work to reduce volumes of vehicular traffic and associated pollution through and around the Site, including coaches, and develop alternative modes of transport in consultation with all stakeholders (local, regional and visiting)

**Objective 19:** Work with public transport providers to improve services, both within and around the Site, and to increase the use of public transport

**Objective 20:** Work to increase the safety, accessibility and enjoyment of the Site for pedestrians and cyclists, and give them priority over motorised traffic

**Objective 21:** Work to provide high quality access for all those with mobility needs, without compromising the Site's values

## 5.6 Visitor Management Issues and Objectives

#### **Visitor Management Issues**

Issue 47: There is an opportunity to enhance the quality of environments at entrance points to the Site, and provide better information

Issue 48: There is an opportunity to disperse visitors around the site beyond current concentrations in the central area

Issue 49: There is a need to manage the heavy impact which all forms of visitor traffic, including coaches, has upon the Site

Issue 50: There is a need to manage the impacts on the Site of the number, type, and length of stay of visitors

Issue 51: There is a lack of consensus on the marketing value of WH status

- 5.6.1 This section is concerned with the relationships between tourism management, the need to protect and conserve the Site and the needs of Bath's resident and business communities. The main themes are:
  - · Welcome and Facilities
  - Dispersal & Travel
  - Impact
  - Marketing

5.6.2 Tourism is a major contributor to the economy of the South West Region of England, with a total of 118.7 million trips worth £9.3 billion in 2007. The area of Bath and North East Somerset (B&NES) had a total of 4.4 million trips worth £349 million. The area has 7,834 jobs related to tourism, which is about 8% of total employment. The City of Bath is the main focus for tourism in the B&NES area.<sup>17</sup>

#### Welcome and Facilities

- 5.6.3 There are excellent visitor facilities and attractions for certain elements of the Site. However, there is a need to make other less well-understood elements more accessible.
- 5.6.4 When providing visitor facilities and attractions, it is important to regard local communities as potential visitors to the World Heritage Site. Museums, attractions, tours, exhibitions and other visitor facilities are not solely of interest to people who travel to Bath from other parts of the country or world.
- 5.6.5 However, local communities also have requirements, such as local needs shopping (rather than souvenirs or gifts), short stay or on-street parking, affordable properties and appropriate access. There is a need to balance the provision of visitor facilities with those supporting local cultural or economic activities.
- 5.6.6 The current road signs to the City (and Site) are over-loaded with information and would benefit from renewal. The opportunity should be taken here to welcome visitors to the Site, and help fulfil interpretation actions. This opportunity should also be realised at public transport arrival points, and major walking and cycling routes.

#### **Dispersal & Travel**

- 5.6.7 Tourism is heavily concentrated in the city centre, and consists mainly of day or overnight visits to a few major attractions and the central retail area. Visitor reception and information is provided in the city centre by a Tourist Information Centre, but information at entry points and other key places is limited. The Civitas funding has also allowed new interpretation signage to be designed and trialled (See para 5.5.6).
- 5.6.8 In 2010 a new self-guided City Trail was published which explains why Bath is a World Heritage Site. Copies are distributed free to visitors via hotels etc. This World Heritage Walking Trail was produced and funded by the World Heritage Enhancement Fund. It is the latest is a range of city trails, but the first to be based on Outstanding Universal Values. This is a relatively low cost option to increase interpretation, promote walking above vehicle travel, and has the potential for expansion to take visitors to less well visited parts of the site, connecting with other initiatives such as the Combe Down Heritage Group trail covering the stone mine community of Combe Down. The National Trust 'Sky-line Walk' has also proved very popular, as has the Jane Austen downloadable audio tour, which has had nearly 40,000 downloads since being introduced in 2007.
- 5.6.9 Projects instigated by the Enhancement Fund include initiatives such as the repair of historic milestones. Such projects achieve the dispersal of the benefit of World Heritage beyond the historic core.

#### **Impact**

- 5.6.10 Tourism provides access to the Site for a wide domestic and international audience. It is generally beneficial and provides support to the local economy which in turn provides funds for conservation.
- 5.6.11 Tourism can have detrimental impacts. The greatest pressures in Bath are felt through traffic. Coach parking, especially for specific events such as the Christmas Market, needs to be carefully managed. Coach day trip tours bring visitors for a stay of only several hours which cause congestion without bringing the wider economic benefit of an overnight stay. There is a need for greater long stay tourism.

#### Marketing

- 5.6.12 Generally, Bath's World Heritage Site status has low visibility on visitor literature, signs around the city and at certain visitor attractions, and it is still possible for visitors to be unaware of WH status. Works are underway to address this, such as the erection of a second sign in Abbey Churchyard in 2010. Further works are needed, including works to entrance signs on both road and rail approaches. The official tourism web site for Bath (www.visitbath.co.uk) has been revised in 2010 to include a section on World Heritage and associated education initiatives.
- 5.6.13 In South West England, the four World Heritage Sites (Bath, Stonehenge/Avebury, Dorset and East Devon Coast, Cornwall and West Devon Mining Landscape) have worked together to pilot a joint marketing project, as described in 5.5.19. By its very nature, the website is raising awareness of the sites but at the same time, it is reinforcing important sustainability messages and encouraging people to think differently about how they travel. A project to investigate if this initiative could be rolled out across all UK World Heritage Sites is currently being developed.

#### **Visitor Management Objectives**

5.6.14 Visitor Management Objectives are addressed primarily through objectives 22, 23, 24, and 25.

**Objective 22:** Work to provide appropriate, high quality and welcoming environments and information for visitors at the main entry points to the Site

**Objective 23:** Work to encourage visitors to explore the wider Site, both intellectually and physically, and extend the necessary infrastructure and visitor management safeguards to currently under-visited areas

**Objective 24:** Work to encourage visitors to use more sustainable forms of transport when travelling to and in the Site

**Objective 25:** Ensure that visitor facilities and information are high quality, and reflect the status of the Site

## Implementation and action plan



## 6 Implementation and action plan

#### 6.1 Introduction

6.1.1 This section of the Management Plan sets out the recommended mechanisms and resources required for achievement of the objectives shown in the previous chapter, plus actions made in response to the UNESCO/ICOMOS mission. There is a direct flow through the plan from issues to objectives and to actions. This programme lists actions against objectives in order to demonstrate this progression.

### 6.2 Implementation

#### **Responsibilities and Administration**

6.2.1 The management and governance of World Heritage in Bath is set out in section 3. Implementation of actions in this programme will involve the full range of partners formerly involved in Site management, plus others whom it is not possible to identify individually. Overall responsibility for the Plan lies with the Steering Group, although in practice the Council carries out most of the actions, and in formally adopting the Plan has acknowledged responsibility for this.

#### **Funding and Resources**

- 6.2.2 It is impossible to quantify the exact extent of staff and financial resources concerned with the protection and presentation of the Site. There are several reasons for this, predominantly (as repeated throughout this Plan) that the Site is large and complex, covering an entire City of 89,000 people and in multiple ownerships (see section 3.3). Also it is not possible to separate out those actions necessary to protect and promote the City as a World Heritage Site from those which would be required in any other historic city.
- 6.2.3 There are some areas which can be identified. The majority of expense falls upon the Council, and this is demonstrated by the high proportion of actions in this chapter for which the council is responsible. No core funding specifically earmarked for World Heritage is received by the Council from government or other bodies.
- Amongst the key cultural assets listed in Appendix 4 are the Roman Baths. This complex presents the sole visible remains of Roman Bath, and is therefore a key component of the Outstanding Universal Value. The Council's Heritage Services business unit, which manages the Roman Baths and Pump Room complex as well as the Council's other museums and historic public buildings, returns a net surplus to the Council of £3.3 million per annum. The Council is also responsible for the public realm, much of which is historic and contributes to the authenticity of the Site. The cost of maintenance can be far in excess of maintaining modern materials.
- 6.2.5 Other key cultural and natural assets are funded by charities, including Bath Preservation Trust and the National Trust.
- 6.2.6 The World Heritage Manager is a full-time post funded solely by the Council, together with a small operating budget. Whilst no other staff are directly employed under the heading of World Heritage, staff in Planning and Heritage Services regularly contribute to the wider agenda, together with periodic contributions across the range of Council departments.
- 6.2.7 The Steering Group Chairman is paid an annual stipend (by the Council) although the current Chairman donates this money to the Enhancement Fund.

- 6.2.8 The Enhancement Fund is a small scale grant fund established in 2009. The main Contributors to the fund are the Council and Bath Preservation Trust. Other sources of funding are also being sought, and this Fund benefits from being able to target funding that the Council could not. In contributing to projects such as the repair of historic features in the Site, the fund would generally expect to attract contributions from other sources, thus generating further funding.
- In terms of large scale projects which involve bidding for funds from national or international bodies, World Heritage has been influential in attracting funding. It is difficult to quantify, as it is often hard to ascertain how much influence World Heritage status had in successful bids, but the CIVITAS bid (€3.975 million of European Commission (EC) funding) is thought to have benefited, and the Combe Down Stone Mine Stabilisation Project (in excess of £150 million of English Partnerships funding) secured provision for heritage interpretation alongside the main funding.
- 6.2.10 A final important element of funding and resource is volunteer time. The World Heritage Volunteer initiative was established by the current Steering Group Chairman in 2009, and parties of around 25 volunteers have undertaken works to repair city centre street furniture, and provide stewarding at events. The Mayor's Guides, described in 5.4.8, guide 30,000 visitors a year and rely on over 50 highly trained voluntary staff. The charities named in 5.4.11 are also reliant on volunteer staff, with Bath Preservation Trust having around 120 volunteers with an estimated value of £70,000.

#### **Monitoring**

- 6.2.11 Monitoring is central to the implementation of the Plan and successful comprehensive management of the Site. The two branches of monitoring, namely those of the condition of the Site and the implementation of the Management Plan, are of equal importance.
- 6.2.12 Monitoring measures are written into the action plan alongside each action. This is essential to judge achievement, and also essential in order to progress actions. Without direct financial control over most of the actions, the principal method the Steering Group employs to ensure implementation is to monitor progress and draw attention to any inaction. The main mechanism for monitoring will be by collation of all information relating to monitoring indicators on an annual basis by the World Heritage Manager, and collation of this data into an annual report to the Steering Group. It is envisaged that this report will also form the basis of the annual newsletter.

## 6.3 Actions to Achieve the Objectives

- 6.3.1 Building on experience of the 2003 Plan, changes have been made to the programme of action designed to ensure a greater level of achievement. Extra columns have been inserted into the tables below to show where responsibility for the action lies, and where the funding will come from. As explained in the section on monitoring above, this is essential information as the Steering Group works mainly through influence rather than financial control, and there is therefore a requirement to know where responsibility lies.
- 6.3.2 Actions may be implemented by a single partner or by multiple partners. The 2003 plan listed 'a suggestion of possible key organisations' against each action. Again, this Plan aims to be more specific as a choice of possible partners is a recipe for nobody taking the lead. There may however be more partners involved in implementation than is possible to identify at this stage.
- 6.3.3 Where possible, time scale has been given as accurately as can be foreseen. The 2003 Plan gave short, medium and long term labels to actions, but in attempting to tighten up delivery this ambiguity has been reduced. Some actions, by their nature, will be on-going.
- 6.3.4 Funding is also as specific as possible. The Action Plan clearly distinguishes between actions which are funded and those for which funding must be found. Inclusion of unfunded items is warranted, an example being improvement of the city archives in Bath Record Office. Although funding is not in place, the objective of improvement remains valid and the action is to attempt to secure this. Actions such as this were seen in the 2003 plan as being a promise of delivery, but the plan must strike a balance between being visionary and deliverable, and inclusion of an issue cannot constitute a promise of delivery.

- 6.3.5 The programme is intended to be as comprehensive as possible but is not definitive as it is expected that new projects will arise and existing ones will be revised according to changes in circumstances. The actions are numbered sequentially and are not prioritised by order. It is envisaged that the Action Plan can be updated within the life of the plan without the need to re-write the entire document.
- 6.3.6 Public consultation on the draft of this plan resulted in a large number of comments. The Steering Group developed main themes from these responses in order to focus on key priority areas. The six key priorities (together with a seventh 'other' category) are listed below. The six priorities closely match recommendations from the 2008 UNESCO Mission Report. In order to effectively direct limited resources to the topics of highest need, the Action Plan has been organised around these priority themes.
  - 1 WH Funding and Management
  - 2 Transport
  - 3 Buffer Zone/Setting
  - 4 Planning Policy
  - 5 Public Realm
  - 6 Interpretation
  - 7 Other/ Cross Cutting actions
- 6.3.7 Most of the headings are self explanatory, but funding and management and planning policy require brief explanation. Funding and management refers to the way that WH is administered in Bath, and in particular the ability to ensure that WH is at the heart of decision making in the City. Different models of governance exist across UK WH sites and improvements to the current Bath system are worthy of investigation. Planning policy provides the framework within which development in the site is managed. Some of the UNESCO Mission Report issues concerning new development can be addressed through planning policy, and the production of clear guidance such as tall buildings guidance or the WHS Setting Study.

Abbreviations used in the Action Plan:

B&NES Bath and North East Somerset Council

EH English Heritage

OUV Outstanding Universal Value

PRMP Public Realm and Movement Programme SPD Supplementary Planning Document

WHS World Heritage Site

Key to prioritisation

BoldPriority Funded ActionsNormalNormal Funded ActionsItalic BoldPriority Unfunded ActionsItalic NormalNormal Unfunded Actions

## **Managing Change Actions**

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
1 Ensure that management & administrative arrangements are appropriate for the effective implementation of the Plan, encourage community involvement, enable partnership working & secure the required funding	1a Review the WHS Management arrangements with a view toward potentially moving to a new model placing OUV at the centre of decision making & unlocking new sources of funding	B&NES Council, Steering Group	Further funding may be required	2011-2012	Review undertaken
Priority: Funding and Management	1b Continue to hold regular Steering Group meetings	WHS Manager/ Steering Group Chairperson	Allocated budget	Bi-annual as a minimum	Regular meetings held
	1c Develop an annual work programme for WH	WHS Manager	Existing allocated budget	Annually	Programme developed & implemented, results reported to Steering Grp
	1d Produce an annual WHS report/ newsletter	WHS Manager	Existing allocated budget/possible sponsorship	Annually from 2011	Newsletter produced
	1e Continue to identify funding sources to include contributions from visitor attractions &/or local tax	All Steering Group members	No budget likely to be required	On-going	Results reported annually to Steering Group
	1f Maintain links with appropriate local, national & international bodies which support WH management & funding	All Steering Group members	WH Manager has a limited budget for memberships	On-going	Evidence reported annually to Steering Group

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
2 Ensure that risk management plans for the protection of the Site, including the fabric & relevant archives, are undertaken	2a Undertake & engage partners in a review of the risks facing the site, & evaluate how these are being addressed	WHS Manager/ all relevant partners	No budget allocated	2011/12	Review reported to Steering Group & published
& periodically updated, & resulting actions identified & undertaken  Priority: Funding and Management	2b Progress, adopt & implement the emerging Flood Risk Management Strategy	Environment Agency, B&NES	Allocated budget for strategy production – further funding required for implementation	Adoption 2010 – actions on-going	Strategy completed & adopted. Actions undertaken. Incidents of Flooding monitored.
3 Ensure that research & information about the Site is produced, collected, archived &	3a Support proposals for better facilities for the Council's archives	B&NES Culture, Leisure & Tourism	No budget allocated	On-going	Evidence that opportunities are being sought.
analysed, & made available to partners in ways that assist implementation of the Plan	3b Complete & publish the revised list of Listed Buildings for Bath	EH, B&NES Historic Environment Team	EH/B&NES (notifications to owners, etc) – may need extra budget	2010/2011	New list published
of the Plan Priority: Interpretation	3c Maintain publicly accessible Historic Environment Record (HER) library and archive	B&NES planning	Greater public access only possible following appointment of HER Officer	Late 2010 or early 2011	Comprehensive HER maintained & available
	3d Establish a WHS Research Group with a remit to identify existing research & research opportunities	Bath Spa Uni/ Bath Uni	Universities & partners, plus opportunity for funding bids	2010 onwards	Research Grp meetings held, papers published, results fed back to Steering Grp.

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
4 Ensure periodic monitoring of the condition of the site  Priority: Funding and Management	4a Identify suitable processes & partners to develop processes to assess the condition of the OUV	WH Manager/ partners	Existing allocated budgets	2011-12	Partners, processes & criteria established
	4b Establish & implement annual monitoring system	WH Manager/ partners	Existing allocated budgets	2012 onwards	Monitoring in place, reported to Steering Grp
5 Ensure that the Site & its setting are taken into account by all relevant planning,	5a Include WH policies & references in the emerging Core Strategy	B&NES Planning Policy Team	Existing allocated budgets	Public Consult. Dec 2010	Adopted Core Strategy which protects the OUV of the WHS
regulatory & policy documents (statutory & non-statutory) & by any future changes to the planning system  Priority: Planning Policy	5b Complete Building Heights Study & take this forward as a SPD	Consultants/ B&NES Major Projects, B&NES Planning Policy Team	£40k committed for completion of study. No budget currently identified for progression to SPD	Dependent upon resources. Not currently in the Local Development Scheme	Production of Study, adoption as SPD
	5c Produce a summary of the WHS Management Plan & adopt this as a SPD	WH Manager/ B&NES Planning Policy Team	Further funding may be required	Not currently on Local Development Scheme programme – target 2011-12	Production & adoption of SPD
	5d Provide general support to Planning Development Management on the use of WH policies	WH Manager/ B&NES Environment Team	Existing budgets	On-going	Record of support given reported to Steering Group
	5e Provide training as required to elected members & officers on WH issues	WH Manager/ partners/ specialists as required	Existing allocated budgets	On-going	Record of training undertaken reported to Steering Group

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
	5f Review the Bath Conservation Area boundary & produce character appraisals	B&NES Planning Service	No resource identified	Dependent upon resources	Reviewed conservation area
	5g Produce a local list SPD as encouraged by Planning Policy Statement 5	B&NES Planning Service	No budget currently identified	Dependent upon budget	Production & adoption of a local list
6 Ensure that the Site is taken into account in all relevant decisions taken by the Local Authority & other management partners	6a Review all major plans & strategies affecting the WHS & ensure account has been taken of potential impacts on OUV	WH Manager/ partners	No budget required	On-going	All plans & strategies affecting the site take account of impacts on OUV
Priority: Funding and Management	6b Ensure web sites & links are appropriate & in place	All Steering Group partners	Budgets may be required for web site changes	Periodic review of sites	All web sites linked & up to date
7 Ensure that architecture, which enhances the values of Group the site, is encouraged	7a Explore development of training for planners, elected members etc. on architecture	B&NES Planning Service	Existing training budgets	Periodic	Training undertaken Results reported to Steering
Priority: Funding and Management	7b Encourage preservation societies to clearly state their policy on contemporary architecture	Bath Preservation Trust	No budget required	Late 2010	Trust to launch its own design principles for new architecture

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
8 Ensure that adaptation to address climate change is made & promoted, with any harm to the heritage asset balanced against the public benefit	8a Undertake partnership work to seek consensus & guidance	Bath Preservation Trust with Centre for Sustainable Energy, B&NES and other partners as required	DCLG grant obtained under Empowerment Fund	2010-11	Detailed guidance produced, route to SPD adoption identified
Priority: Planning Policy					

### **Conservation Actions**

Objectives	Actions	Delivery partners	Resources	Timescale	Monitoring Indicator
9. Ensure that owners & users of historic properties/sites within, or impacting upon, the WHS & its setting, are aware of requirements for care & maintenance,	9a Produce a list of guidance required (including information for building owners), prioritise this & include production in the annual WH work programme	B&NES Planning Service/Bath Preservation Trust	No resource required for initial identification – resource will be required for production of guidance	2011 (depend on resources)	Work programme of required guidance
& have access to appropriate guidance, advice & craft skills  Priority: Planning Policy	9b Continue to offer a range of lectures & other learning opportunities for owners related to OUVs	B&NES, BPT, Universities	Existing resources	On-going	Programme of educational opportunities
10 Encourage the use of, & where appropriate prepare, programmes for planned maintenance, management &/or conservation  Priority: Other/ Cross – Cutting	10a Embed maintenance requirements into procurement of all capital works	B&NES Highways, Developers, Planning Dept. (Section 106 agreements)	Ensure funding is in place when development occurs	2010-2015	Records of Financial & other arrangements from individual schemes.

Objectives	Actions	Delivery partners	Resources	Timescale	Monitoring Indicator
11 Ensure that damaged & disused structures within the Site are monitored, repaired, maintained &, where appropriate, re-used	11a Continue to monitor & address listed Buildings at Risk (& other assets carrying OUV), & act accordingly	B&NES Planning Services, with possible outside assistance	Dependent upon adequate resources to undertake this above statutory duties. Within the framework of existing resources	On-going as the need arises	Up to date Buildings at Risk register maintained. Number of buildings on the list. Evidence of active management of neglected structures
Priority: Other/ Cross – Cutting	11b Act quickly to remove Council owned properties from the Buildings at Risk register	B&NES Property Services	B&NES Property budgets – extra resource may be required	On-going	Evidence of active management of Council owned Buildings at Risk. Number of Council owned properties at risk
	11c Instigate a Streetscape at Risk Register to identify non-building elements of the historic environment under threat	World Heritage Manager/Bath Preservation Trust	Existing budgets/ volunteer assistance PRMP	2011	Register produced Assets identified within Bath Pattern Book & enhance. delivered within each spatial project
	11d Continue to progress enhancement & conservation works through the WHS Enhancement Fund /seek new funding	WH Enhancement Fund	Continued funding from existing & new partners/ contributors is required	On-going	Annual report of completed projects

Objectives	Actions	Delivery partners	Resources	Timescale	Monitoring Indicator
12 Ensure that landscape & natural elements of the Site & its setting, including heritage sites & their associated remains, are protected, acknowledged, understood &	12a Bring forward the information paper Bath WHS Setting Study (Oct 2009) as a SPD, & ensure SPD identifies key views	B&NES Planning Service	Further funding required	Dependent upon resource availability	Study adopted as a SPD
managed 12 alongside the to Site eff ex Priority: Buffer pr Zone/Setting co ne ap for zo pr the wi er	12b Continue to monitor the effectiveness of existing setting protection & consider the necessity of applying a formal buffer zone	B&NES Planning Service	Within existing budgets	On-going	Monitoring undertaken, evidence base gathered & reported to Steering Group
	12c Include protection of the hot springs within the emerging Core Strategy	B&NES Planning Service	Within existing budgets	2010-11	Policy protection included in adopted Core Strategy
	12d Produce a Trees & Woodlands Strategy for the WHS	B&NES Parks/ Planning Service/ other partners	No budget identified	No current timetable	Strategy produced & adopted by B&NES
	12e Continue to progress possible transfer of Beechen cliff from the Council to the National Trust	National Trust/ B&NES	Budget for preliminary investigation identified, no B&NES budget for transfer of land	Target 2011	Investigation completed Ownership & management transferred to the National Trust.

Objectives	Actions	Delivery partners	Resources	Timescale	Monitoring Indicator
13 Ensure that awareness & understanding of the archaeological remains are increased, &	13a Publication of 'Bath Urban Archaeological Assessment' research and planning tool	B&NES Planning/ EH	To be identified	2011	Publication and official launch of document
improve the range & accessibility of the associated artefacts & information	13b Revision of Archaeology in Bath SPG as new Supp. Planning Document	B&NES Planning	Only possible if Archaeological Officer's time is freed up by appointment of HER Officer	2011/12	Publication and official launch of document
Priority: Interpretation	13c Revision of B&NES Archaeology web pages to reflect changes in national guidance (PPS5) for the management of archaeology	B&NES Planning	Only possible if Archaeological Officer's time is freed up by appointment of HER Officer	2011/12	Launch of new B&NES Archaeology web pages
14 Ensure that the public realm is seen as, & understood to be, a significant, historic & cultural element of the Site & that alterations are of a high standard to take this into account	14a PRMP to provide pattern book for landscape features in public realm to manage asset & inform material choices for all future improvement work	B&NES Major Projects	Budget in place as part of PRMP - £680k to deliver all public realm preparatory projects	2010-2011	Compliance with pattern book. Environmental improvement.
Priority: Public Realm	14b Produce a street lighting strategy for the WHS as part of PRMP pattern book	B&NES Highways/ PRMP	PRMP budgets  – £680k for preparatory works	2010-2015	Production & adoption of a strategy/ programme
	14c PRMP adopted & programme of works identified to achieve incremental improvement	B&NES Major Projects	Initial PRMP funding in place. Street improvement projects for Union/Stall St, Bath Street funded to £1.6m	2010-2015	Development & execution of projects

# Interpretation, Education & Research Actions

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
15 Ensure that the current provision of interpretation is established, &	15a Complete Interpretation Strategy for the WHS	B&NES Heritage Services/ WH Manager	None identified	2011-12	Interpretation strategy in place
provide high quality, accessible facilities & materials that present a comprehensive view of the	15b Continue to explore the feasibility of a City Museum/ WHS Interpretation Centre	All partners	None identified	On-going	Evidence of discussions, project proposals
Site's values & management issues	15c Investigate development of an improved WHS website	Steering Group	None identified	2011 – dependent upon resource	Web site in place
Priority: Interpretation					
16 Ensure that the Site is used widely & effectively as a resource for learning in all sectors &	16a Continue to use UNESCO WH day as an opportunity for learning & celebration	Steering Group/ B&NES Heritage Services/ Bath Preservation Trust/ Museums	No permanent budget	Annually in April	Numbers attending/ positive publicity
phases of education & training  Priority: Interpretation	16b Continue to promote the use of the WH Education pack in schools & refresh as necessary	Bath Preservation Trust, B&NES Education	-	Periodically as required	Continued take up & use of the pack/ feedback from teachers
	16c Continue to train 'visitor ambassadors' in WH matters	World Heritage Manager, B&NES Heritage Services	No budget	Periodically as required	Consistent message rolled out to visitors – examples monitored.
	16d Implement City information system & heritage interpretation within the suite of PRMP outputs	B&NES Major Projects	Funded under PRMP programme: CIVITAS & Growth Point funding to £2m	2011	Information system in place User satisfaction/ feedback

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator		
	16e Provide annual outreach event(s) to promote the HER and archaeology in the district	B&NES Planning and Heritage Services	Only possible following appointment of HER Officer	2011	Evidence that event has been held and number of attendees		
Physical Acc	Physical Access Actions						
17 Ensure that all traffic, transport & pedestrian management schemes enhance the	17a Bring forward a Comprehensive Traffic Management Plan for the Site	B&NES Transport	None identified	unknown	Production of the plan		
values of the Site Priority: Transport	17b Implement CIVITAS package elements of cycle hire & Wayfinding schemes	B&NES Transport	CIVITAS funding	2011-2015	Vehicle traffic volumes Usage of cycle hire.		
18 Work to reduce volumes of vehicular traffic through the Site including coaches, & develop	18a Implement establishment up of a freight trans-shipment depot outside Bath	B&NES Transport	Funding secured under CIVITAS programme	2011	Depot established. Monitor HGV numbers passing through site		
alternative modes of transport in consultation with all stakeholders (local, regional & visiting)	18b Progress the Closure of key streets and spaces to vehicular traffic	B&NES Transport, Bus operators	Investigative works are within existing PRMP resources via proposed programme for street scape improvements	2011-2015	Street closures implemented		
Priority: Transport	18c Support the City Car Club initiative	B&NES Transport	•	2010-2011	Provision of new hybrid vehicles. Monitoring of usage.		

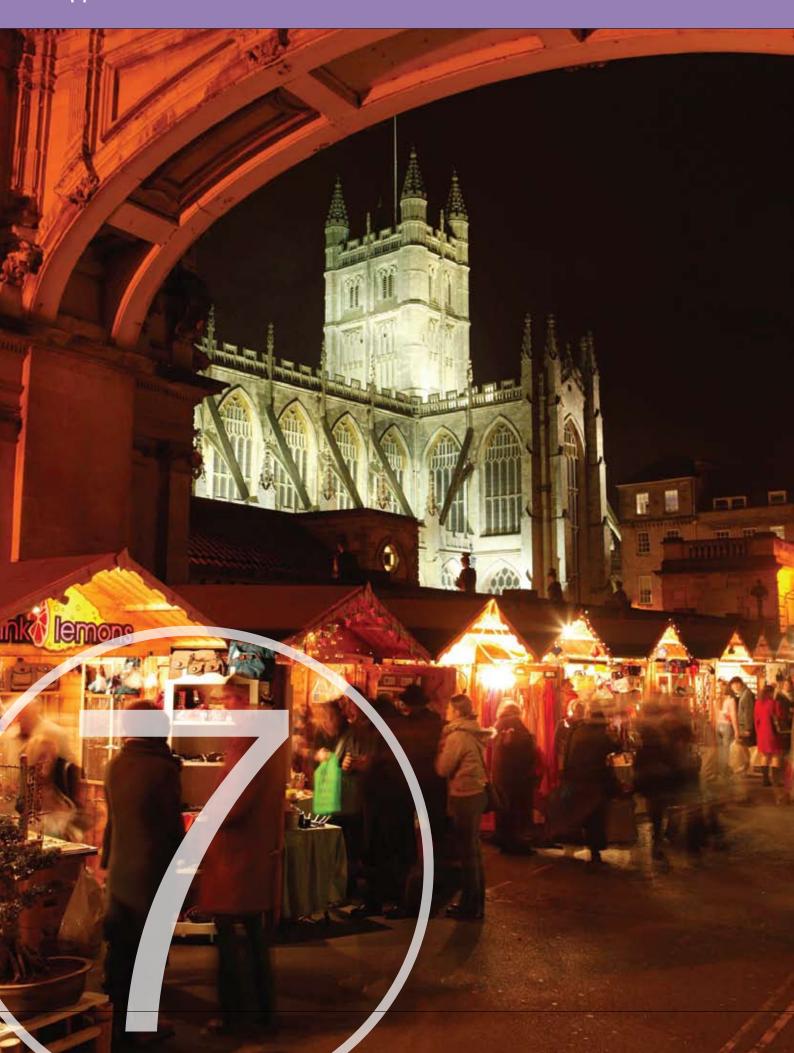
Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
19 Work with public transport providers to improve services, both within & around the Site, & to increase the use of public transport	19a Continue to implement the Greater Bristol Bus Network provisions, including A367 route & A4 scheme	B&NES Transport First Bus Group	Joint funding by Dept. of Transport, First Group, Local authorities (x 4), developers. Total package £69.8m	2010 onwards	Bus patronage Figures. User satisfaction survey. Bus reliability & punctuality. Percentage of population withir 45 minutes journey time of Bath centre.
Transport	19b Implement Bath Transport Package provisions of Park & Ride expansions, Bus Rapid Transit construction, city centre improvements, showcase bus route upgrade & active traffic management measures	B&NES Transportation	Govt. funding currently on hold pending spending assessment	Subject to Government spending assessment Autumn 2010	Implementation of measures. Traffic flow figures. User satisfaction surveys. Park & Ride usage.
20 Work to increase the safety, accessibility & enjoyment of	20a. Implement 'Two Tunnels' project	Sustrans, B&NES, Heritage Lottery Fund	£1.9m	Due to open at the end of 2011	Route open for use. User numbers
the Site for pedestrians & cyclists, & give them priority over motorised traffic Priority:	20b Implement Bath Rapid Transport route with cycle path provision	B&NES Transport	Part of the £53m Bath Transport Package	Depend. Upon outcome of Dept. for Transport funding bid process	Route open for use. User numbers
Transport  21 Work to provide high quality access for all those with mobility needs, without compromising the Site's values  Priority: Other/ Cross – Cutting	21a Continue to identify & implement opportunities to make the historic environment more accessible	B&NES Highways, Building Control, Accessibility Groups	Generic action  – Budgets to be identified on a individual project basis	On-going	Individual projects to be reported back to Steering Group in annual report

# Visitor Management Actions

Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
22 Work to provide appropriate, high quality & welcoming environments & information for visitors at the main entry points to the Site  Priority: Public Realm	22a Instigate replacement & upgrade of the roadside City entrance signs  22b Seek to provide WHS welcome signs in Bath Spa Railway Station, & other locations as appropriate	B&NES Highways, Major Projects Steering Group Bath Tourism Plus, Rail Operator	None identified – PRMP budgets to be investigated Resources required for potential signage & any fee. No identified budget.	Target 2011 2010 – 11	Signage incorporated at the station
23 Work to encourage visitors to explore the wider Site, both intellectually & physically, & extend the necessary infrastructure & visitor management safeguards to currently undervisited areas	23a Continue the WH City Trail, evaluate success & repeat or extend as appropriate	WH Enhancement Fund	£1,000 Re-print of 6,000 in 2010. Further resources will be required for future re-prints	On-going	Uptake of leaflet. Feedback on leaflet.
	23b Participate in Year of the Museum which will include a World Heritage Trail	Bath tourism Plus/Bath Preservation Trust	Budget under discussion	2010-11	Podcast trail downloadable
Priority: Interpretation					
24 Work to encourage visitors to use more sustainable forms of transport when travelling to & in the Site  Priority: Transport	24a Progress joint SW WH sites marketing scheme	WH Manager. Stonehenge, Avebury, Dorset & East Devon Coast, Cornwall & West Devon Mining Landscape WH Sites	Total project cost approx £42,000. B&NES contribution £500 (subject to budget process) Funding provisionally identified	2011 – pre Cultural Olympiad	Enhanced web-site with wider coverage Web site hits
	24b Introduce trial hybrid fuel low carbon park & ride buses	First Group, B&NES Transport	Funding secured under the CIVITAS project	Late 2010	Trial bus operating in Bath
	24c Introduce new map base & wayfinding system	B&NES Major Projects	PRMP budgets	2011-2012	New system in place

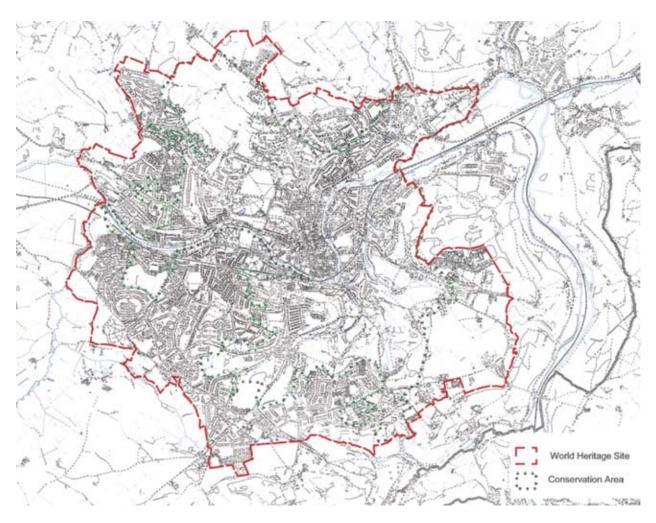
Objectives	Actions	Responsibility for delivery	Resources	Timescale	Monitoring Indicator
25 Ensure that visitor facilities & information are high quality, & reflect the status of the Site	25a Promote co-ordination between visitor attractions through the Visitor Attraction Forum	Bath Tourism Plus, Independent Museums & attractions	Budgets to be identified on a individual project basis	On-going	Review actions on an annual basis in report to the Steering Group
Priority: Other/ Cross – Cutting	25b Encourage opportunities to use WHS status & logo in promotion, marketing & civic signage within UNESCO guidelines	All partners	Should not require further budgets	On-going	Record actions on an annual basis & report to Steering Group

# Appendices



# 1 Map and location details

- A1.1 Map (see below)
- A1.2 Location details
- A1.3 Name of the World Heritage Site: City of Bath
- A1.4 Date of Inscription onto World Heritage List: 1987
- A1.5 Country: England, within the United Kingdom
- A1.6 Region: South West England
- A1.7 Local Authority: Bath & North East Somerset Council (Unitary Authority)
- A1.8 Geographical Co-ordinates:
  - British Ordnance Survey
  - National Grid Reference
  - (Bath Abbey Church) ST 751648
  - Longitude: 2°22'W
  - Latitude: 51°23'N



Map to be improved in final publication

# 2 Summary history of the site

# The Foundation of Bath

- A2.1 The exact date of Bath's foundation as a settlement is not known. There has been human activity in the area since c.5000 BC but it is difficult to establish what, if any, actual settlement there was. There are Bronze Age burial mounds (tumuli) on Bathampton Down, to the east of the city, and an enclosure that dates from the Late Iron Age. This may have been used for seasonal pasture activities, rather than regular or continual inhabitancy.
- A2.2 There is evidence that role of the Hot Springs was sacred before the Romans monumentalised. During excavations of the Roman reservoir in the 1970s, a gravel and boulder causeway was discovered leading to the spring head, dating to the Late Iron Age. Around the causeway were found a number of Celtic coins. It is believed the native goddess Sulis was worshipped here, with offerings cast into the spring. It is known that the Romans tended to build on sites of native power or religious significance in order to establish their dominance as rulers.

## Roman Bath

- A2.3 When they invaded Britain in 43 AD, the Romans moved rapidly through the country and are thought to have established a military encampment in the Bath area, traditionally supposed to be at Bathwick, although substantial evidence has yet to be found. Cleveland Bridge (linking London Road to Bathwick) is the location of a natural river crossing with existing routes travelling north and south and this became the junction of four major Roman roads showing the strategic importance of the crossing.
- A2.4 The Temple of Sulis Minerva (see below) has previously been thought of as the stimulus for the development of the town of Aquae Sulis. However, the archaeological evidence from the two main areas of continued Roman occupation the central area, and the Walcot Street / London Street area is very different and seems to relate the largely separate development of the town and the temple area.
- A2.5 In the 60s AD, the great Temple of Sulis Minerva was built. The temple precinct, including thermal healing baths, used the Hot Springs for worship, health and social interaction. The engineering feat the Romans achieved is astonishing for until the Temple was built the Springs bubbled up out of open marshes. A lead lined reservoir was built where the Springs rose and a sluice gate arrangement was put in place to cope with the amount of sand brought to the surface by the water. The spring overflow can still be seen today in the Roman Baths Museum, stained bright orange by the oxidised iron salts. The reservoir formed the sacred pool of the temple, near to the sacrificial altar which was in the courtyard of the great Classical temple building.
- A2.6 The area appears to have consisted solely of the temple and baths precinct until the 2nd century when other large public buildings were built. Development continued into the 4th and possibly 5th centuries. In the 2nd century the area, about 24 acres, may have been enclosed by an earthen bank. The stone walls, which are believed to have followed the line of the bank, were built in the 3rd or 4th centuries. It is only in the 4th century that evidence for domestic or industrial activity is found and the change seems to have been on a large scale, with buildings being erected over part of the temple precinct itself.
- A2.7 Prior to the building of the temple, there was already enough activity in the Walcot Street / London Street area to suggest a settlement was developing. Finds from the area around Cleveland Bridge date from 48-63 AD, before the temple was constructed. This location would have been supported by good communications and passing trade and the presence of a military establishment would have required goods and services. The settlement included river and street frontage and contained a mixture of timber and small masonry buildings, later to be replaced by more substantial masonry structures. Activity was both domestic and industrial. There was a cemetery unusually close into area occupied by the living (these were by law kept completely separate).

## Saxon Bath

- A2.8 The Romans left Britain in the early 5th century and after a battle at Dyrham in 577 AD Bath was taken over by the Saxons. The Roman buildings decayed and were gradually demolished, providing building material for the Saxon town that grew. Strategically, Bath held an important location: the city sat on the political boundary between Mercia (north) and Wessex (south), two strong Saxon powers. Originally held by Mercia, the town was transferred to Wessex in the late 9th century, in the time of King Alfred.
- A2.9 The Wessex kings set about improving the defences of Bath and repaired the Roman walls that were still standing, though probably in a poor condition. In 901 AD the Witan (Saxon parliament) was held in Bath and later a mint was established. The highlight of the Saxon era was undoubtedly on 11 May, 973 AD, when Edgar was crowned first king of all England at the monastery in Bath.
- A2.10 The monastery of St. Peter was an ancient foundation, established by the mid-8th century. From the fragments of Saxon Bath that still survive, it seems that the Saxons built their religious buildings both inside and around the Roman Temple of Sulis Minerva.
- A2.11 One cemetery, believed to belong to the monastery, has been located in the precinct of the Roman Temple where the East Baths project out beneath Kingston Parade. A second has been found to the north of the King's Spring, which may have belonged to either the monastery or the nearby Saxon church replaced by the medieval church of St Mary de Stalles. The exact location of the monastery is not known but these cemeteries suggest it was close to the existing Abbey church. Though the physical remains are elusive, the reputation of the monastery was well established in the Saxon era and in 973 AD it was considered a fitting place for the crowning of Edgar.

## **Norman Bath**

A2.12 Saxons stayed in the West Country until 1013, when the area surrendered to the Danish king Swein at Bath. Though the town is thought to have been largely unaffected by the arrival of the Normans in 1066, in the unsettled period that followed the death of William the Conqueror in 1088 Bath was at the centre of a plot to displace the new king William II with his brother, Robert of Normandy. The revolt was supported by the Norman bishops, whose base was at Bristol, and because Bath was largely owned by King William the town was sacked. The disruption caused by this event marked a new era in Bath's history.

## The Medieval Town

- A2.13 In 1090, John of Tours (also called de Villula) was appointed as Bishop of Wells. The new bishop decided to move his seat to the monastery church of Bath and a new era in building began. The religious complex that John of Tours planned and started to build (it was finished by Bishop Robert of Lewes who died in 1166) took up an entire quarter of the Medieval walled town.
- A2.14 The new cathedral was one of the largest of its kind in England and far larger than the 16th century Abbey church that exists today. At this time the walled town covered about 24 acres, much the same as the Roman complex, of which only 3 acres belonged to the bishop, with most of the rest belonging to the king. John of Tours paid 500 pounds for all of the king's property in Bath and the church became the largest power in the city, a power that would last for 450 years.

# King's Bath

A2.15 John of Tours was probably also responsible for the renovation of the King's Bath, largely demolished and then forgotten in Saxon times. A new bath was built over the Roman reservoir (though they may not have known it was there under the surface) and it was developed into quite an extensive complex with additional baths at the two other main springs, the Cross and Hot Springs. From later drawings it is apparent that there were distinct baths for healthy and diseased bathers, with areas for undressing, sheltered alcoves around the edge of the bath for resting and privacy (the baths were open to the sky) and refreshment facilities.

A2.16 Though it is not clear how much attention was paid to the Hot Springs during Saxon times, by the 12th century the baths were well known throughout Europe for their healing properties and, as in Roman times, travellers came from far away to use them.

# St John's Hospital

A2.17 In about 1180, the Hospital of St John the Baptist was founded by Bishop Reginald to benefit the poor of Bath and was placed under the control of the monastery. Land was given to the hospital between the Cross and Hot Baths and the city walls for the hospital buildings, and parcels of land over a wider area were granted to them for income. It seems to have been fairly standard medieval hospital with an infirmary building and a chapel at the east end. Other buildings would have been kitchen and barn and there would have been a courtyard and garden. The hospital has had a varied history, with periods of diminished prosperity, but it has always been active since its foundation.

## Late Medieval

A2.18 With the removal of the bishopric back to Wells in 1218, the abbey church in Bath ceased to be a cathedral and returned to being a priory church for the monastery. While the town developed into a thriving wool market, the religious buildings and baths gently declined, until the town's regional market was of greater importance than either. In 1499, Bishop King decided to replace the almost ruined Norman cathedral with a new church, but by the time of the Dissolution in 1536 the church was not finished: it was gutted and left as a ruin.

# The Rise of the City Corporation

- A2.19 In the 16th century, the power balance in the city changed completely. The church, which had been influential for over 400 years, was going through the unsettled period of the Dissolution and the civic authorities, in the form of the City Corporation, were gaining strength. The Letters Patent of 1552 gave the mayor and citizens of Bath all the property owned by the priory. In 1590, Queen Elizabeth compounded this when she authorised a new charter of incorporation and finally gave all the powers of the bishop and prior to the Corporation.
- A2.20 One of the most important aspects of the charter was that it extended the boundaries of the city beyond the medieval walls, to include Barton Farm and Walcot, and gave the city the potential to expand. Also as a result of the charter the abbey church, still unfinished, was reconsecrated as the parish church of St Peter and St Paul, which it remains to this day. The new status of the church meant it was the principal place of worship for the city and as such it was gradually renovated by the city authorities.
- A2.21 The baths, traditionally Crown property, had been given to the Corporation in 1552. The 16th century saw a number of publications extolling the virtues of bathing and the Corporation, realising the potential of the baths, set about renovating them. Mostly still the medieval structure, the Corporation added the Queen's Bath (originally known as the New Bath) in 1576. There were also two other baths: the Cross Bath, mainly used by diseased bathers, and the Hot Bath. The Hot Bath in particular was improved in the 16th century to 'gentrify' it. The growing number of visitors, attracted by the improved facilities, led to a greater number (and higher quality) of lodging houses. This was the start of the mass tourist trade in Bath.
- A2.22 The 17th century saw attempts to clean up the city. Bath was still small, largely confined within its walls, but had a steadily growing population. In 1643, during the Civil War (1642-9), Parliamentary forces occupying Bath were defeated by the Royalists in a battle on Lansdown Hill, just north of the city. Though the city did not expand out into the countryside during this century, it changed greatly within the walls. The two storey thatched houses were replaced with four storey tiled buildings, filling in empty spaces and defining more than ever the differences between the poor and the wealthy. Outside the walls, the city was surrounded on most sides by orchards and market gardens.

# The Beginning of Georgian Bath

- A2.23 Bath increased in popularity throughout the 1600s and in the later decades of the 17th century was established as a fashionable resort. The visits of Queen Anne in 1692 (as Princess) and then in 1702 and 1703 were seen as confirmation of the good society that was to be had in Bath and its popularity grew further. In 1700 the population was c.2000, but with the growth and popularity that followed, by 1800 this had risen to c. 30,000.
- A2.24 In response to the increasing numbers of visitors, the first Pump Room was built 1704 -1706 between the Abbey Yard and the King's Bath. As more visitors came, the city's facilities were improved which in turn brought more visitors. Pressure for land grew sharply and those who held land outside the city walls grasped the opportunity now presented to them. Trim Street (1707) was the first speculative development to breach the city walls, and areas such as Barton Farm to the north and Kingsmead to the south soon became available for expansion.
- A2.25 The arrival in Bath of Richard (Beau) Nash, Ralph Allen and John Wood hailed the city's golden era as the toast of society flocked there every year to see and be seen. Beau Nash arrived in Bath in 1704 and quickly established himself as Master of Ceremonies, imposing on society a set of rules that carved out new standards of behaviour. Ralph Allen made his fortune in developing the Postal Service and foresaw the need for building material, buying up most of the stone mines that surrounded Bath in the 1720s. John Wood was an architect whose extraordinary vision for a new city influenced development in Bath for a hundred years.

# **Building the New City**

- A2.26 The building of Georgian Bath took roughly 125 years, starting at the beginning of the 18th century and finishing around 1825. Initially it was a response to the increasing numbers of visitors, with the first Pump Room built in 1706 on the site of the existing building and the lower Assembly Rooms in 1708 on Terrace Walk. These modest buildings were later replaced with the current examples, much grander in both style and scale, reflecting the growth during the 18th century in numbers of visitors and expectations of facilities and status.
- A2.27 The medieval town, as Bath essentially still was in 1700, was small, confined by its walls, and the buildings were almost all in the later medieval tradition with narrow streets and overhanging facades. It is very difficult now to trace this town except in the street pattern, since the Georgian rebuilding was so comprehensive and in such a different style.

# John Wood

A2.28 John Wood's plans changed the face of the city forever. Though he met mixed enthusiasm and his plans were not completed, his achievements were immense, with some of the earliest and most accomplished Georgian buildings and a town planning tradition that can be seen in virtually every development in Bath until the Victorian era. Wood's example was followed by many different architects, both during his lifetime and after his death, with the result that the town expanded very rapidly.

# **Bath Stone**

- A2.29 Despite so many different architects working independently, Bath has a rare visual homogeneity. This is due partly to John Wood's influence but largely to the almost wholesale use of Bath stone, from the mines around the city. This oolitic limestone has been used at least since Roman times for building in Bath and the quarries and mines grew up close to the city at Combe Down and Odd Down and other places such as Box.
- A2.30 Ralph Allen's reasons for buying the stone mines in the 1720s were not so much to supply the city with building material but to promote its use in London, where he hoped to rival the pre-eminence of Portland. Allen was not successful in this plan, but after his death stone from Combe Down was used at Windsor Castle and Buckingham Palace. The availability of the stone locally has given a harmony to Bath's buildings that spans two thousand years of changing styles and techniques.

# Georgian Architecture

- A2.31 The highlights of architecture in Bath must be the crescents and terraces, particularly where they were built on the hills above the old city to make use of the views and countryside setting. John Wood did not work in isolation; there were many architects active in the 18th century, the majority of them local to Bath. The topography of the city was a challenge and it dictated much of the method of building and affected the continuous line of the terraces as they climbed up the steep hills.
- A2.32 For the bigger projects such as Queen Square and the Circus, huge amounts of earth were moved in attempts to level the sites. At Camden Crescent, the instability of Beacon Hill resulted in the collapse of the western end of the crescent and only the houses built on solid rock could be completed. Terrace design became more sophisticated throughout the century, particularly in dealing with the slopes. John Pinch's work of the 1820s, the last of the great terraces to be built, cleverly incorporated the inclines into the decorative finish of the design.
- A2.33 The impact of the 18th century on the city, both physical and visual, was enormous. The scale of the rebuild spared very few of the medieval buildings, though more material may survive behind the facades. Visually the city was transformed. The expansion of the city was rapid, climbing the slopes of Lansdown and stretching out east and west into the countryside.
- A2.34 The design of the town houses had a significant physical impact on the city. The 18th century roads are built on vaults, connected to the basements of the houses on either side of the street: the excavation of these basements and vaults has compromised much of the medieval archaeology of Bath. New roads such as Union and Bath Streets (c.1790) were cut through existing rows of buildings, altering parts of the medieval street pattern and others were widened and refronted.
- A2.35 Bath's position as a society favourite was in part due to its gambling establishments, of which Beau Nash was both a great supporter and regulator. The waters were still used for drinking and bathing but Bath's main attraction was self-perpetuating: society gathered there to be part of fashionable society. The season lengthened from a few weeks to six months and was an essential part of high society's calendar. The city became dependant on the tourists for its wealth: the number of visitors increased by ten times during the 18th century.

# The Decline in Popularity

- A2.36 Towards the end of the century, Bath's popularity with the aristocracy dwindled and the nature of the visitors changed from high society to the emerging middle classes. More people began to retire to Bath and it became safe rather than exciting. New anti-gambling laws and the death of Beau Nash added to the decline.
- A2.37 Physical expansion came to an abrupt halt in 1793 with the financial crisis brought on by the war with France. This led directly to several schemes going unfinished, most notably perhaps Great Pulteney Street, the suburbs of which were never built, leaving the main street in relative isolation. When stability returned in the 1820s, building energy was channelled into the newly popular semi-detached villas. The population continued to grow quickly and Bath's reputation became that of a quiet refined resort, in architecturally excellent surroundings.

# **Victorian Changes**

- A2.38 One of the greatest changes the Victorians wrought on Bath was the introduction of the railway and its grandiose architecture. Isambard Kingdom Brunel constructed the Great Western Railway Paddington to Bristol line with fine viaducts, bridges and stations and southern Bath in particular was affected, though the style of these structures was carefully designed to relate to the style and grandeur of the architecture of Bath. There were many architects who, whilst adopting Victorian architectural advances and stylistic preferences, also continued to work in harmony with the buildings of Georgian Bath, thus adding greatly to the visual homogeneity of the present city. Several architects, such as Henry Goodridge (1797-1864), were prolific and were influential in the development of the city in the mid-later 19th century. The Victorians also made many smaller alterations to the Georgian city as technology progressed, particularly with the introduction of plate glass in windows.
- A2.39 The highlight of the Victorian era was the rediscovery of the Roman Baths complex, with the remains of the Great Bath found in 1880, most of which was achieved through the determination of Major Davis, City Surveyor of Work and architect. New baths were built at the western end of this complex allowing visits to the remains which the city saw as an opportunity to prop up their flagging tourist trade. The Pump Room extension, the Concert Hall, was completed by 1897 and the same architect was then employed to extend the Guildhall and add to it the Victoria Art Gallery. The last large Victorian addition to the city was the Empire Hotel. Bath's popularity as a tourist destination did improve in the first decades of the 20th century, but it was not to recover the social status it had enjoyed throughout the 1700s.

# 20th Century

A2.40 In 1930, before similar Government legislation was prepared, Bath developed a prototype Green Belt based on a Regional Plan written by Patrick Abercrombie and BF Brueton. The plan highlighted the special quality of the landscape around Bath and the need to conserve its character and prevent 'straggling development'. These restrictions were incorporated into a Bath and District Planning Scheme in 1933.

# **Bomb Damage**

A2.41 On 25 and 26 April 1942, Bath was hit by bombs as part of the World War II Baedeker raids. The suburbs felt most of the damage, with a few notable exceptions such as the gutted Assembly Rooms (newly refurbished by the National Trust in 1938) and the destroyed south side of Queen Square. Large swathes of artisan buildings in the west and south of the city were lost, in highly residential areas such as Oldfield Park and Kingsmead. The higher status Georgian buildings were largely restored but the artisan suburbs were generally cleared and redeveloped.

# **Town Planning**

- A2.42 In 1945, Sir Patrick Abercrombie wrote his Plan for Bath, a proposal for city-wide development to replace the war damage and move into a new era of town planning. This document, in parts far sighted though largely unrealised, furthered the Green Belt concept and planned for residential developments inside the existing city boundary. It recognised the desirability of retaining Bath's visual link to surrounding countryside and promoted better standards for residential housing and the incorporation of green open spaces and community facilities.
- A2.43 Further to the early Green Belt provision, Bath saw the first jointly funded grant scheme in the country between central government and the city council, to grant aid to historic building conservation. In 1955/6 the Bath Town Scheme offered grants for the cleaning of the stone facades of the Circus.

- A2.44 Planning controls, however, were altering and the emphasis on incorporating landscape design into new developments was lost. Despite its early protection of Green Belt and participation in the post-war designed landscapes, Bath fell victim to the country-wide blight of wholesale historic building destruction. 18th and 19th century suburbs were cleared in their entireties resulting in the huge loss of fine architecture. The replacement developments no longer considered landscape design as a necessary or even desirable feature. Bath lost much of its historic artisan buildings during this period. The conservation movement that formed in response to the destruction of historic buildings, and the success it achieved in stopping that destruction, helped to influence national attitudes to historic buildings.
- A2.45 Many smaller Georgian artisan dwellings, and in some cases entire suburbs, were lost in the World War II bombing raids (April 1942) and also during the 1950s and 60s when the City Council demolished historic buildings for housing improvements. The successful conservation movement formed to resist the so-called 'Sack of Bath' also helped to influence national attitudes to the conservation of historic buildings.
- A2.46 By the later 1960s, changes in attitude were emerging. Studies were undertaken into the management of traffic and development specifically in historic towns. Gradually an improvement took place, and more thought was put into redevelopment showing a growing awareness of the issues involved in modern life in a historic town.
- A2.47 Bath's suburbs continued to expand in the 20th century and the decline of manufacturing industry in the late 20th century also changed the city's landscape and economy. However, the city's extensive remains form a unique and outstanding ensemble that continues to support a thriving 21st century community.

# 3 Justification for inscription

A3.1 Inscription onto the list of World Heritage Sites is based upon the site meeting one or more of six criteria measuring outstanding universal value, and fulfilling two additional tests of authenticity and the provision of adequate legislative protection. These criteria are set out in the UNESCO World Heritage Committee's 2002 Operational Guidelines for the Implementation of the World Heritage Convention.

# Criteria for outstanding universal value

## The site must:

- i. represent a masterpiece of human creative genius; or
- ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design; or
- iii. bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared; or
- iv. be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history; or
- v. be an outstanding example of a traditional human settlement or land-use which is representative of a culture, especially when it has become vulnerable under the impact of irreversible change; or
- vi. be directly or tangibly associated with events or living traditions, with ideas, or beliefs, with artistic and literary works of outstanding universal significance.

# Two further tests

#### The site must:

- i. meet the test of authenticity in design, material, workmanship or setting
- ii. have adequate legal and/or traditional protection and management mechanisms to ensure the conservation of the nominated cultural properties
- A3.2 Bath was inscribed as a World Heritage Site in 1987 for criteria i, ii and iv. The city also meets the two further tests of authenticity and adequate legislative protection.

# Meeting criteria i, ii and iv

# Criterion i. represent a masterpiece of human creative genius

- A3.3 In the 18th century, Bath prospered and expanded rapidly, changing its character from medieval to classical in the period of one hundred years, and providing the city with much of its outstanding universal value. Several driving forces created the conditions for this expansion, including the city's popularity as a spa, the demand for housing, and the absence of local, ruling autocrats. But it was the presence of several ambitious personalities that drove this change.
- A3.4 Richard 'Beau' Nash (1674-1761) was a gambler who came to Bath in 1705. He saw an opportunity to build on its popularity as a spa and to create a social centre unrivalled outside London. He was largely responsible for the city's incredible popularity throughout the 18th century, and contributed significantly to defining behaviour for the upper classes with the 'rules' he devised for Bath society. Bath's position as a society city, second only to London, prompted the physical expansion of the city and enabled architects such as John Wood to attract patrons and builders to their schemes.

- A3.5 Ralph Allen (1693-1764) was an entrepreneur with exceptional foresight who bought extensive areas for mining stone. He built up that industry to the point where not only was he able to supply all of Bath's stone needs at a time when the city was expanding exponentially, but he was also targeting markets in London. It is through his efforts to build up the stone mines, particularly at Combe Down and Odd Down, and to release money for speculative development, that much of the 18th century building was possible.
- A3.6 The best known and most influential architects at work in Bath in the 18th century were John Wood the Elder (1704-1754) and his son, John Wood the Younger (1728-1781). Their combined contribution to developments in architecture, landscape design and town planning is outstanding, and paved the way for many other architects in Bath and Britain.
- A3.7 John Wood the Elder returned to his native Bath in 1727 with the extraordinary vision to transform the small medieval walled city into a monumental, classical city. His vision included grand public buildings and formal open social spaces, including a Forum, Circus and Imperial Gymnasium for the exhibition of sports. The plans were radical and widely rejected by the city corporation, forcing Wood to continue independently to produce speculative individual developments. The architecture that he created in pursuit of his vision was highly innovative and influential, and changed forever the character of Bath and the art of town planning in Britain.
- A3.8 Wood's main works were Queen Square (1729-36), Prior Park (begun by Wood c.1733, and completed by Richard Jones c.1750), North and South Parade, with Pierrepont Street and Duke Street (1740-43), the General (now Royal Mineral Water) Hospital (1738-42), the Circus (begun 1754) and Gay Street (c.1750). In addition to remodelling commissions for patrons such as the Duke of Chandos, including St John's Hospital (1727-30), Wood also worked extensively around England and Wales, including Bristol's Exchange and Market (1741-3) and Liverpool's Exchange (now Town Hall, 1749-54).
- A3.9 Wood's vision for Bath was heavily influenced by ancient Roman remains, the classical architecture of the previous century and particularly the work of Andrea Palladio. Wood was something of an eccentric, producing architectural writings based heavily on the mythology and architecture of ancient Britain. He found inspiration in stone circles, particularly Stonehenge and Stanton Drew, and myths such as that of Prince Bladud, who is supposed to have discovered the Hot Springs and their curative powers whilst wandering as a swineherd and suffering from leprosy.
- A3.10 John Wood the Younger completed the Circus after the death of his father, but was also an extraordinary architect in his own right. He was involved in all aspects of Bath society, and was instrumental in gaining the funding for the New Assembly Rooms (1769-71), constructing the building to his own design. The interior was unlike anything seen in Bath at that time, and was famed for its beauty and opulence. Other examples of Wood's work in Bath include Rivers Street (c.1770), Catherine Place (c.1780) and the Hot Bath (1773-7).
- A3.11 The Woods' greatest achievement, however, is undoubtedly the Royal Crescent (1767-75) which is approached from the Circus along Brock Street (c.1767). This massive endeavour, built like Queen Square and the Circus on green fields on the edge of the expanding city with speculative funding, became one of the most iconic and influential pieces of architecture and street design of the 18th century.
- A3.12 While the Woods undoubtedly produced much of the finest Palladian architecture of Bath, there were many other architects who were active in the 18th and 19th century and who also produced work of outstanding quality and innovation. The following is a selection.
- A3.13 Robert Adam (1728-92) was responsible for Pulteney Bridge (1769-74), another iconic structure. Highly original, save for Palladio's un-built proposal for the Rialto Bridge in Venice, it introduced a freer Palladian style than that used by the Woods. Adam's work in Bath particularly influenced architects such as Baldwin.

- A3.14 The work of Thomas Baldwin (1750-1820) can be seen all over Bath, in some of the key buildings such as the Guildhall (1775-78), the Bathwick estate (including Great Pulteney Street, c.1788-95) and the Pump Room colonnades (1791-92), as well as many smaller terraces. The Guildhall contains some of the finest 18th century civic building interiors in Britain. In his role as city surveyor, Baldwin also coordinated improvements to the bathing facilities, including the rebuilding of the Cross Bath (c.1786) and the creation of Bath Street (1791).
- A3.15 John Palmer (1738-1817) is best known for Lansdown Crescent (1789-93), which followed the achievements of Wood's Crescent and took it much further with its sinuous curves and harmony with the landscape.
- A3.16 John Pinch (1770-1827) produced a series of elegant terraces throughout the city, such as New Sydney Place (1807-8) and Sion Hill Place (1817-20). Pinch's successful application of single monumental facades to several terraces is particularly notable for its careful treatment of sloping terraces, ensuring that Bath's steep hills did not interfere with the flow of the façade.
- A3.17 That Bath is acknowledged as a place of outstanding universal value is testament to the skill and creativity of the architects and visionaries of the 18th and 19th centuries who applied and developed Palladianism in response to the opportunities offered by the spa town and its physical characteristics. That these architects were working over the course of a century, with no master plan, shared vision or single patron, did not prevent them from contriving to relate each individual development to those around it and to the wider landscape, creating a city that is harmonious and logical, in concord with its natural environment and extremely beautiful.

Criterion ii. exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design

- A3.18 Bath exemplifies the 18th century European move away from the uniform street layouts of Renaissance cities which dominated the 15th, 16th and 17th centuries. European cities were largely characterised by their medieval layouts and fortifications, and by the rule of state and Church. Where they were extended into Classical form, they tended to follow grand axial plans centred on palaces and other key buildings. In Bath, the confluence of Society and the growing wealth and aspirations of the middle class, the increasing opportunities available to the individual, and the absence of the threat of warfare allowed for the rules of Palladianism and the ideas of the French Enlightenment to be interpreted freely and creatively without the constraining power of a single patron or vision. Bath is where the middle class accessed the architecture of the ruling elite.
- A3.19 The Woods' Royal Crescent (1767-75) combined Palladian architecture with the emerging Romantic movement and created a dialogue between building and landscape. This followed on from the tradition established at Versailles (1620s-70s) of placing buildings in direct contact with nature. The principle of nature brought into the city and integrated into the architecture can also be seen at Place de la Concorde in Paris (Jacques-Ange Gabriel, 1763) and the Piazza del Popolo in Rome (Guiseppe Valadier, 1816-20).
- A3.20 In Britain, the Royal Crescent marks the introduction of the Picturesque into the urban environment, where the green landscape creates the illusion of country within the town. The Picturesque movement became one of the dominant aesthetic movements of 19th century Britain. The confluence of the Romantic and Picturesque movements with Palladian architecture is most fully developed in John Palmer's Lansdown Crescent. Here the sinuous curves of the buildings mimic the contours of the land, and the immediate and distant rural settings create the impression that the building is an integral part of the landscape.
- A3.21 Bath's contribution to British town planning is two-fold. The tools of Crescent and Circus, first demonstrated in Bath by the Woods, became, with the square, the mainstay of town planning until the mid-19th century. More important than these was the principle of a flexible and informal relationship between street, open space and building, so far removed from the grand axial town planning of continental Europe.

- A3.22 The extent of the spread of these tools and principles can be seen as far a-field as Charles Bulfinch's Tontine Crescent (1793, demolished 1858) in Boston, Massachusetts. Within Britain, the architecture and spatial arrangements of Bath were echoed in towns and cities from London to Edinburgh, Exeter to Buxton, and in coastal resorts such as Brighton.
- A3.23 The combination of crescent, circus and square, and their interrelation with one another through connecting streets, was immediately taken up by the leading architects of the day. The ideas and principles developed in Bath were first exported by George Dance with London's America Square and its adjoining Crescent and Circus. From the 1790s to the 1810s many of the architect John Nash's unexecuted plans for London show this combination, and the elements can be seen in his work at Regents Park. Here, unified monumental, classical terraces are sited in free contact with nature, continuing the development of architectural Romanticism. In Edinburgh, plans for extending the new town after 1800 made extensive use of crescent and circus, though without the degree of informality of spatial arrangements shown in Bath.
- A3.24 Nash's development of the circus idea at Oxford Circus and Piccadilly Circus, London, marks the point at which the circus moves from being a residential arrangement to a method of traffic management. The early imitations of the Circus were not continued, and relatively few examples survive today.
- A3.25 Conversely, the crescent was translated into all classes of architecture from the grand Royal Crescents at Buxton and Brighton to the softer curves of crescents at Exeter and Shrewsbury. In addition to its use in combination with other elements, it was also widely used as an individual element, increasingly in smaller developments. The crescent, terrace and the square entered the vernacular, and were dominant until the focus on the individual dictated the popularity of villas and private space. However, Bath's Royal Crescent remains unique in that it is a semi-ellipse. The sophistication of its shape either went un-noticed, or was too difficult for later architects to reproduce. All subsequent 'crescents' were laid out as parts of circles.

Criterion iv. be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history

- A3.26 Bath is a reflection of the societies that created it and which, in turn, were influenced by the city. The two most significant eras Roman and Georgian are made richer by the survival of so much of their historical context. The development of this extraordinary city can be traced in physical remains and documentation from its earliest origins as a late prehistoric shrine to its current position as a 21st century heritage city.
- A3.27 The Roman Baths and Temple complex, together with the archaeological artefacts and remains of the Roman settlement, provide an opportunity to study a unique part of the Roman Empire. The importance of the Temple and Baths was recognised across the Empire by the pilgrims who travelled to worship here. Of all the spas in Europe, surviving or lost, Bath was one of the most renowned. The remains in Bath make a significant contribution to an understanding and appreciation of the social and religious character of Roman society in the 1st to 4th centuries AD. With Hadrian's Wall, they are the best surviving Roman remains in the UK, and some of the best spa remains north of the Alps.
- A3.28 There is considerable potential for further archaeological discovery, particularly from the Roman era. This is an exciting prospect since knowledge of the Roman settlement is still uneven.
- A3.29 Individually, the buildings and ensembles of 18th century Bath are of outstanding value. Taken as a whole, the city is a unique example of outstanding architecture, spatial arrangement and social history. Bath exemplifies the main themes of the 18th century neoclassical city the monumentalisation of ordinary houses, the integration of landscape and town, and the creation and interlinking of urban spaces.

- A3.30 The extent of the surviving 18th century city streets, footways social and public buildings, domestic buildings from high status to artisan, parks, gardens, open spaces, landscape settings, stone mines and industrial remains represents a unique survival of outstanding value for its contribution to developments in architecture and town planning, and for its role in the society of the time.
- A3.31 There are many individual buildings and structures that, in addition to their contribution to the wider cityscape, are notable for their individual merits. Buildings such as John Wood the Elder's Prior Park (1733-50) and Robert Adam's Pulteney Bridge (1769-74) particularly demonstrate the application of neoclassical architecture to suit the particular scale and topography of Bath. The great civic and social buildings, such as John Wood the Younger's New Assembly Rooms (1769-71) and Thomas Baldwin's Guildhall (1775-8) and Pump Room (begun 1790, and finished by John Palmer 1795), are harmoniously integrated with residential streets, open public spaces, parks and gardens. They respond to Bath's prime role as a pleasure resort and health spa, and reflect the social ambitions of the age.
- A3.32 The role of Bath as a Spa is can be seen in the many buildings dedicated to the taking of (drinking), and bathing in, the hot water. The Grand Pump Room, Hot Bath, Cross Bath, King's Bath and Hetling Pump Room are the main examples. However, much more important than this is the central role that the Hot Springs have played in the dynamics of Bath throughout its history. They are Bath's 'raison d'être', and a source of continued revitalisation and purpose.
- A3.33 Queen Square (John Wood the Elder, 1728-36) is the first successful treatment in Britain of a block of individual houses as a monumental façade, following earlier attempts in London. It demonstrated to architects across the country the possibilities of composing streets in a completely unified style, at a time when streets were largely constructed house by house. This allowed for the creation of urban spaces that directly related to the buildings around them a device which can also be seen in Wood's North and South Parades, where public promenading against a suitably grand backdrop was the main purpose of the development. For more details of Queen Square, see Appendix 4.
- A3.34 The Circus (John Wood the Elder and Younger, 1754-66) is quite unlike anything to be found across Europe and it has never been repeated to the same degree. Its roots can be seen in Roman coliseums, developments such as Place des Victoires, Paris (Jules Hardouin-Mansart, 1685), and garden designs such as 'rond-points'. The Circus also reflects Wood's interest in antiquities and, in this case, Celtic mythology, Druids and stone circles, such as Stonehenge. This combination produced a highly individual composition that blends fine architecture with dramatic, enclosed, urban space. This drama is greatly increased when viewed as intended after approaching up Gay Street (also by the Woods, 1733-55), where the incline of the hill conceals the Circus until the last moment. For more details of the Circus, see Appendix 4.
- A3.35 Of all the developments in Bath it is perhaps the Royal Crescent (possibly both Wood the Elder and Younger, 1767-75) that has had the greatest impact. It harmoniously blends architecture and landscape, and was a forerunner of the Picturesque movement that became so dominant in the later 18th and 19th centuries. The Royal Crescent makes the best of its situation in the landscape to increase the drama of the building and to provide a monumental backdrop for those who paraded up and down in front of it. It is the first and only use of the ellipse (excluding some Roman amphitheatres, such as Chester) in British architecture, and possibly symbolises the Crescent Moon. It introduced the idea of a single sided street with a vista out over open countryside. The simple style of Brock Street (c.1767, connecting the Circus to the Royal Crescent) and the subtle angling of the Royal Crescent, conceal the sweep of the buildings, providing heightened drama and surprise when they are finally viewed. For more details of the Royal Crescent, see Appendix 4.
- A3.36 Lansdown Crescent represents the apogee of the Picturesque movement in urban architecture. It continues the themes of the Royal Crescent, and echoes the undulating architecture of Francesco Borromini (1599-1667) in Rome. One of the most beautiful terraces in the country, its buildings are so contiguous with the topography that they appear to be an integral part of the landscape. Through buildings such as Lansdown Crescent, Bath exemplifies the English terrace tradition, which is quite unlike the apartment blocks and tenements of continental Europe and Scotland. For more details of Lansdown Crescent, see Appendix 4.

- A3.37 The building of the Georgian city is intimately bound to the development of society during that period. Through the survival of so much of the city's fabric it is possible to trace the character of Georgian society. Bath represents the entrepreneurship and social ambitions of the age, as opportunity grew for ordinary men to make their fortunes and the rules of society were defined. Bath also captures society on the cusp of major industrialisation, after which the planning of towns was irrevocably altered, particularly by the transport revolution.
- A3.38 The development of increasingly grand architectural treatment for ordinary houses, and the growth in size and grandeur of social facilities, clearly illustrate the growing expectations of society improved living conditions, higher quality urban environments and better facilities for entertainment and social interaction. All of this is illustrated in Bath. Much was done throughout the 18th century, in terms of streets, footpaths and open spaces, to improve the amenability and appearance of the city. This followed the growing integration of the themes of the French Enlightenment into the planning and architecture of cities.

# Meeting the two further tests

# i. meet the test of authenticity in design, material, workmanship or setting

- A3.39 The evolution of Bath is exceptionally clear in the buildings and streets, parks and gardens that survive and it is possible to observe evidence of the city's character from its earliest origins right through to the 21st century.
- A3.40 The materials used to create this Site, the workmanship of both architects and craftsmen, the adaptation of architecture and town planning to the extreme topography of the area, and the opportunities of the geology and Hot Springs, are evident throughout the city, which is generally in a good state of preservation. The landscape setting is still an integral aspect and retains its historical, visual links with the architecture.
- A3.41 Despite the scale of the Site, particularly the number of historic buildings, there is a large body of information about the origins and alterations to the buildings, townscape and landscape that supports the authenticity of Bath.
  - ii. have adequate legal and/or traditional protection and management mechanisms to ensure the conservation of the nominated cultural properties

# Legal protection

A3.42 The UK national planning system provides adequate protection for most of the individual elements of Sites through statutory designations such as conservation areas, listed buildings and scheduled monuments. The protection for Sites as a whole is achieved through local development plans as advised in PPG15, which states that World Heritage Site status should be a key material consideration for planning applications.

# 4 Inventory of the selected key elements of the site

# **Archaeology**

## **Historic Environment Record**

- A4.1 The Bath & North East Somerset Historic Environment Record (HER) contains over 1200 archaeological records for the city of Bath of which 700 relate to the post-medieval and modern periods. Of the rest, over half relate to the period 1st to 4th century AD. The high number of later entries is the result of a recent study to record post-medieval monuments such as chapels, industrial buildings and other non-domestic structures. The prehistoric period was until recently confined to a few stray finds, two Iron Age occupation sites at Lower Common Allotments and Sion Hill and the timber lining of the Sacred Spring. However, large scale archaeological excavations carried out during the Southgate Centre redevelopment have revealed evidence of significant Mesolithic (Middle Stone Age) hunter-gatherer occupation in the form of flint tool scatters found within alluvial deposits on the River Avon flood plane.
- A4.2 In addition to the archaeological records, the HER also contains details of the City's Listed Buildings, Conservation Areas and Registered Parks and Gardens, which are vital to the management of the city's Georgian landscape and built heritage. The recently completed stabilisation of the Combe Down stone mines was accompanied by a detailed programme of archaeological recording, which explored Ralph Allen's mine, where much of the stone was quarried to build the Georgian City.

# **Existing Remains**

- A4.3 Characterising the archaeology of the Roman settlement of Aquae Sulis is challenging, not least because the nature of Roman Bath and its status within the region between the 1st and 4th century is ambiguous. It is not readily identifiable as an administrative centre nor yet a commercial and industrial one. There is no clear market site found and the core settlement area appears to be dominated by the baths, temple and associated high status town houses.
- A4.4 Discoveries of complex urban deposits along Walcot Street and London Road north of the city walls, however, suggests that there were in fact two distinct settlement foci, the latter being more of a commercial and industrial area. A third focus lies across the river on the gravel terrace of Bathwick where discoveries over the past two hundred years indicate the presence of a number of substantial buildings.
- A4.5 Circumstantial evidence also points to the existence of a military fort in this location. In many locations in and around Bath, Roman cemeteries and individual burials indicate the locations of main roads, many of which appear to by-pass the core area. The original river crossing appears to have been around the present Cleveland Bridge further strengthening the possibility of a fort at Bathwick.
- A4.6 Whilst settlement at Bath clearly continued beyond the traditional end of the Roman period and became regionally very important in Saxon England, material evidence is sparse. Recent investigations in the basement of Bellot's Hospital on Beau Street revealed well preserved 'black earth' of post-Roman date above substantial Roman deposits and it is this enigmatic material that may well provide the key to this early period. Survival is, however, very patchy.

- A4.7 In many ways the medieval archaeology is even more challenging as so much of it has been severely truncated by more recent development particularly during the late 18th and early 19th centuries. The rebuilding of the Abbey church in the 16th century has left little visible reminder of the dominance of the Saxon monastery and apart from the east gate, two sections of city wall and the present street pattern, very little appears to survive. Having said that, recent work on existing buildings indicates that at least some of the 18th and 19th century town houses in the centre and along Broad Street, a medieval suburb, may contain remains of earlier medieval and early post medieval structures. Work in the basement of Clarks shoe shop in Union Street also indicated that some at least of the 18th and 19th vaults do not extend as deep as others and medieval survival may be better in these locations. Generally it is only the bottoms of medieval rubbish pits that survive.
- A4.8 Later archaeology survives well and work at 4, Royal Crescent and at Circus Mews has produced excellent evidence for original garden layouts and stables. Recent investigations of an early 19th century row of back-to-back houses off the Lower Bristol Road, demolished in the 1960's, has also made a substantial contribution to an understanding of the lives of the working population of Bath, previously overlooked by archaeology.
- A4.9 For the Roman period the majority of archaeological deposits have been classified as potentially nationally significant, indeed major areas of the core medieval and Roman urban area benefit from being designated as scheduled ancient monuments. The significance of the medieval remains, however, is less clear though potentially high, depending on the conditions. For the prehistoric period, the alluviated gravel terraces of the River Avon presents a significant but as yet unrealised potential. It is highly likely that these river valley deposits close to the Hot Springs will have been a focus for the ritual deposition of tools and weapons for a significant period of time.

# **Research Questions**

A4.10 There are many major research questions relating to Bath, some of which are: the nature of pre-Roman Bath; the relationship between the temple and baths complex and the rest of the Roman settlement, and with later post-Roman and early Saxon settlements; the nature and extent of the early monastic site; the exact boundaries of the medieval abbey; the extent, nature and origins of the medieval suburbs; the location of major routeways in the Roman and medieval periods; evidence for a Roman fort; evidence for Roman wharves; the nature of working class housing of the 18th and 19th centuries; and the impact of industrialisation.

# Archaeology in the City of Bath, Supplementary Planning Guidance (2004)

A4.11 The purpose of the Supplementary Planning Guidance (SPG) was to provide more detailed information and guidance on archaeology and planning. Its principal purpose was to supplement the policies of the then emerging Development Plan. It also clarified local development control procedures in relation to previous national the Planning Policy Guidance notes (Planning Policy Guidance Note 16: Archaeology and Planning, DoE 1990 & Planning Policy Guidance Note 15: Planning and the Historic Environment, DoE/DNH 1994) issued by Government. In March 2010 a new combined Planning Policy Statement for the Historic Environment (PPS 5, DCMS, 2010) was issued, which now covers archaeology, historic landscapes and the built heritage. There is now a need to produce a revised Supplementary Planning Document which reflects these changes in national guidance, and takes account of the Council's emerging Core Strategy and Local Development Framework.

# Other elements

# Roman Baths and Pump Room

A4.12 This is a fascinating site with a history that began over 7000 years ago in the Mesolithic period. It includes the Roman temple and bath complex and museum, the Pump Room and the Concert Hall.

- A4.13 Before any baths were built, a temple was erected by the King's Spring dedicated to Sulis Minerva, a combination of Roman and British goddesses. This was constructed in 65-75 AD and the spring was contained in a lead-lined reservoir, probably built of Bath Stone. This reservoir was used for worship, much as the Springs had been used for several thousands of years, with offerings to the Gods being thrown in to the water. The temple was a classical building and stood in a large precinct with other monumental buildings. In the middle of this precinct was a sacrificial altar. Many remains have been found of this precinct, including the pediment and steps of the temple and the altar, found in situ.
- A4.14 Gradually the complex grew and baths were added onto the religious site. At their height the baths included: the central swimming pool, the Great Bath; two suites of rooms (East and West Baths) with plunge and immersion baths; cold, warm and hot rooms; and a smaller warm pool. Curative rooms were a part of the complex, indicating the early understanding of the potential of the waters for improving health.
- A4.15 The baths have been modified on several occasions, including the 12th century when John of Tours built a curative bath over the King's Spring reservoir, and the 16th century when the city corporation built a new bath (Queen's Bath) to the south of the Spring. The existence of the Great Bath was not known at this time, as the Roman buildings covering it had long since collapsed and been buried. Discoveries were made throughout the 18th century, beginning with the highly important find in 1727 of the head of the statue of Sulis Minerva herself, near to where the Pump Room now stands. Further discoveries were made during the building of the Pump Room in the 1790s, and in the 19th century the major discoveries of the Great Bath, Roman reservoir and West Baths brought about a new dimension to the city that of museum of antiquity. The 1897 extension to the Pump Rooms, the Concert Hall (now the main visitor entrance) and Terrace, displayed the discoveries to the public, and they now represent a chapter of history themselves as the Victorian interpretation of Bath's Roman past.
- A4.16 The Pump Room is a very special building, both architecturally and conceptually. It remains the only place in Britain where it is possible to drink hot spring waters, and from the time of its construction to the present day it has been used for its intended purpose of social interaction and entertainment and the drinking of the spa waters.
- A4.17 The first Pump Room, built in 1706, was a much simpler, single storey, stone building. There was the pump, supplying the spa waters, and provision for musical entertainment. In 1751 the building was extended to cater for the crowds who came to drink the waters and socialise, and in 1784 Thomas Baldwin added the north colonnade. The New Baths were built in 1788-89 (Queen's Baths) mirroring the north colonnade in its façade, also designed by Baldwin. The original impact of this southern colonnade is now slightly lost with the alterations to the Baths behind it.
- A4.18 The main block was started in 1789 by Baldwin, but it was John Palmer who finished the scheme (1799). The interior, attributed to Palmer, is not considered to be as rich as either Wood's Assembly Rooms or Baldwin's Guildhall Banqueting Hall, but it is nevertheless appreciated by the thousands of visitors who come each year to eat in the restaurant and drink the spa waters. The building, with its two colonnades, dominates the approach to the Abbey Church Yard and creates an atmospheric link between the Abbey Church and Bath Street area.
- A4.19 The Pump Room is one of the main expressions of Georgian social ambitions, and stands as a reflection of the physical and social improvements taking place throughout the city. Socially, it stands at the centre of all that Georgian Bath was about.
- A4.20 The Roman remains are considered, along with Hadrian's Wall, to be the finest architectural Roman remains in Britain, and some of the best Spa remains north of the Alps. They have huge potential for education and research, as well as being a popular amenity for local residents and visitors. The Pump Room has both architectural and historical importance. It has been at the centre of Bath social activity for nearly three hundred years and is still used for its original functions.
- A4.21 The Pump Room (without the Concert Hall extension) is Grade I listed, and forms a group with 6 to 14 (consecutive) Abbey Church Yard, 13 & 14 Cheap Street, 3 Stall Street, and the Abbey Church. The Roman Baths are a Scheduled Ancient Monument. They are owned by Bath & North East Somerset Council and are operated by the Council's Heritage Services.

# **Abbey Church**

- A4.22 The church occupies a key site adjacent to the Baths complex and Pump Room. Externally its appearance owes a great deal to 19th century restoration, including the polygonal turrets of the tower, the pinnacles added to the turrets and the hollow flying buttresses erected on both sides of the nave. Nonetheless, it remains remarkably true to its Perpendicular style both within and without.
- A4.23 The church, begun in 1499, is cruciform in plan and occupies no more than the nave area of the Norman church which preceded it. The east end corresponds to the west arch that supported the Norman tower at the crossing. Little of the earlier church survives, but there are mutilated remains and a Norman arch high up on what is now the east wall of the south aisle choir. One of the most notable architectural features, the stone vaulted nave, was constructed between 165 1872. Before this, the nave was roofed in timber. The church was damaged in the air raids of 1942 and all the 17th century heraldic glass that survives is now displayed in two windows in the north aisle.
- A4.24 The Abbey Church was built to replace the great Norman cathedral which fell into disrepair. The building survived the Reformation, though in an unfinished condition, and is now possibly one of the grandest parish churches in the country. Finally finished in the 19th century the church is one of the most famous images of Bath and is a focal point for both local worship and tourist visits. Its vaults are run jointly with the Local Authority as a museum, and the Abbey is a popular place to go for quiet reflection.
- A4.25 The Abbey Church is a Grade I listed building and forms a group with 6 to 14 (consecutive) Abbey Church Yard, 13 & 14 Cheap Street, 3 Stall Street and the Pump Room. It is owned by the Parochial Church Council of St Peter and St Paul.

# **Chapel Court**

- A4.26 St John's Hospital is an ancient foundation and its site has evolved over many centuries. Much of what is now visible dates from the early 18th century, when the Duke of Chandos engaged the architect John Wood the Elder to redevelop the site. Chandos had stayed near St John's when he visited Bath in 1726 and had not found the lodgings to his liking. Seeing an opportunity to make some money, he acquired several of the leases in and around the hospital and John Wood set to work.
- A4.27 The main hospital range had almshouses below and private lodgings above. Wood was asked to redevelop the upper storey without demolishing the lower floor, an arrangement that did not suit his taste for large scale developments with wide open spaces. John Wood House was the result, with its rubble-stone rear elevation facing Bath Street, which previously would have been rendered, and ashlar classical front overlooking the courtyard of the hospital. Wood was also commissioned to build several lodging houses for the Duke, including Chandos House and Chandos Buildings (now demolished). Chapel Court House was another reworking of a medieval building and, again, not to Wood's taste.
- A4.28 The complex of Chapel Court is important, both as a significant element of Bath's history the medieval hospital and for containing some of the first examples of John Wood the Elder's use of classicism in the city.
- A4.29 The buildings that make up Chapel Court are a mix of Grade I and Grade II. They are owned by St. John's Hospital.

# **Queen Square**

- A4.30 Queen Square is a prime example of John Wood the Elder's high ambitions for remodelling Bath, revealing his architectural talents and innovative town planning.
- A4.31 The land was leased to Wood by Robert Gay, with each plot in turn sub-let by Wood to local builders, working to his designs. The scheme for Queen Square was grand: three sides of the square were to be built giving the impression of a palace forecourt, with the main façade on the north, and a formal garden between. The south side was to be a separate building, from which to view the palace arrangement, with a broad promenade fronting it. Building started in 1728 on the east side and was completed in 1736.
- A4.32 During the course of building, the plans were altered and while the east and north sides were built to Wood's original palace forecourt plan, the west was not. The north side was the first successful use in Britain of a single monumental façade on a row of individual, domestic houses and is impressive in its execution. The east side, which was intended as a complementary wing, is therefore somewhat simpler. The west side was built further back from the square, with a mansion façade and enclosed forecourt, and was flanked by two buildings of two houses each. The south side was built much as Wood intended, though without the formal promenade. The central area was enclosed by a low balustrade (now railings) and laid out as a formal garden. An obelisk was erected in the centre on the occasion of the visit of the Prince of Wales.
- A4.33 The main north façade is largely untouched, though some window proportions have been altered. The west side was altered by John Pinch the Younger in 1830 when he in-filled the two flanking buildings to create one long façade, in a different style. The south side was heavily damaged in the bombing raids of 1942. Half of it was completely destroyed, and has since been rebuilt.
- A4.34 Queen Square is a highly important development. It is considered to be the most successful early application of a single monumental façade to a group of individual houses and created an urban space that directly related to the domestic buildings around it. The impact of Queen Square was heightened by its early construction, at a time when there were few Georgian buildings in Bath, on previously undeveloped land outside the city walls.
- A4.35 The buildings of Queen Square are Grade I listed. They are individually owned, and are mostly used as business premises.

# **Prior Park**

- A4.36 The mansion of Prior Park was designed by John Wood the Elder for Ralph Allen in 1733-50, famously as an advertisement for the local Bath stone. The design was grand and extensive, but described by Wood as simple classicism. Wood had built the west wing, pavilion and mansion house before he argued with Allen in 1748 and was removed from the project. Allen's clerk of works, Richard Jones, took over and is said to have ruined Wood's classical symmetry by altering the east wing.
- A4.37 The situation of the mansion house, close to Allen's stone mines, at the head of a combe overlooking the city gave the building the advantage of a tremendous view, with natural terraces sloping gently away. The building and park is a prominent feature of the Bath skyline. The grounds were landscaped by Allen, with advice first from Alexander Pope and later from Capability Brown, and they take advantage of the natural topography. The Palladian Bridge, a copy of the one at Wilton, was built in 1756 as a dam for the two lakes.
- A4.38 Prior Park is a lesson in both architecture and history. It is one of John Wood's earliest works, and demonstrates the application of Palladianism to the scale and topography of Bath. The mansion is also a principal element of the story of Ralph Allen and Bath stone.
- A4.39 Prior Park is a Grade I listed building, as is the Palladian Bridge, and the gardens are registered Grade I on the English Heritage Register of Historic Parks & Gardens. The mansion is owned by Prior Park College and the Prior Park Landscape Gardens (including Palladian Bridge) are owned and being restored by the National Trust.

## North Parade and South Parade

- A4.40 Part of John Wood the Elder's overall scheme for Bath was a Royal Forum, to provide a new social focus for the city. The open area would be lined by parades of buildings, each with large terraces overlooking the Royal Forum and built in a grand style similar to the palace façade of Queen Square. The area chosen, Abbey Orchard, was naturally very boggy and a large drainage system had to be in place before building could begin in 1740. Though the site is bordered on the east side by the River Avon, it never seems to have been intended as a visual element of the site.
- A4.41 The Grand, or North, Parade was the first to be constructed, with South Parade, overlooking the Royal Forum, started in 1743. As usual, Wood designed the facades and each individual builder undertook to comply with those designs, whilst given a freehand with the internal layout and rear elevations. East and west were Pierrepont and Duke Streets, with facing blocks of houses. St James' Portico, on the west side of Pierrepont Street was constructed to give access to Orchard Street without breaking the uniformity of the street façade.
- A4.42 The scheme for the Royal Forum was abandoned and so the buildings on the eastern side were never constructed. Alterations to the Parades began even in construction when some tenants began to change proportions, particularly to the raised terraces, and this has continued into the 19th and 20th century with alterations to windows and the insertion of shop fronts. The grandiose scheme was never completed, but serves to illustrate again the ambition of Wood's town planning.
- A4.43 As physical manifestations of John Wood's huge architectural ambitions for Bath, the Parades are very special and unusual buildings despite the fabric alterations that have taken place since their construction.
- A4.44 The buildings of North and South Parade, with Duke Street and Pierrepont Street, North Parade Bridge and North Parade wall and balustrade, are a mix of Grade I, II\* and II. The buildings are in mixed ownership and are used as homes, hotels and business premises.

# Circus

- A4.45 Many believe that the Circus is the pinnacle of John Wood the Elder's work, combining his talent for town planning, understanding of classical architecture and the drama of facades, with his interests in Roman and native British architecture and beliefs. There appears to be much symbolism in the details of the Circus, which have been the focus for discussion for many years. Wood may have been directly influenced by the form of Stonehenge, as there are similarities in dimensions. Wood died soon after the first stone was laid in 1754, and the Circus was completed by his son, also named John Wood.
- A4.46 The Circus consists of three equal segments of buildings around an open area. There are three entrance roads, none of which give vistas of anything other than the buildings of the Circus, thereby creating an enclosed space that relates only to the buildings surrounding it. The approach up Gay Street was designed so that nothing was revealed of the form of the Circus until arrival at the top of the hill. The segments contain different numbers of buildings, varying in size, but all have three principal storeys and a uniform frontage height. Three different classical orders are used, and crowned by a parapet for stone acorns (linking the Circus to the legend of Prince Bladud and the pigs discovering the Hot Springs in ancient times). The unity of the facades is accentuated by the disparity of the rear elevations where, in the usual practice, each builder was allowed to cater to their client's personal requirements.
- A4.47 The central area was originally paved and left open, intended to contain a statue of King George that was never erected. Each house was given a walled garden behind, as a part of Wood's overall design. Wood specified the distance beyond which the rear elevations of the house were not permitted to stretch, in order to maintain some harmony of design and the retention of the garden space.
- A4.48 The Circus holds a unique place in both British architecture and town planning. It was central to Wood's designs for Bath and reflects directly his ideas on the relationship between public and private space and the importance of providing outdoor social spaces within the city.
- A4.49 The Circus is Grade I listed and is in mixed ownership. The buildings are mostly private homes.

# **Royal Crescent**

- A4.50 In the great tradition of his father, John Wood the Younger contrived one of the most outstanding pieces of Georgian architecture. However, whilst construction began thirteen years after Wood the Elder's death, the idea for Royal Crescent may be his. The approach along Brock Street is deliberately subdued architecturally, and the magnificence of the Crescent is only apparent as the end is approached. The situation of the Crescent, the formality of the buildings, the huge front lawn and the views across the city to the rural hills beyond, combine to match any of John Wood the Elder's plans.
- A4.51 In contrast to the Circus, the Royal Crescent is severe in its restraint, relying on scale and proportions for its elegance. The thirty houses differ in size and plan but form a uniform, semi-elliptical façade. The first house, number 1 on the eastern end, was started in 1767, with the last completed in 1775.
- A4.52 As with so many of the Georgian buildings, the sash windows have been altered. But other than this, little has changed. Two of the houses, numbers 2 and 17, were gutted during the bombing raids of 1942, but the remaining interiors are largely original. The retention of green open space in front of the lawn of the Royal Crescent, now part of Royal Victoria Park, is of crucial importance for its setting and views.
- A4.53 There are few other crescents that have had such impact on architecture or held such an iconic reputation for so long. The Royal Crescent directly influenced architecture both in Bath and on a national and international scale. It marks the introduction in Britain of the Picturesque to urban architecture, and is equal to any composition in Europe.
- A4.54 The Royal Crescent is Grade I listed. The buildings are in mixed ownership and are mostly used as private homes.

# **Pulteney Bridge**

- A4.55 Built by Robert Adam in 1769-74 for Sir William Pulteney to allow development across the river in Bathwick, Pulteney Bridge is another enduring image of Bath.
- A4.56 Originally the bridge was part of Adam's extensive development for the Bathwick estate, but his plans were rejected and the bridge is the sole survivor of his grand scheme. The structure of the bridge is very much as built, with some alterations made in 1804 due to subsidence. The buildings, however, have been much altered, and on the north side are quite different to the original plans. The south side, more visually accessible, has been restored and the overhanging projections removed.
- A4.57 Architecturally the bridge is a rare example of classical Palladianism in this form. It resembles a proposed design by Andrea Palladio for the Rialto Bridge across the Grand Canal in Venice, depicted by Canaletto in1743/4. Historically, the bridge represents the grandeur of 18th century Bath society and the spatial needs of the expanding town, requiring the development of Bathwick as a residential area.
- A4.58 Pulteney Bridge is Grade I listed. It is owned by Bath & North East Somerset and let out on a long-term lease. The individual units are used for mixed retail.

# **Assembly Rooms**

A4.59 The first assembly rooms were built in 1708 by Thomas Harrison, situated on Terrace Walk by Harrison's Walks. They were extensively remodelled throughout the century, but by the 1760s, with the growth of the upper town as a residential area, a need grew for additional assembly rooms to serve this area. The New or Upper Assembly Rooms, between Bennett Street and Alfred Street, were designed by John Wood the Younger and paid for by tontine subscription. They were begun in 1769 and opened in 1771.

- A4.60 The Rooms originally contained a Ballroom, octagonal Card Room and Tea Room, and quickly became the focus for social life. The magnificence of the interiors overshadowed every other public building in Bath. An early alteration was the addition of another card room, a large rectangular apartment on the east front. The Rooms are still used today for their original function of public entertainments. The chandeliers are acknowledged as the finest in-situ 18th century examples of their kind in the world.
- A4.61 The Assembly Rooms were hit by incendiary bombs in 1942 and consequently gutted, having just been refurbished by the National Trust who acquired the buildings in 1931. Restoration was completed in 1963 and the building was reopened. The extensive fire damage is still visible in the colour of the stonework in the Tea Room.
- A4.62 The Assembly Rooms were central to Georgian society and are a physical reminder of the growing aspirations and status of the town throughout the 18th century. Architecturally, they have one of the finest interiors in the city, though sadly no longer original.
- A4.63 The Assembly Rooms are Grade I listed. They are owned by the National Trust and let on a long-lease to Bath & North East Somerset Council, who open the Rooms to the public and operate the Fashion Museum which is located in the basement.

## Lansdown Crescent

- A4.64 Built between 1789 and 1793, Lansdown Crescent was designed by John Palmer for Charles Spackman, a wealthy coachbuilder and developer. It is one of the last crescents to be built before the financial crash of 1793. Several of the speculating builders involved with it were ruined that year.
- A4.65 Situated in one of the most striking positions in the city, the sinuous lines of the buildings following the slopes of Lansdown Hill sit comfortably in the landscape. Palmer's designs took the example of Royal Crescent and its landscape setting to another level. The high setting gives the houses a panoramic view of the surrounding hills and their immediate rural context is secured by the rural field sloping down the hill in front of the Crescent. This rough pasture field is protected from development, recognised as central to a full appreciation of this important episode in Bath's architectural history.
- A4.66 The classical design skilfully incorporates both the contours and slopes of the hill, with a concave central crescent and convex stepped up flanking wings. The ironwork is particularly fine on these buildings and is original. The archway between 20 Lansdown Crescent and 1 Lansdown Place West was built by William Beckford to house his library. The buildings have suffered little alteration and only some small damage during the bombing raids.
- A4.67 This development represents the height of landscape design and the terrace crescent in British architecture.
- A4.68 Lansdown Crescent is Grade I listed. The buildings are in mixed ownership and are mostly private homes.

# **Sydney Gardens**

- A4.69 These pleasure grounds were opened in 1795, and represent a focus for the society of Bath towards the end of its high popularity. Originally designed in conjunction with the Tavern (known as Sydney House), as a focal point for Baldwin's Bathwick estate, Sydney Gardens are now somewhat stranded at the edge of Georgian Bath. The gardens, opened before the hotel construction was started, were a profit making enterprise built to rival the reputation of Vauxhall Gardens in London, then the height of fashion for adult entertainment venues.
- A4.70 Laid out with winding paths, pavilions for private al fresco dining, lawns, groves, and water features, the gardens were the scene of some of the best social encounters of the period. The arrival of the Kennet and Avon canal in 1800-1, cutting the gardens at the east end, did not diminish the popularity of the gardens but rather enhanced it, with the two beautiful wrought iron bridges becoming another attraction.
- A4.71 The railway was another matter. In 1840, the Great Western Railway cut through the centre of the gardens, destroying the labyrinth, perimeter walk and isolating a large section of the northern gardens from their connecting paths. By this time, Bath society had altered and the popularity of the gardens was already waning.
- A4.72 Further encroachments took place for building purposes, and in the 1860s the gardens were laid out with bandstand, croquet, archery and lawn tennis, reflecting the changing tastes of the public. The transfer to municipal park was completed by 1912 when Bath City Council bought the whole site, selling the Tavern building (used by the Bath Proprietary College from 1853-1880) and a small area of gardens to the Trustees of Sir William Holburne's art collection. The Holburne of Menstrie Museum (now the Holburne Museum of Art), opened in 1916. In 1995 Bath City Council began a restoration programme to remove some of the modern developments within the park and restore some of the original layout.
- A4.73 The historical importance of Sydney Gardens relates to the development of public entertainments and the sociability of the Georgians. It is an integral part of the story of Georgian Bath towards the end of the 18th century.
- A4.74 Sydney Gardens are registered Grade II on the English Heritage Register of Historic Parks & Gardens. They are owned and operated as a public park by Bath & North East Somerset.

# 5 Planning and policy framework

A5.1 This appendix gives details of and extracts from some of the legislative planning framework for the World Heritage Site.

# **Development Plan**

A5.2 The following policy was adopted with the Bath and North East Somerset Local Plan in October 2007:

Policy BH.1

Development which would harm the qualities which justified the inscription of Bath as a World Heritage Site or which would harm the setting of the World Heritage Site will not be permitted.

- A5.3 The Local Plan contains many policies for the protection of the historic and natural environments, covering issues such as listed buildings and conservation areas, development within sensitive areas, archaeological remains and ancient monuments, ancient woodland, wildlife and geological sites, historic parks and gardens and many others. In addition to this, the Local Plan has extensive policies relating to the control and management of development and sustainability, and also covers local community facilities, transportation, tourism, housing and employment.
- A5.4 There are three levels of protection for the Hot Springs in Bath under Section 33 of the County of Avon Act 1982. Area A, covering the central city, limits excavation to 5m below surface level before consent is required. Area B, a long thin area stretching from Newbridge in the west to Grosvenor in the east, limits excavation to 10m below the surface. The rest of the city is covered by Area C, limiting excavation to a depth of 25m below surface before consent is required. Local Plan Policy BH.13A seeks to protect the quality or yield of the Hot Springs from the adverse impact of development proposals.
- A5.5 Saved policies from the Joint Replacement Structure Plan are also part of the Development Plan for Bath & North East Somerset. Direction has been received from the Secretary of State to extend these policies beyond 27 September 2007 for an indefinite period or until replaced.
- A5.6 The following policy was adopted with the Joint Replacement Structure Plan in September 2002:

  Policy 6

  In Bath, development and transport proposals will maintain and enhance the City's economic and social prosperity, and its roles as a regional centre and a focus for international tourism, whilst

safeguarding and contributing to its status as a World Heritage Site.

A5.7 NB Regional Spatial Strategies have been revoked under s79(6) of the Local Democracy Economic Development and Construction Act 2009 on 6 June 2010 and no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004. This revocation applies to the draft Regional Spatial Strategy for the South West and the Regional Planning Guidance Note for the South West (RPG10).

# **National Guidance**

A5.8 The Planning Policy Statement 'Planning for the Historic Environment' (PPS5), 2010, sets out the Government's approach to the conservation of the historic environment whilst recognising they are a non-renewable resource. It contains policies to be taken into account in development management decisions and provides guidance on integrating consideration of the historic environment into local planning policy. It also highlights the importance of World Heritage Sites at a strategic level and stresses that substantial harm to designated assets of the highest significance, including World Heritage Sites, should be wholly exceptional.

**Appendices** 

A5.9 The Planning Circular 07/09 on the Protection of World Heritage in England clarifies and strengthens the protection for World Heritage Sites. It provides policy guidance on the level of protection and management required for World Heritage Sites. It explains the national context and the Government's objectives for the protection of World Heritage Sites, the principles which underpin those objectives, and the actions necessary to achieve them. It is accompanied by explanatory guidance 'The Protection and Management of World Heritage Sites in England' prepared by English Heritage.

# **Statutory Designations**

- A5.10 Conservation Areas are defined in the 1990 Planning Act as areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. The Bath Conservation Area, covering two thirds of the city, was developed in four separate stages since the introduction of conservation areas in 1968. The current conservation area was fixed in 1985. The boundary can be seen on Map 1.
- A5.11 Listed Buildings are buildings and structures of special architectural or historic interest identified by the Secretary of State. There are 4980 individual Listed Buildings in Bath: 635 Grade I, 55 Grade II\* and 4295 Grade II, though on the statutory list many of these comprise 'groups' such as the Royal Crescent, which is listed once.
- A5.12 Scheduled Monuments are sites designated under the Ancient Monuments and Archaeological Areas 1979 Act by the Secretary of State, as areas of national archaeological importance. There are five Scheduled Monuments in Bath:

The Roman Baths and site of the Roman Town (Monument no. AVON82)

The Wansdyke, part of (Monument no. AVON93)

Bath City Walls, two sites (Monument no. AVON114)

The Eastgate (Monument no. AVON115)

Palladian Bridge, Prior Park (Monument no. AVON155)

- A5.13 The Council has adopted Supplementary Planning Guidance 'Archaeology in the City of Bath' (2004) which is used to guide decisions on development proposals which affect the City's archaeological assets. It is also designed to complement the World Heritage Site Management Plan and divides the city into 36 character zones.
- A5.14 English Heritage maintains a national Register of Historic Parks and Gardens which, whilst not giving statutory protection, highlights the important of these sites and encourages Local Authorities to provide protection for them. The sites are graded similarly to Listed Buildings: Grade I of exceptional interest; Grade 2\* if not of exceptional interest nevertheless of great quality; and Grade 2 of special interest. There are seven sites in Bath included on the Register:

Abbey Cemetery, Widcombe. Grade 2 Beckford's Ride, Lansdown. Grade 2 Crowe Hall, Widcombe. Grade 2 Prior Park, Widcombe. Grade 1 Royal Victoria Park, Bath. Grade 2 Sydney Gardens, Bathwick. Grade 2 Widcombe Manor, Widcombe. Grade 2

- A5.15 Further locally important parks and gardens of interest in the city and district are described in the "Gazetteer of Historic Parks and Gardens in Avon" (1991).
- A5.16 English Heritage maintains a Register of Historic Battlefields, to afford recognition of and protection (non-statutory) to areas of historic significance. Battlefields are often difficult to identify and, once identified, even more difficult to protect from encroaching settlements as there is often little to see on the ground. There is one site in Bath & North East Somerset on the Register, the Lansdown Hill Battlefield, just north of Bath.

- A5.17 Green Belt is a means of restricting the spread of development between settlements, and has been important in preventing the coalescence of adjacent villages with Bath itself. One of the green Belt's core objectives is to protect the setting and character of historic towns. This is important to the countryside setting of the World Heritage Site. The Green Belt boundary is drawn tightly around the urban fringe.
- A5.18 Bath is surrounded on its north, east and south sides by the southern extension to the Cotswolds Area of Outstanding Natural Beauty. The Cotswolds AONB was created in 1966 when the value of the area as a national asset was recognised. After an enlargement in 1990 it is now the largest AONB in the country. AONBs are protected as heritage landscapes of national importance. The Boundary of the Cotswolds AONB generally (though not completely) follows the Green Belt boundary.
- A5.19 Combe Down and Bathampton Mines on the southern edge of Bath form part of the 'Bath & Bradford-on-Avon Bats' Special Area of Conservation (SAC) and is part of a coherent European-wide network natural habitats types. The bats are protected under UK legislation and European Directive and their feeding grounds extend roughly 4km from the roosting and maternity sites.
- A5.20 Sites of Special Scientific Interest (SSSIs) are designated by Natural England and are of national importance for their flora, fauna or geological interest. They exemplify rare and irreplaceable habitats. There are two SSSIs in the city:
  - North Road Quarry, Bath Combe Down and Bathampton Mines
- A5.21 There are a number of sites in and around the city that have been designated by Bath & North East Somerset Council as protected sites of either wildlife or geological interest. There are 16 geological sites including the many disused stone quarries as well as some road cuttings and landslips. These sites have been identified and protected for their educational, research, historical or aesthetic importance. The wildlife areas, around 100 in number, vary in character from hedgerow and water corridors to flower-rich grasslands and ancient woodlands. Bath is also important to many of Europe's and UK rare, protected and "priority" species, such as bats, including the very rare Greater Horseshoe Bat, of which a significant proportion of the world population is based here in the city of Bath. Peregrine Falcon, badgers, otters, hedgehog and Bath Asparagus are also important residents. Some of the city's wildlife can be experienced first hand by visiting a Local Nature Reserve such as Twerton Roundhill; Carrs Woodland or Kensington Meadows.

See the following websites for more information on:

- 1. Local Nature Reserves: www.avonlocalnaturereserves.org.uk
- 2. The local "Wildthings" Biodiversity Action Plan (and its Priority Species and Habitats): www.wildthingsbap.org.uk

# 6 Membership and terms of the World Heritage Site Steering Group

# Membership

- A6.1 The Steering Group, set up in 2000, is a non-executive committee consisting of representatives of local and national organisations with management interests and responsibilities for the Site, and others from various sectors in the city. The membership includes:
  - Avon Local Councils Association
  - Bath and North East Somerset Council (relevant officers, directors, Cabinet Member and Heritage Champion)
  - Bath Chamber of Commerce
  - Bath Charter Trustees
  - Bath Federation of Residents Association
  - Bath Preservation Trust
  - Bath Society
  - Bath Tourism Plus
  - Cotswold Conservation Board
  - Department for Culture, Media and Sport
  - English Heritage
  - ICOMOS UK
  - National Trust
  - Somer Housing Group
  - University of Bath
- A6.2 The Steering Group has an independent chairman, and is serviced by the B&NES Council's World Heritage Manager, who is a full time employee.
- A6.3 The sub-committee established for the purposes of developing this Management Plan included:
  - Steering Group Chairman
  - B&NES Head of Heritage Services
  - B&NES Regeneration Manager
  - Bath Preservation Trust
  - Federation of Bath Residents Associations
  - World Heritage Manager

# Terms of Reference (April 2009)

- A6.4 The Steering Group is the principal body to guide implementation of the City of Bath World Heritage Site Management Plan. It will oversee progress on the implementation of the Management Plan and keep informed of World Heritage matters.
- A6.5 The composition of the Steering group reflects the fields of work within the Management Plan. The Steering Group is intended to represent the wide range of key bodies interested in the future well-being of the World Heritage Site.
- A6.6 All Steering Group members should support the principles, objectives and actions of the Management Plan.
- A6.7 Members attend meetings to represent particular fields of work. They are not there to lobby for the organisations that have nominated them or to represent their personal interests. Some members may be co-opted for particular skills, knowledge or experience. Where a conflict of interest arises, members must declare it.
- A6.8 The main functions of the Steering Group are to:
  - Agree the annual work programmes and review their progress
  - Make strategic decisions about the direction of implementation
  - Support and advise the WH Manager
  - Promote the Management Plan and the World Heritage Site in the community
  - Maintain open dialogue between members
  - Oversee the six-yearly review of the Management Plan
  - Act as a forum for the exchange of information on World Heritage issues
- A6.9 The business of Steering Group meetings will focus on delivering the World Heritage Site Management Plan. Meetings will not be used as a forum for discussing matters beyond the remit of the Group and which are better dealt with in other fora.
- A6.10 The World Heritage Manager will provide the channel of communication between the Steering Group and other groups involved in implementation.
- A6.11 The Group will meet every six months or more frequently if required. The Group will have an independent Chair.

# 7 UNESCO/ICOMOS mission terms of reference, July 2009 World Heritage Committee decision, and response by the UK state party

# A7.1 UNESCO/ICOMOS Terms of Reference

Terms of Reference for the reactive monitoring mission to the World Heritage property of the City of Bath (United Kingdom)

- As requested by the World Heritage Committee at its 32nd session (Quebec City, 2008), carry out a joint UNESCO / ICOMOS reactive monitoring mission in accordance with **Decision 32 COM** 7B.116;
- 2. Review the overall situation of the **City of Bath** with regard to the state of conservation of the site in its widest urban context, its integrity and authenticity, and how current construction projects may affect the Outstanding Universal Value of the property;
- 3. Discuss with national and local authorities how any construction plans affect the Outstanding Universal Value of the site; and more specifically new developments around the property;
- Discuss with relevant authorities, local institutions, organizations and other stakeholders the protection of the historic urban landscape and its visual integrity and in particular the possible impact of the Bath Western Riverside development as well as the Dyson Academy and other projects on the Outstanding Universal Value, integrity and authenticity of the property;
- 5. Consider policies to protect the World Heritage property, its environment and views, and their effective implementation and discuss opportunities for enhanced conservation and management;
- 6. Prepare a detailed report by **15 December 2008** for review by the World Heritage Committee at its 33rd session (Seville 2009) considering the Operational Guidelines, as well as the recent Statement of Significance (Decision **32 COM 8B. 97**), the desired state of conservation, and timeframes for any corrective action which may be required, and submit the report to the World Heritage Centre in electronic form (not exceeding 10 pages) including recommendations;

# A7.2 July 2009 World Heritage Committee Decision

131. City of Bath (United Kingdom) (C 428)

Year of inscription on the World Heritage List 1987

Criteria

(i) (ii) (iv)

Year(s) of inscription on the List of World Heritage in Danger N/A

Previous Committee Decisions 32 COM 7B.116

International Assistance

N/A

UNESCO Extra-budgetary Funds

N/A

Previous monitoring missions

November 2008: joint World Heritage Centre / ICOMOS reactive monitoring mission

Main threats identified in previous reports

N/A

Illustrative material

http://whc.unesco.org/en/list/428

## Current conservation issues

In the past few years, proposals have been put forward for a large scale re-development of an extensive flat area alongside the river Avon, in the centre of the World Heritage property. The area is in the bowl of the valley and thus can be seen from higher parts of the city. The proposals to develop the area have met with considerable opposition for the negative impact the development could have on the overall visual and planning coherence of the property in its landscape setting. In addition, the Bath & North-East Somerset (B&NES) Council had also indicated its intention to approve another large-scale project alongside the river, for a new school (the Dyson Academy) which would involve the demolition of a listed building and the construction of buildings with prominent glass facades that could be highly visible when illuminated.

As requested by the World Heritage Committee at its 32nd session (Quebec City, 2008), a joint World Heritage Centre / ICOMOS reactive monitoring mission took place from 5 to 7 November 2008 to assess the overall state of conservation of the property and the possible impact of the proposed developments on the property's Outstanding Universal Value and integrity. Two reports on the state of conservation of the City of Bath have been received from the State Party: a first one on 30 January 2009, and a second one, in response to the mission findings on 13 March 2009.

a) Potential impact of the proposed Bath Western Riverside and Dyson Academy developments on the Outstanding Universal Value and integrity of the property:

In its January report, the State Party noted the World Heritage Committee's concern over the proposed developments. It also indicated that it was not possible, under the United Kingdom planning scheme to withhold final approval if all other stages of the planning procedure had been completed.

The Bath Western Riverside (BWR) development: The scheme was proposed to provide office, residential, retail, and leisure accommodation together with extensive infrastructure improvements. It will be dominated by a major new residential quarter providing some 2,000 new private, affordable and mixed tenure dwellings (apartments and houses). The project under discussion has a relatively high density and is divided into three phases, with only the realization of the first phase, which includes about 300 dwelling-units, being secured. According to the real need for residential units in Bath, the World Heritage Centre and ICOMOS consider that the realization of this first phase should not be stopped. From the standpoint of World Heritage conservation, the realization of this first step will not have a negative impact on the Outstanding Universal Value and integrity of this living World Heritage property. The mission team also emphasized the necessity for the first phase to already cover the infrastructure needs, such as kindergarten, meeting and multifunctional rooms for the inhabitants, etc. to make it fully functional on its own.

To explain why this first phase will not have adverse impact on the Outstanding Universal Value and integrity of Bath, the World Heritage Centre and ICOMOS recall that the designated area is the right place (currently a derelict and un-aesthetic industrial site) to integrate this new town quarter. The height of the planned buildings is acceptable, and two of the three 9-storey-buildings have already been reduced to 8-storey-buildings; similar heights can be found in the historic quarters of Bath. The acceptance of heights and masses can be understood if account is taken of the fact that the existing gasometers will be demolished more or less during, or soon after, the completion of the first phase. The new buildings will not have more impact than the existing volume of the

gasometers. Furthermore, the new streets planned will be respectful of the urban design in place and will not block views. This project also plans to give the Avon River back its role in the city's life in promoting boat-commuting between the BWR and the city centre; and the development of the banks for leisure purposes.

However, the World Heritage Centre and ICOMOS recommend that consideration be given to adapting the second and third phases in terms of a re-division of masses and heights of the buildings by any means, such as an international architectural competition, which could give a new impact to the appearance of the project and so as not to add a new barrier within the Northern and Southern parts of the city.

The Dyson Academy project: The mission has received confirmation that this project had officially been withdrawn.

#### b) Overall state of conservation of the property

The World Heritage Centre and ICOMOS note that the property is currently very well managed, even when during times when the B&NES Council has been short of professional staff. But the Council has recognized the need of a permanent coordinator who was installed recently. At present, there is a good staffing level and financial resources suitable for the proper implementation of the management plan and the objectives set out.

All major buildings and components of the inscription of the property on the World Heritage List (e.g. Roman Baths, Royal Crescent, Circus, Lansdown Crescent, gardens, parks, and public spaces) are in a very good state of conservation and are being closely monitored, as is the landscape surrounding the City of Bath. Indeed, until 10 years ago, Bath has benefited from a 50-year historic building repair programme, respectful of the property's integrity and authenticity. Efforts are also being put into place by the B&NES Council, through various plans, to prevent any further pollution to the property such as atmospheric pollution due to intense traffic in the City, visual pollution due to numerous street posts and signs, noise pollution through commercial activities in the various historic locations of the City.

The World Heritage Centre and ICOMOS also note that a review of the management plan is currently in progress and that it will include an integrated and comprehensive Tourism management plan, an integrated Public Realm and Movement Strategy, respecting both the authenticity and integrity of the property, and an integrated Traffic Control Plan.

The World Heritage Centre and ICOMOS feel that protection of the views to and from the City of Bath could be strengthened. A clear mapping of these important views to be protected is necessary, as well as how those views will be protected from impacts of any future developments. The study developed by the B&NES Council in this sense, including assessment and identification of key views, based on existing and tested methodologies in the United Kingdom, is welcomed. Finally, the World Heritage Centre and ICOMOS are of the view that the State Party act on the reinforced protection of the landscape surrounding the property to prevent any future developments which could have an adverse and cumulative impact on the Outstanding Universal Value of the property and its integrity.

#### c) Presentation of the property

With regards to the interpretation of the property, the World Heritage Centre and ICOMOS invite the State Party to embark on a reinforced, integrated and homogenous interpretation for all the attributes bearing the Outstanding Universal Value (e.g. Roman baths, Circus, Royal Crescent). The World Heritage Centre and ICOMOS also strongly feel that an interpretation centre for this very rich and complex living World Heritage property is very much needed.

Decision: 33 COM 7B.131

The World Heritage Committee,

- 1. Having examined Document WHC-09/33.COM/7B,
- 2. Recalling Decision 32 COM 7B.116, adopted at its 32nd session (Quebec City, 2008),
- 3. Notes the results of the November 2008 joint World Heritage Centre / ICOMOS reactive monitoring mission and the good overall state of conservation and management of the property;
- 4. Expresses its satisfaction that the Dyson Academy Project has officially been withdrawn;
- 5. Strongly recommends that the State Party submit to the World Heritage Centre and ICOMOS, for review, a revised plan showing that all necessary social facilities have been included in the first Phase of the Bath Western Riverside project;
- 6. Urges the State Party to submit to the World Heritage Centre and ICOMOS, for review, a time-bound revised plan for the second and third phases of the Bath Western Riverside project, including revised density and volume of the ensemble, so as not to impact on the Outstanding Universal Value of the property, its integrity and on important views to and from the property;
- 7. Also recommends that the State Party enhance the protection of the surrounding landscape of the property to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property;
- 8. Invites the State Party to embark on a reinforced, integrated and homogenous interpretation for all the attributes bearing the Outstanding Universal Value of the property;
- 9. Requests the State Party to submit to the World Heritage Centre, for information and by **1 February 2011**, the draft of the revised management plan, including the integrated and comprehensive Tourism management plan, the integrated Public Realm and Movement Strategy, respecting both the authenticity and integrity of the property, and the integrated Traffic Control Plan, before its final adoption.

# A7.3 Response from the State Party (March 2009) Annex A

Mission report: City of Bath (United Kingdom) (C 428) – response by the UK state party

- 5. Conclusions and recommendations
- 5.1 Conservation and integrity of the property

The mission regrets that the Southgate Shopping centre development was undertaken in "pastiche" architectural style.

- We note and welcome the mission's comments and recommendation on the Southgate Shopping Centre and the use of "pastiche" design. These views will be taken into account in the forthcoming revision of the Management Plan for the World Heritage property. The local authority, Bath and North East Somerset Council, will continue to apply UK Planning law and regulations to planning applications, treating each one on its merits, and welcomes proposals containing high quality architecture which respond to and respect their context and the Outstanding Universal Value of the world Heritage property.

The mission felt that the State Party should be encouraged to develop general methodologies for assessing the impact on views from and to World Heritage properties and that important views to and from the City of Bath World Heritage property should be clearly mapped and protected from development

- Visual impact is of course part of the overall requirements of Environmental Impact Assessment as required under British law. There are a number of actions to improve further our ability to assess the impact of development proposals on key views and Outstanding Universal Value. These are at both national and local level and are both methodological and process-based. In addition to the work of English Heritage (see below) a number of different processes for assessment of impact are being developed and tried out in different parts of the country. White it is important that approaches should be consistent nationally, it is also important that they reflect local needs and diversity. For example, a methodology developed for London may not be appropriate elsewhere without considerable adaptation.
- In our state of conservation report to the World Heritage Centre of 30 January 2009, the State party provided an update for the World Heritage Committee on work being undertaken in the UK on the methodology for assessing development in World Heritage views. English Heritage has been leading on the development of a dynamic visual impact methodology and a document 'Seeing the History in View: A method for Assessing Heritage Significance within Views' was published for consultation in April 2008. The consultation closed in the summer of last year and a final publication is expected by mid 2009.
- The document explains how English Heritage intends to assess the historical significance of views in a replicable, consistent and systematic way, drawing on their 'Conservation Principles' for the sustainable management of the historic environment. The method of assessment is intended to help clarify the heritage aspect of the planning process, and to provide a tool to allow objective assessment of the impact on heritage values of proposed developments on a consistent basis nationally. It will be especially useful in carrying out area-based studies as advocated by English Heritage and the Commission for Architecture and the Built Environment (CABE) in their joint *Guidance on Tall Buildings* published in July 2007.
- A Dynamic Visual Impact Assessment (DVIS) is currently being developed by the Greater London Authority and English Heritage to enable assessment of the potential *visual impact* of development proposals which may affect the Tower of London or the Palace of Westminster and Westminster Abbey. It may be possible to adapt and develop this for other places in England in due course.
- Bath and North East Somerset Council (B&NES) is currently progressing a study on the setting of the Bath World Heritage property, which will include an assessment and identification of key views. This study is based on existing, tested methodologies including Landscape and Visual Impact Assessment (The Landscape Institute with the Institute of Environmental Management and Assessment 2002); Seeing History in the View (A Method for Assessing Heritage Significance within Views English Heritage draft 2008) and the Saltaire WH Site Setting Study (W S Atkins 2006). Further discussions on this will be taking place between DCMS, English Heritage and the Council.

We note the mission's recommendation that the Green Belt be reinforced to prevent any future developments which might have an adverse and cumulative impact on the Outstanding Universal Value of the property.

- We wish to clarify that a Green Belt and the setting of the World Heritage property are not one and the same as we think that there is potential for confusion here.
- The Green Belt is a specific land use designation under UK law and is an area around a town where development is restricted. As originally intended, Green Belts were meant to contain urban growth, maintain urban coherence, prevent development from sprawling into the countryside and safeguard the setting of historic towns. Much of the Green Belt around Bath is not visible from the World Heritage Site and is not part of the setting of the World Heritage property.
- The 'green surrounding countryside' of Bath is a key component of the property's Outstanding Universal Value as clarified by the World Heritage Committee last year. Because of the exceptional size of the City of Bath WHS, much of this 'green surrounding countryside' is in fact within the boundaries of the property, while the views into and out from the WHS are sharply confined by the ridge lines around the city. Essentially, the protection of 'the green surrounding countryside' is a matter of management of development within the setting of the property which is already exercised through the planning framework.

## 5.2 Management of the Property

The mission recommends that the State Party be requested to submit, by 1 February 2010, the draft revised Management Plan to the World Heritage Centre and ICOMOS for review before its final adoption, including an integrated and comprehensive Tourism Management Plan, an integrated Public Realm Plan, respecting both the authenticity and integrity of the property, and an integrated Traffic Control Plan.

- Review of the 2003 Management Plan is imminent. However, the complexity of this exercise, nature of the consultative process suggested by the mission, competing priorities and the timescales involved mean that it is not possible for us to commit to submitting a draft document by 1 February, 2010. We are happy to submit a progress report by this date. A full draft Management Plan, including a Tourism Management Plan, a Public Realm Plan and a Traffic Management Plan is timetabled for submission to the World Heritage Centre by 1 February, 2011. We would be grateful if this could be reflected in the draft Decision.
- In terms of strengthening the Management Plan process, the World Heritage Committee will wish to note that steps have already been taken. The World Heritage Steering Group has been relaunched under the Chairmanship of a newly appointed and highly qualified independent Chairman. The Management Plan review process will also involve considerable public and stakeholder involvement.
- We welcome the mission's recognition of the management of the World Heritage property, the excellent staffing levels and the resources committed to the proper implementation of the Management Plan.

We note that the mission's reminder for the State Party to inform the World Heritage Centre of any new developments within the City of Bath World Heritage property in accordance with Paragraph.

- The UK observes the World Heritage Committee's invitation to notify them, through the Secretariat, of major restorations or new constructions which may affect the Outstanding Universal Value of the World Heritage property in accordance with Para 172 of the Operational Guidelines (WHC. 08/01 January 2008).
- With a site of the size and complexity of Bath a great many development proposals occur and judgement must obviously be exercised as to what may require a referral under Paragraph 172. We see no reason to suggest that this judgement has not been exercised correctly, and give assurance that every effort will continue to be made to comply with requirements.
- We should point out also that in practice notifications under para 172 can be problematic because of the different time scales of the processes of the World Heritage Committee and those of national planning systems. The minimum time for getting a response from the Committee is around 6 months and can extend to a year, while the UK planning system aims at dealing with the majority of minor development proposals within 8 weeks of submission and the majority of major development proposals within 13 weeks of submission. We would welcome further discussions with the Centre on how these problems might be addressed, and suggest that the Committee's attention is drawn to this issue as part of the review of its working methods.

# 5.3 Presentation of the property

We note and welcome the mission's positive and constructive comments on the presentation of the property.

- We note the comment concerning the desirability of an Interpretation Centre for the site. We fully agree with the desirability of this, and together with other stakeholders we are actively searching for a solution but it is also a matter that will need to be taken into account in the development of an interpretation strategy.
- An Interpretation Strategy is being bought forward as part of the new Management Plan, and this strategy will address the comments made regarding the interpretation of set pieces, use of the emblem, museum promotion and explanation of reasons for inscription.

- Comments regarding Tour Guide training are noted and will be addressed.
- With regard to on-street multi-lingual information points, the first stage of implementation of the Council's Public Realm and Movement Strategy for Bath City Centre will include the full design and the first phase of implementation of a comprehensive information and way finding system. Design consultants are currently being procured via the Official Journal of the European Union process to conduct this task. The brief seeks to deliver a sophisticated multi-modal information system which can be accessed on line, in print, at all arrival points, on street and which can be downloaded to hand held mobile devices. Due to the flexibility of the proposed system, it is currently anticipated that multi-lingual information would be more effectively provided on line, on printed or downloadable maps, which could then be used in conjunction with the proposed on street mapping and navigation points.

#### 5.4 Bath Western Riverside

We welcome the mission's clear recognition that the first phase of the Bath Western riverside project will not have a negative impact on the Outstanding Universal Value of the World Heritage property. The mission suggests, however, that the first phase be adapted so as to include social and community facilities (a kindergarten is specifically mentioned).

- The current detailed planning proposals place such uses within the development's second phase as components of a hub of facilities in the centre of this large site, and within the UK Planning system the Council has no specific power to require the submission of the revised plans that the Mission's suggestion would necessitate.
- However, in response to the current economic difficulties the phasing of the development (together with some elements of design) is currently under review by the developer in discussion with the Council and this may present the opportunity to address the comments in the report.

The Mission Report recommends that consideration be given to adapting the second and third phases of the project In terms of scale, improvement of north-south permeability and variety in height and roof form. An architectural competition is suggested and the mission recommends that a revised plan be submitted to the World Heritage Centre for review.

- The UK plan-led Planning system means that housing numbers are a crucially important element of any scheme on this site, and it is not appropriate for the Council specifically to seek a reduction in density contrary to the provisions of their own adopted Local Plan and the UK Government's policy guidance on housing provision. The policy framework incorporates some flexibility on design and layout matters and the Council will take every opportunity to work with emerging developers in order to optimise the form and quality of the later phases of the development.
- In terms of an international architectural competition in order to secure the optimum form and quality for later phases in the Bath Western Riverside development, the UK Planning system's plan-led approach makes this difficult to achieve in this case since such a requirement was not included in the Supplementary Planning Document which set the planning context for this site. Provision for a competition would have had to have been made within the Supplementary Planning Document for the development, and the Council has now received a comprehensive planning application for the entire residential scheme in accordance with the statutorily adopted policy requirements.
- Nevertheless, the potential fifteen to twenty year build period of this development means that the nature of the development is likely to evolve over time, and the Council will explore with future developers the potential for design enhancement and for a competitive approach to design.

The Mission comments that the Council should be encouraged to provide clear guidelines with respect to flooding and development.

- This work is already well advanced. The Strategic Flood Risk Assessment (SFRA Level1) has been prepared by expert consultants, and provides essential information for land allocation for development management. The SFRA provides the information required to apply the sequential risk-based approach applied in national Planning Policy Statement 25. The Council is also going beyond statutory requirements and developing a Strategic Flood Mitigation Management Strategy.

#### General comments

#### **National Legislation**

The UK has had a robust system for protecting its historic environment built up over the last 120 years.

This is done in two ways; firstly by designation of specific buildings, archaeological sites, landscapes and areas using specific legislation (the Ancient Monuments and Archaeological Areas Act (as amended) 1979 the Planning (Listed Buildings and Conservation Areas) Act 1990 in England and the 1997 Act in Scotland. The second is via the statutory planning system which recognises the importance of the historic environment in UK planning policy.

This is not either/or; both systems are used to provide the best possible protection. For example, a World Heritage property can contain within it listed buildings, scheduled ancient monuments, conservation areas, registered parks and gardens whilst its surrounding area may be protected by green belt, Landscape or natural designation, by protection of strategic views or by the establishment of a buffer zone or equivalent where this is the most appropriate option.

With regard to the UK's overall policy on Heritage protection, we have previously advised the World Heritage Centre of the publication of a Draft Heritage Protection Bill on 2 April 2008 and forwarded two copies of that Bill to the World Heritage Centre. This will for the first time give statutory recognition to World Heritage properties in England and Wales by placing them on a new Register of Heritage Assets. The Heritage Protection Bill has now been delayed until a legislative slot becomes available but the Government remains committed to introducing this legislation at the earliest opportunity. However a number of reforms to the system are being pursued without the need for legislation; these include:

- From 1 October 2008, World Heritage properties have been included in Article 1(5) land designation in the General Permitted Development Order which means that certain permitted development rights are withdrawn. This gives more control over small-scale changes which incrementally might over time have an adverse impact on Outstanding Universal Value.
- The Department for Communities and Local Government will introduce in spring 2009 specific notification and call-in requirements for significant development affecting World Heritage Sites where English Heritage have objected on the grounds that a proposed development could have an adverse impact on the Outstanding Universal Value and significance of a World Heritage property or its setting, and has been unable to withdraw that objection after discussions with the local planning authority and the applicant. This will bring cases of potential international significance to the attention of government ministers who will, if necessary, be able to take the decision on a particular development themselves.
- We propose to publish, in spring 2009, a new planning circular on World Heritage with an
  accompanying English Heritage guidance note. These documents reaffirm the Government's
  commitment to protecting our World Heritage properties and both emphasise the key role
  Planning Authorities have in protecting World Heritage properties through policies in Plans both
  at a regional and local level.
- The development of new overall guidance on protection of the historic environment is well underway and an announcement on timetable is anticipated soon. It is anticipated that a new draft Historic Environment Planning Policy Statement will be put out for public consultation in spring 2009. This will again reinforce the importance of Planning Authorities in protecting World Heritage properties.

We are confident that these changes will ensure that the need to protect the Outstanding Universal Value of World Heritage properties in England is fully considered in planning applications.

## Thermae Bath Spa and Holburne

We welcome the mission's recognition of the success in renovating the Spa in contemporary fashion, and similarly the conclusion that the contemporary extension to the Holburne Museum will not adversely impact upon outstanding universal value. We trust that these projects, together with the first phase of Bath Western Riverside, will reassure the World Heritage Committee that the Local Authority can confidently bring forward new and contemporary development within the site.

## **Dyson Academy**

The Dyson Academy site is the former Newark Works which is part of the Victorian industrial development of Bath and therefore not inherently part of the Outstanding Universal Value of the World Heritage Site as confirmed by the World Heritage Committee in 2008. We note the mission acknowledges the quality of the overall scheme but has concerns relating to the impact of the proposed works on the fabric of the historic building.

The main significance of the building lies in the architectural value of the impressive Italianate façade to lower Bristol Road and its historical and communal value associated with its use by Stothert and Pitt for the manufacturing of cranes and machines. In assessment of the proposals it was considered that the benefits of the scheme in terms of continued use of the site for engineering related uses, the retention of the principal façade economic regeneration and enhancement of the local environment outweighed the loss of the areas of lesser significance namely the roof and interior. However, as the Mission noted, the scheme has now been cancelled.

# 8 Key facts information sheet

A8.1 An information sheet was produced in 2009 (revised, 2010) in response to advice from English Heritage on the Outstanding Universal Values. The sheet has been used in numerous briefings and communications, and helps to provide consistent messages about the reasons for Bath's inscription.

# What is World Heritage?

World Heritage Sites are 'places of outstanding universal value to the whole of humanity' There are currently 890 World Heritage Sites world-wide. Famous sites include the Taj Mahal, Pyramids of Giza, Great Wall of China and the Grand Canyon. UNESCO considers adding a small number of new sites each year.

'Outstanding universal value' means cultural and/or natural significance which is so exceptional as to transcend national boundaries. This is defined by the extent to which the site meets certain criteria.

The UK signed the 1972 UNESCO World Heritage Convention in 1984. In doing so it committed to identifying, protecting, conserving and interpreting its World Heritage Sites and passing them on to future generations.

# The City of Bath World Heritage Site

UNESCO added the City of Bath as a 'cultural site' to its World Heritage List in 1987. The main reasons for Bath's inclusion are its:

- Roman Archeaology the Roman Baths and Temple thermal establishment;
- The Hot Springs the only of their kind in Britain, attracting visitors for 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;
- 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.

# A few key facts

'World Heritage Site' is the correct designation. The term 'World Heritage City' is sometimes used colloquially but has no status of its own.

Unlike many other cities that include a World Heritage Site, the whole of Bath and not just its historic core is the World Heritage Site.

Bath contains nearly 5,000 listed buildings, including the highest concentration of grade I and II\* listed buildings outside London.

66% of Bath is designated as a Conservation Area, giving a degree of statutory protection to most of the city and its buildings.

# Other UK World Heritage Sites

There are 28 World Heritage Sites in the UK and 18 in England.

Other UK cities containing a World Heritage Site include Canterbury (Cathedral, St. Augustine's Abbey and St Martin's Church), Durham (Castle and Cathedral), Edinburgh (Old and New Towns), and Liverpool (waterfront, commercial and cultural areas).

Within London, Maritime Greenwich, the Tower of London, Westminster Palace and Saint Margaret's Church and Westminster Abbey all have separate World Heritage Site designations.

Hadrian's Wall and the Antonine Wall in Scotland are the only Roman World Heritage Sites in the UK. They belong to a Frontiers of the Roman Empire group created in 2008.

Other west country World Heritage Sites include Stonehenge, Avebury, the Cornwall and West Devon mining landscape, and the Jurassic Coast, the only 'natural' World Heritage Site in England.

For more information visit:

www.unesco.org.uk/world\_heritage www.bathnes.gov.uk/worldheritage www.bath-preservation-trust.org.uk

# 9 Consultation processes and events

- A9.1 The review of the 2003 2009 Management Plan began in 2008, but was delayed pending the outcomes of the UNESCO/ICOMOS Mission to Bath (see Appendix 7). Following the outcomes of the Mission, a review process was identified by the World Heritage Manager in consultation with the City of Bath World Heritage Steering Group. A sub-committee was established to take forward the review process, and advice was taken from English Heritage.
- A9.2 The 2003-2009 Management Plan was reviewed by the World Heritage Manager, and themes, issues and actions (where they were still relevant) were identified for presentation to stakeholders.
- A9.3 A half-day consultation event was designed and facilitated by an independent consultant. Approximately 130 stakeholders representatives of strategic, local, regional and national organisations were invited to the event, which took place at the Guildhall, Bath, on 2 December, 2009. Delegates were sent briefing materials and referred to an online copy of the 2003-9 Plan before the event.
- A9.4 The following organisations were represented at the event:

Action for Pensioners

Age Concern

Association of Local Councils

Avebury World Heritage Site

Avon Fire & Rescue Service

**B&NES** Archaeology

B&NES Business Continuity & Emergency Planning

B&NES Cabinet Member for Development & Major Projects

**B&NES** Corporate Sustainability

B&NES Countryside Strategy/Partnerships

B&NES Culture, Leisure & Tourism

**B&NES** Environment

**B&NES** Heritage Services

**B&NES Historic Environment** 

B&NES Learning & Inclusion

B&NES Major Development

B&NES Parks & Green Spaces

**B&NES** Partnership Delivery

B&NES Planning, Policy & Transport

**B&NES Policy & Environment** 

**B&NES** Racial Equality Council

**B&NES** Regeneration

**B&NES:** World Heritage Manager

Bath Chamber of Commerce

Bath Cultural Forum

Bath Cycling Club

Bath Heritage Watchdog

Bath Preservation Trust

Bath Spa University

Bath Tourism Plus

Better Bath Forum

**British Waterways** 

Chairman, B&NES Council

Chairman, City of Bath WHS Steering Committee

City of Bath College

Cotswolds AONB

Department for Culture, Media and Sport

Donald Insall Associates

Duchy of Cornwall

English Heritage

Federation of Bath Residents Associations

Firstgroup plc

Friends of the Earth

Future Heritage

Government Office for the South West

Independent World Heritage Consultant

Inland Waterways Association

International Council on Monuments and Sites

Jane Austen Centre

Kelston Manor

Local Authority World Heritage Forum

LPC (Trull) Ltd

Mayor of Bath's Honorary Guides

Museum of Bath at Work

Nash Partnership

National Trust

Natural England

Royal High School

Somer Community Housing Trust

**Springs Foundation** 

St John's Hospital

The Forum, Bath

Transition Bath

University of Bath

#### A summary of the main issues raised by stakeholders

- A9.5 Stakeholders raised new issues under the thematic headings of the 2003-2009 Management Plan ie Managing change; Conservation; Interpretation, Education and Research; Physical Access; Visitor management and also under the heading of 'Other Themes and Issues'.
- A9.6 Stakeholders then prioritised the issues for each theme and identified actions to address them. Priority issues and actions were then presented and discussed in plenary.
- A9.7 All issues and actions were written up, compared with the 2003-2009 Management Plan and any new items incorporated into the revised plan. Objectives and actions were then developed to address the issues. This was done in collaboration with stakeholders. In addition to this process, some organisations were consulted on sections of the text particularly relevant to them.
- A9.8 The authors of this Management Plan have also drawn on recent plans for other World Heritage Sites, including Stonehenge (2009), Dorset and East Devon Coast (2009) and Westminster (2007).

## **Next Stage**

- A9.9 A public consultation period was held from 26 August until 7 October 2010. This involved targeted email messages containing the draft document to all Bath and surrounding area councillors, and all attendees of the December 2009 event.
- A9.10 Leaflets advertising public consultation were distributed at heritage open days and other events, electronic copies of the draft plan were available on the web site and hard reference copies were available in libraries and council offices.

- A9.11 250 responses were received from 21 different non-Council bodies, and a summary was compiled. A sub group of the Steering Group considered the summary responses and identified the following 6 key priorities from consultation:
  - i) Funding and Management of the World Heritage Site
  - ii) Transport
  - iii) Buffer Zone/ Setting
  - iv) Planning Policy
  - v) Public Realm
  - vi) Interpretation
- A9.12 The above 6 issues were used to prioritise the action plan, shortening it from the consultation version. Multiple changes were made post consultation including re-ordering Chapter 5 to include issues alongside corresponding objectives, and strengthening of the main body text.
- A9.13 The draft plan was endorsed for submission to UNESCO by B&NES Council (Full Council meeting) on 18 November 2010, and subsequently by single member decision on 29 December 2010. The Steering Group approved the document at its meeting of 23 November 2010.
- A9.14 Prior to the preparation of an SPD, further consultation will be carried out in accordance with Section 17 of the Town and Country Planning (Local Development) (England) Regulations 2004.

# 10 World Heritage Site setting study

# Bath World Heritage Site Setting Study, Information Paper, October 2009

# A summary

- A10.1 Bath is renowned for its outstanding architecture, but its landscape and setting have not always enjoyed the same recognition. The setting is protected through planning policy, but there is limited literature on what is important, how far it extends or how impacts should be assessed. This study brings these together in order to aid decision making. Protection of the setting is linked to the protection of the Site itself, and is particularly relevant to Bath.
- A10.2 A rationale for the protection of the setting can be found in documents such as: *UNESCO Operational Guidelines; Government planning guidance PPG15: and Circular 07/2009* on the Protection of WHS. The concept of identifying, understanding, maintaining and protecting setting is an essential part of the World Heritage Convention and government policy.
- A10.3 Work on identifying Bath's setting began in 2006, and the Setting Study takes into account comments from public consultation, the publication of the Bath Statement of OUV, work carried out elsewhere, good practice guidance and comments from English Heritage.
- A10.4 The project was jointly managed by B&NES Council's World Heritage Manager and the Council's Landscape Architect, with additional input from the Councils' Archaeologist and Bath Preservation Trust's Conservation Officer.

The aims of the study were:

- to define the key characteristics of the setting,
- · to study the extent of the setting
- to provide guidance on how to carry out impact assessments
- A10.5 It is anticipated that the Setting Study will be adopted as a Supplementary Planning Document, initially to supplement policy BH.1 in the Bath & North East Somerset Local Plan, and then the emerging policy in the Core Strategy.
- A10.6 Protecting the setting also protects the authenticity of the Site, and contributes to maintaining and enhancing the city's local distinctiveness and high quality environment, which is important to its economy, health and welfare.
- A10.7 Initial work investigated the meaning of setting in relation to heritage assets, and identified key aspects of setting. The findings are presented through a series of maps, photos and supporting text
- A10.8 The study provides an indication of areas which form the setting and where particular care is required when considering changes and management issues. It also includes a framework for assessing potential impacts of proposed development or other changes to the Site and its setting. This dual approach provides both the information and means for protecting the setting.
- A10.9 The study uses the OUV as a basis for assessment, and this ensures that it is more robust and provides greater certainty on what does, and does not, constitute an impact on the Site and its setting.

- A10.10 For the purposes of this study the Georgian period is taken to include the reigns of George I, II, III and IV and William IV, from 1714 to 1837, and the OUV can be summarised as:
  - 'The Roman Remains' marking 'the beginning of Bath's history as a spa town',
  - 'The Georgian city ... with architecture and landscape combined harmoniously',
  - 'The Neo-classical style of the public buildings' and 'the monumental ensembles' in harmony, and
  - Palladio's ideas transposed 'to the scale of a complete city situated in a hollow in the hills and built to a picturesque landscape aestheticism'
- A10.11 As the study progressed it increasingly suggested a move away from defining setting as a fixed line on a map towards identifying what constitutes setting and providing a means of being able to assess the impact of development or other changes.
- A10.12 In relation to WHS, there are no additional statutory controls resulting from the inscription, but it is a key material consideration. Local planning authorities are expected to protect WHS and their setting through development plan policies.
- A10.13 The Vienna Memorandum<sup>1</sup> states:

'The central challenge of contemporary architecture in the historic urban landscape is to respond to development dynamics in order to facilitate socio-economic changes and growth on the one hand, while simultaneously respecting the inherited townscape and its landscape setting on the other.'

This study informs our understanding of the setting and helps us move towards achieving this balance. It is also intended to inform a range of work including:

- analysis to expand understanding of the Site and its setting
- policies in the Core Strategy
- background information to inform the form and location of development
- preparation of a WHS Supplementary Planning Document
- projects emerging from the Public Realm and Movement Strategy
- work on issues (eg protection of views) linking to Core Strategy policies
- guidance on proposed building design and heights
- preparation of a Landscape, Tree and Woodland Strategy
- A10.14 The document can be found at:

http://www.bathnes.gov.uk/BathNES/environmentandplanning/worldheritagesite

UNESCO, Vienna Memorandum on World Heritage and Contemporary Architecture – Managing the Historic Urban Landscape (2005)

# 11 Selected bibliography

A substantial number of sources are relevant to the World Heritage Site. The following list does not attempt to be comprehensive or hierarchical, but rather should be considered as a taster of what is available.

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- 7 Jurassic Coast WHS: The first Five Years - available on www.jurassiccoast.com
- www.bathnes.gov.uk 'W' for World Heritage 8
- 9 Figures from B&NES 'Celebrating Achievements 2005' pamphlet.
- ICOMOS: International Council on Monuments and Sites, an advisory body to UNESCO. 10
- Decision ref: 08/32 Com/7B.116 11
- 12 Decision 32 COM 8B.97
- 13 http://whc.unesco.org/en/convention
- 14 Figures taken from Bath Transport Package summary document (2010)
- 15 http://www.travelplus.org.uk/our-vision/joint-local-transport-plan-2
- 16 http://www.travelplus.org.uk/
- 17 The State of the South West 2010, South West Observatory; Value of Tourism Report, 2007, South West Tourism; Economic Impact Survey 2007, South West Tourism; Visit Bath http://visitbath.co.uk/site/media/information-sheets/statistics-and-facts-on-bath



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World Heritage Planning Services Trimbridge House Trim Street Bath BA1 2DP

01225 477584