Bath & North East Somerset Local Plan 2016 - 2036

Options Consultation Winter 2018

Topic Paper: Historic Environment



LOCAL PLAN 2016-2036 Topic Paper: Historic Environment November 2018

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1 Introduction and objectives

- 1.1 This is one of a number of topic papers that supports the emerging Bath and North East Somerset Local Plan. These topic papers have been produced to coordinate, consolidate and analyse some of the evidence used in drafting the emerging Local Plan. All the topic papers will be available to view online at: www.bathnes.gov.uk/localplan2016-2036
- 1.2 Bath and North East Somerset's outstanding historic environment, and its sensitive management, is a key component of the identity, sense of place and future economic, environmental and health and social well-being our area, and in the delivery of sustainable development. The District is facing significant housing and economic growth pressures which the Local Plan is seeking to manage and accommodate in a planned way respecting and guided by the conservation of the historic environment.
- 1.3 The development of a positive strategy for the conservation and enjoyment of the historic environment, as required by the National Planning Policy Framework, informed by this topic paper provides an opportunity to consider the importance of the historic environment in the Council's area and how it can be conserved, enhanced and enjoyed by all.
- 1.4 This topic paper is the starting point of establishing and explaining a plan for the appropriate protection of our heritage assets and their use and maintenance; and for the delivery of development which affects them and their setting. It seeks to set out how the Local Plan and associated guidance and initiatives address these matters and fulfil national policy obligations.
- 1.5 The Council will protect, conserve and seek opportunities to enhance the historic environment, including the character and setting of heritage assets, through the following, as described in more detail later:
 - Local Plan
 - supplementary planning documents and other guidance prepared and used to guide decisions on development proposals that affect the historic environment, including conservation area character appraisals and management plans;
 - the development management process;
 - a focus on heritage at risk;
 - ensuring that the historic environment is appropriately considered in wider Council objectives, strategies and initiatives.
- 1.6 It is recognised that managing change and effective delivery in the historic environment will involve well established partnership working between the Council and Historic England and the local community, including local preservation and amenity groups, Mendip Hills and Cotswolds AONBs and other such organisations.
- 1.7 A positive strategy for the historic environment of the Council's area also underpins the Council's strategy with regard to health and wellbeing of its communities. The important role that heritage plays in quality of life and influencing well-being, in supporting social cohesion and inclusion and in improving place is set out in detail

in Historic England, Heritage Counts 2017 Heritage Society. The themes identified run through many of the aims and objectives and approaches in this paper.

2 Bath and North East Somerset's historic built environment

2.1 Bath and North East Somerset is a richly varied area in the south west of England. It stretches from the edge of Bristol, south into the Mendip Hills and east to the southern Cotswold Hills and Wiltshire border. It covers a total area of 570 km2 and encompasses a diverse range of places, each with their own history, identity and communities. Its main urban centre is the city of Bath complemented by a range of towns and villages.

City of Bath

- 2.2 Evidence of human activity in the area stretches back more than 10,000 years to the hunter-gatherers of the Middle Stone Age. From its early history as a Celtic place of reverence and as a spa during Roman occupation, Bath evolved into a Saxon monastic settlement and subsequently a Norman cathedral town. During the Middle Ages it developed into a regional market town and a centre of the woollen trade before becoming perhaps the most significant health resort of Elizabethan and Stuart England. Rapid expansion in the Georgian era saw Bath become the foremost fashionable resort of the 1700s, and created an enduring architectural legacy.
- 2.3 At the beginning of Victoria's reign Bath was the 9th largest town in England with a population of nearly 50,000. Thereafter Bath lagged behind the national level of industrial urban expansion and instead Bath refined its image as a place of genteel residence and retirement, The introduction of Brunel's Great Western Railway, supported the growth of the city and served to crystallize an industrial strip of mills and foundries along the River Avon as far as Twerton. Towards the end of the Victorian period the Corporation sought to revive the city as a spa upon the rediscovery of its Roman origins.
- 2.4 The pace of growth in Bath was slow during the early part of the 20th century, a reflection of the depressed state of the national economy, but the aftermath of WWI resulted in a great deal of inter war house building and a surge in the land coverage of the city. In the interwar period the southern part of the landscape bowl at Southdown and the Odd Down Plateau was colonised. Elsewhere, suburban development took place at Weston and Larkhall. After the Second World War Bath was caught up in the process of rapid socio-economic change that was at work in the country as a whole. Change within the city reflected many national trends, including the growth of private motoring, modernist reconstruction and the subsequent rise of the conservation movement. In 1987, in recognition of its unique cultural value the city was inscribed as a World Heritage Site.

Keynsham

2.5 Keynsham today occupies the west ridge top of the Chew Valley. The River Chew joins with the River Avon to the north of the town. Now a small market town, Keynsham has a rich history. It was an important Roman and then Anglo-Saxon settlement. There is also evidence of prehistoric land uses on land near the Chew and Avon confluence. Recent excavation and survey work in this area has shown that this was the site of a Romano-British settlement, possibly the unprovenanced Roman town of Traiectus. By the medieval period, Keynsham had evolved into a successful town, dominated by the Abbey and with a Market granted by King

Edward I. Up until the 18th century Keynsham remained a relatively small place, focused around the linear High Street, but over the last century the town was subject to much change and expanded rapidly particularly in the 1950s and 1960s.

Somer Valley and the larger settlements

- 2.6 This is the southern part of the Council's area, with a range of distinctive characteristics, identities, communities and history. From medieval market town roots, the area was transformed during the industrial revolution to exploit its mineral resources.
- 2.7 Once known as the 'powerhouse' for Bath, life in the area was dominated by coal mining, leading to a proud heritage of energy production. This relatively short lived but intense period of local history has passed, with formerly industrial landscapes having long returned to countryside but leaving some distinctive landscape features, including the remains of the Somerset Coal Canal and the Old Mills Colliery batch (conical spoil heap). The strength of community and identity borne out of this heritage remains, as do the towns and villages which developed in this period.
- 2.8 The Somer Valley includes the towns of Midsomer Norton and Radstock. Midsomer Norton is an ancient market town dating to the medieval period. It became an important coal-mining settlement in the C18 and C19, which is reflected in a historic townscape in a river valley landscape setting. Radstock has been settled since the Iron Age and is one of the best preserved former coal-mining towns in England retaining many important colliery features. It is a rare example of an early industrial landscape where small scale mining existed in a rural community and has left an important local legacy.
- 2.9 Paulton is one of the largest villages in the Somer Valley. It was originally an agricultural village which grew significantly as a result of coal mining. Following closure of the mines its economic base became industrial, including printing. This coal mining and industrial heritage is reflected in its buildings and landscape.

Rural areas

- 2.10 Over 90% of the Council's area is rural and it has 47 rural parishes. The character of villages and landscape varies distinctly, with almost a third of the District lying within the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty (AONBs).
- 2.11 The villages and hamlets of the Council's rural areas therefore have a diverse historic context and fabric. The distinctiveness of different parts of the rural areas and the villages within them fall within broad *character areas* identified in the 'Rural Landscapes of Bath and North East Somerset' that reflect underlying geology and landscape form.
- 2.12 To the North and East of Bath is the Cotswolds Plateau and Valleys character area which includes part of the Cotswolds AONB. The settlement pattern has evolved based on the form of the land and villages which run along the valley sides. Included within this area are the villages of Bathampton and Batheaston, characterised by their strong relationship to Bath. Neighbouring to the south the Limpley Stoke Valley includes the villages of Bathford and Freshford. The historic settlements include a wealth of archaeology and historic buildings and features, including medieval and through the centuries.

- 2.13 The four character areas to the North West (the largest of which is the Dundry Plateau) are more isolated in character. Whitchurch is the largest village and lies close to the southern suburbs of Bristol. Whilst there is much modern development around Whitchurch, there are historic buildings which characterise the settled areas. In the less developed areas, buildings of a mix of periods either in small groups, isolated cottages and farmsteads are characteristic and archaeology (such as the Maes Knoll Iron Age hillfort) plays an important part in the surrounding landscape.
- 2.14 The Avon Valley retains its historical role as a transport corridor; formerly based on the river. Saltford is the main village in this character area and is visible from much of the surrounding area. It is a well preserved historic settlement with the manor and church at its medieval core and development from the C17 to the C19 as an agricultural community, supported by the presence of riverside mills. In the early C18 it grew as an important centre for the local brass industry.
- 2.15 In the Cam and Wellow Brook Valley area, villages generally follow the valley floors. Camerton, Dunkerton, Combe Hay and Midford are located in the Cam Valley and Shoscombe, Stony Littleton and Wellow are located in the Wellow Valley. The village of South Stoke is a notable exception located on the upper slopes of the Cam Valley and it extends beyond the character area. Mills and their associated features are also an important part of the landscape. There are also smaller hamlets and individual farms and houses that are more isolated and generally higher up the slopes. Again the historic environment includes a wealth of archaeology and historic buildings and features, including medieval and through the centuries.
- 2.16 In the central part of the Council's area, the extensive plateau from Hinton Blewett to Newton St Loe includes the principal villages of Hinton Blewett, Clutton, High Littleton, Temple Cloud, Timsbury, Farmborough, Marksbury, Priston, Englishcombe and Newton St Loe. The settlements are generally located within valleys and dips and are either nucleated around a village centre as at Clutton and Newton St Loe or are linear in form as at Hinton Blewett and Temple Cloud. More rarely as at Timsbury and Marksbury settlement is located on the plateau. Again these villages contain a wealth of historic buildings of all periods. There is also a wealth of archaeology in the area. Stantonbury Hillfort, a Scheduled Monument is dominant in the north east of the area and the Wansdyke crosses the area from Stantonbury Hill to Odd Down. This nationally important linear earthwork is clearly visible in sections such as at Englishcombe and Stantonbury Hill. The earthworks of the medieval Culverhay Castle also survive at Englishcombe.
- 2.17 The Chew Valley is to the west of the Council's area and key villages are the historic settlements of Chew Magna, Chew Stoke, Pensford and Bishop Sutton. The latter has been subject to more modern development but Chew Magna, Chew Stoke and Pensford have medieval origins and historic buildings of all periods. The area includes a number of visible archaeological features including the Stanton Drew Stone Circles Scheduled Monument and Stowey Castle earthworks.
- 2.18 Other character areas towards the South West and South East boundaries of the Council's area are characterised by small settlements, including farms, hamlets and small villages, dotted throughout the countryside again with a wealth of historic buildings and archaeology.

3 Historic environment - statistics

- 3.1 The international significance and importance of Bath is recognised by its World Heritage Site inscription. Beyond Bath the Council's area, as outlined above, has a rich and diverse historic environment, including locally distinct vernacular architecture, uniquely important archaeology and a valuable industrial and coal mining heritage.
- 3.2. Other designated heritage assets comprise:
 - Over 6,000 listed buildings
 - 35 conservation areas
 - 74 Scheduled Ancient Monuments
 - The Registered Lansdown Historic Battlefield site
 - 16 Registered Historic Parks and Gardens
 - 71 Parks and Gardens designated locally by the Avon Gardens Trust
- 3.3 There are a large number of buildings, structures, monuments and other features in Bath and North East Somerset which, while not statutory listed or scheduled, are of architectural and historic interest or make a significant contribution to the character and appearance of an area and are therefore considered to be non-designated heritage assets.

4 Policy and regulatory framework

4.1 National legislative and policy framework

4.1.1 The key national policies and legislative regulations related to the historic environment are set out below:

Planning (Listed Buildings and Conservation Areas) Act 1990

This Act introduced legislation which created special controls for the protection of listed buildings and conservation areas. It established that damage to these assets could amount to a criminal offence.

Ancient Monuments and Archaeological Areas Act 1979

This Act legislates to protect the archaeological heritage of Great Britain. The Act defines monuments which warrant protection and establishes that damage to these amounts to a criminal offence.

National Planning Policy Framework (NPPF)

This sets out the Government's planning policies for England. Paragraphs 184 to 202 detail historic environment policies and focus on ensuring heritage assets are given protection commensurate with their status and encouraging new development which preserves their special qualities. The NPPF particularly focusses on the significance of heritage assets.

National Planning Practice Guidance (NPPG)

The NPPG explains key issues and answers common questions to guide implementation of national policies. The Historic Environment section is of relevance to this paper.

4.1.2 The NPPF is very clear that protection of the historic environment is a key component of sustainable development. The NPPF contains the following policies which are particularly relevant to the local plan:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value61. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations62.

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

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

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

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

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

4.2 Local policy framework and guidance documents

- 4.2.1 The Development Plan for Bath and North East Somerset currently comprises:
 - Bath & North East Somerset Core Strategy (July 2014)
 - Bath & North East Somerset Placemaking Plan (July 2017)
 - West of England Joint Waste Core Strategy (2011)
 - Bath & North East Somerset saved Local Plan (2007) Policies* not replaced by the Core Strategy or the Placemaking Plan:
 - Policy GDS.1 Site allocations and development requirements (policy framework)
 - Policy GDS.1/K2: South West Keynsham (site)
 - Policy GDS.1/NR2: Radstock Railway Land (site)
 - Policy GDS.1/V3: Paulton Printing Factory (site)
 - Policy GDS.1/V8: Former Radford Retail System's Site, Chew Stoke (site)

*These policies are reproduced in full in Volume 6 of the Placemaking Plan (Appendix 1, Table 2)

- Neighbourhood Plans a list of the 'Made' Neighbourhood Plans can be found via this link.
- 4.2.2 The following Supplementary Planning and other documents are also relevant:
 - Agricultural buildings design guidelines 2001 (Mendip AONB)
 - Archaeology in Bath & North East Somerset SPG (2004)
 - Archaeology in Bath SPG (2004)

- Bath Building Heights Strategy (2010)
- Bath City-wide Character Appraisal SPD (2005)
- Bath Conservation Area Commercial signage and tables and chairs on the highway Design and Conservation Guidance (2016)
- Bath Pattern Book (2015)
- Bath Shopfronts: Guidelines for Design and Conservation (1993)
- Bathford Village Design Statement (2005)
- Chew Magna Village Design Statement (2006)
- City of Bath Morphology Study (2015)
- City of Bath World Heritage Site Setting SPD (2013)
- Energy Efficiency and Renewable Energy Guidance For Listed Buildings and Undesignated Historic Buildings (2013)
- Hallatrow & High Littleton Village Design Statement (2003)
- Paulton Village Design Statement (2001)
- Peasdown ST John Village Design Statement (2001)
- Priston Village Design Statement
- Rural Landscapes of Bath & North East Somerset: A Landscape Character Assessment SPG (2003)
- Retrofitting & Sustainable Construction SPD
- Streetscape Manual (2005)
- World Heritage Site Setting (City of Bath) SPD
- Conservation area character appraisals and management plans:
 - Chew Magna Claverton Coombe Hay Freshford Hinton Blewett Keynsham Midsomer Norton and Welton Paulton Pensford Queen Charlton Radstock Saltford Southstoke Wellow Woollard Larkhall Walcot Street Works
- Draft conservation area character appraisals for parts of Bath Conservation Area:
 - Brassmill Lane, Locksbrook and Western Riverside City Centre Bathwick Twerton Pulteney Road North Road, Cleveland Walk and Bathampton Slopes
- Guidance notes: Historic vaults in Bath Paint colours and finishes for historic and traditional shopfronts The Cleaning of Bath Stone Living in a conservation area

4.2.3 In addition the City of Bath World Heritage Site Management Plan (2016-2022) forms an important consideration for this topic paper.

Managing the historic environment

5 Heritage assets

5.1 Listed buildings

- 5.1.1 There are over 6,000 listed buildings in the Council's area. Whilst this at the time of writing comprises 3,739 list entries, structures in the curtilage of a listed building may also be protected and one listing may include a whole complex of buildings such as the Royal Crescent. Of these list entries, 131 are grade I, 212 grade II* and 3396 grade II.
- 5.1.2 All listed buildings and structures have the same level of protection regardless of their grading. The effect of listing is that proposals to alter, extend or demolish such a building require listed building consent as well as any planning permission that may be needed. Applications for listed building consent are dealt with by the local planning authority with the requirement to consult with Historic England in all cases involving Grade I or II* buildings and consultation with national amenity societies subject to certain criteria.
- 5.1.3 The Local Plan will need to continue to support national legislation and policy protecting listed buildings. Specific policies related to alterations to, and demolition of listed buildings, are a crucial component of a strategy to conserve the historic environment.
- 5.1.4 Policy will need to explicitly require an assessment of significance of a listed building as part of any proposal for it, as required by the NPPF, and seek to protect that significance and avoid harm. This should also include regard for any contribution made by a listed building's setting and, where it is found to make a contribution, protect it from harm.

5.2 Conservation areas

5.2.1 Conservation areas are an essential tool for recognising the historic context of an area. There are 35 conservation areas in the Council's area.

Conservation area:	Most recent designation:
Bath	2002
Bathampton	1984
Batheaston	1979
Bathford	1981
Charlcombe	1981
Chew Magna	2002
Chew Stoke	1989
Claverton	1981
Combe Hay	1981
Compton Martin	1993
Corston	1983

Conservation area:	Most recent designation:
East Harptree	1978
Englishcombe	1986
Freshford	1975
Hinton Blewett	1992
Hinton Charterhouse	1983
Kelston	1990
Keynsham	2016
Midsomer Norton & Welton	2018
Monkton Combe	1978
Newton St Loe	1990
North Stoke	1982
Paulton	2003
Pensford	1988
Queen Charlton	2018
Radstock	1999
Saltford	2018
Southstoke	1982
Stanton Drew	1990
Timsbury	1978
Ubley	1990
Upper Swainswick	1983
Wellow	1983
West Harptree	1992
Woollard	1990

Bath

- 5.2.2 Bath has one city wide conservation area which includes the city's unique and much celebrated heritage, but it also encompasses less well known areas which have a range of different characteristics. It is recognised that by establishing what makes a conservation area special through character appraisal, the reasons for designation should be clearer to those who live, work or propose to carry out development in the area. Also through character appraisal and management planning a framework can be provided to support change and proactive conservation and enhancement.
- 5.2.3 Work to complete a character appraisal for Bath Conservation Area is being undertaken by the Council with input from Bath Preservation Trust, Historic England and other local organisations. The conservation area has been divided into 16 character areas which frame a spatial approach to the project. A framework for a character appraisal as a whole has been developed and work has started on appraising the individual character areas. So far, appraisals for 8 of these character areas have been completed with another 5 in progress. The aim is then to bring these together as a whole and progress to public consultation and adoption. The work is being undertaken using a mix of limited capital funding, in house resource and volunteer work. It is the Council's aim to complete an adopted appraisal and a management framework looking at strengths, weaknesses, opportunities and threats, for Bath Conservation Area in the plan period.

Rural towns and villages

5.2.4 The character of Bath and North East Somerset's rural conservation areas play a vital role in portraying the character of the area's diverse historic settlements, including small market towns, a valuable industrial and coal mining heritage, the

influence of agriculture and horticulture, the Chew Valley and villages in the Cotswold and Mendip AONBs. These conservation areas are some of the most sought after places to live in the Council's rural area.

- 5.2.5 In addition to the areas already designated, there are areas which may still merit designation as conservation areas going forward and the Council needs to review these opportunities when resources allow.
- 5.2.6 As noted above in respect of Bath Conservation Area, conservation area character appraisal and management planning is a vital tool for understanding the reasons for conservation area designation, addressing change as well as proactively seeking to preserve and enhance the areas. 15 of the Council's 34 rural conservation areas have character appraisals. These are noted above at 2.2.2, although the oldest (Radstock 1999, Chew Magna 2003 and Paulton 2003) are over 10 years old and would therefore benefit from review and updating. All published appraisals are available on the Council's website and should be actively referenced as part of any proposal for development. The more recent appraisals also address management proposals as is best practice and in line with Historic England guidance.
- 5.2.7 Opportunities to undertake new or to update existing character appraisals, including review of conservation areas boundaries, and management proposals continue to be taken when resources, either financial or volunteer, permit. In particular external resource has been sourced where the pressure for change is greatest. Also some limited in-house resource is being used to progress appraisals and management proposals where some conservation area analysis work has already been undertaken. It should be the Council's aim, if resources allow, for all conservation areas to have up to date character appraisals, in line with best practice, in the period of the emerging Local Plan.
- 5.2.8 It is vital that the area's conservation areas continue to be protected from inappropriate development and improved through policies to ensure that:
 - development and demolition conserves or enhances the character or appearance of a conservation area;
 - development outside a conservation area, including in the area's setting, does not harm the conservation area character or appearance;
 - applications affecting a conservation area are detailed and accompanied by a comprehensive assessment of significance;
 - sympathetic, high quality design is expected.

5.3 Archaeology and scheduled ancient monuments

- 5.3.1 There are 58 scheduled ancient monuments (77 separate areas) in the Council's area and more than 4,000 recorded archaeological sites.
- 5.3.2 Scheduled ancient monuments are protected independently of the planning system. Proposals to demolish, remove, repair, alter, add to, flood or cover up a scheduled monument require scheduled monument consent.
- 5.3.3 The Local Plan will need to continue to provide policies to encourage the protection and restoration of scheduled ancient monuments as part of development proposals and to protect the setting of scheduled ancient monuments.

5.4 Historic parks and gardens

- 5.4.1 The Register of Landscapes, Parks and Gardens of Special Historic Interest identifies the areas gardens, grounds and other planned open spaces which are not directly included in the protection of listed buildings. The register is advisory only and provides no statutory powers, however, registration is a 'material consideration' in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscape's special character.
- 5.4.2 There are 16 parks and gardens on the Register of Landscapes, Parks and Gardens of Special Historic Interest and 71 parks and gardens designated locally by the Avon Gardens Trust which should all be recognised through policy.
- 5.4.3 The Local Plan will need to continue to provide policies to encourage the protection and restoration of registered and locally recognised parks and gardens as part of development proposals and to protect their setting as necessary.

5.5 World Heritage Site

- 5.5.1 The City of Bath World Heritage Site was inscribed in 1987. The reasons for inscription, or key attributes of Outstanding Universal Value, can be summarised 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
 - 6. Georgian architecture reflecting 18th century social ambitions
- 5.5.2 Bath World Heritage Site is exceptional in that the inscription covers the entire city, not just the central area or individual monuments. The vision set out in the World Heritage Site Management Plan 2016-2022 states:

'Bath will be an exemplar of sustainable urban management, striving to balance the needs of an inventive and entrepreneurial 21st century place with the conservation and enhancement of the unique heritage which is of world-wide significance.

- 5.5.3 The World Heritage Site status of the city is a key material consideration when making planning decisions. As a designated heritage asset of the highest significance there is a strong presumption in favour of the conservation of the Outstanding Universal Value of the World Heritage Site. The significance of the WHS is set out in the Statement of Outstanding Universal Value (OUV) (2010). The World Heritage Site Management Plan (2016-22) sets out the objectives and actions needed for the successful conservation and management of the Site.
- 5.5.4 The setting of the World Heritage Site, beyond its designated boundary, is important as inappropriate development here could impact upon the Outstanding Universal Value of the site. The setting is the surroundings in which the World Heritage Site is experienced. It includes a range of elements such as views and historical, landscape and cultural relationships as well as the surrounding green landscape. The views out to the green 'skyline' are critical as is the landscape setting and appearance of the city within the green 'bowl'. The World Heritage Site Setting SPD provides information needed to assess whether a proposed development falls within the setting, whether it will have a harmful impact and to what extent. The Green Belt, which closely surrounds the city, also plays an important role in

protecting the setting of the WHS and its surrounding landscape. The Local Plan will continue to protect its openness from inappropriate development. Any proposal to change the Green Belt boundary can only be made if 'exceptional circumstances' can be demonstrated.

- 5.5.5 The Local Plan will need to maintain a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against the level of harm to the Outstanding Universal Value of the World Heritage Site.
- 5.5.6 The Local Plan should continue to be a key document in terms of World Heritage Site management. The World Heritage Site Management Plan Action Plan (Chapter 6) contains multiple examples for which the Local Plan will provide the policy guidance to address issues.

5.6 Non-designated heritage assets

- 5.6.1 Many of the area's non-designated heritage assets are also highly regarded and often much-cherished local features ranging from undesignated archaeology (comprising the vast majority of the archaeological assets) to locally important historic buildings, structures and features.
- 5.6.2 The concept of non-designated heritage assets as a planning consideration has been part of planning policy guidance since the 1990s but has been more closely defined in the current National Planning Policy Framework (NPPF, 2018) and National Planning Practice Guidance Department for Communities and Local Government (2014) (National Planning Practice Guidance, Conserving and Enhancing the Historic Environment, Para 039).
- 5.6.3 Non designated heritage assets are defined in the NPPF as buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets and are not protected by legislation.
- 5.6.4 In April 2018 the Council set out in a draft supplementary planning document *Locally Listed Heritage Assets* the process by which non designated heritage assets will be identified and recorded. The process essentially requires that potential heritage assets are assessed against a set of criterion, following guidance by Historic England on Local Heritage Listing (May 2016). The process was subject to public consultation during 2018 and formal adoption is in progress.
- 5.6.5 Following formal adoption of the process, and subject to available resources, the *Locally Listed Heritage Assets* initiative will be promoted further across the Council's area. The list of locally listed heritage assets will be held spatially on the Bath and North East Somerset Historic Environment Record.
- 5.6.6 Government guidance makes it clear that the effect of a proposal on the significance of a non-designated heritage asset should be taken into account when determining applications. Non-designated archaeological heritage assets of demonstrably equal significance to Scheduled Ancient Monuments will be subject to the same policy considerations as designated heritage assets.

5.6.7 Council policy should continue to provide recognition of and protection for identified non-designated heritage assets, requiring that any proposals affecting the significance of a non-designated heritage asset should ensure that the asset is conserved with regard to its significance and provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.

5.7 Designated heritage assets at risk

- 5.7.1 Para 126 of the NPPF requires local planning authorities to set out a positive strategy for the conservation and enhancement of heritage assets at risk through neglect, decay or other threats.
- 5.7.2 Historic England's national Heritage at Risk register (grade I and II* listed buildings only) includes sites within the Council's area. At the time of writing, these are:
 - 4 listed buildings / structures
 - 4 conservation areas
 - 8 scheduled ancient monuments
- 5.7.3 The Council has its own Listed Buildings (and Scheduled Monuments) at Risk Register. Listed buildings have not been subject to full review of condition for more than 5 years. However the register of buildings, structures and monuments at risk, which included around 100 buildings / structures, as it stood following previous review, is currently being reviewed. Some of the sites are no longer at risk. Periodically other sites have become at risk and have been added to the register too. The Council is working with Historic England in seeking to secure the long term future of some of the most significant and vulnerable buildings at risk.
- 5.7.4 A full review of the condition of all listed buildings in the Council's area is needed when resources permit. This has been successfully addressed elsewhere using volunteer support, but even then it needs to be managed by a core resource.
- 5.7.5 A large number of the assets on the existing register have no obvious modern use or cannot readily be converted, for example church yard memorials and table tombs. These will require a proactive, themed and targeted approach to secure their long term future and local partnership working.
- 5.7.6 The Local Plan could include policies which allow redundant buildings at risk capable of conversion to be converted to viable uses consistent with the building's conservation. More widely 'enabling development' allows a more flexible approach to be taken when the future of a listed building can be secured for public benefit.
- 5.7.7 NPPF para 202 states local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
- 5.7.8 Detailed guidance and a national policy recommendation on enabling development was issued by Historic England, in 2008 (currently under review). The guidance and policy advocates a higher level of scrutiny and more onerous tests than are included in NPPF para 202 which is helpful in any policy formulation.
- 5.7.9 The Council works closely with Historic England to address issues affecting monuments at risk, such as the developing the West Wansdyke Management Plan and better access, understanding and management through projects like Bathscape (Heritage Lottery funded Landscape Partnership scheme).

- 5.7.10 The Council will continue to work with partners to resolve long standing high profile heritage sites at risk (for example, the former King Edward's School and Cleveland Pools in Bath and The Wansdyke).
- 5.7.11 The four conservation areas on the Historic England at Risk Register are Keynsham (formerly two areas, now amalgamated as a single conservation area), Midsomer Norton and Paulton. As noted above, recent reviews of the boundaries of Keynsham and Midsomer Norton conservation areas have been undertaken and up to date character appraisals and management proposals prepared which is the first step in seeking to address this at risk status. The same needs to be undertaken for Paulton when resources permit.
- 5.7.12 As a second stage, in respect of Keynsham, further work has been undertaken in the form of a shopfront and façade study as the loss of historic architectural detailing and features (including shop fronts and poor commercial signage) are in part responsible for this at risk designation. The survey exercise has focused on the commercial area of the conservation area. Its purpose is to develop a targeted program of repair, re-use and regeneration of vacant buildings (where required) and enhancement; enabling any future resources to be focused on those properties most in need of heritage repair, regeneration and potential re-instatement of lost architectural detail. The opportunity to extend this work to Midsomer Norton Conservation Area and the Westgate Street part of Bath Conservation Area is now being considered. This work and any similar future work in this and other conservation areas should form part of adopted Local Plan policy.

5.8 Historic Environment Record (HER) and other local guidance and advice

- 5.8.1 It is an applicant's responsibility to provide sufficient information and assessment of the impacts of their scheme on the significance of heritage assets and/or their settings, and the wider historic environment. To ensure the opportunities provided by the historic environment are appreciated, the HER should be referred to at an early stage in the design process. Therefore applications affecting the significance of a heritage asset will be required to provide sufficient information, such as desk-based assessment reference to the HER, field evaluation or a historic building report, including a description of significance, to demonstrate how the proposals would contribute to the asset's conservation. Where a development would result in the partial or total loss of a heritage asset and/ or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and to ensure the publication of that record to an appropriate standard for retention on the HER. Relevant advice and guidance is also available on the Historic England website.
- 5.8.2 The HER is also accessed widely by organisations who need to understand the implications of the historic environment in their activities.
- 5.8.3 NPPF para 188 requires information related to the historic environment to be publically accessible. The Council will continue to make available the Historic Environment Record (HER) to help inform change and the conservation of the area's heritage assets.
- 5.8.4 There exists an opportunity to better signpost the many online historic environment resources and also increase direct accessibility to resources wherever possible. In doing so the authority can encourage awareness and continue to improve the

consideration of the historic environment in development proposals as well as supporting other organisations in recognising and understanding the historic environment in their activities.

- 5.8.5 In addition to documents referenced elsewhere, such as conservation area character appraisals and management plans, the Council will as resources allow continue to prepare specific local guidance on the management of the historic environment and update existing guidance on subjects as diverse as historic shop fronts and colours, stone cleaning and retrofitting. These will add more detailed advice or guidance to supplement policies in the Local Plan and help the management of heritage assets as well as help support the submission of well-informed applications. This is also considered in Design Quality below.
- 5.8.5 In order to sympathetically manage heritage assets in the development process there must be a clear understanding of the assets themselves, including their significance and setting. Early pre-application work by the developer using the Council's specialist pre-application advice service will continue to be encouraged to avoid abortive and costly work at a later stage.

6 Design quality

6.1 Design quality and the historic environment

- 6.1.1 Design quality in the built environment, including buildings, the public realm and transport infrastructure is founded in an understanding of context and location. The design of new development within B&NES should therefore normally be heavily influenced by heritage assets. Good design helps to enhance the sense of place, add to local distinctiveness, create value and economic growth and improve quality of life.
- 6.1.2 Development should respond to and support valued local historic character. New buildings are not placed in a vacuum but will become part of an existing place. The Local Plan should continue to promote and reinforce local distinctiveness through high quality design.
- 6.1.3 The development management process plays a fundamental part in the delivery of high quality design which is set out in planning policies contained in the Council's development plan and in guidance. The diversity of the Council's area requires a spatially focussed approach.

6.2 City of Bath

- 6.2.1 With an intricate and long history Bath remains a living city with the demands of a growing population. It is paramount that its rich character and unique historic environment is not compromised when accommodating change and new development. In addition to understanding the immediate context and the wider area more generally, development must be informed by an understanding of the Outstanding Universal Value of the World Heritage Site, its authenticity and integrity.
- 6.2.2 As noted previously much of the city of Bath is designated as a single conservation area. Conservation area character appraisal is therefore valuable in setting out the context for new development. The position and plans with regard to developing a full conservation area character appraisal for Bath is set out above.

- 6.2.3 The Council has published and promotes guidance for Bath, which has evolved over a number of years, in order to encourage good practice. This includes:
 - Bath City-wide Character Appraisal SPD (2005)
 - Bath Conservation Area Commercial signage and tables and chairs on the highway Design and Conservation Guidance (2016)
 - Bath Pattern Book
 - Bath Shopfronts: Guidelines for Design and Conservation (1993)
 - City of Bath Morphology Study (2015)
 - City of Bath World Heritage Site Setting SPD (2013)
 - Energy Efficiency and Renewable Energy Guidance For Listed Buildings and Undesignated Historic Buildings (2013)
 - Retrofitting & Sustainable Construction SPD
 - Streetscape Manual (2005)
 - World Heritage Site Setting (City of Bath) SPD
 - Historic vaults in Bath
 - Paint colours and finishes for historic and traditional shopfronts
 - The Cleaning of Bath Stone
- 6.2.4 The guidance is wide ranging and some of it is adopted as a Supplementary Planning Document, whilst other publications remain as guidance. It is inextricably linked to the historic environment. The guidance ranges from the macro to the micro height matters, morphology and setting to detailed or more intricate matters such as shopfront design, signage, colour and the use of historic vaults.
- 6.2.5 All of the guidance remains appropriate and valid and there is the opportunity to review its promotion, presentation and interrelationship and also, in bringing it together within an adopted framework, to assess and map out gaps and opportunities and to plan for further guidance as resources permit. The Local Plan will articulate and support this approach.
- 6.2.6 The Local Plan currently provides and should continue to provide a series of key design guidelines and values for Bath.

6.3 Town centres, villages and rural areas

- 6.3.1 Good quality design is essential to help maintain a sense of place and local distinctiveness; as part of the innovative reuse of existing buildings; in heritage-led regeneration and in supporting the vitality and viability of the Council's town centres.
- 6.3.2 The importance of the historic environment of many of the town centres and villages and some of their surrounding areas is recognised in their designation as conservation areas. Conservation area character appraisal is therefore valuable in setting out the context for new development both within and in the setting of these areas. The position and plans with regard to conservation area character appraisal and potential new designations are set out above.
- 6.3.3 New housing developments to towns and villages need to respond sensitively to existing design characteristics to ensure that they make a positive contribution to the settlement and avoid harm. There is the opportunity to consider the development of specific design guidance in relation to these circumstances and to reinforce and contribute to specific local context and create attractive and inspiring

places. This essential requirement for the setting of historic cores as heritage assets should continue to be reflected in policy.

- 6.3.4 The conversion and / or extension of historic farm buildings and farmsteads and associated works can harm the historic character of these buildings and their settings. As these building continue to become redundant from their original uses there is a case for policy specifically focussed on ensuring their special character is retained in development and schemes of repair.
- 6.3.5 Generally, the villages and rural areas of Bath and North East Somerset are sought after places to live with the historic environment at their core. They include settlements in the Mendip Hills and Cotswold AONBs. The two AONB Management Plans focus on the special qualities of these areas including the historic environment and there is also some design guidance produced. Given the sought-after nature of these areas, there is ongoing pressure for small scale development and alteration. This cumulatively can have a significant impact on the distinctiveness and qualities of the areas. There exists therefore the opportunity for more comprehensive design guidance for the Council's rural areas.

6.4 Design review

- 6.4.1 It is recognised in the NPPF that design review, as an independent impartial evaluation process, is a well-established way of improving the quality of design outcomes in the built environment.
- 6.4.2 The Council has procured the Creating Excellence South West Design Review Panel to undertake design review of the emerging planning frameworks at the Strategic Development Locations at Keynsham and Whitchurch and with the scope to cover wider planning applications. This will be developed through the lifetime of this Local Plan in order to get consistency through the design review process and to build up a panel that genuinely understands the local context of Bath and the surrounding area.

Key drivers for change and the historic environment

7 Transport and traffic

- 7.1 The Joint Local Transport Plan (JLTP) 3 2011 2026 sets out the strategic approach to deliver transport improvements in the Council's and surrounding areas. The JLTP4 is in the process of being produced by the 4 West of England authorities and consultation on a draft will take place early in 2019. The current strategy aims to minimise the impact of transport on the natural and historic environment. It recognises that Bath World Heritage Site, towns and villages, conservation areas, the two Areas of Outstanding Natural Beauty (AONB) all contribute to the quality of life in the area and that historic city and town centres, conservation areas and villages should be maintained and enhanced as part of delivery.
- 7.2 Locally the aim is to continue the longstanding theme of reducing car dependency and working towards making walking, cycling and use of public transport, the more attractive options for travel, which in turn will have benefits for the historic environment. Improvements to some of the area's historic streets and settlements will hopefully become possible by reducing the volume of traffic using those historic streets and spaces. The management of the highway network, particularly in areas of historic significance, needs to continue to be undertaken within the context of the

historic built environment and include reducing the impact of signage, road markings and the impact of traffic calming.

- 7.3 Conservation area characterisation and management proposals should play a key role in analysis and understanding to inform the development of transport related schemes and decision making. There should also be a continuing opportunity for historic environment engagement in the development and design of schemes as currently exists through close officer working. This is equally relevant in the City of Bath and in the area's historic town centres, villages and rural areas.
- 7.4 Local Plan policies should ensure that the historic environment is recognised and taken into consideration in the development of strategic transport related initiatives.

8 Public realm

- 8.1 Public realm is defined as any publicly accessed streets, pathways, right of ways, parks, open spaces and any public and civic building and facilities. Development proposals often include areas of public realm as part of their proposals and/or contribute financially to the creation of new or enhanced streets and spaces.
- 8.2 Despite the public realm being an intrinsic part of the historic built environment, it does not have the same degree of legislative protection or historic environment stewardship or management that historic buildings have enjoyed. This applies from the World Heritage Site of Bath to our town and village centres which are, in the most part designated as conservation areas.
- 8.3 The Council has prepared a number of strategies and guidance to support the delivery and coordination of quality of public realm improvements and maintenance. In addition, Neighbourhood Plans often include detailed public realm proposals and policies. Conservation area character appraisals also identify opportunities.
- 8.4 In Bath, the Council adopted the Public Realm and Movement Strategy for Bath City Centre in March 2010. It was founded on a thorough appreciation of the historic development and design values of the city and puts forward an incremental plan for transforming the public realm. It is supplemented by the Bath Pattern Book – Public Realm Framework (Part 1),Technical and Operational Guidance (Part 2) (December 2015) and associated Street Furniture Pattern Book Design Guide, Operation and Maintenance Manual & the City Information Systems Design Guide, to ensure the highest standards of public realm are delivered across the City.
- 8.5 Any future review of this framework for Bath and the priorities set out in the Public Realm and Movement Strategy should continue to be influenced and led by the historic built environment and the opportunity taken to link to heritage at risk and opportunities which are being identified though the Bath Conservation Area characterisation work.
- 8.6 As noted above improvements to parts of the area's historic settlements should become possible by reducing the volume of traffic using historic streets and spaces. The management of the highway network in areas of historic significance to support the creation of high quality public realm is supported by the Development Plan. The Council's conservation area character appraisals for towns and villages will continue to identify detailed opportunities. This should continue to be recognised in Local Plan policies.

8.7 Keynsham town centre public realm works are already critically linked to opportunities for the historic built environment through characterisation work. Midsomer Norton town centre has similar opportunities for the public realm and historic built environment. Radstock town centre will continue to provide a focal point for the community with opportunities linked to its mining heritage.

9 Economy

- 9.1 The historic environment is intrinsically linked to economic activity, with a large number of economic activities occurring within it, dependent on it or attracted to it. It is an asset that attracts and sustains the residential population, and it adds value to the continually growing tourism sector, regeneration and business. It acts as a highly significant stimulus to local economic growth.
- 9.2 Bath's historic environment and vibrant character is a unique asset and a fundamental reason why people choose to move to or stay associated with the city, and this residential population supports a strong economy. Bath also draws millions of domestic and international visitors each year. This in turn supports thousands of jobs and contributes to national and local economic growth. Figures nationally are set out in Historic England Heritage Counts 2017¹. The Council's Economic Strategy (which will be reviewed alongside preparation of the Draft Local Plan) recognises Bath as a World Heritage Site, an international tourism destination and a regional shopping centre and the importance of this in the Bath and North East Somerset economy. It provides nearly 70% of the areas employment and economic output (GVA), is home to over 50% of B&NES businesses and 75% of knowledge based and priority sector employment is based in the city. All of the matters set out in this paper seek to ensure that the historic environment is managed and sustained in a manner that will continue to contribute to this essential aspect of the economy.
- 9.3 The growth potential of the tourist visitor economy, currently 9% of GDP, an 8.1% increase since 2010, with, by 2025, the total contribution of tourism to the UK forecast at £324 billion and 4.6 million jobs (Deloitte/Oxford Economics) also has to be planned for, particularly in the Bath World Heritage Site. The appropriate and effective management of the historic environment needs to be recognised as a fundamental part of the Council's emerging Destination Management Strategy.
- 9.4 Also addressed in Historic England Heritage Counts¹ is the value of the built heritage as the cornerstone of many successful regeneration projects. Local historic buildings add to the unique character of an area, help to foster a sense of community and have an important role in creating a sense of place and distinctiveness; this in turn attracts people, businesses and investment.
- 9.5 The Local Plan will need to continue, through policy, the requirement to sustain and enhance the area's historic environment in allocated sites, drawing particular attention to heritage assets and their setting.
- 9.6 The historic environment is also an important site of specific economic activity and forms a vital part of infrastructure by providing premises for businesses, amenities, education and utilities. Many of the shops, restaurants, hotels, and offices in towns and the City of Bath are located within pre-1919 traditional buildings. Therefore, the historic environment is not just about the past but is also an important part of current commercial activity.

- 9.7 In addition historic buildings have been identified as having potential to provide ideal premises for growing creative industries. Recent research commissioned by DCMS found that the greater the density of cultural and heritage assets, the better the performance of the creative industries and the greater the level of specialisation towards the creative industries. Creative and cultural industries are more likely to be found in listed than non-listed buildings¹ Making provision for the specific space needs of small creative and knowledge based businesses is seen as a key opportunity for Bath and North East Somerset in the Council's Economic Strategy. In Bath it is considered in the strategy that action is required to build on partner and operator interest to bring forward a new creative industries hub. The historic environment therefore offers key opportunities in this respect.
- 9.8 The importance of the historic environment in addressing the issues and challenges in the Council's market towns needs to be fully recognised. Town centre High Street historic environment initiatives, which are currently being developed by the Council support ongoing opportunities for commercial activity and at the same time linking closely to tourism and destination value by focussing on opportunities for regeneration and improvement of the historic environment (see 5.7 12 above).
- 9.9 The Council's Economic Strategy seeks to ensure that existing businesses and residents are enabled to reduce their energy and resource use and adapt to future climate change. This has implications for the historic environment and positive steps for managing this are set out in section 11 below.
- 9.10 Most historic buildings are inherently sustainable having been well-constructed from high quality, locally sourced materials by local craftsman. Their inherent embodied energy means that care of them and their retention is both logical and consistent with modern concepts of sustainability. At the same time it will be possible to make changes to buildings which do not harm their significance.

10 Delivering high quality new homes

- 10.1 The housing requirement for B&NES established by the Joint Spatial Plan will be challenging to meet, particularly in the context of the area's historic (and natural) environment assets. Integrating new developments into and around historic areas will be essential. NPPF paragraph 185 makes reference to the desirability of new development making a positive contribution to local character and distinctiveness and opportunities to draw on the contribution made by the historic environment to the character of a place
- 10.2 The starting point is ensuring appropriate sustainable locations are selected and the historic environment is fully integrated in site selection methodology. The Council's Housing and Employment Land Availability Assessment (HELAA) assesses the technical suitability & availability of land for housing and/or employment development. A preliminary historic environment screening has been undertaken of all proposed sites with 'traffic light' outcomes and clearly identifying unsuitable sites. The Council is also providing the opportunity for Parish & Town Councils to assess the sites and in so doing they are encouraged to consider (as well as other matters) the historic environment using 'assessment toolkits'. The outcome of this work will then be used primarily to inform the selection of sites for allocation in the draft Local Plan, alongside further assessment work by Council specialists/experts.

- 10.3 Where the historic environment has the potential to be affected by site allocations, the Local Plan should seek to demonstrate explicitly, a clear understanding of the significance of heritage assets and their setting. Also, how development and infrastructure could take place in an appropriate location and form, with clarity about nature and scale, through detailed assessment, considering impact on significance, maximising enhancement, avoiding harm and meeting overall the NPPF tests of soundness.
- 10.4 Local Plan policy should also continue to seek to ensure development proposals address how the historic environment adds to the sense of place for new development and the importance of setting and managing a positive relationship with the historic environment and heritage assets through scale, design, materials and detail, and recognising and respecting local distinctiveness.

11 Responding to climate change

- 11.1 Climate change and a focus on energy efficiency is inevitably leading to changes to the historic environment. It is also widely recognised and accepted that the historic environment should play its part in meeting these current and future challenges. However, it is vital that changes are consistent with the aims of heritage protection, primary legislation, Government policy and national guidance, from the authenticity of the World Heritage site to the significance of historic areas and individual heritage assets.
- 11.2 In accepting that some change will be necessary it is critical that this is carefully managed so that the historic environment and its heritage assets are sustained. National policy guidance has an emphasis on careful, sensitive informed management of change.
- 11.3 Historic buildings are a finite resource and, as noted above, are inherently sustainable having been, in most cases, well-constructed from high quality, locally sourced materials by local craftsman. Their inherent embodied energy means that care of them and their retention is both logical and consistent with modern concepts of sustainability and with the ambition of reducing carbon emissions. At the same time it is possible to make changes to buildings which do not harm their significance.
- 11.4 Local Plan policy should continue to support energy efficient improvements and the installation of micro-renewables affecting designated and undesignated historic buildings and areas, including listed buildings and conservation areas, provided that the proposals are consistent with the assets' conservation and do not harm its significance.
- 11.5 The Council's, Energy Efficiency and Renewable Energy Guidance for Listed Buildings and Undesignated Historic Buildings (September 2013) remains an up to date policy and guidance document consistent with Historic England best practice guidance. It is aimed at house holders and small scale developers and should continue to be referenced in the Local Plan as key policy and guidance.
- 11.6 Measures to reduce fuel consumption, increase energy efficiency and exploit renewable energy sources on a wider scale are supported but at the same time it is recognised that some renewable energy technologies have the potential to cause serious damage to irreplaceable historic sites, which are themselves an integral part of the wider environmental and sustainability agenda. A wholly sustainable

approach to renewable energy generation needs to secure a balance between the benefits it delivers and the environmental costs it incurs.

- 11.7 Local Plan policy should aim to maximise the benefits of renewable energy opportunities projects, while minimising their adverse effects on the historic environment. This can be achieved by considering the cumulative effects of projects as well as their specific impacts and by ensuring that the implications of renewable energy developments on the historic environment are fully understood.
- 11.8 The Local Plan should note that high quality design can play a key role in minimising any adverse effects of projects, from energy crops in the landscape to the positioning of photo-voltaic cells on historic buildings. Also that this requires a sound understanding of the character and importance of the historic asset involved, whether at the scale of individual buildings and sites or more extensive historic areas and landscapes. The opportunity for reversibility can also be a consideration.

Working together with members and local councils

12 Heritage and Culture Champion

- 12.1 The Council, in accordance with Historic England guidance, has appointed a Heritage and Culture Champion; it is recognised that this is a key role and there is a commitment to support the role in assisting in:
 - Helping with the management of the historic environment of the area.
 - Promoting heritage within the Council and local communities and generating enthusiasm for and awareness of the importance of the local historic environment.
 - Helping to ensure that commitment to the proper care of the historic environment is embedded in all relevant activities and plans of the Council;
 - Supporting the Council's historic environment officers and influencing and communicating with others to ensure benefits for the historic environment.

13 Developing understanding

13.1 There is a commitment to developing the understanding of members in respect of historic environment matters and this will therefore continue to be integrated as part of an ongoing member training programme. The programme includes an annual review of completed development sites assessing matters including design and the historic environment.

14 Community planning and the historic environment

- 14.1 The historic environment should be fully recognised in community planning and local communities. Those preparing neighbourhood plans, will be provided with sign-posting to appropriate historic environment information and relevant training and encouraged to include historic environment matters in their community planning processes.
- 14.2 The Council has worked successfully with local community groups taking the lead in the preparation of all or part of conservation area character appraisals and management proposals as detailed above. The Council will therefore continue to encourage local communities to become involved with the conservation area characterisation work and where possible take a lead role.

15 Action plan

The following actions are derived from the content of this paper. The timescales will be dependent upon resources and potential partners will need to be reviewed and agreed.

	Action
	Managing the historic environment
	HERITAGE ASSETS
1	Policy should continue to support national legislation and policy protecting and managing designated heritage assets (world heritage site, listed buildings, conservation areas, scheduled ancient monuments, historic parks and gardens).
2	Policy should explicitly require an assessment of significance of a heritage asset as part of any proposal for it and seek to protect that significance.
3	Lead completion of an adopted appraisal and a management framework looking at strengths, weaknesses, opportunities and threats, for Bath Conservation Area.
4	Lead review opportunities for designation of new conservation areas in rural locations.
5	Lead preparation of new or update existing character appraisals, including review of conservation area boundaries, and management proposals so that all rural conservations areas have up to date appraisals and management proposals.
6	Policy should continue to seek opportunities for improvement and enhancement of conservation areas.
7	Policy should maintain a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity.
8	Policy should cross reference to World Heritage Site Management Plan Action Plan.
9	Adopt a Locally Listed Heritage Assets Supplementary Planning Document.

10	Promote the Locally Listed Heritage Assets initiative to develop the local list.
11	Policy should continue to provide recognition of and protection for identified locally listed (non-designated) heritage assets.
	DESIGNATED HERITAGE ASSETS AT RISK
12	Complete review of and publish register of listed buildings, structures and scheduled monuments at risk.
13	Plan for a full review of the condition of all listed buildings and structures in the Council's area engaging volunteer support.
14	Develop and begin to implement a proactive, themed and targeted approach to secure the long term future of listed buildings and structures at risk.
15	Consider policies which allow redundant buildings at risk capable of conversion to be converted to viable uses consistent with the building's conservation which would otherwise conflict with planning policies.
16	Continue to work closely with Historic England to address issues affecting monuments at risk.
17	Continue to work with partners to resolve long standing high profile heritage sites at risk (for example, the former King Edward's School and Cleveland Pools in Bath and The Wansdyke).
18	Policy should reference and recognise the Keynsham shopfront and façade study (and any similar future studies) as a basis for managing related change.
19	Develop the next stage of the Keynsham shopfront façade study to seek to secure implementation of recommendations as part of a wider Council market town initiative.
20	Seek to carry out a shopfront and façade study similar to Keynsham in Midsomer Norton and Welton Conservation Area and seek to secure implementation of recommendations as part of a wider Council market town initiative.
21	Seek to carry out a similar shopfront and façade study similar to Keynsham in the Westgate Street part of Bath Conservation Area and seek to secure implementation of recommendations as part of a wider Council market town initiative.

	HISTORIC ENVIRONMENT RECORD AND OTHER LOCAL GUIDANCE AND ADVICE
22	Continue to make available the Historic Environment Record (HER) for Bath and North East Somerset.
23	Better signpost externally historic environment online and ensure direct accessibility to resources.
24	Continue to prepare specific local guidance on the management of the historic environment as topics require. Policy should reference existing and potential future Council guidance.
	DESIGN QUALITY
25	Review existing guidance for the city of Bath, its promotion, presentation and interrelationship bring together within an adopted framework. Assess and map out gaps and opportunities and to plan for further guidance.
26	Continue to provide a series of key design guidelines and values for Bath in the Local Plan.
27	Include specific design guidance in the Local Plan for new housing allocations in relation to designing for and to reinforce and contribute to specific local context and create attractive and inspiring places.
28	A policy should be specifically focussed on ensuring the special character of historic farm buildings and farmsteads is retained in development.
29	Consider the need and opportunity for comprehensive design guidance for the Council's rural areas.
30	Establish a design review process for the Strategic Development Locations at Keynsham and Whitchurch.
31	Develop a consistent design review process as an integral part of the development management process for Bath and rural areas.
	Key drivers for change and the historic environment
	TRANSPORT AND TRAFFIC
32	Ensure that conservation area characterisation and management proposals play a key role in analysis and understanding to support the development of transport related schemes and decision making.
33	Continue historic environment engagement in the detailed development and design of traffic and transport schemes.

34	Policy should ensure that the historic environment is recognised and taken into consideration in the development of strategic transport related initiatives.
	PUBLIC REALM
35	Review of public realm framework for Bath and the priorities set out in the Public Realm and Movement Strategy should continue to be influenced and led by the historic built environment and the opportunity taken to link to heritage at risk and opportunities which are being identified though the Bath Conservation Area characterisation work.
36	Recognise in policy and ensure that the conservation area character appraisals for towns and villages continue to identify detailed opportunities for the public realm.
	ECONOMY
37	The appropriate and effective management of the historic environment needs to be recognised as a fundamental part of the Council's Destination Management Strategy.
38	Policy should continue the requirement to sustain and enhance the Council's historic environment in allocations sites, drawing particular attention to heritage assets and their setting in relation to tourism, regeneration and business.
39	Seek to ensure that the value and importance of the historic environment is recognised in implementation of the Council's economic strategy.
	DELIVERING HIGH QUALITY NEW HOMES
40	Ensure that historic environment issues are fully considered during site allocation, including analysis of all relevant sites by historic environment specialists.
41	Where the historic environment has the potential to be affected by site allocations, the Local Plan will seek to demonstrate explicitly a clear understanding the significance of heritage assets and their setting. Also, how development and infrastructure could take place in an appropriate location and form.
42	Policy should continue to seek to ensure development proposals address how the historic environment adds to the sense of place for new development and the importance of setting and managing a positive relationship with the historic environment and heritage assets through scale, design, materials and details, and recognising and respecting local distinctiveness.

	RESPONDING TO CLIMATE CHANGE
43	Local Plan policy should continue to support energy efficient improvements and the installation of micro-renewables affecting designated and undesignated historic buildings and areas, including listed buildings and conservation areas, provided that the proposals are consistent with the assets' conservation.
14	Local Plan should reference Energy Efficiency and Renewable Energy Guidance for Listed Buildings and Undesignated Historic Buildings (September 2013)
45	Local Plan policy should aim to maximise the benefits of renewable energy opportunities projects, while minimising their adverse effects on the historic environment.
46	Local Plan should set out the importance high-quality design can play a key role in minimising any adverse effects of projects.
	Working together with members and local councils
	HERTAGE AND CULTURE CHAMPION
47	The Council's member appointed Heritage and Culture Champion will, supported by officers, take a lead role in historic environment matters, strategic and operational.
	DEVELOPING UNDERSTANDING
48	A programme of continuing professional development on historic environment matters will be maintained for all members.
	COMMUNITY PLANNING AND THE HISTORIC ENVIRONMENT
49	Local communities, particularly those preparing neighbourhood plans will be provided with sign-posting to appropriate historic environment information and relevant training and encouraged to include historic environment issues in their community planning processes.
50	Local communities will be encouraged to become involved with the conservation area characterisation work and where possible take a lead role.