BATH & NORTH EAST SOMERSET

PLANNING SERVICES

Archaeology in the City of Bath

Supplementary Planning Guidance

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Introduction

1.1 The purpose of this Supplementary Planning Guidance (SPG) is to provide more detailed information and guidance on archaeology and planning in Bath. Its principal purpose when adopted, is to supplement the archaeological policies of the existing and emerging Local Plan and should be read in conjunction with these (see Part 5: Policy framework). It also clarifies development control procedures and Planning Policy Guidance notes (PPG 15 & 16) issued by Government. Upon adoption it will be a material consideration in the determination of planning applications relating to the historic environment in Bath.

1.2 This SPG is directly linked to an analysis of the archaeological character of Bath which will be fully presented in the companion publication, the Bath Urban Archaeological Strategy (UAS), the final phase of the Bath Extensive Urban Archaeological Survey supported and part funded by English Heritage. The first phase of this survey was the collation of an Urban Archaeological Database (UAD), established in 1997. The UAD has subsequently been incorporated into the Bath and North East Somerset Sites and Monuments Record (SMR). The second phase, the Urban Archaeological Assessment (UAA) is in its final draft and will be published in 2005. The UAS will consider the wider implications of managing the archaeology of Bath. As well as looking at the development control process it will consider the international significance of Bath's archaeology, and will contain a detailed assessment of character, and will examine the opportunities for increasing understanding and promotion. A research framework will also be proposed in the document.

1.3 This SPG is also designed to complement the district wide Supplementary Planning Guidance *'Archaeology in Bath and North East Somerset, 2003'*, which contains detail on archaeological methodology within the planning process and more general district matters. As both these SPG's may be read independently there will unavoidably be some repetition in the presentation of archaeological procedures and methodologies associated with the planning process.

1.4 The third aspect of the historic environment that this SPG is designed to complement is the World Heritage Site Management Plan, a key aim of which is securing a sustainable future for the City. This Plan contains many issues, objectives and actions, and archaeology is a central theme.

Plate 1, 18th century quarrymen's housing

1.5 **Structure of this document**

The SPG sets out to delineate zones of archaeology within the City of Bath and to provide advice and guidance to anyone involved in development and development related activities on the development control implications associated with these zones. The advice and guidance given is in the context of archaeological policies in the emerging District Wide Local Plan. Part one provides information on the databases used for decision making and a description of the archaeological character zones. Part two considers the statutory instruments dealing with archaeology and the archaeological aspects of listed buildings. Part three deals with development control. Part four considers methodology. Part five examines the Policy framework. Part six deals with supporting information and the glossary.

Part 1: Databases and character zones

The Bath Urban Archaeological Database (UAD) and the Sites and Monuments Record (SMR)

2.0 The UAD, established in 1997, contains detailed information on 90 monuments and around 700 archaeological investigations, surveys and historical interpretations within the City of Bath. This information is stored in a Microsoft Access database which forms part of the Bath and North East Somerset SMR.

2.1 The SMR itself is a cumulative record of all known archaeological sites, monuments and historic landscape features in Bath and North East Somerset. The SMR is held in digital form in a database called *Exegesis Historic Buildings, Sites and Monuments Record*. The database is connected to a GIS (Geographical Information System) called *MapInfo* which includes historic maps from the 1840's, 1884-8, 1904 and 1936 and a variety of other mapped data including historic farm surveys and historic landscape surveys. There are over 5,000 entries in the database relating to monuments and sites, and over 2,000 entries relating to archaeological investigations carried out over the past 100 years or so.

2.2 The Council uses the SMR as the basis for archaeological and historic environment advice in formulating Planning Policy, Development Control and other Council services. It is also used by national organisations, and can be used by developers and their agents, academic researchers, college students and local people seeking information on the District's past, by appointment.

Plate 2, Upper Borough Walls, line of medieval City wall

Plate 3, Roman wall found on the site of St Andrew's Church, Julian Road

Figure 1, map of Bath centre showing SMR and UAD entries.

2.3 The UAD and SMR are managed by Bath and North East Somerset Council's Planning Services in accordance with national guidelines set by English Heritage and the Association of Local Government Archaeological Officers (ALGAO).

The SMR, formally adopted by Bath and North East Somerset Council in 2002, is available for consultation by appointment. Enquiries should be made to the Planning Services Archaeological Officer at the contact details shown in the appendix.

Bath archaeological character descriptions

3.0 The archaeology of Bath has been ascribed to 36 character zones, based on the state of existing, sometimes limited knowledge. The detail of these zones, including an assessment of character, threats and opportunities, and research potential, will be contained in the forthcoming Bath Urban Archaeological Strategy. These character zones are however, non-statutory and have been developed for guidance only. The zone boundaries are not meant to be solid and may change as more information is collected through archaeological investigation and research. The specific measures for each zone set out in the following pages may not be appropriate in some cases. The following table, including maps is a summary of this information and presented as part of this SPG to facilitate Development Control in Bath.

Zone Name	Brief Description
Zone 1, The Central Area	The Roman and medieval settlement overlaid by later Georgian development and largely confined within the City walls. The archaeological resource is mixed and complex with evidence of human settlement and activity associated with the hot springs and the rise of urbanism. Key sites include the Roman Baths and temple, Bath Abbey, the medieval street layout and some significant Georgian grand gestures.
Zone 2, Southgate	Medieval suburb from the City's south gate to a 13th century or earlier, river crossing over the Avon.
Zone 3, The Ham	Water meadows in medieval times which included one of the Abbey mill's, Isobel's Mill and associated water management features. The alluvium and gravel terrace are known to contain evidence of prehistoric activity. Later Georgian and Victorian development has also left its mark and the original site of Stothert and Pitt's Newark works is in this area.
Zone 4, Broad Street	Continuous occupation since at least 1200AD. Northern medieval suburb beyond the North Gate and comprising a number of surviving late medieval and early post medieval buildings, some of which have been re-fronted in the 18th century. The most visually complete is the Saracens Head public house.
Zone 5, Walcot Street	Major periods of settlement and occupation between 1st and 5th century and from c.1800AD to the present. The area between the site of the North Gate and Beehive Yard has also produced evidence of early and late medieval settlement. This zone contains significant archaeological deposits of urban character relating to Roman occupation. The built environment comprises surviving 18th century artisans housing amongst later Victorian and Edwardian vernacular buildings including the recently converted turn of the century brick tram depot in Beehive Yard.
Zone 6, Julian Road	Occupied from 1st to 5th century and again from c.1800AD. Discovery of Roman burials over the past 200 years suggests that there is a Roman road running east west reflected in the modern alignment of Julian Road. The discovery of building evidence in several locations suggests that there is also an element of Roman linear development similar to Walcot Street.

Zone Name	Brief Description
Zone 7, George Street/ Queen Square	Queen Square represents the earliest expression of John Wood's vision for Bath and the two earliest streets outside the city walls lie in this zone, Trim Street and Quiet Street laid out between 1708 and 1721. Roman burials have also been found in the zone.
Zone 8, Royal Victoria Park	The zone includes Marlborough Buildings, a formal Georgian terrace and garden allotments (Lower Common Allotments) on which a significant late Iron Age settlement superseded by a Roman stone building complex has been investigated. The park also contains evidence of late bronze age settlement and a Roman road running from Julian Road down to the river. A number of burials are known from the ditches of this road.
Zone 9, The Circus	One of the earliest Georgian set pieces also contains important evidence for original Georgian gardens, some of which have been buried intact.
Zone 10, The Royal Crescent	Impressive Georgian set piece architecture with rear mews buildings and well preserved gardens. Roman burials area also known from the zone and the Roman road in Zone 8 runs through this zone. Further evidence of late bronze age settlement should also survive, especially in the gardens.
Zone 11, London Road	The A4 follows the line of the main Roman road into Bath from the east and over the past two hundred years or so there have been a number of inhumations, tomb stones and other funerary indications found along the whole length. In a number of locations, notably Sims Garage and the Cleveland Bridge junction, there have been indications of settlement and occupation. It is likely that this length of Roman road will comprise a scattered ribbon development running from Cleveland Bridge which in itself may have been one of the major crossing points of the Avon. Roadside cemeteries will also be a feature.
Zone 12, Kensington Meadow/ Lambrook	Investigations at the site of the former Kensington bus depot and the Rugby training ground confirmed that the alluvial flood plain has been raised in the areas closest to the road over the past two hundred years but that significant depths of alluvial deposits exist. There are also good environmental deposits noted in test pits at both locations. Evidence for early medieval occupation, possibly associated with a small farm was exposed during investigations at the rugby training ground.
Zone 13, Alice Park	2nd terrace gravel deposits with the potential for Roman and prehistoric settlement. There may also be deposits associated with a medieval farm identified during a watching brief along the Batheaston by-pass.

Zone Name	Brief Description
Zone 14, Bathwick	The majority of the area comprises 2nd and 3rd terrace gravel with alluvial floodplain deposits partially overlying. Immediately opposite Cleveland Bridge was the medieval village of Bathwick now completely masked by later development. The church of St John the Baptist lies on the site of the medieval church, demolished in the early 19th century. There have been a number of discoveries relating to Roman activity in the area over the past 200 years or so most notably the discovery of columns and mosaics. More recent archaeological investigations have demonstrated the excellent survival of archaeological features cutting into the alluvium and gravel. A large ditch and quantities of finds support the assertion that Bathwick was a significant Roman settlement. Burials are also common in the zone and indicates the existence of a road through the area, possibly a major crossing of the Avon. Sydney Gardens represents one of the best examples of a formal Georgian pleasure garden in the country, and contains some significant canal architecture not found elsewhere. The Georgian terraces are also particularly fine in this area.
Zone 15, Sydney Buildings	Area where a few Roman burials have been found that may indicate one of several possible routes for Roman roads linking up to a probable crossing of the River Avon opposite to Hat and Feather public house.
Zone 16, Pulteney Road	Gravel terrace. No known archaeology but has potential for prehistoric and Roman activity.
Zone 17, The Recreation Ground	Area of alluvial floodplain that has potential for prehistoric and Roman activity.
Zone 18, North Avon Floodplain	Roman villa under Norfolk Crescent known from early 19th century sources and work at Kingsmead Motors site has identified areas of Roman demolition material. It is probable that this zone, particularly the higher ground above the river may contain evidence of Roman ribbon development along a possible east west road along the line of Upper Bristol Road which forms the northern boundary of this zone. There may also be a number of individual Roman villa style dwellings still to be found. The Roman road in Zone 8 may also cross this zone. The zone also contains Georgian terraces and 19th century working class housing. Industrial landscapes are represented by the remains of the Midland Railway and Green Park Station.
Zone 19, South Avon Floodplain	Largely water meadows belonging to Twerton Parish prior to the late 18th and early 19th centuries. The area has subsequently been built over for industrial housing including the site of some interesting 19th century back to back housing. The general morphology of the area reflects its industrial roots although many of the original field boundaries are still recognisable. The gas holders, dating back to the mid 19th century are the most dominant feature. The alluvium has been raised through dumping prior to redevelopment and the alluvial deposits and underlying gravel are consequently largely untouched. There is therefore a high potential for prehistoric and possibly Roman archaeology. This zone also includes the site of Stothert and Pitt's late 19th century engineering works demolished in the 1980's. The Midland railway embankment survives over much of the area.

Zone Name	Brief Description
Zone 20, Lower Bristol Road	As a gravel terrace this zone has potential for prehistoric and Roman settlement and activity although the majority of the area forms part of the late 19th century expansion of Bath with Victorian terraces. Some industrial buildings including the Bath printing works which includes a neo-classical frontage onto Lower Bristol Road are significant. St James Cemetery is one of Bath's 19th century municipal cemeteries and of considerable social interest.
Zone 21, Locksbrook Cemetery	Possible Roman road along Upper Bristol Road as there have been reports of a number of Roman burials and stone coffins found in the area including some from within the cemetery itself. The cemetery is one of the main 19th century municipal cemeteries. The original early 19th century Bath Gas Light and Coke Company gas works was sited to the east of the bridge.
Zone 22, Upper Bristol Road	19th century terracing with remains of Midland railway line. Possible prehistoric potential in the gravel.
Zone 23, Weston Island	Largely built over but used to comprise two Brass Mills at either end, one burnt down by fire in recent years. Both are thought to be on the site of Domesday mills that belonged to Bath Abbey.
Zone 24, Twerton	Medieval village mentioned in Domesday with a surviving medieval Parish Church. Majority of present village dates to 18th and 19th century although there are one or two earlier buildings. There is a good collection of listed Georgian buildings. The medieval village which is situated on a gravel terrace was divided into Upper and Lower Twerton.
Zone 25, Whiteway	Area which periodically reveals Roman burials particularly in stone coffins. Several Roman coins have also turned up. It is likely that some form of settlement, possibly a Roman farm lies in the immediate area.
Zone 26, Englishcombe Lane	Roman burials found over a number of years, notably in the gardens. Indicative of roadside cemetery, possibly the same road that features in Zones 15 and 27 and therefore may be the main southern route out of Roman Bath.
Zone 27, Prior Park Road	Roman burials found indicating possible line of a Roman road that may be one of the main Roman southern routes out of Bath. Prior Park Road was also the line of a Ralph Allen tramway giving access from Combe Down stone mines to the wharves of the River Avon and the Kennet and Avon Canal. There are a number of original Allen buildings in this zone.
Zone 28, Widcombe	Medieval settlement of Widcombe mentioned in various documents. The church of St. Thomas-a-Becket dates back to c.1422AD and may have replaced an earlier chapel. The origins of the settlement are obscure but it may have formed part of a large land holding originating in a grant made by King Edgar in 970AD. Number 5, Widcombe Hill appears to be a much altered 17th century building but the majority of other buildings date to the late 18th century. Widcombe Hall and Crowe Hall are two of the finest.

Zone Name	Brief Description
Zone 29, Sion Hill	Over the past few decades there have been a number of investigations and chance discoveries of Iron Age and Roman date which indicates the presence of an Iron Age and Roman settlement and associated burial ground.
Zone 30, Weston	Medieval village mentioned in Domesday of which the plan form probably still remains although the majority of the buildings are apparently of 18th or 19th century date there may be earlier fabric surviving behind later facades.
Zone 31, Locksbrook Road	Alluvial flood plain with the potential for environmental samples and prehistoric riverside activity. Roman artefacts including leather and wood have been found in fill from a bore hole in this zone.
Zone 32, Bathampton Down	Substantial surviving late prehistoric and Roman field systems revealed as low banks particularly on the golf course. Evidence of settlement is also known and Bathampton Down Camp is a scheduled ancient monument. Roman quarries and buildings in the west part of the zone are also suspected.
Zone 33, Lyncombe	Medieval settlement of Lyncombe mentioned in various documents and probably forms part of the same land holding mentioned above originating in a grant made by King Edgar in 970AD.
Zone 34, Partis College	Site of a large Roman building found during construction of the College. Roman burials are also known from the area. There is also evidence for a Roman road running north to Weston.
Zone 35, Combe Down	Area of substantive 18th and 19th century quarrying associated with Ralph Allen with possible evidence of earlier workings. The zone also contains an excellent collection of Georgian and later buildings associated with the quarrying. There is also some evidence of Roman settlement in the area.
Zone 36, High Common Golf Course	On the upper slopes of the golf course there are some areas of very well preserved medieval ridge and furrow forming part of the Walcot parish field system. Other signs of ridge and furrow occur throughout this zone. A Roman building has also been discovered here during irrigation work and some earthwork boundaries that may be contemporary are visible in the area.
Zone 37, Bath Background	This zone comprises the rest of the area within the City Of Bath not covered specifically by the other zones. Archaeological sites are known from this zone including quarries, evidence for Roman settlement, the sites of medieval farms and numerous Georgian buildings. However, it has proved very challenging to attempt to characterise these disparate elements in map form which would have contributed to over complicating matters from a development control point of view. Without doubt significant archaeology remains to be discovered in this area.

Part 2: Protection through statutory designation

Scheduling

4.0 Scheduling is the process through which the Government, with advice from English Heritage, gives legal protection to nationally important sites and monuments by adding them to a list or 'schedule' as laid down in the Ancient Monuments and Archaeological Areas Act of 1979. A monument which has been scheduled is protected against disturbance because it is an offence to carry out works without the authority of the Secretary of State accorded through Scheduled Monument Consent (SMC).

Character zones and scheduled monuments

4.1 A total of 1.4 hectares or 13% of the area enclosed by the old city walls (Character Zone 1) are protected as Scheduled Ancient Monuments (SAM's) under the 'Ancient Monuments and Archaeological Areas Act 1979'. There are 13 separate scheduled elements within Zone 1, and 2 elements outside this zone, each of which is described below.

Monument number	Title	Grid reference	Zone
82	The Roman Baths and site of Roman town, Bath	ST 7485 6487	1
		ST 7485 6480	1
		ST 7489 6483	1
		ST 7490 6489	1
		ST 7492 6464	1
		ST 7494 6483	1
		ST 7499 6457	1
		ST 7506 6473	1
		ST 7512 6466	1
		ST 7518 6456	1
93	Wansdyke: section 1230yds (1120m) eastwards from Burnt House Inn	ST 7347 6176 – ST 7462 6186	37
114	Bath City Walls	ST 7494 6488	1
		ST 7515 6486	1
	The Eastgate, Bath	ST 75175 6487	1
155	The Palladian Bridge, Prior Park, Bath	ST 7607 6332	37

Plate 4, The medieval Eastgate

Scheduled Monument Consents (SMC)

4.2 The definition of 'works' requiring SMC is very broad and in many cases the setting of a monument as well as its physical preservation is a material consideration. An SMC application is made to the Secretary of State for Culture, Media and Sport on forms supplied by the Department for Culture, Media and Sport. The Secretary of State will not usually consent to work that might damage a scheduled site, but scheduling does not necessarily mean that a monument will be preserved exactly as it is for all time. Advice on these issues can be obtained from English Heritage South West at the address at the end of this document.

Character Zones and Listed Buildings

4.3 Bath and North East Somerset has approximately 6,400 listed buildings and structures in its area of which 5,000 lie within the City of Bath. It is these buildings and their associated squares, terraces, crescents and roads, largely of 18th century origin, that underpin the whole significance of Bath as a major tourist destination, as a World Heritage Site and as an exceptionally attractive place to live and work in. They are also a major archaeological resource. A listed building is a building or structure, which is considered to be of 'special architectural or historic interest'. The Secretary of State for Culture, Media and Sport has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to prepare and approve lists of such buildings, on the advice of English Heritage. Further information on listed buildings can be found in the Bath & North East Somerset guidance note, *'Owning a Listed Building'* (available from Planning Services and on the Council's web site.)

4.4 Understanding a historic building is an essential first step in any decision making process involving management, repair and alteration. Without adequate information, decisions may be ill-founded, damaging and open to challenge. Adequate information needs to include consideration of the following three elements:

- The archaeology of a building (physical)
- The history of a building (documentary)
- The architecture of a building (style)

Plate 5 The Saracen's Head public house, circa 1700 (date on wall of 1713).

The archaeological assessment of a building deals with the physical history not just of the building itself but of the whole site including outbuildings and gardens. The use of archaeological techniques, in addition to historical and constructional research allows a building to be viewed the same as an archaeological site, comprising a number of different layers forming a stratigraphic relationship. Understanding the stratigraphy, or historical development provides objective criteria for the assessment of the impacts of proposed changes. New information on the origins, history and use of a building and its site, can be uncovered.

5.0 Recording discoveries

Historic buildings may also occupy much older sites and alterations and repairs in cellars, yards and gardens can sometimes involve disturbance to earlier foundations. Re-laying new basement floors and providing a lift in Bellots Hospital on Bath Street in 1998 exposed substantial Roman remains including a 3rd century blacksmiths shop complete with anvil stone.

5.1 The Association of Local Government Archaeological Officers has published useful guidance on this subject. Their publication, '*Analysis and recording for the conservation and control of works to historic buildings*' (ALGAO 1997) defines the term Historic Building Analysis to be a combination of architectural and archaeological skills. It also defines a *Buildings Analyst* to be a professional who combines the disciplines of architectural history and the archaeology of structures in order to interpret buildings.

Three principles affecting historic buildings in the day-to-day planning process as reflected in legislation and guidance (taken from ALGAO 1997)

- **Decisions about repairs and alterations must be informed by a documented understanding of historic character and appearance, sufficient to take the implications fully into account.**
- **During repairs and alterations, the need may arise to record information – often previously hidden – which adds to understanding of the building and is relevant to the works in progress.**
- **When the loss of particular features, or demolition of the whole building, is considered to be unavoidable, usually as a result of a development proposal, a record may need to be made; its purpose is to benefit understanding and future management of that type of building, and to improve appreciation of the historic environment.**

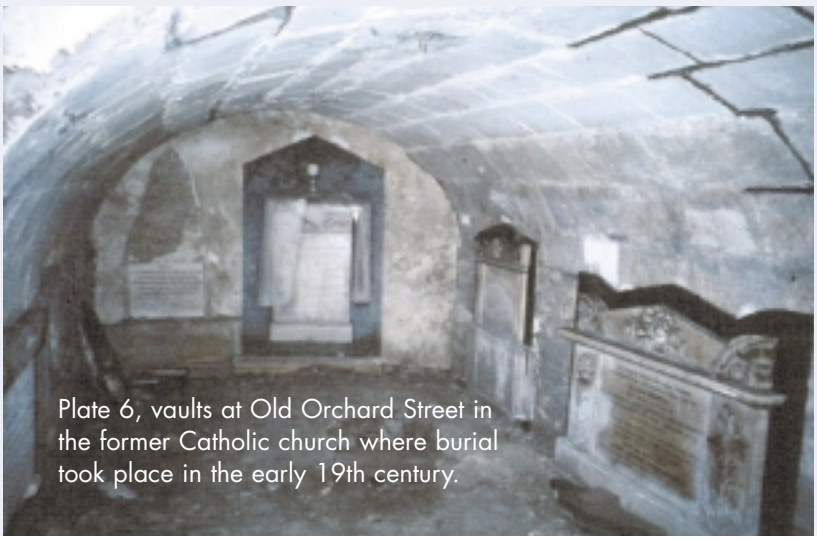


Plate 6, vaults at Old Orchard Street in the former Catholic church where burial took place in the early 19th century.

5.2 Alterations and repairs to buildings within Zones 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10 are very likely to affect buried archaeological remains. In addition to detailed building analysis, an archaeological assessment of the site may be required to inform the decision making process. In those cases where important features and deposits may be disturbed by development, further mitigation may be required as detailed in Part 4. In all other zones, the impact of alterations and repairs to archaeology is not so clear and will need to be considered on a case-by-case basis.

Work affecting a listed building in zones 1, 4, 5, 6, 8 and 9

5.3 Contact the Historic Buildings Team as early as possible if the proposed alterations and repairs affect cellar or basement floors; involve the insertion of new services including drainage and radon ducts under the building or in the gardens, yards and outbuildings and; involve the construction of new extensions or any excavation work (see below for definitions). The Historic Buildings Team will contact the Archaeological Officer where appropriate.

Do the proposed repairs and alterations to the building include all or some of the following;

- **Waterproofing or tanking of vaults and cellars**
- **Re-flooring of vaults and cellars**
- **Laying new drains or services in vaults, cellars or gardens and yards**
- **Knocking through from one room to another**
- **Inserting new windows or doors**
- **Removal of old plaster**
- **Demolition of extensions, outbuildings and boundary walls**
- **Construction of new extensions**
- **Creation of new access including new stairs**
- **Removal of existing stairs**
- **Creation of Radon sumps**

Part 3: Protection through Development Control

6.0 Controlling development through the planning system is one of the clearest mechanisms for influencing what happens to archaeological remains. At the heart of the Government's approach to archaeological remains is the principle that every effort should be made to preserve significant remains. Within the context of this document, the term 'preserve' means either, the preservation *in situ* (where found) of archaeological features, or the preservation 'by record' (through the process of professional excavation) of archaeological information.

6.1 Current archaeological information about Bath is incomplete and poorly understood, as is knowledge about what will and what will not have an adverse impact on buried or standing archaeological remains. Therefore, the 'significance' of archaeological remains will usually only be determined through the process of appraisal and assessment as defined in Part 4. PPG 16 contains criteria for assessing the national significance of archaeological remains following the Secretary of State for Culture, Media and Sport's scheduling criteria (annex 4). There are no established criteria for assessing local or regional significance and determination will need to reflect local and regional research issues and priorities. The forthcoming archaeological strategy and the South West Regional Research Frameworks (due to be completed in 2006) will provide a framework for this.

6.2 In areas of significant archaeological potential, as in zones 1, 2, 3, 4, 5, 6, 8, 9, 12, 14, 18, 19 and 29, the Local Planning Authority may use Article 4 Directions (GPDO 1995) to remove Permitted Development Rights in some circumstances to ensure that archaeological remains are properly assessed and appropriate action is take to preserve them (see 6.6).

Character zones and archaeological appraisal and assessment

6.3 Archaeological issues involving preservation *in situ* or substantial mitigation in the form of archaeological excavations are most likely to occur in zones 1, 2, 3, 4, 5, 6, 8, 9, 12, 14, 18, 19 and 29. The determination of significance of the site will be necessary in these zones, and an archaeological assessment may be required as part of an application for planning permission.

6.4 If a proposed development, no matter how small, involves ground disturbance in these zones , then the Council's Archaeological Officer should be contacted at the earliest opportunity. The Archaeological Officer can then carry out an appraisal against the SMR and UAD and advise on what implications there may be.

6.5 The Archaeological Officer will determine firstly, if the proposed development will have a potentially detrimental impact on archaeological remains and secondly, the scope of any archaeological assessment that may be required. This assessment may involve desktop study and/or evaluation (see Part 4: Methodology).

6.6 **Definitions of Ground disturbance**

The survival of archaeological deposits and structures varies from location to location and it is not always obvious at which depth archaeology will survive. Therefore as a rule of thumb, any breaking out of ground in excess of 1.00 meter in depth from ground level should be classified as ground disturbance. However, in many parts of Bath there has been significant raising of ground level from the 18th century onwards and in these circumstances archaeological remains will only generally occur beneath this deposit, usually in the vaults and basements. The following examples cover most situations in Bath likely to have adverse effects on archaeology.

Demolition and site clearance – the demolition of any structures including buildings will usually involve removal, partial removal or disturbance to existing foundations which in turn can affect buried archaeology in a variety of ways. Subsequent site clearance will usually involve scraping existing surfaces or in more extreme cases, removal of substantial quantities of what is generally referred to as 'made ground' which often consists of archaeological deposits and structures. Planning permission is not usually required for this type of operation, although conservation area consent, or other licenses or permissions (for example, relating to protected species) may be required. It is essential therefore, that operations of this sort are carefully controlled and monitored to ensure that archaeology is not adversely affected. Where Conservation Area Consent is required, it may be conditional on the implementation of some form of archaeological mitigation (See Part 4).

Foul drainage and services – Many seemingly low impact conversions or renovations of existing buildings can involve changes to existing drains and services, quite often in vaults and cellars or rear yards where archaeological sensitivity can be at its highest.

Plate 7, Roman walls exposed in the base of a sewer trench at St Swithin's Yard, Walcot Street.

Substantial damage to archaeology can occur and significant opportunities to enhance our understanding of the history of Bath will be lost. In many cases, these activities may be carried out as Permitted Development under the GPDO 1995 and may be subject to Article 4 Directions. On larger developments in particular, the provision of services and foul drainage can represent a significant impact on buried archaeology, often destroying archaeological features that the rest of the development was carefully designed to preserve. The Local Planning Authority will, in some circumstances expect a planning application to be accompanied by a detailed plan of the proposed service runs and foul drainage. The Local Planning Authority will encourage the re-use of existing service runs and the amalgamation of services into a single run.

Infrastructure maintenance and repair – Excavation to locate, repair and in some cases extend existing major service and drainage runs within the City can be very damaging to buried archaeology and also represents a lost opportunity for examination of deposits if not monitored appropriately. The response from Utility companies to consultation on historic environment and archaeological issues in Bath is variable and the Local Planning Authority will expect all Utility companies to develop and implement appropriate Codes of Good Practice to avoid the withdrawal of their Permitted Development Rights. It is essential therefore that details of any proposed schemes of this nature dealing with water, electricity, gas or cable are forwarded to the Archaeological Officer as early as possible for appraisal.

Road maintenance, repair and enhancement – Many of Bath's roads and passages can be traced back to Saxon and medieval times and some may have origins in earlier Roman times, Fig 2 illustrates the number of sensitive roads in this context. A case in 2000 involving resurfacing of Upper Borough Walls revealed surviving wooden block paving of mid 19th century date apparently used to dampen contemporary traffic noise in front of the Royal Rheumatic Hospital. This was removed without record. These activities may be carried out as Permitted Development under the GPDO 1995 and may be subject to Article 4 Directions. The Local Planning Authority will work with the Council's Traffic and Waste Management Department to develop an appropriate Code of Practice and it is essential that any proposals affecting these sensitive roads are forwarded to the Archaeological Officer as early as possible for appraisal.

Fig 2, Archaeologically and historically sensitive roads in Bath

Conversion and renovation of vaults – this usually involves re-flooring or tanking and in some cases repair or removal of stonework, and the insertion of radon sumps. Archaeological remains can survive immediately beneath vault and basement floors which in some cases have been laid directly onto Roman and medieval building foundations. The vault walls themselves can also be partly formed out of earlier structures as in the case of vaults along Terrace Walk, which incorporate sections of the old medieval and Roman City wall.

Geotechnical investigations – The excavation of inspection pits and cores for the examination of foundations and made ground can be highly damaging and in many cases are implemented at an early stage in the development process. These also represent an opportunity to examine archaeological deposits and can be a valuable addition to an archaeological appraisal. The coordination of these activities and their management by archaeologists is essential and early consultation with the Council's Archaeological Officer is recommended.

Character zones and archaeological monitoring (watching brief)

6.7 In zones 7, 8, 11, 13, 15, 20, 21, 22, 24, 25, 26, 27, 28, 30, 32, 33 and 34, the ability to predict the presence or absence of significant archaeology is much less than in the more central zones. These zones tend to be marked by discoveries of Roman burials or chance finds of coins made over the past 200 years or the existence of known medieval settlements such as Widcombe (zone 28) and Lyncombe (zone 34) but with limited archaeological evidence. In these zones, archaeological remains may be encountered almost anywhere.

6.8 Smaller developments potentially involving ground disturbance or alterations to land or buildings within the above zones may be conditional on an applicant commissioning a programme of archaeological monitoring to be implemented both prior to and during ground works. This monitoring (sometimes known as a watching brief) will be required to ensure that archaeological discoveries are examined and recorded to an appropriate professional standard.

6.9 Generally, ground works are the same as those listed in 6.6. However, in the context of smaller developments the following definitions may be useful and will, if forming part of an application for planning consent trigger a programme of archaeological monitoring. For larger developments in these zones it may still be necessary to carry out archaeological assessments or a more detailed level of archaeological investigation and it is always best to contact the Archaeological Officer if in doubt.

Excavation for footings – The use of a mechanical excavator is the usual method used to dig out footing trenches for buildings and other structures.

Topsoil and subsoil stripping – usually in advance of laying an aggregate sub base for access roads, driveways, forecourts, and for small structures such as garages.

Landscaping and tree planting – in particularly sensitive areas where for example graves might be expected, activities involving the movement of topsoil and excavation for ponds and trees can expose archaeological evidence.

6.10 All planning applications or pre-application enquiries involving potential ground disturbance will normally be referred by development control officers to the Archaeological Officer for appraisal against the Sites and Monuments Record. Early discussions with the Archaeological Officer are strongly recommended.

6.11 Planning permission may be granted with a condition requiring archaeological monitoring and a design brief setting out the Local Planning Authority's requirements will usually be issued with the decision notice. The scope of archaeological monitoring contained within the design brief will be determined by the Archaeological Officer in consultation with the Sites and Monuments Record, the Bath Urban Archaeological Assessment and all existing national, regional and local research frameworks (see Part 4: Methodology).

Character zones and preservation *in situ*

6.12 Zones 1, 5, 6 and 11 are known to contain archaeological remains of national and international significance, and zones 2, 3, 4 and 14 have the potential to contain nationally and internationally significant remains. If, for instance a Roman fort was found in Zone 14, Bathwick, then preservation *in situ* will almost certainly be required. Within these character zones, the emphasis will always be on preservation in situ of significant archaeological remains. In some cases, the remains will be of national importance and may fulfil the Secretary of State's criteria for scheduling detailed in PPG16. However, significant archaeological remains worthy of preservation *in situ* may also be defined within the context of the World Heritage Site Management Plan and the contribution that they make to the understanding and presentation of the World Heritage City.

6.13 In most cases, any proposal involving ground disturbance or alterations to land or buildings within these zones must demonstrate that the results of an archaeological assessment have significantly informed the design process. An applicant for planning permission under the Town and Country Planning Act 1990, and their consultants must demonstrate that all possible engineering options for preservation of important archaeology have been considered and that the design of the development has been informed by this process. This information will allow the Local Planning Authority to determine an application taking full account of Government guidance and Local Plan Policy in relation to archaeology.

6.14 Preservation *in situ* may be secured through the use of planning conditions or through the use of a legal agreement under Section 106 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.

6.15 A major obstacle to the preservation *in situ* of archaeological remains in these central zones is piecemeal small scale development such as property refurbishment involving works to cellars and vaults. Development like this has the potential to cause incremental damage to the City. As an individual piece of development the impacts on the historic environment may not appear that significant but viewed as part of a more extensive and cumulative impact it is highly significant and will be a material consideration in decisions involving planning and listed buildings applications.

6.16 **Engineering issues relating to preservation *in situ***

Altering the development layout
On some sites it may be possible to redesign the layout by moving services and access roads and even decreasing the density of structural elements on a site in order to avoid significant archaeology. This will require discussion with local authority Planning Officers.

Pile Foundations
The use of pile foundations has been one of the more popular engineering solutions to the preservation of archaeological remains within a development particularly in major urban conurbations such as London or in cities that have substantial depths of archaeological deposits such as York. This technique however will not be suitable in every case. Factors that need to be considered in the appropriateness of pile foundations include the size of pile, the density of piles, the method of inserting them, the depth of pile caps and the location and depth of ground beams.

Re-use of piles
In those cases where piled foundations already exist on site, there may be scope for their re-use either in part or entire. There are a number of examples from other cities where this has been successfully implemented. In appropriate situations this will be encouraged.

Raft foundations
The use of a raft foundation with fewer piles may be more appropriate in cases where denser piling will adversely affect buried archaeological remains by truncating important relationships such as between buried walls and floors.

Strip foundations
Not recommended for use where archaeological deposits are particularly shallow or close to the surface. This technique can, however, prove very effective in preserving deeper archaeological remains.

Raising level
In some cases it may be possible to raise the site level sufficiently to ensure that archaeological remains are preserved although consideration needs to be given to the potential effects of compaction on buried archaeological deposits. Archaeological remains that have been exposed during evaluation work and site level reduction will need special protection. The use of a soft aggregate such as sand and weak concrete binding (as a base for ground slabs) together with an appropriate geotextile membrane can be used very effectively to preserve archaeological remains beneath development.

Foul drainage and other services
The provision of services to a site can, if not managed correctly, cause a significant amount of damage to archaeological remains and where possible existing service trenches should be used to minimise the impact on archaeological deposits. Placing as many of the services as can be effectively managed together in one trench will also help to contain damage to archaeological deposits. Allowing for the addition of future services will also help. Consideration of this aspect at the earliest opportunity will greatly assist the management of subsequent mitigation.

Project and site management
In most cases implementation of design solutions will require careful management and the site contractor together with their sub-contractors should be involved at an early stage with the site architect and engineer, the archaeological contractor and the local planning authority. This is particularly important in relation to site clearance operations and the provision of services to the site. Often the best solutions to archaeological preservation and management can come unstuck when a site is taken over by a design-build company or contractor who was not party to the original negotiations.

Character zones and preservation by record

6.17 Preservation by record usually involves archaeological excavation followed by specialist research, archive creation and publication, details of which can be found in Part 4: Methodology. This would be required on sites where preservation *in situ* may not be appropriate and would be secured by condition or through legal agreements.

Plate 8, 18th century mews foundations to the rear of The Circus (courtesy Bath Archaeological Trust)

7.0 Planning conditions

7.1 Engineering solutions

Once engineering solutions have been agreed in principle the Local Planning Authority may be content to secure further approved details through the imposition of planning conditions. The following condition, sometimes referred to as The Westminster Condition may be used:

'No development shall commence (including any site clearance or demolition works) until detailed drawings of all underground works, including foundations, drainage and those of statutory undertakers, have been submitted to, and approved in writing by, the Local Planning Authority. Such details shall include the location, extent and depth of all excavations and these works shall be carried out and completed in accordance with details as approved.'

7.2 The reason for this condition is to satisfy the Local Planning Authority that pre-approval discussions and agreements can be secured post-determination. In some cases this may not be appropriate and the Local Planning Authority may insist on detailed drawings and proposals to be provided as part of the application and approved as part of the overall scheme.

7.3 **Preservation by record**

In most cases preservation by record will be secured through the use of planning conditions and the following conditions are in common usage in Bath and North East Somerset:

7.4 The following condition is used to secure most forms of archaeological work from very complex full excavations to a simple watching brief.

'No development shall take place within the application site until a programme of archaeological work has been undertaken in accordance with a detailed written scheme of investigation which has previously been submitted to and approved in writing by the local planning authority.'

7.5 The following condition is used to secure the recording of standing buildings from full survey and descriptions of a whole building to a small photographic record of minor internal modifications.

'No development or demolition shall take place within the application site until a programme of archaeological work to record those parts of the building(s) which are to be demolished, disturbed or concealed by the proposed development has been undertaken in accordance with a detailed written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.'

7.6 Other, more specific conditions will be used where appropriate for particular forms of archaeological work such as field walking and evaluation as part of a suite of archaeological conditions. In some cases conditions may refer to specific parts of a site or particular drawings and method statements. In these instances the wording will be more specific.

7.7 **Discharge of conditions involving archaeology**

Archaeological investigations are not completed until the various specialists have carried out their studies and the results have been prepared for publication. PPG16 states that '...planning authorities will... need to satisfy themselves that the developer has made appropriate and satisfactory arrangements for the excavation and recording of the archaeological remains and the publication of the results.' (Para 28). Until then the preservation of the record is not complete and access to the results is not possible. Post-excavation work is an important part of an approved mitigation agreed in response to a planning condition. It may therefore not be appropriate to discharge the archaeology condition until agreement has been secured to ensure that the post-excavation work is completed.

8.0 Legal agreements

8.1 In complex cases, particularly those involving the preservation of archaeological remains within a development and those that involve large scale excavation, the Local Planning Authority may decide to secure archaeological mitigation through the use of a legal agreement under Section 106 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991. These legal agreements will usually contain a number of triggers relating to each phase of development involved with archaeology and each phase of archaeological work. For instance, one trigger may relate to the completion of all archaeological field work prior to the excavation of services to a site or the construction of the access road.

Part 4: Methodology

9.0 The following methodologies reflect best practice as detailed in numerous publications, particularly those by the Association of Local Government Archaeological Officers and the Institute of Field Archaeologists. The three basic stages are, 1. Appraisal, 2. Assessment and 3. Mitigation (considered in more detail in the companion SPG, 'Archaeology in Bath and North East Somerset'). For the purposes of this SPG, the text has been abbreviated and in some cases tailored specifically to Bath. The reader is therefore strongly advised to refer to both documents.

Appraisal

9.1 An appraisal is an initial consideration by an appropriately qualified person, normally the Council's Archaeological Officer, of the archaeological potential of a proposed development site. An appraisal involves consultation of the Bath and North East Somerset Sites and Monuments Record (SMR) and any associated published or unpublished archaeological information held as part of the SMR, including the UAD. A site visit may also be carried out in some instances. The appraisal considers both the presence of known archaeological sites directly and indirectly affected by the proposed development, and the potential of an area to contain archaeology. The appraisal will confirm whether there will be a need for further analysis in the form of an assessment.

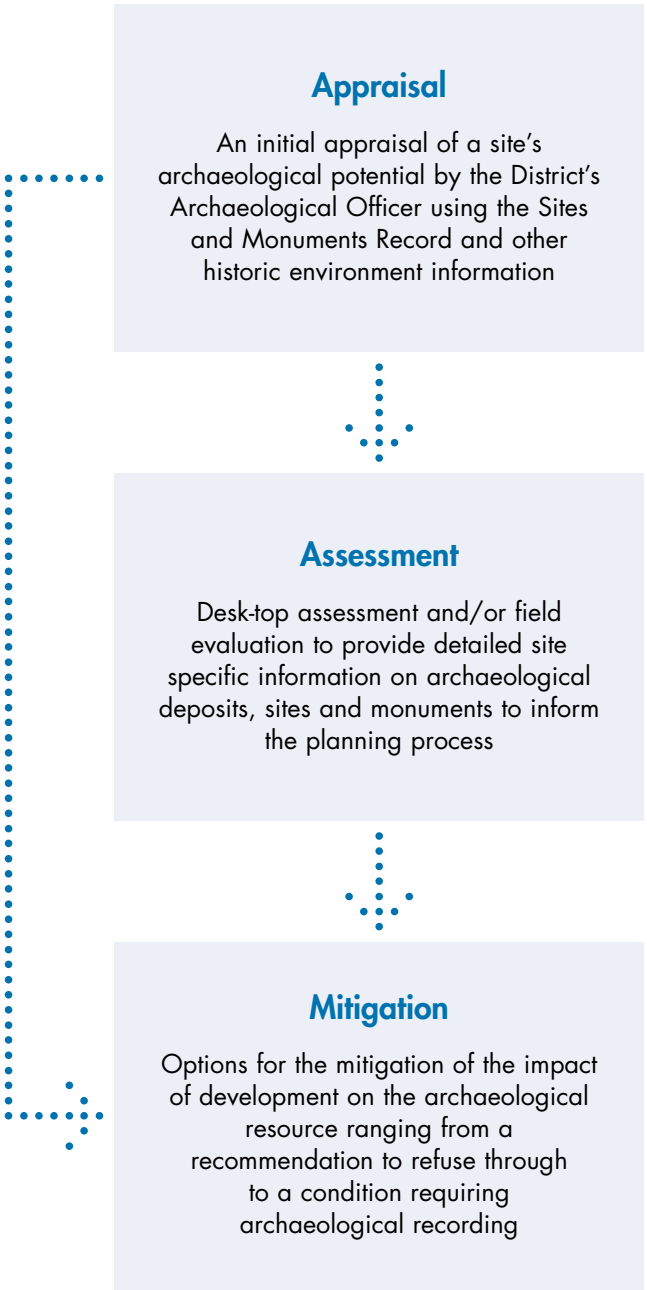
9.2 In appropriate cases the Archaeological Officer will carry out an appraisal in response to an enquiry from a prospective planning applicant or consultant, an enquiry from a planning officer or in response to a planning application.

Assessment

9.3 An archaeological assessment is generally required in cases where the initial appraisal considers that a proposed development will have a potential impact on archaeological remains. Because the SMR does not contain information on every archaeological site that may exist, and because the Local Planning Authority lacks the resources to carry out more detailed survey work, the developer or consultant is asked to provide further information on archaeological potential and the impact that the development will have on archaeological remains. In most cases this information is required to enable an informed planning decision to be reached, and to develop a suitable mitigation strategy which in some zones may feature preservation *in situ*.

9.4 The archaeological assessment is commissioned by the developer or consultant at their expense. Most professional archaeological organisations are experienced in preparing assessments. There are a variety of different techniques available to assist in an archaeological assessment, listed below.

Fig 3. Diagram showing the three main stages involved in development control archaeology



Desktop study

9.5 A desktop study involves detailed analysis of all available archaeological and landuse information on a site and its immediate locale. The purpose of this research is to gain the maximum amount of information to inform design and decision making. Generally this research will also result in the development of an archaeological deposit model for a site which will predict both the nature of any buried archaeological remains and their relative depth to present ground level. The depths of any proposed ground works associated with a development can then be modelled against this.

9.6 In Bath, a desktop assessment should include an examination of the following data sets:

- The SMR/UAD
- The Roman Baths Museum records and archives
- The Local Studies Library collections
- The Bath Record Office
- The Building of Bath Museum archives

It should also specifically examine the following documents and strategies:

- The City of Bath World Heritage Site Management Plan
- The Bath Urban Archaeological Assessment
- The Bath Urban Archaeological Strategy

Other analysis that forms part of a successful desktop study includes:

- Past and present land use
- Aerial photographic analysis
- Topographical analysis
- Geological analysis
- Geotechnical analysis (results of bore holes and test pits)
- Map regression analysis
- Historical sources
- World War II bomb damage assessments
- Planning and building control records

Site evaluation

9.7 In some cases other forms of information may be required that relate directly to buried archaeological remains. For example, if the difference between the depth at which any proposed ground works will intrude and the presumed level at which archaeological deposits will survive is only a few centimetres, then it will be crucial to determine the nature of the buried deposits. If there is some doubt about the significance of buried archaeological deposits then an examination of them may be appropriate. Other examples relate to confirmation on the siting of suspected remains or the location of existing services.

9.8 The site evaluation technique relies on the excavation of trenches or test pits to examine buried archaeological deposits in a similar way to geotechnical examinations of buried strata or building foundations. One of the basic techniques is to sample a development site with trenches that will vary in length depending on the size of site and availability of suitable locations. These trenches are generally the width of a machine bucket (approximately 1.5m to 2m). The non-archaeological overburden such as topsoil or rubble is carefully removed by mechanical excavator under archaeological supervision followed by hand excavation and recording of any archaeological layers that may be revealed. These archaeological investigations continue until the aims of the evaluation have been met. No unnecessary investigations should normally be carried out beyond that point.

Plate 9, Evaluation trench at Walcot Street

9.9 Assessing the nature and value of buried archaeological deposits in Bath can be quite complex and many different forms of analysis may be required including geomorphological analysis which examines the processes that have contributed to the formation of archaeological deposits. It is best that the geomorphologist is able to examine deposits in the ground rather than from soil samples. In some circumstances waterlogged and anaerobic deposits may be encountered which will require analysis by a palaeo-environmentalist. Each of these analyses can make a significant contribution to evaluation results.

Standing structures analysis

9.10 This analysis may be implemented as part of a desktop study on a wider site or commissioned in its own right as part of proposals for the building or structure. It is a thorough review of all existing information relating to a building. A desktop assessment can involve:

- reviewing all readily available written information and illustrations of the building (or its type), broadly characterising its identity and development;
- demonstrating a detailed understanding of the historical significance of the part(s) affected in relation to the whole building through a measured survey of architectural and structural features and photographs;
- assessment of the phases of development;
- assessment of the impact of the proposals in the light of this information;
- indicating the need for any further documentary, architectural or archaeological work, specialist investigatory techniques, and opening-up to inform decisions on treatment of hidden fabric.

9.11 If the building or structure is particularly sensitive or the proposed works are complex, more detailed information in the form of an evaluation may be required. Typically this can also involve:

- preliminary opening up works to inform proposed works (agreed in advance with the local planning authority and possibly requiring listed building or scheduled monument consent);
- trial excavations to identify the archaeological implications of ground disturbance during repairs, such as underpinning, leveling of historic floor surfaces, french drains, and the footprint of extensions in sensitive areas;
- a detailed schedule of likely impacts with suggestions for mitigation which may include further analysis or recording, before or during the works (taken from ALGAO 1997).

Plate 10 (left), The Spa excavations showing Roman walls

Plate 11 (right), Preliminary investigations on the site of a Roman villa at the former Oldfield Boys School.

Mitigation

9.12 Where preservation *in situ* is not being fully implemented, either because the archaeological significance (determined through archaeological assessment) does not demand it, or only parts of a development site comprise significant archaeology, then a program of archaeological investigation and recording may be required.

9.13 This program of archaeological investigation and recording will normally be secured through the use of conditions on any planning approval. Archaeological work associated with large and complex developments may also be secured through use of a legal agreement under Section 106 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991. These legal agreements will usually contain a number of triggers relating to each phase of development involved with archaeology and each phase of archaeological work. For instance, the completion of all archaeological field work may be required prior to the excavation of services to a site or the construction of the access road.

9.14 *Watching brief* – can be used in cases where archaeological remains are either of lower value or being largely avoided by development. Generally consists of one or two archaeologists on-site observing ground works and carrying out very basic recording of any exposed remains. Recording may require development work to be halted in specific locations for an hour or so at most. A watching brief may also be required following more extensive fieldwork.

9.15 *Building recording* – can be used in cases where a historic structure is being altered in such a way that the architectural fabric and archaeological integrity of the building is being affected. Recording can range from a simple photographic record to a detailed drawn, photographic and historical survey of all features affected.

9.16 *Historical research* – carried out to aid the interpretation of the history and development of a site as part of an archaeological investigation. Typically this will involve accessing available documents and maps at City and County Record Offices, local libraries and Planning/Building Control records.

9.17 *Full excavation* – a programme of archaeological investigation comprising site works and off-site works culminating in the publication of the results and deposition of the site archive in an appropriate museum. These investigations can be time consuming and expensive depending on the size of the site and the complexity and depth of surviving archaeology. Figure 3 is a flow diagram that explains the various stages in conducting a full excavation. The most important thing to bear in mind is that on-site excavation forms approximately half the actual mitigation. The process of post excavation continues after the completion of site works. A programme of archaeological mitigation is not deemed complete until either publication has been achieved or agreement on publication has been approved by the local planning authority.

9.18 *Post excavation* – This phase of an archaeological excavation comprises the preparation of the Excavation Report and Site Archive. The process includes analysis of finds and any soil or environmental samples taken from the site which will involve external specialists. As a rule of thumb the cost of post excavation can be as much again as the cost of the site works although a true figure can never be certain until the site works are completed. Much of the time involved is in researching and writing the report and analysing all the information that the excavation has recovered.

Plate 12, medieval jug after restoration and specialist study (courtesy Avon Archaeological Unit)

9.19 *Excavation Report* – Depending on the quality and complexity of archaeological information this report will be published either as a single monograph or as a contribution to a regional or national journal. Usually, those sites which contribute to national or international research objectives will be published in national journals or monographs in an established academic series. Regionally significant results will tend to be published in regional journals and locally significant results will tend to be published as an Archive Report with a short note in a regional journal.

9.20 *Archive Report* – The archive report is the detailed report of an excavation comprising detailed narrative, plans, sections and elevations, photographs, the design brief, the Written Scheme of Investigation and the full specialist reports. This document is usually far too large and specialist to constitute a publication in its own right and will be deposited as part of the site archive.

9.21 *Site Archive* – This comprises all data retrieved from an excavation including the archive report, all finds, catalogues, indexes, photographs and site notebooks. The archive will be deposited at an approved museum store.

10.0 Commissioning archaeological work

10.1 Archaeological work including building recording should always be carried out by professionally qualified archaeological consultants, or where appropriate, architectural historians or historic buildings consultants. Details of appropriate organisations can be found in the Institute of Field Archaeologists (IFA) Yearbook and Directory or by consulting the IFA direct. Whilst the local planning authority does not hold an approved list of specialists, advice and guidance can be obtained from the Archaeological Officer or the Historic Buildings Team Manager. The usual procedure would be to request a design brief from the Archaeological Officer or the Historic Buildings Team Manager as appropriate which will enable the consultant to produce the necessary documentation required for the submission of a planning application or for the preparation of a justification statement to accompany a listed building or scheduled monument application. The brief will also be required in response to a planning condition.

10.2 *Design Brief* – A brief is written by the Bath and North East Somerset Archaeological Officer as a guide for the preparation of a Written Scheme of Investigation. The brief contains information about the site or building, the significance of the site or building, the proposed changes to the site or building and the detailed recording requirements. The brief should be forwarded to the archaeological contractor or consultant.

10.3 *Written Scheme of Investigation (WSI)* – A written scheme of investigation, prepared by an archaeological contractor or consultant will contain details of exactly how a professional archaeological organisation or individual will answer the brief and satisfy the condition. The written scheme of investigation will include details of the recording techniques and will include information about the specialist. The Local Planning Authority through the Archaeological Officer will need to approve all documentation presented as part of a Written Scheme of Investigation.

10.4 *Cost of archaeological work* – This will depend on the scale of the development and the level of detail being asked for. There are several levels of archaeological recording ranging from the simple watching brief involving one person for a day to highly detailed full excavations involving numbers of people for many weeks. The cost of these works will therefore be dependant on time and complexity. Please note that Bath and North East Somerset Council does not fund such work and all archaeological work undertaken in response to planning issues will need to be funded by applicants or their agents.

Part 5: Policy framework

11.0 National policy and guidance

Since 1990, when the White Paper, *This Common Inheritance* was published, the Government has been committed to policies which seek to ensure the conservation and enhancement of our cultural heritage, including the natural and built environment. PPG16, also published in 1990 states that *'Archaeological remains should be seen as a finite, and non-renewable resource, in many cases highly fragile and vulnerable to damage and destruction. Appropriate management is therefore essential to ensure that they survive in good condition. In particular, care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed. They can contain irreplaceable information about our past and the potential for an increase in future knowledge. They are part of our sense of national identity and are valuable both for their own sake and for their role in education, leisure and tourism.'* (PPG16, par. 6).

11.1 This was further strengthened in 1994 through the publication of PPG15, *Planning and the Historic Environment* in which local authorities were urged to maintain and strengthen their commitment to the stewardship of the historic environment. The government statement on sustainability, *Sustainable Development: The UK Strategy* (1994), had earlier recognised that failure to maintain and protect historically and aesthetically important monuments, buildings, sites and landscapes would result in irreversible loss of the nation's heritage.

11.2 In September 2000 the Government ratified the Valletta Convention (the *European Convention on the Protection of the Archaeological Heritage*, revised 1992), which came into force in 2001. Among other things, the Convention includes commitments:

- to provide for the maintenance of an inventory of the country's archaeological heritage (article 2i);
- to provide for archaeological participation in planning policies designed to ensure well balanced strategies for the protection, conservation and enhancement of sites of archaeological interest (article 5ia);
- to ensure that in development schemes affecting archaeological sites, sufficient time and resources are allocated for an appropriate scientific study to be made of the site and for its findings to be published (article 5iib);
- to make provision for conservation in situ when feasible (article 5iv);
- to ensure that provision is made in major public and private development schemes for covering the total costs of any necessary related archaeological operations (article 6iia).

11.3 In 2000, Government requested English Heritage to consult widely specifically about the historic environment and the resulting report, *Power of Place* identified a number of key issues. The Government response to *Power of Place* was issued in December 2001: *The Historic Environment. A Force for our Future*. This is a very important statement about Government's approach to the historic environment. It sees the historic environment as 'something which all sections of the community can identify with and take pride in' (3.16). It states that the Government looks to a future in which:

- public interest in the historic environment is matched by firm leadership, effective partnerships, and the development of a sound knowledge base from which to develop policies;
- the full potential of the historic environment as a learning resource is realised;
- the historic environment is accessible to everybody and is seen as something with which the whole of society can identify and engage;
- the historic environment is protected and sustained for the benefit of our own and future generations;
- the historic environment's importance as an economic asset is skilfully harnessed.

11.4 **Structure Plan Policy**

The Joint Replacement Structure Plan for the Unitary Authorities of Bath and North East Somerset, Bristol, South Gloucestershire and North Somerset was adopted in September 2002. The following policy is relevant to the built and historic environment:

POLICY 19 – Local Plans will, through existing national/international designations, and other policies and initiatives:

- protect that part of the cultural heritage that consists of the built and historic environment of the area and manage development and land use change in a manner that respects local character and distinctiveness, ensuring that new development and other land use changes respect and enhance local character through good design and conform with any local character statement guidance produced locally;
- protect Scheduled Ancient Monuments and other nationally important archaeological remains, which should be preserved in situ and their settings maintained and enhanced; and
- require development proposals affecting archaeological sites of local importance to demonstrate an overriding need for the development, to provide for a mitigation strategy where necessary, and to provide for appropriate prior investigation and recording of the site.

11.5 **Local Policy**

Bath Local Plan, adopted in June 1997 contains the following policies relevant to archaeology and the historic environment:

11.6 Policy C27 – within areas of recognised archaeological potential shown on the proposals map, the city council will not determine planning applications involving work below ground level until the applicant has provided information in the form of an evaluation of the archaeological importance of the site, and an assessment of the archaeological implications of the proposed development.

11.7 Policy C28 – development which would adversely affect the site or setting of a scheduled ancient monument or of an archaeological site that is of national importance will not be permitted.

11.8 Policy C29 – in considering development proposals which affect sites which are found to be of archaeological interest, the city council will take account of the following factors:

i) the extent to which the archaeological interest would be preserved in situ in the proposed scheme or in feasible alternative schemes;

ii) the intrinsic importance of the remains;

iii) the significance of the remains in the context of the development of the City of Bath and its status as a world heritage site; and

iv) any substantial benefits for the community which would be brought about by the proposed works.

If planning permission is to be granted the city council will impose conditions or seek planning obligations to secure the preservation of the archaeological interest in situ or where this would be impractical or inappropriate, by record, prior to and during development.

11.9 The Wansdyke Local Plan Deposit Draft 1995 as amended and adopted for development control purposes 2000 contains the following policies relevant to archaeology:

11.10 Policy CH.1O – Planning permission will not be granted for development that does not physically preserve *in situ* Scheduled Ancient Monuments, or any other sites which may be of national importance, and their archaeological settings.

11.11 Policy CH.11 – Development which would harm important archaeological remains or their settings, including sites of Particular Archaeological Importance as defined on the Proposals Map, will not be permitted unless the importance of the development and the need for the development in that particular location outweighs the significance of the remains. In such cases, where the physical preservation *in situ* of these remains is not justified, development will only be permitted if appropriate and satisfactory arrangements have been made for excavation and recording and publication of results.

11.12 Bath and North East Somerset Local Plan including waste and minerals policies Deposit Draft 2002 contains the following policies:

11.13 Policy BH.11 – Development which would adversely affect Scheduled Ancient Monuments or any other sites of national importance, and their settings and does not preserve such sites in situ will not be permitted.

11.14 Policy BH.12 – Development which would harm important archaeological remains or their settings outside the scope of Policy BH.11 will not be permitted unless the adverse impact of the development proposal on the remains can be mitigated.

11.15 Policy BH.13 – Development which adversely affects significant archaeological remains within Bath will not be permitted unless the preservation in situ of these remains can be achieved through a detailed design and construction scheme.

Part 6: Other information

Selected bibliography

Primary legislation

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Planning (Listed Buildings and Conservation Areas) Act 1990

Regulations and Orders

Town and Country Planning Act General Regulations 1988

Town and Country Planning (Development Plan) Regulations 1991

Planning (Listed Buildings and Conservation Areas) Regulations 1990

Ancient Monuments and Archaeological Areas Act 1979

Planning Policy Guidance Notes

Planning Policy Guidance Note 12: Development Plans and Regional Planning Guidance, DoE 1992

Planning Policy Guidance Note 15: Planning and the Historic Environment, DoE/DNH 1994

Planning Policy Guidance Note 16: Archaeology and Planning, DoE 1990

Policy documents

The Joint Replacement Structure Plan for the Unitary Authorities of Bath and North East Somerset, Bristol, South Gloucestershire and North Somerset adopted September 2002

Bath Local Plan, adopted in June 1997

The Wansdyke Local Plan Deposit Draft 1995 as amended and agreed for development control purposes 2000

Bath and North East Somerset Local Plan including waste and minerals policies Deposit Draft 2002

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Royal Commission on the Historical Monuments of England (RCHME) 1999. *Recording Archaeological Field Monuments: A descriptive specification*. English Heritage

Useful Web links

Council for British Archaeology
http://www.britarch.ac.uk (has many links to archaeologically consultancies).

English Heritage
http://www.english-heritage.org.uk

Association of Local Government Archaeological Officers
http://www.algao.org.uk

Institute of Field Archaeologists
http://www.archaeologists.net

Useful Contacts

English Heritage South West
29 Queens Square, Bristol, BS1 4ND
Telephone 0117 975 0700

Institute of Field Archaeologists
University of Reading, 2 Earley Gate, PO Box 239, Reading, RG6 6AU
Telephone 0118 9316446

Archaeological Officer
Bath and North East Somerset Council, Planning Services, Trimbridge House,
Trim Street, Bath, BA1 2DP
Telephone 01225 477651

Historic Buildings Team
Bath and North East Somerset Council, Planning Services, Trimbridge House
Trim Street, Bath, BA1 2DP
Telephone 01225 477547

Character Zone Overview

Figure 4

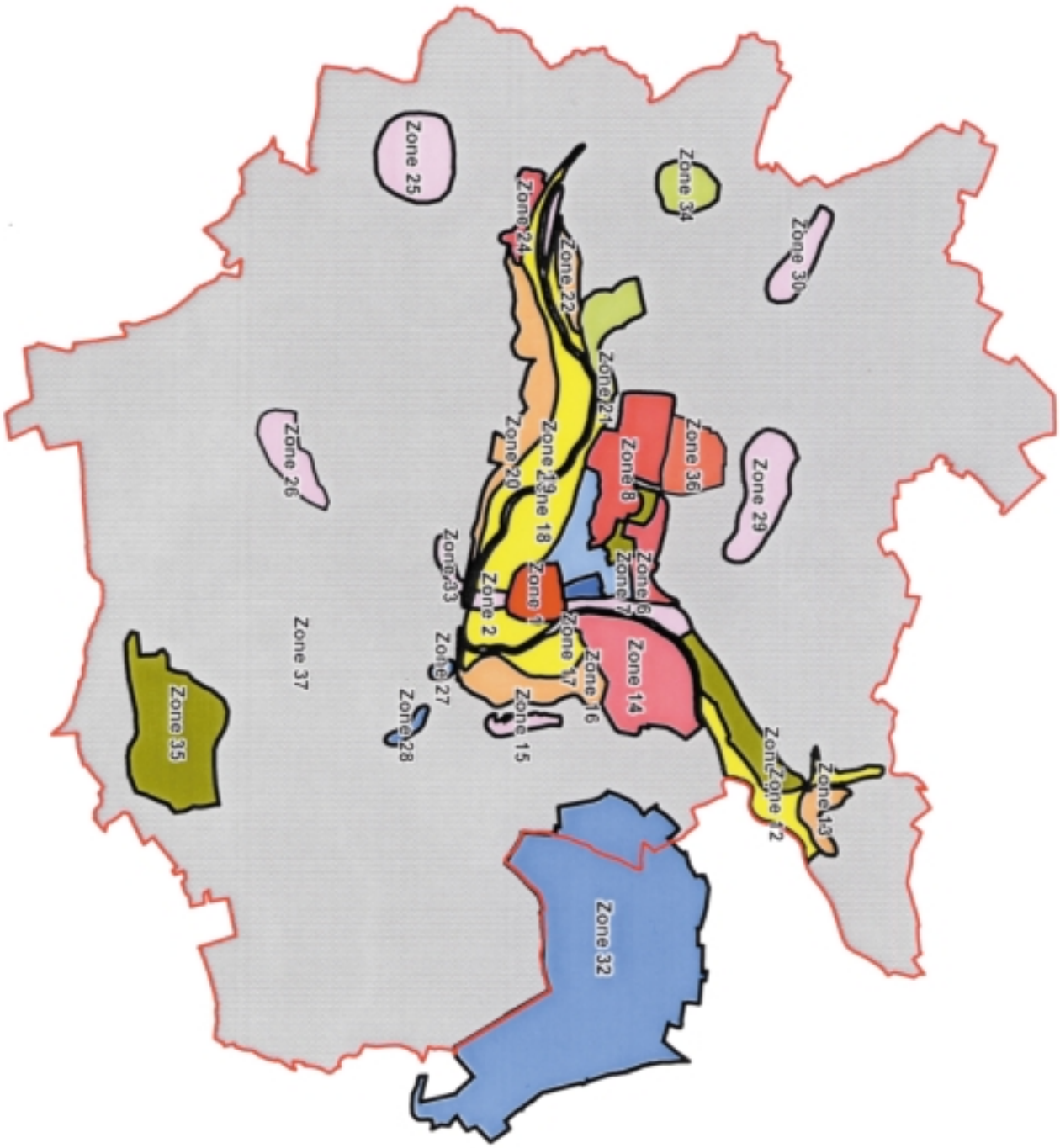
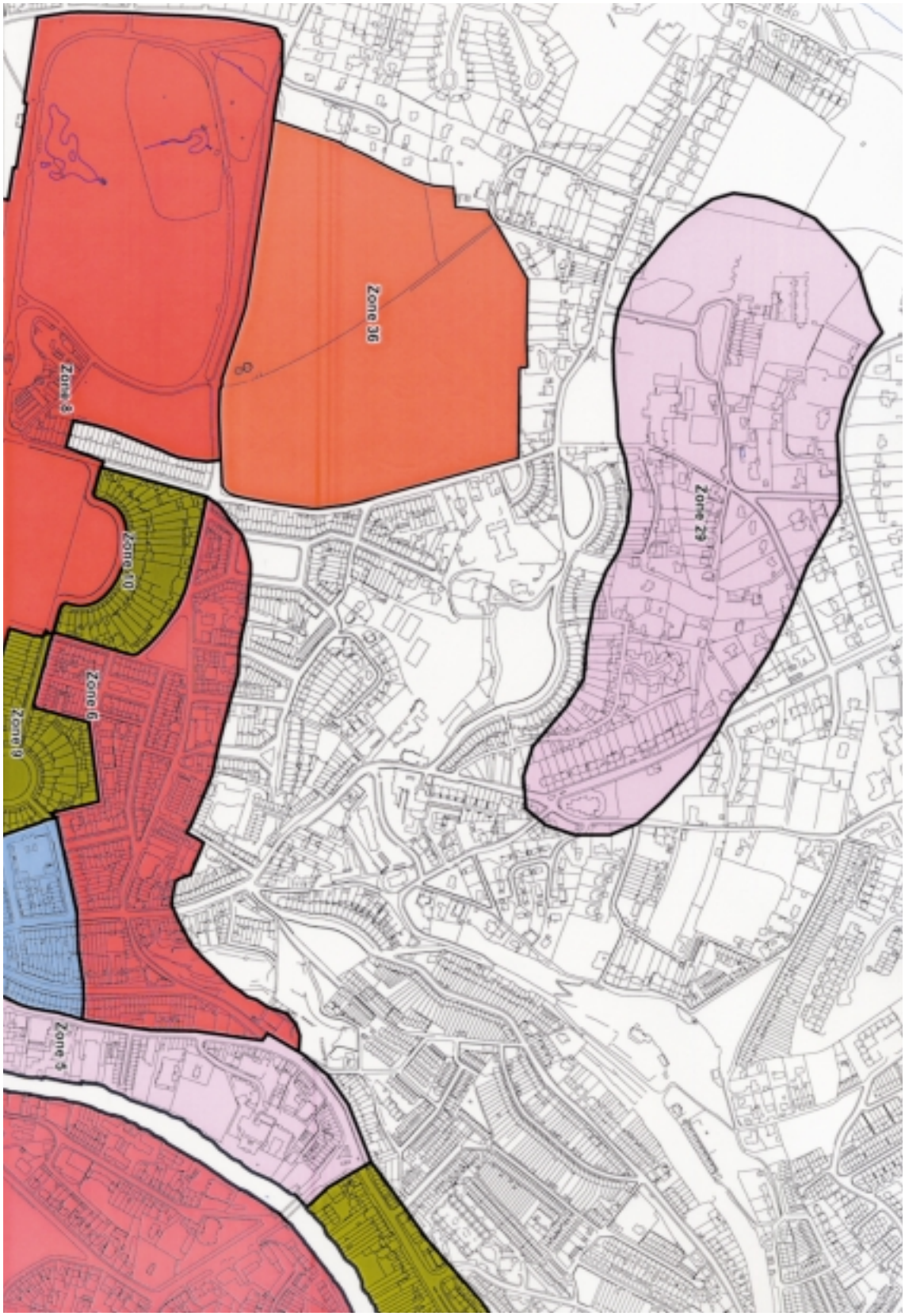


Figure 5

Figure 6



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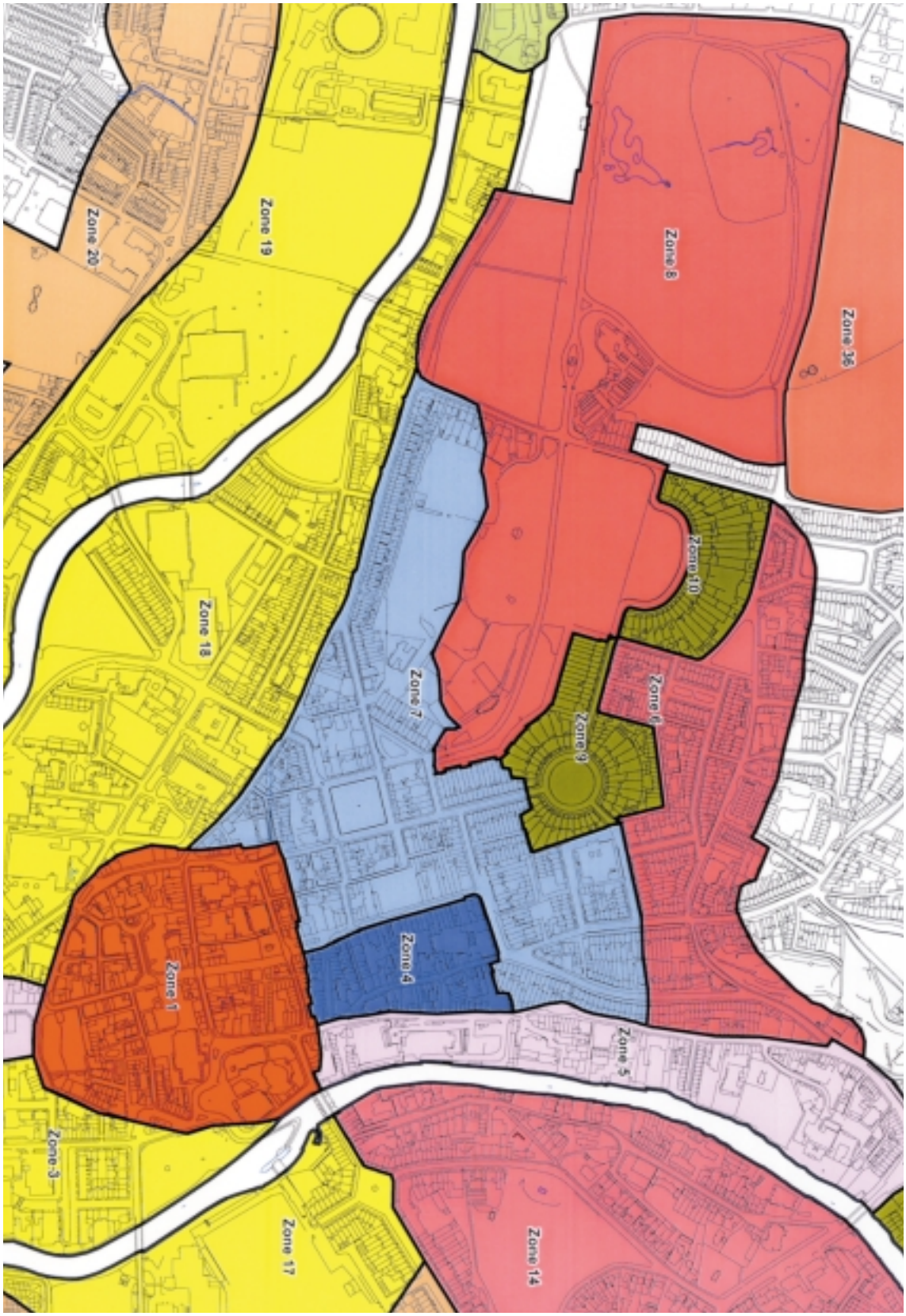

Zone 20
Zone 19
Zone 8
Zone 36
Zone 10
Zone 18
Zone 7
Zone 6
Zone 9
Zone 4
Zone 1
Zone 5
Zone 3
Zone 17
Zone 14

Figure 8

Figure 9


Zone 21
Zone 8
Zone 20
Zone 19
Zone 18
Zone 7
Zone 33
Zone 4
Zone 1
Zone 2
Zone 3

Figure 10

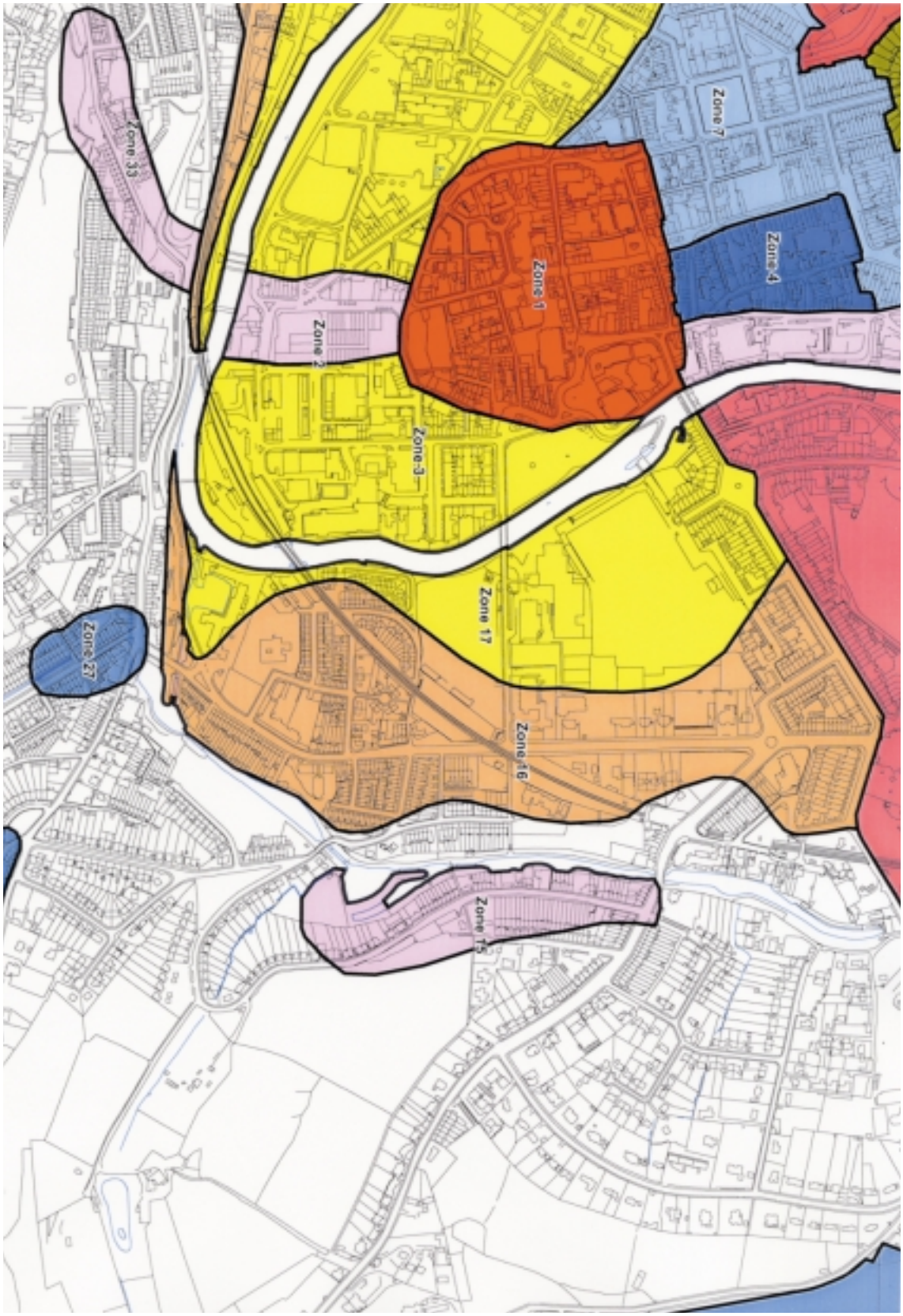

Zone 33
Zone 7
Zone 4
Zone 1
Zone 2
Zone 3
Zone 17
Zone 27
Zone 16
Zone 15

Figure 11

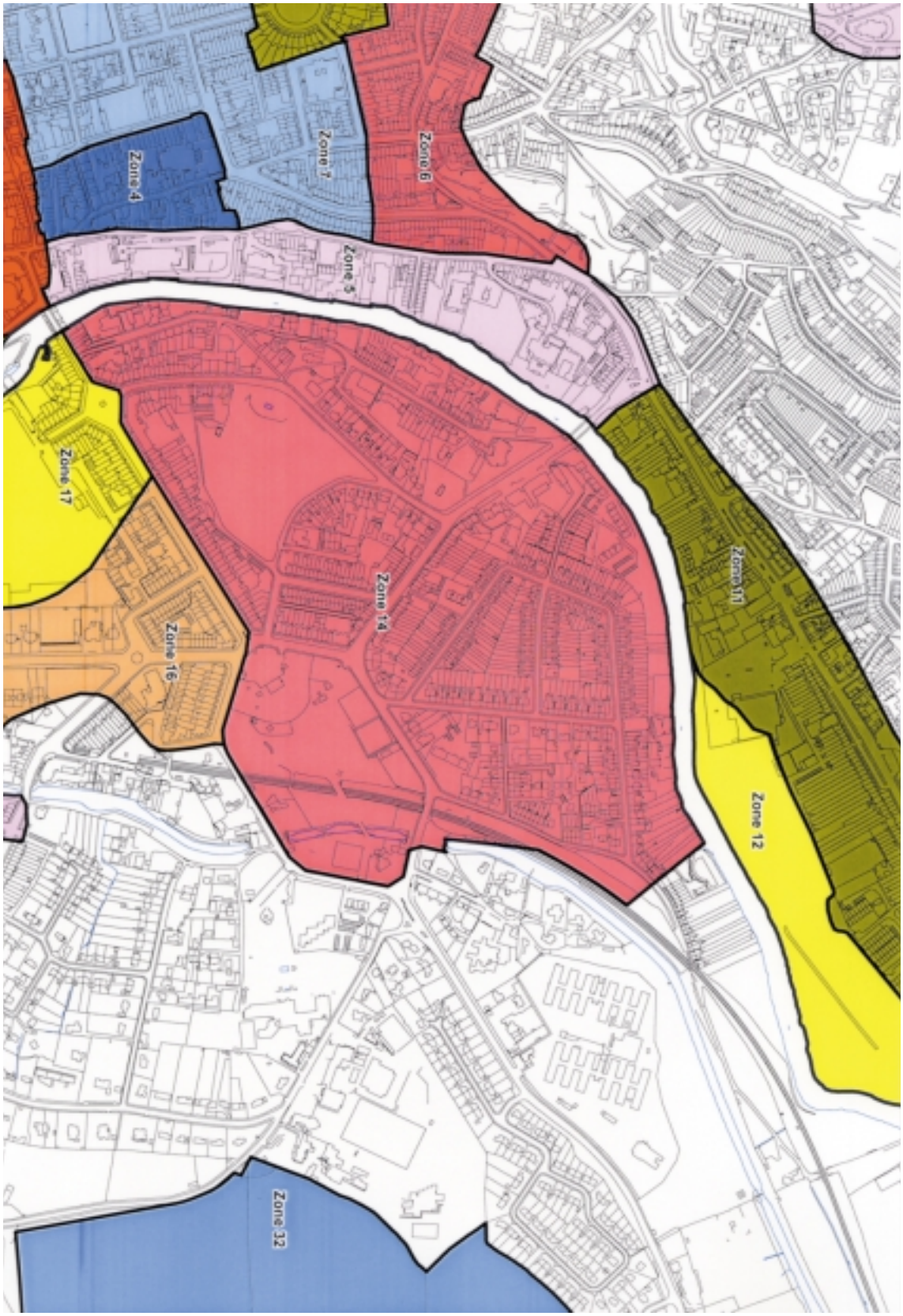

Zone 4
Zone 7
Zone 6
Zone 5
Zone 17
Zone 14
Zone 16
Zone 11
Zone 12
Zone 32

Figure 12

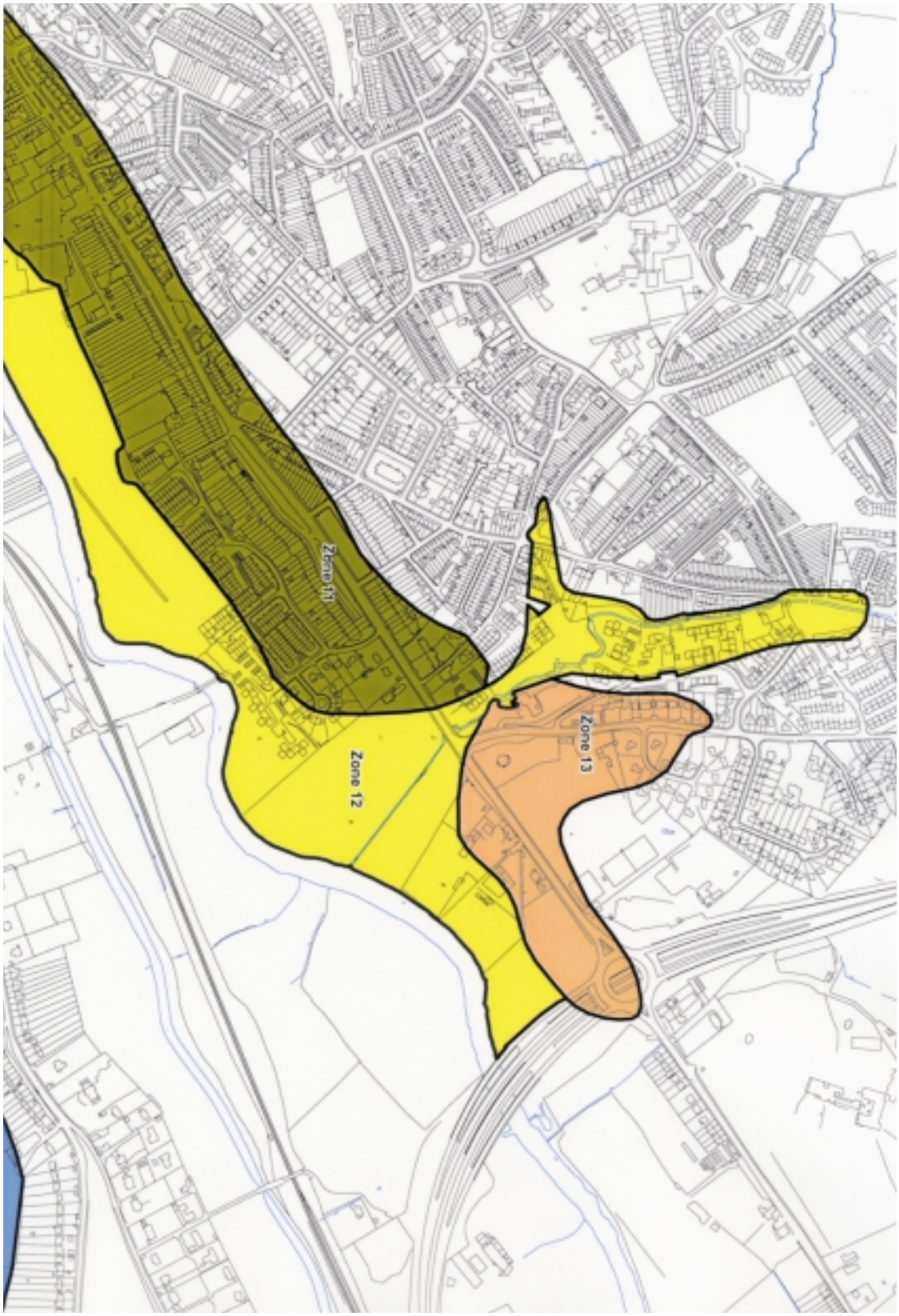


Figure 13

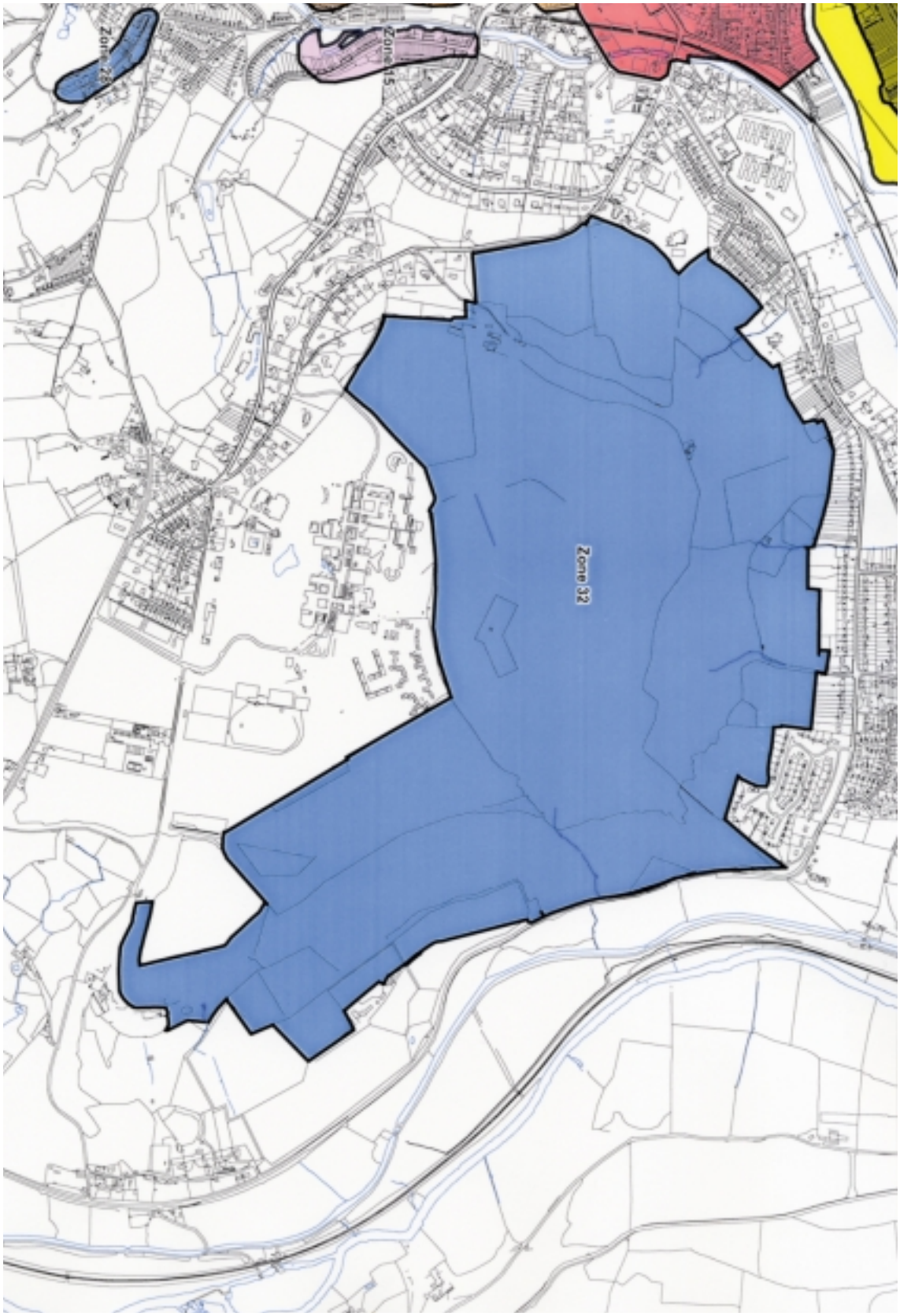


Figure 14

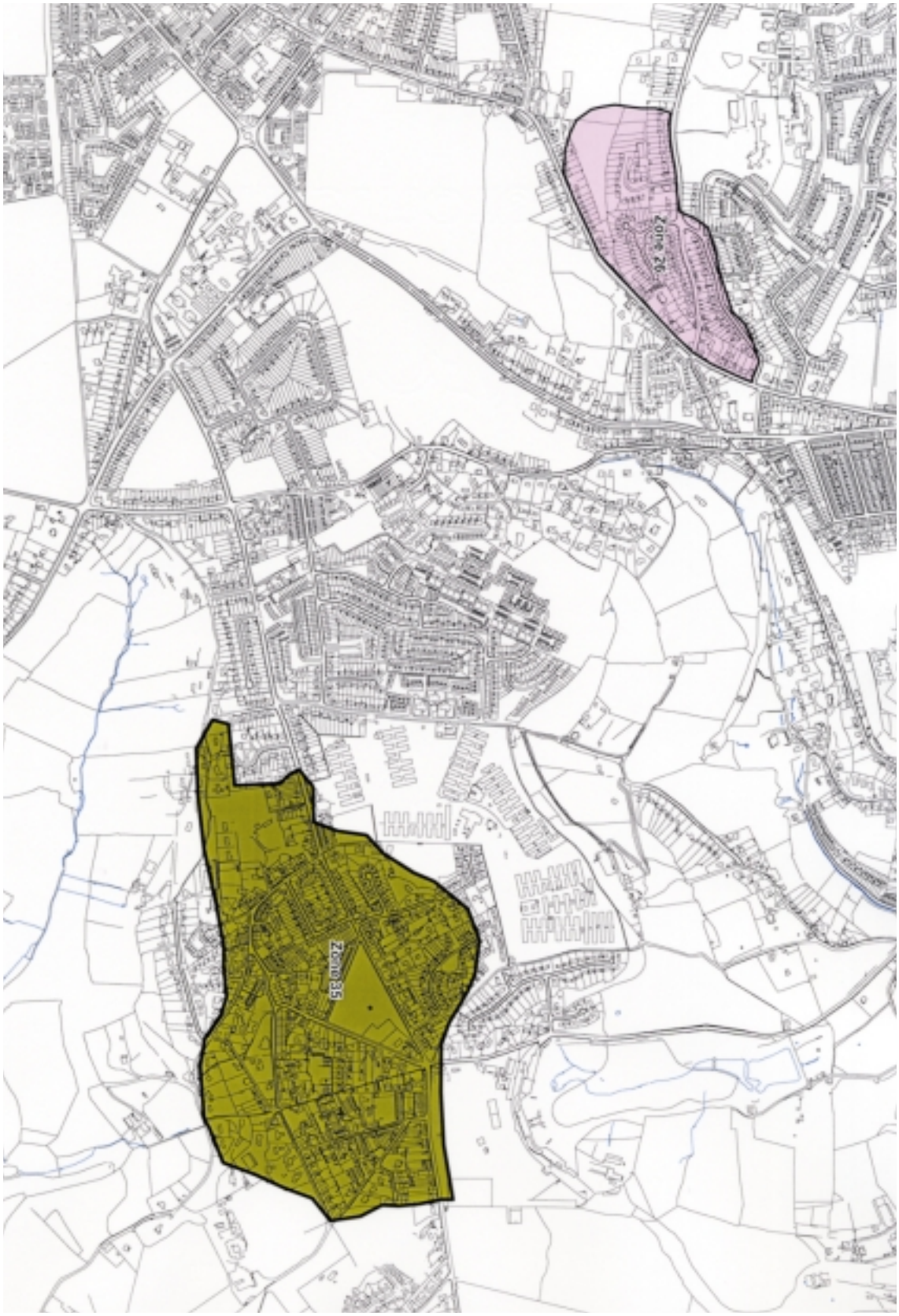
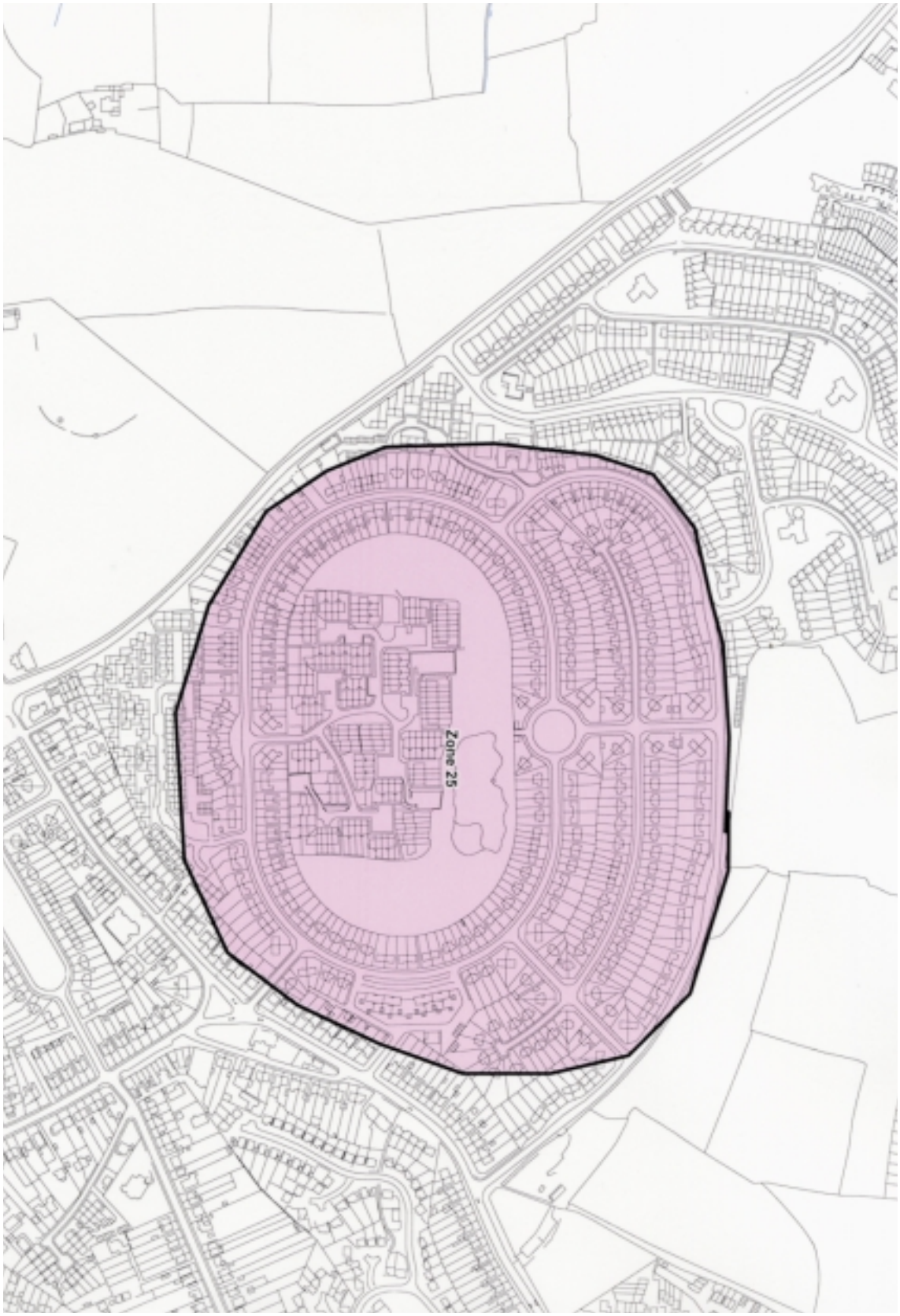


Figure 15



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