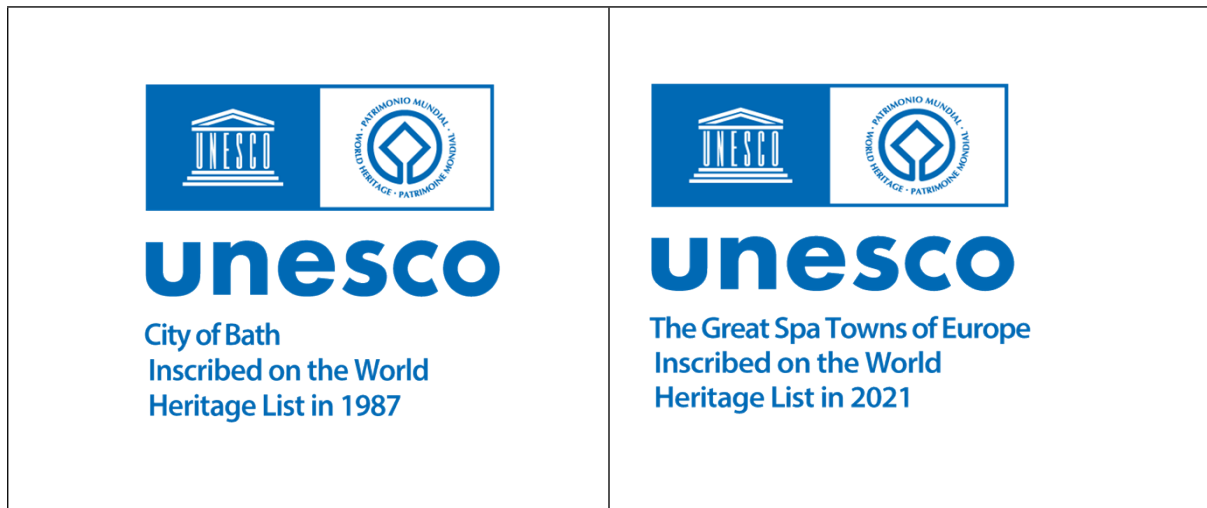


# City of Bath & Great Spa Towns of Europe

## World Heritage Sites

Management Plan 2024-2030





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## **Preface from the Chair of the Bath World Heritage Advisory Board**

The double inscribed Bath World Heritage Site (WHS) is a unique place of international significance, inscribed by UNESCO in 1987 as a living city set within a beautiful and dramatic landscape, it received a further inscription in 2021 in a serial nomination for the Great Spa Towns of Europe. The Outstanding Universal Value (OUV) cited by both UNESCO inscriptions draws upon centuries of historical interplay fashioned within the natural and built environments set in a landmass site of just over 29 square kilometres.

During the previous plan period (2016-2022) major achievements were made in conservation, funding and interpretation, including The Great Spa Towns of Europe inscription and the opening of the World Heritage Centre and Clore Learning Centre in 2022. Significant investment funding was secured (leveraging approximately £20m of National Heritage Lottery Funding) through a range of major heritage projects which enhanced conservation and interpretation of key assets within the Site.

Following Bath's declaration of climate and ecological emergencies a Clean Air Zone (CAZ), the first outside of London, became operational in 2021 marking a considerable step forward in protecting and enhancing human health and historic fabric.

The Bathscape Project resulted in a partnership of 12 organisations delivering 25 interconnecting projects, secured over £2 million in funding, established a major new method of managing the green setting of the city, and with the transfer of ownership of Bathampton Meadows to the National Trust the 'green gateway' to the city is maintained, realising significant ecological benefits.

The establishment of social media accounts and a new website launched (2016) have significantly increased the ability to promote and interpret the site and provide transparent governance.

Both inscriptions recognise that the City of Bath as a dynamic, modern urban area and a living site subject to constant change. Sensitive managed change is essential in ensuring the city is fit for the needs of its citizens and remains economically productive and must constantly adapt and develop to meet the needs of its rising population as well as those who work or visit the site. This unique combined Management Plan must respond to development pressures and carefully guide necessary change to accommodate the needs of a thriving city while protecting its OUV. The over-arching objective is to ensure that such change does not harm the OUV, authenticity and integrity of the WHS by ensuring that development is sustainable and that the whole property continues to be effectively managed, adequately protected, and enhanced, maintained and resourced to build upon the attributes.

Through a consultative and participative process, the Bath WHS Advisory Board determined to concentrate on identifying key issues and actions to deliver the coming six-year Plan period to deliver these objectives. The issues arise from a

number of sources, such as the previous Plan, public engagement and consultation including a Stakeholder Workshop facilitated further aided deliberations enabling the Advisory Board to agree the core priorities and actions.

The starting point for identifying actions is enshrined in the UNESCO World Heritage Convention (1972), Article 4 requires state parties to 'protect, conserve, present and transmit' their cultural and natural heritage and this requirement is carried forward in the UNESCO Operational Guidelines. This requirement underpins both the role of the WH Managers and the remit of this Plan. Eighteen over-arching objectives have been identified with justification based on risk assessment, monitoring and analysis to achieve these, under which actions are added.

The dynamic Plan outlines six equally vital priority objectives, all of which have been rigorously validated through extensive public consultation, engaging our communities, partners, and stakeholders in a truly participative process:

- Supporting climate action while safeguarding OUV
- Managing Sustainable Development
- Improving the Public Realm
- Traffic, Transport and Mobility
- Promotion, interpretation, inclusion and presentation
- The Landscape Setting and Nature Recovery

This Plan not only establishes a clear vision for the long-term future of the site, but it also defines actionable aims, and initiatives developed collaboratively to ensure effective management and preservation of OUV for both present and future generations.

As Chair, I am fiercely committed to safeguarding Bath's World Heritage site and advancing the Sustainable Development Goals set forth by UNESCO. My passion, dedication, and energy are devoted to protecting and future-proofing Bath's World Heritage status, in perfect alignment with the Council's mission and values.

However, the successful delivery of this Plan is a collective responsibility, shared among all partners, including national agencies. I want to take this moment to express my sincere gratitude to my colleagues on the Advisory Board for their unwavering commitment to partnership. Your dedication, time, patience, and effort in reviewing, updating, and creating this World Heritage Site Management Plan are invaluable. It is on behalf of all of you that I am proud to sign off on this essential document.

Thank you for your collective efforts in ensuring a vibrant future for our cherished heritage.

**Professor Marion Harney**

Chair of the UNESCO Bath World Heritage Site Advisory Board

## **Executive Summary**

1. Bath is inscribed twice on the UNESCO World Heritage List and one of around 22 of the 1223 (2024) World Heritage Sites to be double inscribed: The City of Bath (1987) and The Great Spa Towns of Europe (2021). This dual inscription is a rare event and testimony to the exceptional significance and uniqueness of the city and its Outstanding Universal Value (OUV) to all of humanity. World Heritage inscription is universally recognised and remains the most prestigious and highly respected heritage accreditation that can be achieved. As a result, Bath is a city with a significant global profile.
2. The OUV can be summarised as follows:

### **The City of Bath**

- Roman archaeology
- The Hot Springs
- Georgian town planning
- Georgian architecture
- The green setting of the city
- Georgian architecture reflecting 18th century social ambitions

### **The Great Spa Towns of Europe**

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

3. This Management Plan is a ground-breaking document. This is likely to be the first time in the history of UNESCO World Heritage List where a combined plan covering two inscriptions has been produced. It is the fourth management plan for Bath and covers a six-year period from 2024



to 2030. In essence, it sets out why the site is of global importance and significance, how this will be protected and managed, what the issues are impacting upon its OUV, what the priorities and objectives are for management, and the actions proposed to address these. Management plans are a requirement of UNESCO to clearly demonstrate how OUV will be protected, preserved and enhanced. In simple terms, this is set out in two principal parts: the first four chapters identify what is universally special and significant about the property, and the second sets out how it will be managed based on identified priorities and specific actions.

4. The Management Plan is produced and managed through participatory means and collaboration with the Bath World Heritage Site Advisory Board, who are advised by its Strategic Management Group. It is a long-established partnership board (established 2001) made up of key stakeholders from local and national organisations with a broad range of top-level experience, including from higher education, heritage, planning, business, tourism, the community, landscape and nature, and local government.
5. The principal purpose of this plan is to protect the World Heritage Site and safeguard the OUV for which it is inscribed in what is likely to be a period of considerable change and growth. This is reflected in the 6 headline Plan priority areas, which are:
  - Addressing Climate Change
  - Development
  - Public Realm
  - Traffic, Transport and Mobility
  - Promotion, Interpretation, Inclusion and Presentation
  - Natural Setting and Nature Recovery
6. The Action Plan at the end of this Plan sets out priority actions that form the basis of management strategies, identifying potential funding streams and budgets to support them. This part will be stand alone and may be updated when required. This arrangement allows the actions to be reviewed and brought quickly up to date to respond to changing circumstances. For instance, to effectively respond to changing circumstances that may arise from the management of The Great Spa Towns of Europe World Heritage Site, the overall management of which will be informed by an agreed Property Management Plan for all 11 European spa towns included in this serial inscription.

7. The Management Plan is intended for everyone and has been produced in the spirit of UNESCO World Heritage and its founding principles, that it is of universal value, transcending national and political boundaries, and is a positive unifying force for good. Furthermore, it recognises Bath as a living city and not a static monument. Whilst the state of conservation remains in largely excellent condition, the work of balancing the needs of a modern, living city with a world-renowned heritage site are constant and the need for careful management is ongoing. The Management Plan sets out a framework of actions to sensitively manage a complex and exceptional city through a period of change. Lastly, it identifies conservation and enhancement, plus significant risks such as inappropriate development, and the climate and ecological emergencies, and in doing so ensures UNESCO's Sustainable Development Goals<sup>1</sup> are met and that change does not harm or compromise the OUV that signifies Bath as being of worldwide importance.

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<sup>1</sup> <https://www.unesco.org/en/sdgs>

## Vision

The Outstanding Universal Value of the City of Bath and Great Spa Towns of Europe World Heritage Site will be conserved, enhanced and safeguarded for this and future generations.

Bath will continue to be an exemplar of sustainable management balancing the needs of an inventive and entrepreneurial 21st century city and its many visitors and the conservation and enhancement of the unique heritage and its natural setting, which is of world-wide significance.

Ensure that development and infrastructure projects respond positively to the WHS and its setting and avoid harm to OUV.

Excellent urban heritage management, conservation and interpretation will be founded on strong and effective partnerships of local, national and international communities and organisations.

The city will adapt to meet the challenges of carbon reduction and climate change, and in all proposals for change the Outstanding Universal Value will be safeguarded.

Bath will be accessible and enjoyable to all; a site that understands and celebrates its Outstanding Universal Value, beauty and character.

World Heritage status will continue to be used to support and enhance the vitality and wellbeing of the local community and underpin sustainable development.

# CHAPTER 1 INTRODUCTION

## 1.1 City of Bath World Heritage Sites

The City of Bath is a cultural World Heritage Site (WHS), first inscribed on the UNESCO List of World Heritage Sites in 1987 for the global significance of the Roman archaeology and eighteenth-century architecture and town planning<sup>2</sup>. It was inscribed a second time in July 2021 as a component part of The Great Spa Towns of Europe (GSTE), which is a single WHS comprising of 11 spa towns in 7 countries<sup>3</sup>. The city forms part of the family of World Heritage Sites in the UK that now numbers 35 sites (2024), which includes four overseas territories.

The City of Bath WHS inscription is exceptional. It encompasses the entire urban area, which is a situation seldom seen elsewhere worldwide. It is also a rare example of a twice-inscribed site, with only around 22 examples known amongst the 1223 (2024) sites globally. The management challenge that this generates is balancing conservation of heritage of the highest significance against the needs of a vibrant and thriving twenty-first century city.

## 1.2 UNESCO World Heritage

The United Nations Educational Scientific and Cultural Organization (UNESCO) was created in 1945 and is the body which designates and administers WHS. The UNESCO Operational Guidelines<sup>4</sup> define WHS as being places of Outstanding Universal Value (OUV) which is 'so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. Cultural, natural or mixed sites may be inscribed. The UNESCO World Heritage list<sup>5</sup> includes places as unique and diverse as the Great Wall of China, Pyramids of Giza, the Australian Great Barrier Reef and the Taj Mahal in India. World Heritage inscription remains the most prestigious and highly respected heritage accreditation.

The focus of this plan is the City of Bath (and as part of the Great Spa Towns of Europe series), but World Heritage inscription brings an obligation for conserving the city for the whole of humanity and places Bath amongst a world-wide community of heritage sites. UNESCO's 1945 founding principle was building peace in the minds of men and women and that objective remains valid today. UNESCO encourages both international conservation cooperation and local participation in the preservation of heritage. UNESCO also recognises the important role World Heritage Sites can play in both sustainable development and climate action. Bath is an international city and is proud to play a leading role in the UNESCO mission.

## 1.3 This Management Plan

UNESCO requires all WHS to have an up-to-date management plan. The format of these follows the same general principles in describing what the site contains, why it

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<sup>2</sup> World Heritage Committee 11th December 1987 Ref SC-97/CONF.005/9 Paris 20 January 1988

<sup>3</sup> UNESCO Reference:- WHC 21/44 COM 8B

<sup>4</sup> <https://whc.unesco.org/en/guidelines/>

<sup>5</sup> <https://whc.unesco.org/en/list/>

is important, how it is managed, the issues and factors affecting it and what actions are proposed to address these.

This is the fourth consecutive WHS Management Plan for Bath (see Appendix 2 - Story So Far). However, for the first time this plan brings together the 1987 and 2021 inscriptions and it is likely to be the first example of such a combined plan worldwide.

Article 4 of the 1972 UNESCO Convention<sup>6</sup> requires that WHS are identified, protected, conserved, presented, and transmitted to future generations. These 5 commitments form the basis of all site management. The purpose of this management plan is therefore to set out how these commitments will be applied to the City of Bath, and to ensure that they are delivered.

In accordance with UNESCO guidance, the City of Bath is managed through participatory means<sup>7</sup>. This management plan sets the priorities, objectives and actions for the Bath WHS Advisory Board (see Chapter 5) for the next 6 years.

#### **1.4 Scope and Status of the Plan**

The geographical scope of the plan relates to the site itself and its setting. This is clarified in section 2.4 (Boundary of the WHS).

With regard to the scope of what the inscriptions cover, Chapter 3 gives full details of the significance. It is sufficient to note here that the attributes of the 1987 inscription cover Roman archaeology and the Georgian city, which includes its town planning, architecture, and green setting. The Great Spa Towns of Europe inscription covers structures, features or landscapes associated with Bath as a spa town from the early 18<sup>th</sup> century to the 1930's.

Regarding scope of contents, the primary focus of this plan is the protection, conservation and interpretation of OUV. Note therefore that not everything within the boundary is necessarily of World Heritage significance. This is not a generic city plan, but rather a plan that is purely focused on the OUV of Bath. Reasons for inscription give particular importance to certain periods of history, although to be effective it must ensure a holistic and strategic approach to management as it is neither practical nor sensible to exclude entire periods of history. Similarly, although inscribed as a cultural site, natural elements are also of importance. Chapter 3 expands on this.

In terms of status, the Plan is a partnership document. It represents the consensus view of the members of the City of Bath World Heritage Site Advisory Board. Successful implementation and achievement of objectives depend upon partnership participation. This plan was endorsed by Bath and North East Somerset Council on ... *(date to be confirmed/added)*.

The WHS Management Plan informs and works alongside and is complementary to the Council's Local Plan, which helps to guide and influence development proposals,

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<sup>6</sup> <https://whc.unesco.org/en/conventiontext/C:\Users\neilsoa\AppData\Local\Microsoft\Word\unesco world heritage convention>

<sup>7</sup> UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (see para. 108) - <https://whc.unesco.org/en/guidelines/>

contains planning policies used in the determination of planning applications, and protects land which is valued for a variety of reasons. But this does not diminish the responsibility of any agency or individual. The National Planning Policy Framework (NPPF) 2023 recognises World Heritage Sites as designated assets of the highest significance. Associated historic environment guidance states that management plans should inform the Development Plan or Local Plan policies, and that WHS management plans are a key material consideration in the planning process.

The key differences are that the Local Plan can set policy, and the Management Plan cannot, and the Local Plan is largely concerned with spatial or land-use development matters, whereas the Management Plan can cover aspects such as projects and funding. The Local Plan is a statutory document whereas the WHS Management Plan is not.

The Plan was prepared by participatory means and through consultation, consistent with both UNESCO's and the Council's requirements for public participation and engagement.

### **1.5 Aims of the Plan**

- I. ensure that the Outstanding Universal Value of the Site and its setting is understood, protected and interpreted
- II. ensure World Heritage Site status is managed sensitively in a way that contributes positively to addressing the climate and ecological emergencies whilst safeguarding Outstanding Universal Value
- III. ensure that all development within the World Heritage Site and its setting is consistent with the protection, enhancement and safeguarding of its Outstanding Universal Value
- IV. promote the sustainable management of the Site
- V. maintain and promote Bath as a living and working city that benefits from World Heritage Site status
- VI. improve physical access to, interpretation of and inclusion in Bath's heritage, achieving widespread local, national and international ownership of the Site's Outstanding Universal Value
- VII. fully embed the Great Spa Towns of Europe inscription within the management of Bath as a World Heritage Site

## **CHAPTER 2 DESCRIPTION OF THE SITE**

### **2.1 Introduction**

This chapter describes the site location, the inscription boundary, how the city has evolved and how it is today. Chapter 3 then follows on to clarify why it is deemed to be of Outstanding Universal Value and to clarify the attributes relating to that which this plan seeks to conserve.

### **2.2 Location**

The City of Bath is located in the southwest of England, approximately 100 miles (160km) west of London and 13 miles (21km) south-east of the port of Bristol. It is located on a bend of the River Avon, which cuts through the limestone hills of the Cotswolds to the north, dividing them from the Mendip Hills to the south.

### **2.3 The three Hot Springs**

Bath exists because of the emergence of three natural springs that rise close to each other in the heart of the city. They are the only springs classified as ‘hot’ in the UK. The thermal water contains some 43 minerals with dissolved carbon dioxide.

The catchment area is thought to be the Mendip Hills, some 25km to the southwest. Rain falling here around 5,000 years ago filtered through the limestone and flowed to Bath in geological faults 2 to 3 kilometres deep.

The springs constantly issue over a million litres of water per day, with the output of the King’s Spring is 13 litres per second, sufficient to fill a domestic bathtub every 8 seconds. The 3 springs are the King’s Spring (46 degrees C), the Hetling Spring (48 degrees C) and the Cross Bath Spring (41 degrees C).

The springs were held sacred in Roman culture and still regarded as such by some people today. In recognition of this intangible value, all references to the springs in this Plan are capitalised as Hot Springs.

*Diagram 1: Sketch map of the location of the 3 Hot Springs within the Roman City walls*

### **2.4 Boundary of the WHS**

The 1987 and 2021 inscriptions both follow the same boundary. This is the municipal city boundary which encloses an area of approximately 29 square km. This administrative boundary defines the Parliamentary Constituency, the Mayoral area and the extent of legislation including the Avon Act 1982 (see Appendix 1, Map 1)

### **2.5 Setting**

Beyond the boundary the landscape setting is largely attractive open countryside characterised by valleys, small woodlands and largely undeveloped high plateau grasslands, frequently called ‘downs’. Bath remains a compact city standing alone in open countryside, without the urban sprawl associated with many modern similar settlements.

UNESCO Operational Guidelines (2021)<sup>8</sup> require that ‘wherever necessary for the protection of the property, an adequate buffer zone should be provided’. This is however qualified by a following statement (para 106) that ‘Where no buffer zone is proposed, the nomination should include a statement as to why a buffer zone is not required’. Bath has no formal buffer zone in either the 1987 or 2021 inscriptions. Instead, an area of between approximately one and two miles beyond the boundary has been identified as an ‘indicative setting’. This is protected by means of planning policies associated with the WHS, the Green Belt and the Cotswolds National Landscape, and informed by the City of Bath World Heritage Site Setting Supplementary Planning Document (2013)<sup>9</sup> and enhanced and part-managed by the work of the Bathscape Landscape Partnership<sup>10</sup>. These protection methods are considered to negate the need for a formal buffer zone and have proven effective and this was accepted by UNESCO during the 2021 Great Spa Towns of Europe inscription. More detail is given Chapter 4, Management.

## **2.6 Summary history of the site**

For the first time, this iteration of the Management Plan places the summary history in an appendix (Appendix 3). This in no way diminishes the importance of the history and it remains essential that it is understood, as the cultural (and natural) heritage which this Plan seeks to conserve is obviously a result of that story. However, it is a section which lends itself to a free-standing appendix, it avoids repetition with elements of that history being contained in the two statements of Outstanding Universal Value and it helps reduce the size of this combined plan and improves legibility.

## **2.7 Bath today**

Bath is a thriving 21<sup>st</sup> century community and home to around 107,161 residents (2021 estimate).

The city is generally contained in a hollow in the Cotswold Hills, formed by the River Avon. Trees crown most of the skyline when viewed from the city centre and the hillsides provide a green pasture backdrop. As with other spa towns, this provides a sense of calm and creates an impression that the city is smaller than it is.

Bath is a beautiful, unified city with most of the historic buildings constructed from local, honey coloured Oolitic limestone, quarried from Combe Down to the south of Bath, with slate or clay tiled roofs. This limited palette of materials results in a strong visual unity and homogeneity unusual amongst British cities. There is also a predominance of classical architecture within the historic core, and again this single architectural style contributes to the city’s uniqueness and unity.

There is very little sign of former heavy industry. Residential properties form most of the building stock, with building height relatively consistent and low-rise.

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<sup>8</sup> <https://whc.unesco.org/en/guidelines/> (see para. 103)

<sup>9</sup> <https://www.bathworldheritage.org.uk/bath-world-heritage>

<sup>10</sup> <https://www.bathscape.co.uk/>



Bath is served by air from Bristol Airport (18.6 miles away) and by major roads from the M4 London-Cardiff motorway (11 miles to the north). A mainline railway runs through the city giving journey times to central London of an hour and twenty minutes. Local transport is predominantly provided by buses, with 'park and ride' facilities to the north, south and west of Bath. The compact nature of the city affords opportunity for walking or cycling, with vehicle ownership in the city centre lower than the England/Wales average. However, the compact historic city is difficult for modern vehicular traffic, resulting in some congestion and resultant air-pollution.

Bath continues to be a major tourist centre, attracting approximately 5m visitors per year and adding an estimated £470m to the local economy. The culture of the spa town continues, with the historic Roman Baths attracting over 1 million visitors per year from all over the world and the modern Thermae Bath Spa very popular with short break domestic visitors. There are over 300 places of accommodation, including around 80 hotels, 180 bed and breakfasts, and 174 guesthouses, equating to approximately 6281 bed spaces. The main tourist season is summertime, with high day time tourist numbers in the city centre. This gives a colourful and vibrant international flavour in comparison to cities with predominantly commercial centres.

Bath & North East Somerset is divided into 33 electoral wards with 15 of these covering the Bath city area. Bath is a university town with two universities: the University of Bath and Bath Spa University, and according to the 2021 Census, 19.5% of the resident population aged 16 and over in these 15 wards were full-time students. The academic summer break ensures student levels fall when tourist numbers are at their highest. Levels of education are generally high across Bath. Of the 15 electoral wards which make up the city area, all but 4 wards have higher proportions than the national average that are qualified to degree level or higher.<sup>11 12</sup>

In terms of employment, in 2021 19% of employees based in B&NES were employed in the public sector, similar to the national level (18%). The health sector is the biggest employer in B&NES, accounting for 19% of jobs. The Wholesale & Retail trade and Education sectors are the second and third highest employment sectors accounting for 13% of employment each. Levels of employment are generally high compared to national levels (78% B&NES, 76% England, 2023 Q4). 33% of those in employment are classed as professional workers compared to 27% nationally.<sup>13</sup>

9 of the 15 wards have a population of older people (65 and over) above the England/Wales average, but not significantly so. Crime levels are low, with drug related crime being very low.

Despite the image of Bath as an affluent city with a skilled and educated workforce, high employment and low crime rates, there are pockets of significant deprivation.

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<sup>11</sup> B&NES Strategic Evidence Base: <https://beta.bathnes.gov.uk/strategic-evidence>

<sup>12</sup> B&NES Strategic Evidence Base: <https://beta.bathnes.gov.uk/strategic-evidence> B&NES Ward profiles: [Ward profiles](#)

<sup>13</sup> ONS Census 2021 data & NOMIS – Official Labour Market Statistics

Five neighbourhoods (Twerton, Twerton West, Whiteway, Whiteway West and Fox Hill North) are within the 20% of most deprived in England.<sup>14</sup>

## 2.8 Condition of the Site

At the start of this new plan period the state of conservation of the city remains largely good. Given the high number and concentration of protected buildings, very few are vacant or in poor condition. Heritage at risk surveys are a key monitoring indicator, and there were a number of entries on Historic England's national Heritage at Risk Register<sup>15</sup> located in the WHS, including an historic Isambard Kingdom Brunel footbridge north of Sydney Gardens, King Edward's School in the city centre enters its fourth decade of being vacant and the Council remains in close contact with the owners to encourage its restoration and reuse and implementation of planning approvals. Cleveland Pools, the only surviving Georgian public swimming baths in the country and Beckford's Tower have now undergone an extensive and successful programme of restoration and refurbishment. However, although the Cleveland Pools was fully operational and open to the public following the programme of restoration it has since been affected by issues related to flooding. It is hoped that these can be successfully overcome to enable the pools to reopen again. Sections of the Wansdyke to the south of Bath, and within the setting of the WHS, are also regarded as at risk. A pair of historic gate piers located at the top of Ralph Allen's drive and associated with Allen are also a cause for concern. The public realm is regarded as being in a variable state of deterioration, and this is stated as being one of the six key priorities of this Plan with a specific action included to reflect this.

## 2.9 Key Facts

There are 35 (2024) WHS in the UK (and its overseas territories), and World Heritage UK is the independent organisation that represents all UK sites<sup>16</sup>.

The City of Bath World Heritage Site was inscribed on 12 December 1987.

Bath is exceptional in that the entire urban area (approximately 29 square km) is inscribed. Only Venice provides a comparable example throughout Europe. In addition to this the indicative setting of the World Heritage Sites covers an area of approximately 60 square kilometres.

The Great Spa Towns of Europe were inscribed on 24 July 2021, which is a thematic transnational inscription made up of 11 European spa towns.

Bath is thought to be one of only 22 sites worldwide to be double inscribed.

The 3 springs at the heart of the site are the only ones classified as 'hot' in the UK.

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<sup>14</sup> Further Bath statistics can be found on the Council's website at: <http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/wiki/bath-forum-area>

<sup>15</sup> <https://historicengland.org.uk/advice/heritage-at-risk/>

<sup>16</sup> <https://worldheritageuk.org/>

The hottest spring is the Hetling at 48C and there are 43 minerals contained within the water.

The most voluminous is the King's Spring, with a continuous flow of 13 litres per second or 1,106,400 litres per day. This flow will fill a domestic bathtub every 8 seconds.

107,161 people live within the site.

There are approximately 5,000 listed buildings in the site, with the highest concentration of grade I and II\* listings outside of central London. 3% are Grade I, 10% are Grade II\* and 87% are grade II.

The site generates approx. 1,500 applications for Planning Permission and Listed Building Consent per year – undoubtedly the highest of any UK World Heritage Site.

A single conservation area of 1,486ha covers two thirds of the site.

There are 5 scheduled monuments covering 1.4ha (approx. 13% of the central area).

The surrounding landscape is covered by both the Bath & Bristol Green Belt and the Cotswolds National Landscape (NL), which lies to the north, east and south of the city.

There are 9 registered historic parks and gardens within the site itself, 3 within the indicative setting, with 23 Parks and Gardens of local Historic Interest and 2 Sites of Special Scientific Interest.

Approximately 5m people visit Bath each year, adding an estimated £470m to the local economy and accounting for an estimated 10,000 jobs<sup>17</sup>.

There are 21 primary schools in or adjacent to the WHS, plus two universities with over 20,000 students.

The Bath area is home to around 8,500 businesses employing around 92,000 people.<sup>18</sup>

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<sup>17</sup> Visit Bath figures 2020: <https://visitbath.co.uk/>

<sup>18</sup> Our Future Ambition Place Prospectus 2022:

<https://beta.bathnes.gov.uk/sites/default/files/BA414%20Regeneration%20Prospectus%20AW%20for%20accessible%20PDF%20single%20page.pdf>

## **CHAPTER 3 SIGNIFICANCE OF THE SITE**

### **3.1 Introduction**

This chapter outlines why Bath is considered to be of Outstanding Universal Value (OUV) to all of humanity. Each WHS has a Statement of OUV, which is a concise description endorsed by the UNESCO World Heritage Centre. Today this Statement is agreed at the time of inscription, as with the Great Spa Towns of Europe (2021), although in the case of the City of Bath (1987) inscription, this was agreed retrospectively.

The chapter then describes the ‘attributes’ that convey or express the OUV of the site and which contribute to and enhance understanding of the Site and its OUV. Thirdly in the hierarchy are the individual ‘elements’ such as historic buildings and other structures.

The UNESCO criteria against which both inscriptions were made, the two statements of OUV and the respective lists of attributes and elements are set out below. It should be noted that both inscriptions have equal importance and neither has primacy over the other.

### **3.2 The City of Bath Inscription (1987)**

The first WHS in the UK were added in 1986, with the City of Bath being added in that early tranche in 1987. The UNESCO criteria (with wording from that time) that the inscription was found to be consistent with are as follows:

- i. Represent a masterpiece of human creative genius
- ii. Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design
- vi. Be directly or tangibly associated with events or living traditions, with ideas, or beliefs, with artistic and literary works of outstanding universal significance.

### **3.3 City of Bath Statement of Outstanding Universal Value**

#### Brief synthesis of the City of Bath WHS

The City of Bath in South West England was founded in the 1st century AD by the Romans who used the natural hot springs as a thermal spa. It became an important centre for the wool industry in the Middle Ages but in the 18th century under the reigns of George I, II and III it developed into an elegant spa city, famed in literature and art.

The City of Bath is of Outstanding Universal Value for the following cultural attributes:

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

The Georgian city reflects the ambitions of John Wood Senior (1704-1754), Ralph Allen (1693-1764) and Richard "Beau" Nash (1674-1761) to make Bath into one of the most beautiful cities in Europe, with architecture and landscape combined harmoniously for the enjoyment of the spa town's cure takers.

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

The individual Georgian buildings reflect the profound influence of Palladio (1508-1580) and their collective scale, style and the organisation of the spaces between buildings epitomises the success of architects such as the John Woods (elder 1704-1754, younger 1728-1782), Robert Adam (1728-1792), Thomas Baldwin (1750-1820) and John Palmer (1738-1817) in transposing Palladio's ideas to the scale of a complete city, situated in a hollow in the hills and built to a picturesque landscape aestheticism creating a strong garden city feel, more akin to the 19th century garden cities than the 17th century Renaissance cities.

**Criterion (i):** Bath's grandiose Neo-classical Palladian crescents, terraces and squares spread out over the surrounding hills and set in its green valley, are a demonstration par excellence of the integration of architecture, urban design and landscape setting, and the deliberate creation of a beautiful city. Not only are individual buildings such as the Assembly Rooms and Pump Room of great distinction, they are part of the larger overall city landscape that evolved over a century in a harmonious and logical way, drawing together public and private buildings and spaces in a way that reflects the precepts of Palladio tempered with picturesque aestheticism. Bath's quality of architecture and urban design, its visual homogeneity and its beauty is largely testament to the skill and creativity of the architects and visionaries of the 18th and 19th centuries who applied and developed Palladianism in response to the specific opportunities offered by the spa town and its physical environment and natural resources (in particular the hot springs and the local Bath Oolitic limestone). Three men – architect John Wood Senior, entrepreneur and quarry owner Ralph Allen and celebrated social shaper and Master of Ceremonies Richard "Beau" Nash – together provided the impetus to start this social, economic and physical rebirth, resulting in a city that played host to the social, political and cultural leaders of the day. That the architects who followed were working over the course of a century, with no master plan or single patron, did not prevent them from contriving to relate each individual development to those around it and to the wider landscape, creating a city that is harmonious and logical, in concord with its natural environment and extremely beautiful.

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

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

### Integrity

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

### Authenticity

The hot springs, which are the reason for the City’s original development, are of undoubted authenticity. The key Roman remains are preserved, protected and displayed within a museum environment, and the Roman Baths can still be appreciated for their original use. The majority of the large stock of Georgian buildings have been continuously inhabited since their construction, and retain a high

degree of original fabric. Repairs have largely been sympathetic, informed by an extensive body of documentation, and aided by a programme of restoration in the late twentieth century. More vulnerable is the overall interaction between groups of buildings in terraces, crescents and squares and views to the surrounding landscape that contributed to the city's visual harmony. There is a need for new developments to respect the planning of the Georgian terraces, to respect the scale and rhythm of its structures, and to contribute to picturesque views.

### Protection and Management Requirements

Note: UNESCO introduced a requirement that all Statements of OUV contained a section on protection and management requirements in around 2012. The following information was therefore written for the site at that time (adopted June 2013). Some details are now out of date and are clarified below by footnotes. However, as this section is included as part of the Statement of OUV it is not possible to amend it without a decision of the UNESCO WH Committee.

The UK Government protects World Heritage properties in England in two ways. Firstly, individual buildings, monuments and landscapes are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979, and secondly through the UK spatial planning system under the provisions of the Town and Country Planning Acts, associated with the recent Levelling-up and Regeneration Act 2023 which, for the first time, affords legal protection for WHS in the UK<sup>19</sup>, along with Scheduled Monuments and Registered Parks and Gardens. This introduces the requirement, as with conservation areas, that special regard be given to the desirability of preserving or enhancing when considering development proposals.

Government guidance on protecting the Historic Environment and World Heritage is set out in National Planning Policy Framework and Circular 07/09<sup>20</sup>. Policies to protect, promote, conserve and enhance World Heritage properties, their settings and buffer zones are also found in statutory planning documents. The Bath and North East Somerset Local Plan<sup>21</sup> contains a core policy (B4: The World Heritage Site and its Setting) that states there is a presumption against development that would result in harm to OUV and the setting of the WHS, and will not be permitted. The protection of the surrounding landscape of the property has been strengthened by adoption of the City of Bath World Heritage Site Setting Supplementary Planning Document (May 2012), and the recent transferring of land at Bathampton Meadows to the east of the city from Bath and North East Somerset Council to the National Trust to create one of their 20 'green corridors'.

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<sup>19</sup> <https://www.legislation.gov.uk/ukpga/2023/55>

<sup>20</sup> Parts of this have been overtaken with the publication of the Government's Guidance in the National Planning Framework. However, Circular 07/09 has been 'archived' and remains policy until it is withdrawn.

<sup>21</sup> The adopted Local Plan for Bath is an amalgamation of the following documents: Core Strategy (2014), Placemaking Plan (2017) and the Local Plan Partial Update (2022). In line with government requirements, the Council is currently in the process of producing a new Local Plan for the district. This will refresh and update the current planning policy framework.

The City of Bath World Heritage Site Strategic Management Group (SMG) was established as a non-executive committee consisting of representatives from 14 organisations with interest in the site. It has an independent chairperson. Members represent national government, Bath and North East Somerset Council elected members and officers, surrounding Parish Councils, heritage bodies, and the city business group, resident's associations, both universities and the tourism company.

The SMG oversees the production and implementation of the World Heritage Site Management Plan. This plan aims to address the key tensions between development and conservation of the city-wide property. The main pressures currently facing the site include large-scale development, the need for improved transport, the effects of climate change, and landscape deterioration.

The need for development to be based on an understanding of the distinctiveness and OUV of the Georgian city continues to be guided by the policy framework listed above. A UNESCO/ICOMOS Mission assessed the development at Bath Western Riverside (BWR) in 2008 and concluded that the OUV and the site's Integrity and Authenticity would not be adversely impacted by phase one of the development of the BWR area.

Transport improvements are based principally around a bus-based network and pedestrianisation, as outlined in the Management Plan.

Tourism is promoted by Visit Bath, an independent company. The Destination Management Plan has been updated by a 'Destination Marketing Strategy' for Bath, which aims to promote growth in value of tourism rather than in volume.

### **3.4 Attributes of Outstanding Universal Value (1987)**

As explained in 3.1, attributes are aspects which convey or express the OUV of the WHS. They are in essence summary headlines from the Statement of OUV. Normally five or six such key attributes are identified to aid understanding of WHS and their OUV to guide management.

Six headline attributes were agreed in relation to the 1987 City of Bath inscription. These are:

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 18<sup>th</sup> century social ambitions.

### **3.5 Elements reflecting OUV (1987)**

When considering planning applications, new projects or other interventions, it is necessary to consider which elements of the site carry OUV. Given that the City of Bath inscription covers an entire city, it has been impractical to map or identify every individual element. The approach has been to list these elements, often by giving key examples of type, enabling an informed judgement to be made in individual



cases. It should be noted that elements are not exclusively physical. For example, 'The deliberate creation of a beautiful city' relates to an overarching philosophy rather than an individual building, but it is equally useful in understanding the site and assessing the impact of change. The table below shows the elements under the headings of the six attributes of OUV.

|    |   |
|----|---|
|    | <b>Roman Archaeology</b>  |
| 1  | The archaeological remains of the Roman temple of Goddess Sulis Minerva and baths complex built around the Iron Age Sacred Spring, where earlier Mesolithic flint tools were also discovered, including the Great Bath, East Baths, Circular Bath, West Baths, and Gymnasium with the Roman Baths still capable of being used for their original function |
| 2  | Roman archaeological remains within the city wall (itself thought to be of Roman origin) beyond the temple and baths complex, demonstrating the extent of the city  |
| 3  | Roman and Iron Age archaeological remains beyond the city wall including hill forts, field systems, villas and funerary monuments, demonstrating the context of the Roman city  |
| 4  | The surrounding road system and street plan of the Roman city, overlain by the medieval layout and influencing the form of the Georgian city, such as London Road   |
| 5  | The culture and traditions associated with bathing and healing (recovered fragments, including Roman pewter, coins and inscribed curses, are artefacts and not themselves of OUV, but help demonstrate the function of the Baths and Temple Complex).   |
|    | <b>The Hot Springs</b>  |
| 6  | Bath as a centre of healing, the medical research and learning associated with the 'cure' of the hot waters and medical establishments developed around them including almshouses and hospitals.  |
| 7  | The spiritual importance of the hot springs, the cultural use of the waters and the continuous flow of hot water from antiquity to present day  |
|    | <b>Georgian Town Planning</b>   |
| 8  | The introduction of innovative forms of town planning including squares, crescents and circus   |
| 9  | Visual homogeneity of the city due to widespread use of local Oolitic (Bath) limestone, a limited palette of colour tones and the uniform scale and height of buildings   |
| 10 | The deliberate creation of a beautiful city   |
| 11 | Views and vistas, within the Georgian city deliberately created by awareness of context, and beyond, including such components as Prior   |

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|----|---|
|    | Park and Sham Castle, designed to view, and be viewed from, the city centre.  |
| 12 | The positioning, orientation and layout of Georgian buildings, for example in serpentine terraces, to use slopes and contours to create dramatic forms  |
| 13 | The design of the Georgian city to facilitate outdoor social interaction and activity, including walks, promenades, colonnades to afford weather protection, and pleasure gardens   |
| 14 | The Kennet & Avon Canal, Somerset Coal Canal and associated features  |
| 15 | The influence of Georgian town planning in Bath on subsequent developments in the UK and beyond   |
| 16 | The creation of wide, flat pavements to encourage promenading   |
| 17 | The harmonious and logical integration of individual Georgian developments, with residential terraces interspersed with public buildings such as Assembly Rooms and Pump Rooms, and multiple architects building to a common ethos rather than to an overall masterplan |
| 18 | The principal historic road routes into the city, marking the arrival points for visitors who almost universally came by road   |
| 19 | The design of the Georgian city as a theatre set, with visual surprises and open spaces linked with one another   |
| 20 | C18th picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens   |
|    | <b>Georgian Architecture</b>  |
| 21 | Transposition of Palladio's ideas to the scale of a complete city in a British setting, and employed in a wide range of building forms including houses, public buildings, Pulteney Bridge and churches   |
| 22 | Key visual landmarks within views, such as the Royal Crescent and Beckford's Tower  |
| 23 | The contrast between polite, controlled, formal facades and the informal rear of Georgian buildings   |
| 24 | The Abbey Church as a key part of the urban form of the Georgian city   |
| 25 | The works of noted architects including the John Woods, Robert Adam, Thomas Baldwin, John Palmer, John Eveleigh and John Pinch  |
| 26 | The design of terraced houses to appear as though they were a single country house or palace, demonstrating the social aspiration of occupiers to emulate the aristocracy   |
| 27 | The Georgian monumental ensembles of crescents, squares, circus and terraces forming iconic, internationally recognisable structures, where the whole is greater than the sum of the individual parts.  |
| 28 | The extent of Georgian redevelopment, almost totally obscuring previous mediaeval buildings and the widespread survival of this fabric leaving a unique complete example of a Georgian city.  |
| 29 | Detached villas, largely in the suburbs of the city, showing the transformation of Bath toward a genteel retirement settlement at the end of the Georgian period.   |
| 30 | The universal use of natural building materials in the Georgian city  |

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|----|---|
| 31 | Widespread creation of basements and vaults to level the land below the Georgian city   |
| 32 | The widespread use of timber vertically sliding sash windows in the Georgian city, with scale and detailing that evolved over time and often closing directly onto a stone sill   |
| 33 | The use of wrought iron work to provide external features such as railings, overthrows for lanterns, etc.   |
| 34 | Components of Georgian street furniture, including coal holes, basement winches, foot scrapers, lamp brackets, watchman's boxes, and similar items.   |
| 35 | The high quality of craftsmanship in Georgian building construction and ornamentation   |
| 36 | The expressed hierarchy in both the exterior design of Georgian buildings, and the use spaces within, and the subsequent difference in their scale, ornamentation and decoration.                                       |
| 37 | Shop units, coffee and ale houses, demonstrating the evolution of the retail industry in the Georgian period  |
| 38 | The ubiquitous use of chimneys and fireplaces within Georgian buildings reflecting the use of coal as a fuel source   |
| 39 | Building design adaptations such as semi-circular stair walls and ramps for the use of sedan chairs, reflecting the adaptation of architecture to cater for the needs of a spa town.                                    |
| 40 | Many of the Georgian buildings remain in, or are capable of being used for, their original purpose  |
| 41 | Individual internal fitting out of Georgian houses behind a uniform facade, and incomplete, truncated terraces, demonstrating the speculative nature of Georgian development finance                                    |
|    | <b>The Green Setting of the City in a Hollow in the Hills</b>   |
| 42 | The compact and sustainable form of the city contained within a hollow of the hills   |
| 43 | The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city.  |
| 44 | Green, undeveloped hillsides within and surrounding the city  |
| 45 | Trees, tree belts and woodlands predominantly on the skyline, lining the river and canal, and within parkland and gardens   |
| 46 | Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period   |
| 47 | Fingers of green countryside which stretch right into the city  |
| 48 | Oolitic limestone mines, quarries, outcrops and historic features including Ralph Allen's tramway, inclines and structures used to exploit the stone from which the city was constructed                                |
|    | <b>Georgian architecture reflecting 18<sup>th</sup> century social ambitions</b>  |
| 49 | The patronage and vision of John Wood the Elder, Ralph Allen and Beau Nash in leading the social, economic and physical re-birth of the city from a small provincial English town into an internationally famous resort |

|    |   |
|----|---|
| 50 | Bath as a place of resort, attracting visitors from a wide geographical area, and the historical associations with the extensive list of famous and influential people who visited. |
| 51 | Custom and practices associated with 'taking the waters', including promenading   |
| 52 | Rules and etiquette developed in the polite society, largely intangible but embodied in buildings such as the Assembly and Pump Rooms.  |
| 53 | The reflection of mythological, folkloric and antiquarian influences on the decorative motifs, alignments and dimensions on buildings such as the Circus.                           |

### **3.6 The Great Spa Towns of Europe Inscription (2021)**

The Great Spa Towns of Europe were inscribed by the UNESCO World Heritage Committee on 24 July 2021.

The UNESCO criteria that the inscription was found to be consistent with are as follows:

- ii. Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;
- iii. Bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

### **3.7 The Great Spa Towns of Europe Statement of Outstanding Universal Value (2021)**

#### Brief synthesis of the Great Spa Towns of Europe

The Great Spa Towns of Europe bear an exceptional testimony to the European spa phenomenon, which gained its highest expression from around 1700 to the 1930s. This transnational serial property comprises eleven spa towns located in seven countries: Baden bei Wien (Austria); Spa (Belgium); Karlovy Vary, Františkovy Lázně and Mariánské Lázně (Czechia); Vichy (France); Bad Ems, Baden-Baden and Bad Kissingen (Germany); Montecatini Terme (Italy); and City of Bath (United Kingdom). The series captures the most fashionable, dynamic and international spa towns among the many hundreds that contributed to the European spa phenomenon.

Whilst each spa town is different, all the towns developed around mineral water sources, which were the catalyst for a model of spatial organisation dedicated to curative, therapeutic, recreational and social functions. Ensembles of spa buildings include baths, pump rooms, drinking halls, treatment facilities and colonnades designed to harness the water resources and to allow its practical use for bathing and drinking. 'Taking the cure', externally and internally, was complemented by exercise and social activities requiring visitor facilities such as assembly rooms, casinos, theatres, hotels, villas and related infrastructures (from water piping systems and salts production to railways and funiculars).

All are integrated into an overall urban context that includes a carefully managed recreational and therapeutic environment of parks, gardens, promenades, sports facilities and woodlands. Buildings and spaces connect visually and physically with their surrounding landscapes, which are used regularly for exercise as a contribution to the therapy of the cure, and for relaxation and enjoyment.

**Criterion (ii):**

The Great Spas of Europe exhibits an important interchange of innovative ideas that influenced the development of medicine, balneology and leisure activities from around 1700 to the 1930s. This interchange is tangibly expressed through an urban typology centred on natural mineral springs and devoted to health and leisure. Those ideas influenced the popularity and development of spa towns and balneology throughout Europe and in other parts of the world. The Great Spas of Europe became centres of experimentation which stayed abreast of their competitors by adapting to the changing tastes, sensitivities and requirements of visitors. Other than physicians, the principal agents of transmission were the architects, designers and gardeners who created the built and 'natural' environments framing spa life. As a result, the property displays important examples of spa architecture such as the 'kurhaus' and 'kursaal', pump rooms, drinking halls ('trinkhalle'), colonnades and galleries designed to harness the natural mineral water resource and to allow its practical use for bathing and drinking.

**Criterion (iii):**

The Great Spas of Europe bears exceptional testimony to the European spa phenomenon, which has its roots in antiquity, but gained its highest expression from around 1700 to the 1930s. 'Taking the cure', either externally (by bathing) or internally (by drinking, and inhaling) involved a highly structured and timed daily regime and a combination of medical aspects and leisure, including entertainment and social activities (e.g. gambling, theatre, music, dancing) as well as taking physical exercise within an outdoor therapeutic spa landscape.

These parameters directly influenced the spatial layout of spa towns and the form and function of spa buildings or 'spa architecture'. Urban parks and promenades allowed people taking the cure "to see and be seen" by others.

Integrity of the Great Spa Towns of Europe (2021)

The eleven component parts that comprise the serial property represent the most exceptional examples of European spa towns. All component parts share a set of determining characteristics formed during the most significant "culture creating" phase of their history and development, the heyday period from around 1700 to the 1930s. Each and every one continues to function for the purpose for which it was originally developed.

The series illustrates the main stages of the development of the spa phenomenon, starting with the most influential spa towns in the 18th century, to the development of model spa towns in the 19th century, to towns that are testimony to the last stages of the phenomenon in the early 20th century.

Boundaries are determined in relation to the mapping of the attributes that convey Outstanding Universal Value, namely: the most important spa structures and buildings used for thermal-related activities; the social facilities and buildings for leisure and pleasure; accommodation facilities; related spa infrastructure; and the surrounding therapeutic and recreational spa landscape. Buffer zones are drawn both for the protection of spring catchments and important setting.

All component parts and their constituent elements are generally in good condition. Elements requiring conservation either have works already planned, or are awaiting alternative uses, with their current state of conservation maintained. Upgrades and redevelopments made to keep pace with standards of services, hygiene and new spa technology, can create tensions with their conservation as historic buildings, and need to be carefully addressed. Challenges in the adaptive reuse and technical upgrading of industrial structures pose similar challenges.

### Authenticity of the Great Spa Towns of Europe

The property meets the conditions of authenticity in terms of form and design, materials and substance, use and function, traditions, and location and setting.

All component parts express the Outstanding Universal Value of the property through a variety of common and highly authentic attributes: mineral springs, of great diversity, which maintain their natural physical qualities, including substance, location and setting; a distinct and highly legible spatial layout and a well-maintained location and setting that combine to retain an enduring spirit and feeling; spa architecture, that remains authentic in form and design, original materials and substance, even though some buildings have experienced change of use; the spa therapeutic landscape, which retains its form, design and function, and continues to be used for the purpose for which it was designed; spa infrastructure, much of which is either original or evolved on original principles and remains in use; continuing spa use and function despite the need to meet today's standards.

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

### Protection and management requirements of the Great Spa Towns of Europe (2021)

Responsibility for the protection and management of each of the eleven component parts of the property rests with the national/regional government (in the case of Germany, with the government of the Länder, and local authorities of that State Party). Each component is protected through legislation and spatial planning regulations applicable in its State Party or individual province, as well as by a significant degree of public/ charitable ownership of key buildings and landscapes. Each component part has a property manager or coordinator and a Local Management Plan in place conforming to the overall Property Management Plan.

An overall management system for the whole property has been established, with a Property Management Plan and Action Plan agreed by all stakeholders. An Inter-Governmental Committee, made up of national World Heritage Focal Points and/or a representative of the highest monument or heritage protection authority, keeps track of matters relating to the property. A Great Spas Management Board (GSMB), made up of the Mayors of the eleven components, is responsible for the operational coordination and overall management of the property in close consultation with the Inter-Governmental Committee. The Board sets and manages the budget for the overall management functions, monitors and reviews the Action Plan, approves and publishes an Annual Report, employs the Secretariat, and directs other activities for the property as a whole.

The Site Managers Group includes site managers for each component part, the Secretariat, and any specialist advisors. The Site Managers Group is essentially an expert group for debate and exchanges of experience and to advise the GSMB on relevant management issues. The international structure is supported and serviced by a Secretariat jointly funded by all the component parts.

An important concern will be to continue to develop cooperation and collaboration between the individual component parts and to ensure that the property as a whole is effectively managed and the overall management system is adequately resourced. Development pressures may be an issue since these are living cities which will need to continue to adapt and change to maintain their role as spa towns. Managing tourism so that it is truly sustainable may also become a challenge. A management approach at the landscape level, which considers the relationship between each component part, the buffer zone, and the broader setting is also needed to maintain views to, and from, the picturesque wider landscape.

### **3.8 Attributes of Outstanding Universal Value (2021)**

As with the City of Bath inscription, seven headline attributes of Outstanding Universal Value have been identified for the Great Spa Towns of Europe. These are:

1. Mineral Springs
2. Spa Spatial ensemble
3. Spa architecture
4. Therapeutic Spa Landscape
5. Spa Infrastructure
6. Continuing spa function
7. Internationalism

### **3.9 Elements reflecting OUV (2021)**

Most of the attributes of the two inscriptions are similar, with the exception of Roman archaeology and Georgian Architecture reflecting the 18th Century Social ambitions, as featured the City of Bath 1987 inscription. A table of elements relating to the attributes is shown below.

During the inscription process, the main elements relating to the Great Spa Towns of Europe attributes were also mapped and that map is shown in Appendix X. It should

be noted that the map was created for the purposes of the nomination process and it is not as an exclusive depiction of all elements.

| <b>Mineral Springs</b>      |  |
|-----------------------------|--|
| 1                           | Number of working springs, and their characteristic spatial pattern (i.e. mono centric, linear, polycentric) and setting.  |
| 2                           | Continuous flow of Hot water from antiquity to the present day   |
| 3                           | Water quality and flow (temperature, physical and chemical) and flow rates   |
| 4                           | Distribution network (e.g., Pipelines)   |
| <b>Spa Spatial ensemble</b> |  |
| 5                           | General form, spatial organisation, and layout, including composition of functional zones and their relative proportions (by area) and interrelationships, e.g. urban ensemble of the spa district (all towns in the series), Villa belt (some), therapeutic and recreational spa landscape (all).   |
| 6                           | Urban ensemble including general character, key axes, and its relationship with springs and other zones  |
| 7                           | Important setting, including natural features and key views from and to the city   |
| 8                           | 18th Century landscape aesthetics including the relationship, orientation and layout of buildings to landscape and contours blending countryside and town  |
| 9                           | Views and vistas, within the Georgian city created by an awareness of context including elements such as Prior Park that was designed for the view and seen from the city centre   |
| 10                          | The design of the Georgian ensembles for outdoor social interaction, leisure and exercise with walks, parades, promenades, colonnades and pleasure gardens   |
| 11                          | The designed elements of Bath as a 'theatre set,' with visual surprises and connected open spaces  |
| 12                          | Harmonious integration of individual Georgian development of residential terraces and civic buildings with many architects working with a common ethos rather than an overall masterplan   |
| 13                          | The influence of the planning of Bath on subsequent developments in the UK and beyond  |
| <b>Spa architecture</b>     |  |
| 14                          | Condition (i.e. State of Conservation) of important spa buildings, structures and spaces related to: <ul style="list-style-type: none"> <li>• Curative waters (e.g., Spring pavilions, baths, drinking halls, hospitals)</li> <li>• Leisure and pleasure (e.g., assembly halls theatres)</li> <li>• Accommodation (e.g., Hotels, villas)</li> <li>• Religious buildings and facilities (e.g., churches, cemeteries)</li> <li>• Comparative significance of structures should be considered in relation to the series ... 'one world heritage property')</li> </ul> |



|                                  |   |
|----------------------------------|---|
| 15                               | Bath as a place of resort, attracting visitors from a wide geographical area and the historical associations with the extensive list of famous and influential people who visited   |
| <b>Therapeutic spa landscape</b> |   |
| 16                               | Condition of the therapeutic and recreational spa landscape, including: <ul style="list-style-type: none"> <li>• Urban parades, promenades, pathways and spa bridges</li> <li>• Parks and gardens</li> <li>• Sports facilities (e.g., Historic golf course, equestrian and races courses, tennis courts, water sports)</li> <li>• Informal green environment (e.g., hillside trails, rides, drives and overlooks, river trips)</li> <li>• Managed, landscape setting; vistas</li> </ul> |
| 17                               | Green and undeveloped hillsides within and surrounding the city   |
| 18                               | Trees, tree belts and woodlands predominantly on the skyline, lining the compact and sustainable form of the city contained within a hollow of the hills  |
| 19                               | Fingers of green countryside which stretch right into the city  |
| 20                               | The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city   |
| 21                               | Recreational paths and woodland walks, rides and drives   |
| 22                               | Hillside footpaths viewpoints   |
| 23                               | Sports facilities (golf courses, tennis courts, horse racecourses);   |
| 24                               | The landscape of the river and canal, and parkland and gardens  |
| 25                               | Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those conducted in the Georgian period   |
| 26                               | Relics of industrial activity; including, quarries, outcrops and historic features, tramways, inclines and structures used to extract stone from which the city was constructed.  |
| <b>Spa Infrastructure</b>        |   |
| 27                               | Condition of railway stations, key administrative buildings   |
| <b>Continuing Spa function</b>   |   |
| 28                               | Traditional spa buildings and related features that remain in use   |
| 29                               | New developments that sustain the spa function  |
| 30                               | Continued use of the therapeutic landscape for recreation and well being  |
| <b>Internationalism</b>          |   |
| 32                               | i) Places and specific buildings where significant progress in developing scientific principles of balneology, hydrotherapy, crenotherapy and other medical diagnostics were made (and other scientific social cultural achievements). Places which transformed society and which created transferable models of sociability;<br>ii) places where 'high art' originated or performed for the first time;  |

- |  |  |
|--|--|
|  | iii) palaces of major political events and/or where many important decisions were made;<br>iv) Churches, synagogues, mosques and other religious buildings related to spa clientele. |
|--|--|

### 3.10 Other Cultural Value

The attributes and elements outlined above give Bath international significance, but there are also national and local values which have to be taken into account in holistic site management.

Moveable heritage cannot be included under the World Heritage inscription, but nevertheless museum collections are essential in interpreting how previous civilisations lived. The collections of the Roman Baths Museum, Bath Record Office, and the Bath Fashion Museum Collection hold ‘designated’ status under the Arts Council England scheme. The Roman Curse tablets, which are the personal and private prayers of 130 individuals inscribed on small sheets of lead or pewter and cast into the hot springs at Bath, were inscribed on the UK UNESCO ‘Memory of the World’ register<sup>22</sup> in 2014. One tablet is written in Brittonic in the Latin alphabet and is the only known surviving text in Brittonic, whilst another contains what is currently the earliest known reference to Christianity in Britain.

World Heritage designation can inadvertently highlight certain periods of history to the exclusion of others. The mediaeval and Victorian industrial past of Bath are of particular note and should not be overlooked in managing the historic environment.

There are also intangible associations and traditions which contribute to Bath’s significance. The culture of worship, bathing and healing associated with the hot springs is a living tradition which is several thousand years old. This culture has inspired the development of the outstanding physical elements of the Site. Bath also has rich associations with prominent people from all periods, particularly during the 18th and 19th centuries. Royalty, politicians, aristocracy, artists, writers, and musicians were amongst the many prestigious spa visitors. It has played a long-term role as a national and international place for large-scale social interaction and the shaping of social values. The Great Spa Towns of Europe inscription and the research work undertaken as part of that inscription have contributed significantly to recognition of these intangible values.

### 3.11 Local Natural Values

Although Bath is (twice) inscribed as a World Heritage Site for its cultural attributes, its significance is dependent upon the natural Hot Springs, the surrounding landscape of incised plateau hills and the Avon Valley. Its distinctiveness to a large degree results from the harmonious relationship of the built form and the natural countryside including the river and canal corridors and the surrounding landscape which enfolds and extends right into the heart of the city. This ‘therapeutic’ landscape is appreciated today much as it was historically for its health, visual and

<sup>22</sup> <http://www.unesco.org.uk/2014-uk-memory-of-the-world-register/>

environmental benefits. Effective governance and appropriate landscape management of the natural environment is essential to maintain biodiversity and the health of the natural environment and its value for people as well as contributing to protecting the authenticity, integrity and significance of the WHS. Bath and North East Somerset Council declared an Ecological Emergency in July 2020 which was followed by an Ecological Emergency Action Plan<sup>23</sup>. In addition to this, the Bathscape Landscape Partnership and the Bath and North East Somerset Council Green Infrastructure Strategy<sup>24</sup> also contribute significantly to this management.

In terms of ecology and biodiversity, the predominant and iconic natural habitats in the Site are broadleaved woodland, unimproved calcareous grasslands and lowland meadows. These are UK priority habitat types but are all vulnerable and under threat to some degree. Many of the woodlands are at threat from long term neglect and from inadequate management, together with the impacts of climate change and the severe impacts of Ash Dieback Disease. Similarly, many grasslands are at threat from under grazing and the pressures of their topography and urban edge location. These habitat types are important and iconic to the setting of Bath and need strategic management objectives and support.

The River Avon, together with associated water meadows, is an important wildlife corridor cutting through the heart of the city, supporting otters, dragonflies and damselflies, and providing important flight lines and foraging habitat for many notable bat species. Parks, gardens and cemeteries also provide important habitats. In addition to woodland habitat already described individual parkland, street and specimen trees, some ancient, provide a significant contribution to the landscape character and the local distinctiveness of the city and skyline.

Protected species include both Lesser and Greater Horseshoe Bats. These are key species which use the green setting within and around the city, and which breed and hibernate in the disused stone mines of Combe Down and Bathampton Down. Bath Asparagus, or Spiked Star of Bethlehem (*Ornithogalum Pyrenacium*), is a nationally scarce plant found in its greatest numbers around the Bath area (one theory is that it was a Roman food crop). Another significant species is the Peregrine Falcon, which successfully breeds in the heart of the city on St John's Church Tower, South Parade.

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<sup>23</sup> <https://beta.bathnes.gov.uk/ecological-emergency-action-plan>

<sup>24</sup> <https://beta.bathnes.gov.uk/sites/default/files/GI-strategy-final-web-interactive-version.pdf>

# CHAPTER 4 MANAGEMENT OF THE SITE

## 4.1 Introduction

This chapter outlines the management of the WH site, both in terms of the 1987 inscription and as a component part of the GSTE.

Management has many facets and is dependent upon factors such as land ownership, legislation, governance systems, resources and how the many stakeholders interact. Bath is a large urban WHS, and the number of partners involved and the relationships between them are complex, and this is inevitably increased by the 2021 GSTE inscription. This chapter seeks to explain procedures as clearly as possible.

## 4.2 The Bath UNESCO story so far and previous performance

In order to understand how current WHS management has evolved, a description of the 'story so far' was included in the previous plan. With time this section has inevitably increased in length, and it is now included as Appendix 2.

During the previous plan period (2016-2022) major achievements were made in conservation, funding and interpretation. The major headlines are as follows:

- The Great Spa Towns of Europe were inscribed onto the UNESCO World Heritage List in July 2021. This pioneering serial transnational inscription is the result of a 10-year nomination project which involves 11 historic spa towns from 7 countries, including the City of Bath.
- A World Heritage Centre was opened in York Street in May 2022 and welcomed 72,000 guests in its first year. The adjacent Clore Learning Centre welcomed 8,000 school children in this period and increased Roman Baths heritage-based educational capacity by 400%. The £5m project includes an archaeological investigation zone and sub-terranean access to the Baths.
- Significant investment funding was secured through a range of major heritage projects which enhanced conservation and interpretation of key assets within the Site. Projects included the Bath Abbey Footprint Project, Cleveland Pools restoration, Roman Baths Archway Project, Sydney Gardens refurbishment and Prior Park Dams repair. The Bath Abbey Discovery Centre provides a brand-new visitor learning experience for the Site. These projects levered in approximately £20m of National Heritage Lottery Funding.
- A Clean Air Zone (CAZ) became operational on 15 March 2021 and was the first such scheme in England outside of London. Following the declaration of climate and ecological emergencies and together with a suite of other initiatives, this marks a considerable step forward in protecting both human health and historic fabric.
- The Bathscape Project has resulted in a partnership of 12 organisations delivering 25 interconnecting projects supported by £2m in funding. This partnership is a major new method of managing the green setting of the city.

- The ownership of Bathampton Meadows, in the setting of the WHS, transferred to the National Trust. Part of this land had previously been proposed as a new bus park and ride site with associated car parking. Retention of this ‘green gateway’ land as water meadow ensures the character of the setting is maintained, provides ecological benefit and also offers flood capacity. The site had extensive flooding in February 2020 and again in 2024
- Social media accounts (Facebook and X, formerly Twitter) were established for the WHS and a new website was launched (2016). Together these measures significantly increase the ability to promote and interpret the site and provide transparent governance.

### 4.3 Ownership

Most of the land within the WHS and many historic buildings are in private ownership. Owners therefore have significant control over how their land is used, within overarching planning policy and legislation. This underlines the importance of a collaborative approach to ensure that the need for conservation is recognised.

There are a wide variety of owners, many with large property portfolios. These are outlined in Appendix 4. It is worth noting here though that there are several land/property ownerships which differ from most UK cities. The first is that the local unitary authority, Bath and North East Somerset Council (B&NES), owns a large property portfolio largely within the city centre. Secondly, the National Trust (NT) as a national conservation body controls approximately 10% of the land area within the WHS. As outlined above, Bathampton Meadows was recently added to this portfolio ensuring that this land in the setting remains undeveloped.

These are significant factors in the management of the Site. Most of the large land and building portfolio owners are represented on the WH Advisory Board and the Bathscape Landscape Partnership Board (see 4.13).

### 4.4 Management Systems

UNESCO oversee World Heritage Sites across the globe and management systems therefore include international, national/regional and local elements. This is certainly the case with both Bath inscriptions. The section below details these levels of management and diagrams 2 and 3 show the main bodies involved.

*Diagram 2. City of Bath WHS management structure*

*Diagram 3. GSTE management structure.*

### 4.5 International Management

The UNESCO World Heritage Committee meets annually and consists of representatives from 21 States Parties to the World Heritage Convention elected by their General Assembly. The UNESCO World Heritage Centre (Paris) administers the committee. The UNESCO website<sup>25</sup> gives a full explanation of these workings.

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<sup>25</sup> <https://whc.unesco.org/en/committee/>

The WH Committee is advised by several expert bodies. Of principal relevance to Bath (as a cultural WHS) is the International Council on Monuments and Sites (ICOMOS)<sup>26</sup>. ICOMOS is a non-governmental international organisation, working for conservation and protection of the world's cultural heritage sites. It comprises of a network of interdisciplinary experts working largely on a voluntary basis and has 27 International Scientific Committees plus 95 National Committees (including ICOMOS UK)<sup>27</sup>.

Due to the number of World Heritage sites worldwide (1223 as of July 2024), UNESCO liaise directly with state parties rather than individual sites. Correspondence between 'the property' (City of Bath and the GSTE) and UNESCO therefore goes via the 'state party'. Department for Digital, Culture, Media and Sport (DCMS) are the UK government department responsible for World Heritage matters. DCMS are advised by Historic England.

UNESCO Operational Guidelines (2021, para.172) invites state parties to routinely notify UNESCO of developments 'which may affect the OUV' and the City of Bath will continue to work closely with partners Historic England and DCMS in doing so. The inscription of the Great Spa Towns of Europe has placed extra emphasis on this matter as Bath is part of this serial inscription, and if one spa town should be delisted all other spa towns in the inscription would also be delisted. However, the City of Bath 1987 inscription is entirely separate and would not be directly impacted by this.

For the GSTE, the Government of Austria is the responsible state party for the series.

#### **4.6 The Great Spa Towns of Europe management system**

The Great Spa Towns of Europe is a ground-breaking, single serial inscription that includes 11 European spa towns. Most existing serial inscriptions were for archaeological monuments or linear structures such as defensive walls. Due to the nature of the 11 living towns across 7 countries, the Great Spa Towns of Europe management system is necessarily complex.

Diagram 3 above shows the management structure. The 7 state parties involved in the Great Spa Towns nomination are (alphabetically) Austria, Belgium, Czechia, France, Germany, Italy and the United Kingdom. Accordingly, an Inter-Governmental Committee consists of representatives of the highest protection authority or agency in each state party, with Historic England (London office) representing Bath. This Committee provides liaison between the UNESCO World Heritage Centre (Paris) and the Great Spa Towns Project.

The Great Spa Towns Management Board comprises of mayors (or a political representative in the case of Bath, which has a ceremonial mayor). This Board meets at a General Assembly twice per year. There is also an Executive Board comprising of four mayors elected from the wider Board who meet more regularly (usually online) to progress business. The Boards are supported by a secretariat,

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<sup>26</sup> <https://www.icomos.org/en>

<sup>27</sup> <https://icomos-uk.org/>

which currently (2023) comprises of a half-time administrator post hosted by Baden-Baden municipal authority.

Each spa town has a manager or co-ordinator to progress Great Spa Towns work and to act as a key liaison point within that town. Together they meet regularly as the Site Managers Group.

To note that together the 11 Spa Towns (or 'component parts') form one World Heritage Site. The Great Spa Towns of Europe inscription does not confer World Heritage status individually on each town, although of course Bath is already inscribed separately under the City of Bath inscription. None of the partner Great Spa Towns has a separate pre-existing World Heritage inscription.

In 2022 the Great Spas formed a not-for-profit Association (under Austrian law) to which all partners are signatories. This allows the partnership to legally protect intellectual property rights, employ staff and trade if desired.

There is an overall Property Management Plan, compiled for the inscription process, which sets the framework of action for all 11 component sites<sup>28</sup>. Below this, all 11 towns have a Local Management Plan. In the case of Bath, the Great Spa Towns of Europe Local Management Plan is now combined with the City of Bath Management Plan in this combined document.

#### **4.7 National and Regional management**

Historic England are shown twice on diagram 3, as they advise central government (from their London offices) and Bath from the Southwest regional office in Bristol. A representative from Bristol sits on the Bath World Heritage Advisory Board and the Head of International Affairs represents Bath on the GSTE Inter-governmental committee (diagram 3). Also involved at national level are ICOMOS UK, the UK National Commission for UNESCO<sup>29</sup> and World Heritage UK (WH:UK)<sup>30</sup>, a charitable body providing representation for all UK sites.

#### **4.8 The UK national planning and legislative framework**

The UK planning system is the primary method of protecting Bath as a cultural WHS. This well-established legislative framework protects historic assets and directs investment to achieve declared and agreed objectives. Government relies on the planning system to protect the OUV of Sites at two levels. Primary legislation is handed down from Parliament and sets out duties on decision makers, when, for example, preparing a Development Plan or deciding on proposals for development. Secondary legislation sets out detail on planning matters in regulations and development orders. This Management Plan is not a statutory planning document but informs the approved Development Plan. For example, the Development Plan contains a policy stating the OUV of the Site must not be harmed, and this plan explains what the OUV are. The two plans therefore work hand-in-hand.

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<sup>28</sup> <https://www.greatspatownsofeurope.eu/the-great-spa-towns/unesco-nomination/the-nomination-document?item=08e788bd-4644-4ab6-98df-40e53774b146> (see tab Volume III).

<sup>29</sup> <https://unesco.org.uk/>

<sup>30</sup> <https://worldheritageuk.org/>

Government Guidance is published in its National Planning Policy Framework (NPPF)<sup>31</sup>. The current iteration of the NPPF was published in 2023. It is a material consideration when dealing with applications for planning permission and/or listed building consent and applications affecting a Scheduled Ancient Monument. The NPPF includes policy on the historic environment and is consistent with the UK Government's obligations as a signatory of the World Heritage Convention<sup>32</sup>.

At the time of writing and following the recent national elections in the UK (2024), the NPPF has been revised and is currently undergoing consultation. Whilst this generally maintains protection for environmental and heritage assets, there is a significant change to the number of homes that Bath and North East Somerset is expected to plan for. This is likely to put further pressure on the city to contribute towards meeting increased levels of housing, as well as other related land uses such as employment and other infrastructure.

Listed buildings and scheduled monuments are identified by the Secretary of State following advice from HE. Within Bath WHS, there are approximately 5,000 listed buildings and two thirds of the site is covered by the Bath Conservation Area. Bath has a single city-wide conservation area, first designated as six separate areas in 1968, then as an enlarged single area in 1973, extended again in 1975, 1985 and 2002. Both listed buildings and conservation areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990, (as amended). Similarly, scheduled ancient monuments and their settings are protected through the Ancient Monuments and Archaeological Areas Act 1979. The Historic England Register of Parks and Gardens of Special Historic Interest in England and the Register of Battlefields recognises the significance of those elements and within the site there are 5 scheduled ancient monuments and 9 registered gardens.

#### **4.9 Environmental Impact Assessment/ Heritage Impact Assessment**

WHS are classed as sensitive areas for the purposes of the Environmental Impact Assessment (EIA) Regulations 2017<sup>33</sup>. Accordingly, an EIA is likely to be required (as a statutory requirement) for some development proposals in a WHS or its setting where proposals exceed a defined threshold<sup>34</sup>

In August 2022, UNESCO and its Advisory Bodies (ICCROM, ICOMOS & IUCN) published revised guidance for assessing the impact of development projects that have the potential to cause harm to WHS: Guidance and Toolkit for Impact Assessment in a World Heritage Context<sup>35</sup>. This guidance strongly advocates the preparation, at the very earliest stages of development proposals, of a Heritage Impact Assessment (HIA) that fully assesses any potential impacts, and for this to

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<sup>31</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>32</sup> <https://whc.unesco.org/en/convention/>

<sup>33</sup> Interpretation section, para ref 2 (1) "sensitive areas" (d)) and PPG Environmental Impact Assessment para 32).

<sup>34</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>

<sup>35</sup> Decision 43 COM 11A See Operational Guidelines 2021 Para 118bis  
See <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>



inform the proposals accordingly to ensure that the OUV is safeguarded and protected.

#### **4.10 Design and Access Statement/ Heritage Statement**

The Town and Country Planning (Development Management Procedure) Order 2010 requires a Design and Access Statement<sup>36</sup> for all planning applications. When determining applications in WHS's, there is a requirement for applicants to describe the significance of heritage assets affected, including any contribution to the significance made by its setting. The level of detail required is proportionate to the assets' importance.

As a local requirement, a Heritage Statement<sup>37</sup> is also required as part of the application process within the Bath WHS area. This statement describes the significance of the building and explains how the proposed changes will impact upon it. The statement can be combined with the Design and Access statement.

For more substantial, major development there is a need to prepare, at the very earliest stages of the design process, a Heritage Impact Assessment (HIA) based on the methodology prescribed and set out by UNESCO within their guidance.

#### **4.11 Local Planning Policy**

Bath & North East Somerset Council (B&NES) is the administrative and local planning authority for Bath. It is responsible for setting planning policy, within the national framework of the Government's National Planning Policy Framework (NPPF) and legislation, and for making decisions on most applications for planning permission and listed building consent.

The key document against which applications are determined is the Local Plan and the existing plan contains robust planning policies that protect the OUV of the World Heritage Site and, crucially, its setting, (see Policy B4) and a range of other planning policies which are used in the determination of planning applications. This includes a set of Design Values and a specific Bath Design Policy that were informed by a collaborative process of stakeholder engagement and supported by a broad range of evidence. The adopted Local Plan for Bath is an amalgamation of the following documents: Core Strategy (2014), Placemaking Plan (2017) and the Local Plan Partial Update (2022).

In line with government requirements, the Council is in the process of producing a new Local Plan for the district. The preparation of a Local Plan enables a review of the existing planning policy framework as it relates to the management of the WHS and to ensure that it is robust, fit for purpose, enables positive and sensitive change

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<sup>36</sup> <https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement>

<sup>37</sup> <https://beta.bathnes.gov.uk/policy-and-documents-library/heritage-statement>

to the city whilst ensuring that its outstanding universal value (OUV) is protected, and where possible enhanced.

The new Local Plan will need to respond to the priorities of the Council including meeting housing needs, ensuring sufficient land is safeguarded for its employment needs, as well as addressing the climate and ecological emergencies. These challenges need to be balanced against the demands of a highly sensitive historic environment and the landscape setting of the city. Further consideration will also be given to how the current approach to design in Bath is to be taken forward, to provide the basis for more detailed design guidance and coding, and in updating existing evidence. The Council is keen to engage with stakeholders in this assessment process and to identify which aspects of design policy and guidance are of higher priority given limited resources. The outcome will inform the approach to be taken in the Local Plan and for any supporting documents

In addition to the Local Plan, there are a wide range of other documents that support and inform decision making. These include:

- Bath Building Heights Strategy (2010) which provides robust guidance to inform the heights of new buildings in the city
- City of Bath World Heritage Site Setting Supplementary Planning Document (August 2013)<sup>38</sup> which describes and indicates where the setting is, outlines its importance, and indicates the process for assessing impacts on this area.
- Bath City-Wide Character Appraisal
- Conservation Area Character Appraisals
- City of Bath Morphological Study
- Public Realm and Movement Strategy and Pattern Book

Subject to resources and other priorities, these supporting documents will be reviewed and updated to ensure that they brought up to date to reflect changes in legislation and best practice, and can continue to be used to support how to manage changes and development pressures in relation to the WHS. In addition, new studies

**Policy B4: The World Heritage Site and its setting.** There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against the level of harm to the Outstanding Universal Value of the World Heritage Site.

and initiatives will be undertaken to fill gaps in our knowledge and understanding, and to fulfil requirements set out by the government. Within the boundary of the Site,

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<sup>38</sup> [https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/Landscape/WHS/whs\\_spd\\_low\\_res.pdf](https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/Landscape/WHS/whs_spd_low_res.pdf)

these studies include the Building Heights Strategy study<sup>39</sup>. This is an important supporting study for this Management Plan, as sustained development pressure over many decades, limited availability of building land within the Site and rising development costs, have led to proposals for taller buildings. A specific Action has been included to support and encourage the study becoming adopted SPD to give it greater weight in the planning process.

The setting of the WHS (see 2.5 and Appendix 1, Map 2), is also an area subject to potential development pressure. The City of Bath World Heritage Site Setting Supplementary Planning Document (August 2013)<sup>40</sup> describes and indicates where the setting is, outlines its importance, and indicates the process for assessing impacts on this area.

Much of the setting is covered by Green Belt policy designation (see Appendix 1, Map 3). The Cotswolds National Landscape also covers large areas of the setting (see Appendix 1, Map 4).

Due to the policy protection in place in the setting, plus land ownerships described earlier in this chapter, a formal buffer zone has not been deemed necessary (see 2.5)

Full public consultation is undertaken during formulation and adoption of new planning policy.

#### **4.12 Development Management**

Decisions on most applications for Planning Permission and Listed Building Consent are made under 'delegated powers' by planning officers. In the case of more complicated or contentious cases they will be considered by the Council's Development Management Committee. This committee is comprised of elected local councillors and is held in open public meetings, ensuring that the planning process is both democratic and transparent.

#### **4.13 Bath World Heritage Site Advisory Board**

World Heritage management in Bath is conducted through an Advisory Board. This group was established in 2001 (under the name 'Steering Group') and has operated continuously for over 20 years (including online throughout the Covid pandemic). Its primary purpose, as set out in the Terms of Reference, is to guide the production and implementation of this six-year WHS Management Plan. It does not have a formal role in the planning process or comment on development applications.

Due to the size and urban nature of the WHS, Bath and North East Somerset Council takes the role of 'Principal Steward' and through the full-time World Heritage Site Manager position recruits the (independent) Chair of the Advisory Board and provides the secretariat.

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<sup>39</sup> <https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Urban-Design-Landscape-and-Heritage/BathBuildingHeightsStrategyPart1ExecSummaryandIntro.pdf>

<sup>40</sup> [https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/Landscape/WHS/whs\\_spd\\_low\\_res.pdf](https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/Landscape/WHS/whs_spd_low_res.pdf)

The Advisory Board is non-executive and meets 2 times per year and currently has 30 Board members representing 21 organisations. The Board covers both the 1987 and 2021 inscriptions and Board membership was widened post-2021 to include expertise related to the Great Spa Towns inscription.

Advisory Board meetings are not open to the public, but all proceedings are published online with its Terms of Reference.<sup>41</sup>

#### **4.14 Protection of the Hot Springs**

The municipal authority in Bath (through various organisational evolutions) has been charged with the protection of the springs since a Royal Charter of 1591. The County of Avon Act (1982) is an Act of Parliament giving B&NES Council powers to take reasonable measures to protect the water supply of the springs. This Act identifies three concentric zones within the city where excavation deeper than a prescribed limit requires Council prior consent. In the central area close to the springs, the limit below which consent is required is 5m. The critical depth extends to 15m in a zone along the River Avon's flood plain; on the valley slopes and beyond the city to Batheaston the depth limit increases to 50m. The Council employs a trained officer to deal with these matters and retains a consultant geologist to assess prior consent applications. Applications may also be submitted to a hydrogeologist at the Environment Agency and the Head of Water Resources (Supply Strategy) from Wessex Water joined the WH Advisory Board in Spring 2021.

The Hot Spring water is monitored at source for flow, pressure, temperature and content by the Council, on an automated ten-minute basis. As a precautionary measure, deep quarrying in the surrounding region is also monitored, with Whatley Quarry, some 15 miles south of Bath, entering into legal agreements through the planning process to monitor potential impacts.

#### **4.15 Additional Management measures**

The main measures for managing impacts upon the OUV are outlined above, but there are many other mechanisms in place. For example, building regulations apply standards to new building construction, traffic Acts and regulations control vehicle movement and parking, the 5 main Christian denominations are exempt from the need for listed building consent (under 'ecclesiastical exemption') as they have their own control systems in place, and the railway, river and canal all have their own managing bodies. The depth and complexity of control cannot be outlined in full here, but the table below shows recent Council strategies which are of relevance:

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<sup>41</sup> <https://www.bathworldheritage.org.uk/bath-world-heritage>

| <b>Council Strategy</b>                                     | <b>Date</b>             | <b>Link</b>   |
|---|-------------------------|---|
| Green Infrastructure Strategy                               | March 2013              | <a href="https://beta.bathnes.gov.uk/sites/default/files/GI-strategy-final-web-interactive-version.pdf">https://beta.bathnes.gov.uk/sites/default/files/GI-strategy-final-web-interactive-version.pdf</a>   |
| Bathscape Landscape Character Assessment                    | 2017                    | <a href="https://www.bathscape.co.uk/wp-content/uploads/2019/09/Bathscape-Landscape-Character-Assessment.pdf">https://www.bathscape.co.uk/wp-content/uploads/2019/09/Bathscape-Landscape-Character-Assessment.pdf</a>   |
| Corporate Strategy  | February 2020           | <a href="https://beta.bathnes.gov.uk/policy-and-documents-library/corporate-strategy-2020-2024">https://beta.bathnes.gov.uk/policy-and-documents-library/corporate-strategy-2020-2024</a>   |
| Economic Strategy Review 2014 - 2030                        |                         | <a href="https://www.bathnes.gov.uk/sites/default/files/siteimages/Planning-and-Building-Control/Major-Projects/ba192_economic_strategy_05.pdf">https://www.bathnes.gov.uk/sites/default/files/siteimages/Planning-and-Building-Control/Major-Projects/ba192_economic_strategy_05.pdf</a> |
| Bath and North East Somerset Landscape Character Assessment | August 2021             | <a href="https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20LCA%202021%20-%20full%20report_compressed.pdf">https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20LCA%202021%20-%20full%20report_compressed.pdf</a>   |
| Climate Emergency Strategy 2019-2030                        | March 2023              | <a href="https://beta.bathnes.gov.uk/document-and-policy-library/bath-north-east-somerset-climate-emergency-strategy">https://beta.bathnes.gov.uk/document-and-policy-library/bath-north-east-somerset-climate-emergency-strategy</a>   |
| Ecological Emergency Action Plan 2023-2030                  | March 2023              | <a href="https://beta.bathnes.gov.uk/document-and-policy-library/ecological-emergency-action-plan">https://beta.bathnes.gov.uk/document-and-policy-library/ecological-emergency-action-plan</a>   |
| Journey to net zero transport strategy                      | Updated 12 October 2022 | <a href="https://beta.bathnes.gov.uk/document-and-policy-library/journey-net-zero-final-report">https://beta.bathnes.gov.uk/document-and-policy-library/journey-net-zero-final-report</a>   |
| Heritage Services   | 2022                    | (see link below)  |

|   |                   |   |
|---|-------------------|---|
| Strategy<br>2022-2027   |                   |   |
| <a href="https://democracy.bathnes.gov.uk/documents/s76078/Heritage%20Services%20Strategic%20Plan.pdf">https://democracy.bathnes.gov.uk/documents/s76078/Heritage%20Services%20Strategic%20Plan.pdf</a>   |                   |   |
| 'Our Future<br>Ambition'<br>Place<br>Prospectus   | September<br>2022 | (see link below)  |
| <a href="https://beta.bathnes.gov.uk/sites/default/files/BA414%20Regeneration%20Prospectus%20AW%20for%20accessible%20PDF%20single%20page.pdf">https://beta.bathnes.gov.uk/sites/default/files/BA414%20Regeneration%20Prospectus%20AW%20for%20accessible%20PDF%20single%20page.pdf</a>   |                   |   |
| Local Plan<br>land use<br>strategy<br>2022-2042   | October<br>2022   | <a href="https://beta.bathnes.gov.uk/sites/default/files/local_plan_launch_doc_1.pdf">https://beta.bathnes.gov.uk/sites/default/files/local_plan_launch_doc_1.pdf</a> |
| Waterspace<br>Study   | 2017              | (see link below)  |
| <a href="https://www.bathnes.gov.uk/services/environment/river-safety/rivers-canals/water-space-study#:~:text=The%20WaterSpace%20Study%20includes%20opportunities,some%20are%20just%20a%20concept">https://www.bathnes.gov.uk/services/environment/river-safety/rivers-canals/water-space-study#:~:text=The%20WaterSpace%20Study%20includes%20opportunities,some%20are%20just%20a%20concept</a> |                   |   |

#### 4.16 Conservation Initiatives

Protection of the site can also be achieved through the accumulation of smaller scale grant funded works. The World Heritage Enhancement Fund was established in 2009 as a funding partnership between B&NES Council and Bath Preservation Trust. It operates on an annual budget of approximately £25,000 (2023) and from this undertakes small-scale works and gives grants. From 2024 the Fund will receive £20,000 from B&NES Community Infrastructure Levy (CIL) contributions rather than direct B&NES funding. To date it has delivered approximately 153 works to a total of around £440,000, including the leverage of significant external funding. One of the flagship projects is the restoration of the city's distinctive carved street names, with 70 now being completed. The Fund often restores smaller historic structures within the public realm which are not the priority of other agencies and in doing so helps conserve the authenticity of the site. This initiative also relies upon significant volunteer input.

The Bathscape scheme delivers conservation activities across the WHS and its setting, restoring meadows planting trees, advising landowners and providing small grants for conservation actions such as fencing to allow reinstatement of grazing.

#### **4.17 Interpretation & education initiatives**

As mentioned in section 1.3, the World Heritage convention requires that WH sites are not only protected and conserved, but also ‘presented’. Interpretation is therefore a key strand of site management.

Interpretation is conducted in a wide variety of ways. These include websites, published material (books, walking trails, etc), museum collections, events (such as the annual World Heritage Day), open days, talks and lectures, and many others.

Captured in both the achievements section (Chapter 4) and the Issues (Chapter 5) is the new Bath World Heritage Centre. The 2016 Management Plan included a justification and action supporting the development of the new centre, which was opened in 2022.

There are 12 accredited museums in Bath, with the Roman Baths leading on the Roman aspect of OUV, and Number 1 Royal Crescent and the Holburne Museum being amongst those enhancing understanding of the Georgian period. With regards to the Roman Baths, ‘Discovery Cards’ are available to local people giving them free access to key heritage sites, and since the launch of the new Discovery Cards in May 2022 48,823 cards have been issued. This is important and impressive testimony of not only successful Council community engagement initiative in providing free access for all residents, but also of the significant interest in Bath’s World Heritage Site by local people.

Promotion of the UNESCO emblem to raise awareness of the status of the site and the UNESCO message is important and this plan retains an action supporting this.

The Mayor of Bath’s Honorary Guides are a major asset in interpreting the WHS. Established in 1934, 90 voluntary guides from the local community offer free twice-daily walking tours throughout the year. So far in 2024 they have guided 37,800 visitors, and it’s estimated that in 2025 this will increase to more than 45,000 people being taken around the city by the Guides. They have won various awards in recognition for excellent service, including The Queen’s Award for Voluntary Service (2014), and high ratings from customers regularly wins the Guides the TripAdvisor Traveller’s Choice Awards, which they won again in 2024, placing them within the top 10% of all experiences worldwide.

Volunteers play an essential role in operating the Bath World Heritage Site. The Chair of the WHS Advisory Board gives their time voluntarily, as do many of the 30 Board members (some will be paid by their organisations). Pre-pandemic (2019 estimates) showed over 300 volunteers working with Bath Abbey, 80 volunteers with Bath Preservation Trust, 70 with the National Trust, 85 with the Mayor’s Guides and 71 with Victoria Art Gallery. There are many others, plus (since figures were compiled) those now working at Bath World Heritage Centre. In addition, Bathscape has engaged over 800 volunteers in its activities, has 20 trail guides on its website to encourage access across the WHS and setting, is producing video guides targeting wider audiences (6 produced to date) and oversees the annual Bathscape Walking Festival. Over 16,000 people have attended Bathscape events to date.

Volunteers influence site management, with for example the 33 resident's associations in being represented on the Advisory Board. Nearly all these volunteers are likely to be local people and as such this is a good case study of 'participatory management' (as advocated by UNESCO), in action.

#### **4.18 Risk Management**

Risk assessment and response is a key tool in guiding site management, and UNESCO Operational Guidelines (2021, para.118) recommend that it is included.

Risk assessment over the extensive site of Bath differs from a site where an individual complex or monument is inscribed. Generic emergency response for the city is provided by the emergency services (fire, police, health), plus the Council's Emergency Planning and Business Continuity Team. Through the Avon and Somerset Local Resilience Forum these bodies work together and produce guidance such as the Community Risk Register and planned co-ordinated responses to a range of possible emergencies such as a city centre evacuation plan.

Individual buildings or attractions, especially those open to the public will have their own strategies and insurance in place.

Flooding is the most likely natural risk and the lead body on flood risk is the Environment Agency. Again, a range of assessment and mitigation measures are in place, including a Flood Emergency Plan, guidance for householders and food businesses, plus emergency advice contact details.

In terms of specific WHS management, a risk assessment table is retained and used primarily as gap-analysis tool to ensure all necessary measures are in place to protect the OUV. This is a 'live' document subject to periodic change and is kept as an unpublished background working document.

#### **4.19 Monitoring**

Monitoring falls into two categories. Firstly, there is monitoring of the condition of the Site, and secondly monitoring of the implementation of this Plan.

UNESCO monitors the condition of all World Heritage sites through Periodic Reporting<sup>42</sup>. This took place in 2005, 2013 and 2023. This is a high-level exercise enabling trends to be identified. The 1987 and 2021 Bath inscriptions are monitored separately for this purpose.

Locally, many different monitoring indicators are available to assess site condition. These range from tourism statistics (collected by Visit West), listed buildings at risk (collected by Historic England and the Council's Planning and Conservation Team), shop vacancy and city centre footfall (collected by Bath Business Improvement District), traffic counts (Council Highways) through to detailed monitoring of water flow of the Hot Springs (Council Building Control) and conservation monitoring of individual monuments (for example Beckford's Tower). Given the size and complexity of the site, the benefit of regularly collecting and collating all such data from multiple sources and producing periodic World Heritage reports is currently

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<sup>42</sup><https://whc.unesco.org/en/periodicreporting/>



outweighed by the resource it would take to do so. No local regular WH monitoring report is therefore compiled or considered necessary. The existence of individual information sources ensures mechanisms are in place to flag up problems and provide the necessary data to assess it. This situation may change through the Great Spa Towns project, which has an ambition to define and implement monitoring indicators (see Action 40).

With regard to the monitoring of management plan action, this will be undertaken on a mid-term basis, so once every three years (see Action 45).

# 5 Issues, challenges & opportunities

## 5.1 Introduction

This chapter sets out the issues, challenges and opportunities facing the WHS and the objectives and actions identified to address them.

Under both inscriptions, the City of Bath is recognised as a dynamic, modern urban area and a living site subject to constant change. Managed change is essential in ensuring the city is fit for the needs of its citizens and economically productive. In accordance with the aims of this plan, an over-arching objective is to ensure that such change does not harm the OUV and authenticity and integrity of the site.

## 5.2 Identifying the issues

Issues are gathered from a number of sources. Firstly, some are rolled forward from the 2016 plan. Some issues are on-going (for example running an efficient Advisory Board), some are long term matters, such as the improvement of the public realm, or as yet unmet ambitions, such as raising a local tourist tax. Secondly, issues have changed in importance during the life of the 2016 plan (for example ‘fracking’ re-emerged and then dropped off the national political agenda). Such issues are largely identified through risk assessment (see 4.18). Thirdly, this combined plan for the first time contains actions as a result of the Great Spa Towns of Europe inscription. Finally, but of no lesser importance, issues have emerged through full public consultation.

Full details of consultation are given in the Statement of Consultation document published alongside this plan.

The starting point for identifying actions is enshrined in the UNESCO World Heritage Convention (1972)<sup>43</sup>. Article 4 requires state parties to ‘protect, conserve, present and transmit’ their cultural and natural heritage and this requirement is carried forward in the UNESCO Operational Guidelines. This requirement underpins both the role of the WH Manager and the remit of this plan. 17 over-arching priorities and objectives are identified to achieve this, under which actions are included to indicate how they will be addressed.

## 5.3 Priorities & Objectives

The 2016 Plan listed 5 priorities, all of which are being carried forward, with the addition of the Natural Setting and Nature Recovery. Therefore, this Plan has 6 key priorities as listed below, and all are of equal importance. Climate change was previously included under ‘Environmental Resilience’ and has risen in prominence and urgency since 2016 and is included as a specific Action as Addressing Climate Change.

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<sup>43</sup> <https://whc.unesco.org/en/conventiontext/>

|    | <b>Priorities &amp; Objectives</b>  |
|----|---|
| 1  | <b>Addressing Climate Change (key priority):</b> Support measures to adapt to and mitigate the impacts of climate change, decrease environmental impact, and ensure safeguarding and protection of OUV  |
| 2  | <b>Development (key priority):</b> Ensure that new buildings and other development does not harm the OUV and should be sustainable  |
| 3  | <b>Public Realm (key priority):</b> Continue to support and promote a high quality and consistent public realm approach across the city allowing good accessibility to all and enhance the WHS and its OUV  |
| 4  | <b>Traffic, Transport &amp; Mobility (key priority):</b> Support, encourage and promote less car use and increase in active travel, use of public transport, and ambition to establish Bath as one of Europe's most walkable cities   |
| 5  | <b>Promotion, Interpretation, Inclusion &amp; Presentation (key priority):</b> Work to increase interpretation of the OUV, including intangible values and continue to encourage co-ordination amongst providers, promote citizen involvement and WHS as being for everyone   |
| 6  | <b>Natural Setting and Nature Recovery (key priority):</b> Promote the natural setting of Bath, both within the city and surrounding landscape, as a key attribute of OUV that is afforded equal importance to the built element and is protected, conserved and interpreted, and that associated nature recovery initiatives are fully supported |
| 7  | <b>Maintenance and Repair:</b> Ensure that damaged and disused historic structures within the site are monitored, repaired maintained and where appropriate reused  |
| 8  | <b>Conservation:</b> Ensure that there are measures in place to provide ongoing conservation of the attributes of OUV   |
| 9  | <b>Tourism &amp; Visitors:</b> Ensure that visitor management is sustainable in that it benefits the WHS and does not harm the OUV.   |
| 10 | <b>National &amp; Regional Strategies:</b> Ensure that national and regional bodies take full account of the WHS in their strategic planning  |
| 11 | <b>Policies &amp; the WHS:</b> Ensure that all relevant new policy documents take full account of the WHS and do not propose actions which would harm the OUV   |
| 12 | <b>Skills &amp; Training:</b> Ensure that craft skills necessary to conserve the attributes of OUV are in place and are of sufficient quality   |
| 13 | <b>Leadership, Liaison and Communication:</b> Ensure that key decision makers have a good understanding of the OUV of the site and their role in the management of the WHS  |

|    |   |
|----|---|
| 14 | <b>Research:</b> Ensure that research and information about the Site is produced, collected, archived and analysed, and made available to partners in ways that assist implementation of this management plan                                       |
| 15 | <b>Education &amp; Youth:</b> Ensure that the WHS is used widely and effectively as a resource for learning in all sectors and phases of education and training, and promote UNESCO Global Citizenship Education programme <sup>44</sup> and values |
| 16 | <b>Governance:</b> Ensure that management systems are appropriate for the effective implementation of the Plan, encourage community involvement, enable partnership working and secure the required funding.  |
| 17 | <b>The Wider UNESCO Family:</b> Ensure continued liaison with other Sites for learning from and helping others to develop and share best practice   |

#### 5.4 Addressing Climate Change (KEY PRIORITY)

The 2016 Plan contained little direct reference to addressing climate change, but across that plan period it rose to become a topic of increasing importance. In March 2019 Bath & North East Somerset Council declared a climate emergency, followed by an ecological emergency (July 2020). This led to a commitment to strive for a target of zero carbon emissions by 2030. To achieve this ambitious target, significant action will be necessary, such as insulating large numbers of buildings, encouraging a mass switch to renewable energy and changing travel habits. All such measures have the potential to impact upon attributes of OUV. UNESCO in its Policy Document on Climate Action for World Heritage (2023)<sup>45</sup> recognises the need for climate action which safeguards OUV. Approaches need to be identified that deliver imperatives.

It is estimated that the main contributors to carbon emissions in Bath are buildings (66%) and vehicles (29%)<sup>46</sup>. There is also a desire to ‘green’ the city, introducing street trees and reducing vehicular impact.

The world-class heritage of Bath should be seen as a resource for climate action, as these traditional buildings, which have stood for hundreds of years, are inherently sustainable. Georgian buildings have adapted over the centuries to accommodate services such as internal plumbing and toilets, electricity and central heating. Forthcoming alterations to address climate change will be the latest phases in this evolution, and if undertaken in a sensitively and carefully managed way need not be harmful to the OUV of the Site. B&NES Energy efficiency, retrofitting, and sustainable construction supplementary planning document outlines how to achieve sensitive improved energy efficiency measures consistent with conservation best practice and Historic England specialist guidance notes.<sup>47</sup>

To this end, the Advisory Board has taken the following steps:

<sup>44</sup> <https://www.unesco.org/en/global-citizenship-peace-education/need-know>

<sup>45</sup> <https://whc.unesco.org/archive/2023/whc23-24ga-INF8-en.pdf>

<sup>46</sup> <https://beta.bathnes.gov.uk/document-and-policy-library/journey-net-zero-final-report>

<sup>47</sup> <https://beta.bathnes.gov.uk/sustainable-construction-and-retrofitting-supplementary-planning-document>

- Climate action has been added into the Plan vision
- Climate change has been listed as a priority action area
- A new objective on climate change action has been added to the Plan
- Two extra single item Advisory Board meetings were held in 2020 and 2021 to discuss climate change
- Actions have been added including, with Great Spa Towns of Europe partners, the desirability of a climate vulnerability exercise and the introduction of a Local Listed Building Consent Order making the installation of solar panels on listed buildings easier where the significance of the listed buildings is preserved and OUV safeguarded
- Multiple actions by partners are already completed or ongoing. These include for example exemplar projects by Bath Abbey and the Footprint Project using thermal water for underfloor heating, B&NES Council using heat exchangers in the Sacred Spring, the publication by Bath Preservation Trust in 2011 of Warmer Bath, a guide to retrofitting historic properties, B&NES adoption of the Energy Efficiency, Retrofitting and Sustainable Construction SPD in 2022 and the development of a multi-agency partnership, Green Heritage Homes, and a partnership funded specialist B&NES conservation officer post to provide public retrofit advice and assess consequent applications.

The potential impact of climate change upon the OUV is not yet fully understood, and continuing support and involvement in on-going research is critical in order to better understand what the risks are and identify appropriate solutions to mitigate them. This should include focus groups with key stakeholders, and the Scottish World Heritage Sites, including Edinburgh, have run such exercises giving a useful basis to learn from these and identify further action. This is an action which other GSTE partners are also interested in conducting. A climate vulnerability study would be comprehensive as it looks at the vulnerability of all property's attributes in terms of climate change, and not just buildings. A Climate Vulnerability Index (a specific methodology) would also be community-focused, engaging communities in the process and looking at how communities would be impacted by climate change, with the aim of identifying appropriate management responses, whether these are specific climate adaptation/mitigation strategies, or a disaster risk assessment.

***Action 1. Continue to support and assist research into climate risk and vulnerability for the WHS***

Listed buildings are amongst those which will need to be adapted to improve insulation and install renewable energy systems. For instance, the roofs of Georgian buildings commonly have a central, hidden valley which offers scope for installing solar panels without compromising their historic appearance and character, and this approach has proven successful in Edinburgh WHS. To assist homeowners, a Local Listed Building Consent Order is being progressed by Bath and North East Somerset Council that would remove the need for listed building consent for installation in a

defined area on buildings and to meet certain criteria, carefully identified as being appropriate for this initiative. An action is included to support this pioneering approach.

**Action 2.** *Support the introduction of Local Listed Building Consent Order relating to solar panels on listed buildings and ensure OUV safeguarded*

**Action 3.** *Support innovative new projects and partnerships which trial new technology and approaches, which enable de-carbonised systems without compromising the OUV of the sites*

## **5.5 Development (KEY PRIORITY)**

New development continues to be one of the most challenging aspects of WHS management, both within urban sites and the setting, and inappropriate development is one of the significant risks to the OUV of the WHS. The planning system is the primary tool in managing development and B&NES Council typically deals with and manages around 2200 applications per year for the entire district, (of which listed building applications account for around 500) and approximately 1500 of those applications are for development within Bath.

The UK planning system, in seeking to balance benefit against harm, differs from the UNESCO approach of allowing no harm to the OUV. This disparity has caused tension, most notably with the de-listing of Liverpool from the World Heritage List in 2021, and it will continue to be an issue to be mindful of during this Plan period. The 'paragraph 172 and 174' notification reporting procedure relating to this is outlined in Chapter 4.

The spaces in-between buildings can be as important as the buildings themselves, as recognised by UNESCO's Historic Urban Landscape Recommendation<sup>48</sup>. The single, large conservation area of Bath has been divided into 16 areas with specific characteristics in order to ensure that development proposals preserve or enhance their special architectural or historic interest and to identify management opportunities and actions.

A programme of work to complete a full conservation area character appraisal began, with some community input, during the previous plan and remains ongoing with (as of August 2023) 11 of the 16 sub-areas appraised.

**Action 4.** *Support the continuing programme of work to complete full character area appraisals for Bath Conservation Area and formal B&NES Council adoption*

At the early stages of the 2016 plan period, the allocation of housing numbers was taking place from central Government, and it was perceived that inadequate consideration was being given to the capacity of the city to deliver these. An action to engage in any such exercise 'upstream' of any binding decision is retained.

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<sup>48</sup><https://whc.unesco.org/en/hul/>

**Action 5.** *Engage with national & regional local government to ensure that sub-regional growth & new housing numbers allocated to the city respects the special characteristics of the WHS and safeguards OUV*

Development costs within the site and the setting can be high, due to both land scarcity and the need to clean previously developed land. These and other factors have led applicants to seek permission for taller buildings which potentially have a detrimental impact upon views across the historic city and to and from the setting. The call to adopt enforceable guidelines on this matter stretches back over a decade and each new tall building approval creates a precedent for the next. This remains a matter of concern. The Building Heights Strategy<sup>49</sup> (produced in September 2010) would benefit from renewal and to be given greater weight as a Supplementary Planning Document.

**Action 6.** *Ensure that the issue of unacceptable building heights is effectively managed through the application of the Local Plan and the Building Heights Strategy, and continue to support and encourage its adoption as a Supplementary Planning Document*

The UK has one of the oldest and best developed planning systems in the world. It is based on national legislation, transparent and democratic with major decisions being made by elected representatives (see Chapter 4.12). The Advisory Board plays no formal role in the process of deciding applications and is not a statutory consultee to the planning process. The Advisory Board may however be involved in liaising with and guiding applicants in terms of Heritage Impact Assessment and ensuring Advisory Board members have sufficient knowledge to formerly comment on behalf of their own organisations.

During this Plan period applications are anticipated on significant sites, including the Bath Rugby's current proposals at the Recreation Ground. This latter proposal is a long-term ambition of the Rugby Club and was mentioned in both the 2010 and 2016 management plans. A 'paragraph 172' notification (see Chapter 4) was submitted to UNESCO concerning this in 2019, 2023 and again for the current proposals in 2024.

**Action 7.** *Ensure that relevant emerging development proposals have taken full account of the potential impact upon the OUV*

The UNESCO Vienna Memorandum<sup>50</sup> welcomes high quality modern interventions rather than pastiche replicas. B&NES Council planning policy confirms this design approach and states that World Heritage status should not be seen as a constraint, but as an invitation to excel. To this end, an action was included in the 2016 Plan to re-establish a design review panel for major development applications. This was achieved in the form of the South West Design Review Panel, but now replaced by Design West based in Bristol. An Action is included in this plan to supplement this with the Architect in Residence position at the University of Bath.

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<sup>49</sup> <https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Urban-Design-Landscape-and-Heritage/BathBuildingHeightsStrategyPart1ExecSummaryandIntro.pdf>

<sup>50</sup> <https://whc.unesco.org/en/documents/5965>

**Action 8.** *Continue to encourage the use of a Design Review Panel and support and work with the Architect in Residence position to advise on design issues. Provide training to ensure all involved have a comprehensive understanding of the attributes of OUV and their spatial and design implications*

## **5.6 Public Realm (KEY PRIORITY)**

Whereas the state of conservation of buildings is very good, the maintenance of the public realm continues to prove problematic. The underlying problem is one of finance, where the cost of street repairs falls almost exclusively to B&NES Council. These costs will often be far higher for an historic city, for example in having to source and re-lay natural pennant paving stone, and this is not reflected in Government funding. B&NES Council cannot currently directly financially benefit from the, approximately, 5m annual tourists to the site to contribute to this (see Action 19 which relates to a potential visitor tax).

Where new interventions have been made, these are generally of high-quality and examples include a new urban square at Brunel Place, a similar plaza at Saw Close (2018) and the £1.2m re-paving of York Street completed April 2022. These works have been guided by the Bath Pattern Book and actions 11 and 12 call for the continuation of high-quality interventions in line with the Pattern Book guidance.

**Action 9.** *Ensure that new street works & other developments are completed to high & consistent design standards & allow good accessibility to all, continue to implement improvements to pavements & public realm, and encourage and support in identifying budget and funding to improve and enhance the public realm*

**Action 10.** *Ensure that the Bath Pattern Book is adhered to & updated as necessary to guide street works in the WHS. Pursue public realm condition survey to inform alterations, improvements and enhancements across the Council*

Considerable progress has also been made under Action 13 which is rolled forward from the previous plan and calls for pedestrianisation of key streets. In the previous plan period several city centre streets were closed to traffic (including the Milsom Street partial closure). This process is on-going, driven partly by the implementation of security measures to guard against 'hostile vehicle' attacks.

The action is retained in recognition that security works are not yet fully implemented (2023) and there remains work to do.

**Action 11.** *Continue to support the reduction of vehicular traffic impact within the Site, especially in the city centre, where there is a valid case for doing so*

## **5.7 Traffic, Transport & Mobility (KEY PRIORITY)**

Vehicular transport within the WHS is an on-going issue in an historic city not designed for modern traffic. Congestion, pollution, parking and a range of associated issues are detrimental to human health and to the fabric of buildings and the natural environment. At the same time there remains a perpetual need for people and goods to move around.



Previous transport proposals have included major projects such as an eastern A46/36 bypass, a 'rapid transit route' from the west, electrification of the railway line, a new eastern park and ride site and a cable-car from the south. Suggestions for a tram system re-emerge periodically but to-date (most recently in 2017) these have not been able to identify project funding. At the time of writing no such major proposals exist, but their potential to have a major impact upon OUV is recognised in Action 7.

Transport currently accounts for 29% of carbon emissions in the B&NES area and is the major contributor to poor air quality. In March 2021 a Clean Air Zone (CAZ) became operational which levied charges on the most polluting vehicles entering the site and which has led to both an improvement in air quality and an incentive for drivers to switch to cleaner vehicles. The recently issued Transport Plan (2022)<sup>51</sup> is entitled 'Journey to Net Zero' which reflects the change of emphasis toward sustainable transport solutions. This strategy includes the Transport Delivery Action Plan for Bath<sup>52</sup> which includes a range of measures plus a range of supporting information such as current travel patterns across the site. During this Management Plan period, new challenges include an increased demand for electric car charging points and the establishment of cycle routes cross the city.

***Action 12. Engage with, support, and encourage the delivery of the Journey to Net Zero Transport Strategy objectives to deliver positive benefits for the WHS and that safeguard its OUV, including: reducing the negative impacts of vehicular traffic, improving access by more sustainable modes of travel, and making Bath a more pedestrian-friendly and walkable city***

Bath WHS, in common with other historic sites, contains physical features which may be difficult for those with limited mobility. Examples include uneven street surfaces, raised kerbs and steps. Significant improvements have been in improving this in the previous decade and new schemes have been designed to high accessibility standards, but there remains work to do. Action 12 relates not only to the public realm, but also to museums and other centres which provide interpretation for the site.

***Action 13. Continue to identify & implement opportunities to make the historic environment more accessible for those with limited mobility***

## **5.8 Promotion, Interpretation, Inclusion & Presentation (KEY PRIORITY)**

Interpretation and presentation of the OUV fluctuated across the previous plan period. The Covid-19 pandemic saw the temporary closure of all museums, with most still struggling to reach previous levels of incomes. Despite this, the overall long-term performance was positive. The opening of the Bath World Heritage Centre (May 2022) and Clore Learning Centre (June 2022) enabled engagement with 72,000 visitors and 8,000 schoolchildren during the first year of opening, with numbers expected to rise moving forward. This together with the new Bath Abbey Discovery Centre (2023) and the addition of a new WH website, social media feeds

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<sup>51</sup> <https://beta.bathnes.gov.uk/document-and-policy-library/journey-net-zero-final-report>

<sup>52</sup> <https://beta.bathnes.gov.uk/sites/default/files/Bath%20Report%20Aug%202020%20-%20Final%20edited.pdf>

and talks to the public enabled the number of people interacted with to be increased substantially.

There remains more to do in the coming Plan period in working with communities. For instance, Bath has recently seen renewed awareness and interest in how money generated from the trans-Atlantic slave trade and the ownership of plantations and enslaved people, came to the city in the eighteenth century and helped finance the development of Georgian Bath. There is also interest in other under-represented heritage associated with the city and many heritage organisations are responding to this with new research, interpretation and programming. Several Advisory Board partners have established the Bath and Colonialism Archive Project<sup>53</sup>. Associated projects include the publication of 'Beckford and the Slave Trade'<sup>54</sup> and in 2023 Bath Abbey launched a new website<sup>55</sup> containing details of its (approximately) 1,500 memorials, including those with links to enslavement.

The work and research relating to interpretation in general is on-going and new proposals include a project by the National Trust to open a new visitor facility at the Assembly Rooms. New actions have therefore been introduced as below.

Additionally, Bathscape will continue their promotion and education relating to the WHS setting, its significance and their work to enhance it.

***Action 14. Support measures aimed at increasing the diversity of audience & inclusivity of research, interpretation and programming relating to the OUV***

***Action 15. Support the ongoing and emerging research to explore the relationship between Georgian Bath and the transatlantic slave trade and British colonisation to further interpretation relating to OUV***

World Heritage Day is celebrated every year on or close to the date of 18<sup>th</sup> April which is approved by UNESCO as being 'International Day for Monuments and Sites'. B&NES has organised and staged the event every year since 2009, with online events staged during the Covid-19 pandemic. It has proved a very popular and effective way of engaging with local communities and promoting the message of World Heritage. It is also beneficial in bringing together multiple heritage partners working in collaboration with B&NES to help stage the event. The retention of an action to stage and support this is a commitment to continue to do so.

***Action 16. Continue to support the organising of WH Day and other initiatives to increase understanding of the OUV of the City of Bath and GSTE***

The UNESCO World Heritage emblem is an effective, visible indicator that the site is inscribed which in turn encourages people to explore why and what this means. The visibility of the emblem has increased steadily since original inscription and it is incorporated in many ways, including in the bronze pavement roundel in Stall Street, on road signs on main road entrance routes, in promotional literature and on floor mats in the Roman Baths. Advancements during the previous plan period include

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<sup>53</sup> <https://bathandcolonialism.org/>

<sup>54</sup> <https://beckfordstower.org.uk/about/history/>

<sup>55</sup> <https://www.bathabbeymemorials.org.uk/>

installing the UNESCO roundel on windows at Bath Spa rail station and the windows of Bath World Heritage Centre. It does however remain possible to visit the city without releasing it as a WHS and the action to promote the logo is considered to be ongoing. It should be remembered that UNESCO brand guidelines forbid the use of their emblem for commercial purposes.

**Action 17.** *Continue to use and promote the UNESCO emblem throughout the site within brand guidelines*

Given the relatively recent inscription of the GSTE, the project has a number of actions relating to promotion and interpretation. Given that Bath was already inscribed, the city is ahead in this respect, although the GSTE is one single WHS so Bath will need to be included in these actions.

**Action 18.** *Create a project website within the GSTE to:*

- i) promote the concept*
- ii) create links to the websites of component towns*
- iii) provide a model for presenting the GSTE concept*

*and continue to maintain the Bath WHS website*

**Action 19.** *Produce within the GSTE*

- i) a design handbook for all component sites (with current procedure for the use & authorisation of the UNESCO & WH emblems in all GSTE material)*
- ii) an information pack in all participating mother tongues for briefing local politicians, municipal officials & in particular the staff in the local tourism information centres concerning the inscription on the World Heritage List*

**Action 20.** *Organise a bi-annual event within the GSTE*

- i) for community representatives of the WHSs to meet & share experience & recognise the wider vision The GSTE, &*
- ii) workshops for strategic tourism officers*

**Action 21.** *GSTE Create an electronic newsletter at least twice per annum & develop a data base for circulation through the municipal offices of the component GSTE towns*

**Action 22.** *Support outreach work to help people (especially the young) engage in heritage issues, both local and global, working with local societies & interest groups*

## **5.9 Natural Setting and Nature Recovery (KEY PRIORITY)**

Whilst Bath under both inscriptions is inscribed as a cultural rather than natural site, the natural landscape is an essential part of the OUV both within the city and its setting. As described in Chapter X, the landscape must therefore be afforded equal importance to the built fabric and Objective 6 confirms this. A major advancement in managing this land has been the establishment of the Bathscape partnership. This

partnership is fully funded until 2026 but beyond this it is highly desirable that the current partnership approach continues.

**Action 23.** *Continue to support the Bathscape Landscape Partnership to deliver projects aimed at conserving the landscape setting of the WHS & seek to ensure it has a legacy beyond the current funding end date of 2025*

The 2016 Plan contained an action to investigate whether the Hot Springs could be formally recognised through designation as a rare, natural, geological asset in the UK. This would add to their protection against proposals such as regional 'fracking' (see Action 24 below) and bring natural and cultural conservation systems closer together. Some progress was made here in discussion with Natural England, but no formal status was progressed. This action is therefore included from the previous Plan.

**Action 24.** *Continue to investigate the potential for formal designation and protective status of the Hot Springs (SSSI or similar designation)*

Management of the Hot Springs involves routine monitoring and inspection (as outlined in Chapter 4) and this should continue. The exact underground path of the aquifer rocks bearing the thermal waters is not known, but it is known to be susceptible to disruption and possible diversion by drilling or mining. For this reason, potential engagement to prevent damage from such operations is included as an action. The potential for hydrocarbon extraction through 'fracking' within the Somerset coalfield is currently off the natural political agenda, but events during the 2016 Plan period have shown that this can change.

**Action 25.** *Continue to monitor the hot springs & seek to secure protection from hydrocarbon extraction or any other mineral extraction operation*

Artificial lighting has been in place for around 150 years, transforming how humans live but purely for their benefit and often to the detriment of wildlife. Poorly controlled lighting can be detrimental to human health and animal welfare, it can be wasteful of energy and unsightly. Although this issue does not directly impact upon the OUV of the site, the multiple connections with environmental impact, plus natural and human health, warrant the inclusion and support of the Advisory Board.

**Action 26.** *Engage with proposals to establish guidance for responsible lighting in the WHS*

**Action 27.** *Support the establishment of an effective holistic management structure for the River Avon & Kennet & Avon Canal*

## **5.10 Maintenance and Repair**

As noted in section 2.8, the overall state of conservation of the site is very good, especially in relation to the buildings. Bath has one of the highest number of listed buildings of any European World Heritage Site but despite this very few are in poor condition. This is in large part due to the fact that most buildings remain in use, many as family homes, and their owners ensure they are maintained (at their own expense

without public subsidy). In recent years the price of building work and materials has risen sharply and this will inevitably impact upon building owners. This is a position which should be watched moving forward, although at a time when public finances are also difficult, solutions are not obvious.

There are historic structures other than buildings which need attention, and many of these items (including milestones, street signs, bridges and cemeteries) have been the target of World Heritage Enhancement Fund (see 4.16). The action below contains a commitment to continue the work of maintenance and repair.

**Action 28.** *Ensure that damaged & disused historic structures are monitored, repaired, maintained & where appropriate re-used, including regular appropriate maintenance and repair of the public realm*

### **5.11 Conservation**

There are many historic structures which may not meet the criteria for listing, but which nevertheless have heritage significance. It is important for the authenticity and integrity of the site to conserve these and in accordance with UNESCO's Historic Urban Landscape Recommendation (see 5.6) to manage in a holistic manner. To this end steps are being taken by B&NES to establish a process to formally register 'locally listed heritage assets' (2024). Once this has been implemented, local heritage assets will be able to be submitted for local listing and these structures will be a material consideration in planning decisions.

**Action 29.** *Support for progressing the B&NES Locally Listed Heritage Assets SPD for registering locally important heritage*

The following Action is taken from the GSTE Property Management Plan and seeks to build consistent frameworks within all partner spa towns around conservation issues.

**Action 30.** *Establish a joint project within the GSTE to create a model framework to develop an understanding of the various methods & systems in place for recording the state of conservation, & promote & disseminate an understanding of the WH Convention & OUV to Local Communities Action*

### **5.12 Tourism & Visitors**

Bath is a major tourist destination attracting approximately 5m visitors per year. As such, tourism is a major employer (both directly and indirectly). The visitor economy of Bath is buoyant, and the revenue gained through visitor spend provides some conservation funding of major attributes of OUV such as the Roman Baths. This direct link between tourism income and building conservation extends to tourist accommodation, restaurants, pubs, etc, which are often housed in the very historic buildings that the visitor comes to see.

Excessive or uncontrolled tourism can also be problematic. Pre-pandemic, demonstrations were seen in Europe where residents protested against negative impacts such as loss of housing to tourist accommodation, excess traffic,

overcrowding and inflated prices. Bath has a high tourist to visitor ratio and is not immune to such issues.

Bath has no tourism strategy as such, although the GSTE has published an overarching Responsible Tourism Strategy that can be drawn upon. Destination Management Plans produced by Visit West concentrate largely on tourism marketing. B&NES Council has a range of actions including provision of coach and car parking, admission charging the Roman Baths, maintenance of the public realm, hotel beds, etc, which are related to tourism, but these are not linked to a tourism strategy which contains desired capacity and proposals to achieve this. An ambition is contained in Action 31 calling for such a strategy.

***Action 31. Encourage and support the production & adoption of a Sustainable Tourism Strategy for the WHS in accordance with the principles and priorities outlined in the Responsible Tourism Strategy of the GSTE***

An aspect of the negative impact of tourism is through the wear and tear on the public realm and the refuse created by millions of visitors. European sites routinely address this by charging a visitor tax on overnight stays and re-investing this in public realm maintenance. In the UK, local authorities cannot set such a tax without the authorisation of Parliament and during the previous plan period discussions have been held attempting to achieve this. This matter has become highly politicised and is not directly in local control but is rolled forward as an aspiration.

***Action 32. Continue to explore options for a visitor tax or levy & use proceeds to for appropriate projects and initiatives that improve, enhance, conserve & interpret the WHS and its OUV***

### **5.13 National & Regional Strategies**

As demonstrated by the table in 4.15 there are a wide range of strategies compiled by B&NES Council and others which potentially impact upon the OUV. Engaging with these strategies during their formation can prevent future problems and is included within the following actions to validate this work.

***Action 33. Engage with national & regional bodies, plus central government to ensure that WHS is recognised in strategic planning engage & the impact of major road traffic routes passing through the WHS is addressed***

***Action 34. Engage with & support the current programme of cycling improvements & ensure that they deliver sustainable travel option whilst protecting OUV***

### **5.14 Policies & the World Heritage Site**

***Action 35. Review & engage with all relevant emerging strategies to ensure that they take full account of the WHS & do not propose actions that would result in harm to OUV***

***Action 36. Review and update the WHS Setting Study to ensure it provides relevant policy protection***

## **5.15 Conservation Skills & Training**

The availability of craft skills and building materials to maintain the site are essential and this is therefore an on-going issue. Skills include ornamental plastering, stonemasonry, metal working and joinery, and by nature this is specialist work undertaken by a small number of companies. The WH Enhancement Fund (see 4.16) has helped by commissioning stonemasonry and ironwork craftworkers amongst others, and Bathscape has run a number of drystone walling courses.

**Action 37.** *Support initiatives which help ensure that craft skills necessary to maintain the fabric & conserve the attributes of OUV are in place & are of sufficient quality*

The GSTE partners have similar issues, and the action below is specific to that project.

**Action 38.** *Ensure that contacts are made within the GSTE with the academic institutes, universities & colleges responsible for training conservation specialists in each spa town region & that dialogue & joint projects are developed*

## **5.16 Leadership, Liaison and Communication**

Action is required to spread awareness and understanding of WH issues amongst a variety of audiences. This includes, for example, training for elected councillors, who can be key decision makers and who may change at each local election. This action may also cover raising awareness amongst the general public and over the course of the 2016 Plan the previous Chair of the Advisory Group gave a significant number of presentations promoting the WHS its OUV. It may also cover receiving visits of professionals from other UNESCO sites worldwide and as such overlaps with Actions 20 and 38.

**Action 39.** *Provide training as required to elected members, officers, visitor ambassadors & others on WH issues*

The Great Spa towns have an action to ensure that people and procedures are in place to ensure effective liaison. For Bath this is largely already established.

**Action 40.** *Create a network of officials for the state of conservation in each spa town &:*

- I. establish a collaborative forum & mechanism for the early recognition of significant development proposals that require input from GSTE Executive Board & the IGC*
- II. Address the additional requirement from the WH Committee for the GSTE Executive Board & the IGC to contribute to the assessment of emerging proposals that pose a threat to the OUV of the GSTE*

**Action 41.** *Create an electronic newsletter at least twice per annum & develop a data base for circulation through the municipal offices of the component GSTE towns*

## 5.17 Research

Research provides information required for effective site management and it is an on-going issue. There is a significant amount of historic information relating to Bath held by different organisations. The potential provision of a comprehensive on-line index was explored in the previous plan period, but the scale of such a project and work necessary to deliver and maintain an index proved unfeasible. The single action under this heading relates to the GSTE project and a proposal to explore visitor carrying capacities.

**Action 42.** *Use the existing network within the spa towns to develop research proposals for application to the various EU programmes for financial support for, and participation in European and global projects*

The 2016 Plan carried an action relating to the provision of a new History Centre to house the Bath Record Office. Although the Record Office has made significant achievements, including combining with the libraries local records collection, a new interactive website<sup>56</sup> and extensive digitisation, their premises remain far from ideal. However, given the absence of any firm proposal to pursue a funding bid to move to new premises during this plan period, the action is dropped despite a long-term ambition remaining.

## 5.18 Education & Youth

World Heritage provides a valuable learning resource to educate those of all ages, but especially youth. An action is included to support initiatives provided by a range of partners to provide heritage-based education. The content of school curriculums has become increasingly set centrally and attempting to influence these is less effective. The primary approach now is to provide programmes, resources (such as school packs) and venues for schools to visit. Advisory Board partners including Bath Abbey, Bath Preservation Trust, B&NES Council and the National Trust are very active in this respect. For instance, the Roman Baths Clore Learning Centre is proven a great success and is a well-used facility by local and visiting schools. Delivery of this Council-led project was identified as an Action of the previous Plan and one of its achievements.

**Action 43.** *To ensure that the city is used widely & effectively as a resource for learning in all sectors & phases of education, including global citizenship, sustainable development and climate change*

## 5.19 Governance

The governance model of World Heritage in Bath is described in chapter 4 and centres around an Advisory Board. Although this is a well-established and effective model, it will continue to evolve with changes in Board membership. The review of the terms of reference for both the Advisory Board and the Strategic Management Group has been completed.

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<sup>56</sup> <https://www.batharchives.co.uk/>



**Action 44.** *Continue to maintain and resource an effective WHS Advisory Board*

**Action 45.** *Produce progress monitoring reports on this Management Plan at mid-term & end of term points*

**Action 46.** *Improve the Bath WHS website to allow it to become an accessible repository for all key WH information*

## **5.20 The Wider UNESCO Family**

There are 1223 (2024) World Heritage Sites globally, all inscribed under the UNESCO founding principle of contributing to world peace by promoting international cooperation in education, sciences, culture, communication and information. Bath is therefore part of this global network and a display in the Bath World Heritage Centre is dedicated to this. Liaison is essential not only to play a meaningful role in this network, but also for practical advantages of linking specialist staff together from other sites through bodies such as World Heritage UK.

**Action 47.** *Continue liaison with other UNESCO sites for to learn from & help others. Maintain links with appropriate local, national & international bodies*

# CHAPTER 6 ACTION PLAN

## 6.1 Introduction

This chapter sets out actions to address the issues, challenges and opportunities identified in Chapter 5. Actions are grouped under the relevant objectives.

## 6.2 About the actions

The actions will guide the work of the WH Manager and the Advisory Board across the 6-year period. Actions range from minor quick wins through to major projects and long-term aspirations. Every action is as ‘smart’ (**S**pecific, **M**easurable, **A**chievable, **R**elevant, **T**ime-bound) as possible, indicating who is responsible for delivery, with what resources, by when and with what indicator of success. It should be noted however that there is the legitimate inclusion of aspirations where full details may not yet be known. Including aspirations confirms the support of the Advisory Board, which can be pivotal in gaining both funding and political support.

For the first time this Plan incorporates actions from the GSTE Property Management Plan. These are denoted by the inclusion of ‘GSTE’ in the first column of the table below. In many cases the GSTE 2021 action will mirror one for the 1987 inscription, in which case both have been combined.

There are 47 actions included in this plan. The previous plan (2010-2016) contained 71 actions. Despite a good record of achievement on actions in the previous plan, the approach here is to concentrate on a smaller number of projects which can realistically be delivered.

## 6.3 Implementation

Actions will be delivered by a wide range of partners, some Advisory Board members themselves and others. The action plan is included as a separate table so it may be updated as necessary during the plan period. Monitoring of achievement against plan actions, as outlined in 4.19, will be undertaken on a mid-term basis, with reports presented to the Advisory Board.

|   | Action  | Delivery partners   | Resources               | Timescale | Monitoring indicators   |
|---|---|---|-------------------------|-----------|---|
| <b>Objective 1. Addressing Climate Change action (Key Priority):</b> Ensure that the WHS responds to the emerging climate emergency whilst safeguarding OUV |   |   |                         |           |   |
| 1<br>GSTE   | Continue to support and assist research into climate risk and vulnerability for the WHS | Advisory Board partners, B&NES, GSTE Association, Loughborough University | Within existing budgets | Unknown   | Exercise considered & implementation of specific policy and interventions |

|  |  |   |                                |  |  |
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| 2  | Support the introduction of a Local Listed Building Consent Order relating to solar panels on listed buildings   | B&NES, Historic England   | Within existing resources      | Underway as of July 2023                       | Implementation of the legal order. Number of panels fixed.   |
| 3  | Support innovative new projects and partnerships which trial new technology and approaches, which enable de-carbonised systems without compromising the OUV of the sites.          | B&NES, WH AB  | Within existing resources      | Ongoing  | Implementation   |
| <b>Objective 2 Development (Key Priority):</b> Ensure that new buildings and other development does not harm the OUV |  |   |                                |  |  |
| 4  | Support the continuing preparation of a Conservation Area Character Appraisals for Bath Conservation Area  | B&NES, Community partners including the Bath Preservation Trust | Extra resource may be required | Ongoing  | Completed & draft character appraisals component documents   |
| 5  | Engage with national, regional & local government to ensure that sub-regional growth & new housing numbers allocated to the city and within its setting respects and preserves OUV | B&NES, Historic England   | Within existing budgets        | To coincide with regional planning discussions | Evidence of measures undertaken.<br><br>Housing allocation figures   |
| 6  | Ensure that the issue of unacceptable building heights is effectively managed through the application of the Local Plan & supporting   | B&NES   | Within existing budgets        | Ongoing  | Monitoring of tall building proposals & corresponding planning decisions. Monitoring to be done through GSTE |

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|   | documents, including the Building Heights Strategy, and continue to support and encourage its adoption as a Supplementary Planning Document                                    |  |   |   | update reports. Adoption of a Building Heights Strategy as SPD  |
| 7   | Ensure that relevant emerging development proposals have taken full account of the potential impact upon the OUV   | Applicants & their agents, B&NES, Historic England | Within existing budgets   | Dependent upon progress of the scheme in question | Evidence that full account of WHS has been taken account of in the preparation & final design of projects & delivery of the projects without harm to OUV. |
| 8   | Continue to encourage the use of a Design Review Panel, and to liaise and work with the Architect in Residence   | B&NES, University of Bath, other Board partners    | Within existing budgets   | Ongoing   | Panel convened & meetings held. Evidence that panel and architect in residence advice is considered in implementation of schemes.                         |
| <b>Objective 3 Public Realm (Key Priority):</b> Ensure that new street works, and other developments are completed to high and consistent design standards allowing good accessibility to all |  |  |   |   |   |
| 9   | Ensure that new street works & other developments are completed to high & consistent design standards & allow good accessibility to all. Continue to implement improvements to | B&NES, WH Enhancement Fund                         | Combination of existing budgets, Community Infrastructure Levy (CIL) and S106 | Ongoing   | Regeneration, improvement, and enhancement schemes implemented  |

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|  | pavements & public realm  |  |  |  |  |
| 10   | Ensure that the Bath Pattern Book is adhered to & updated as necessary to guide street works in the WHS. Pursue public realm condition survey to inform alterations, improvements and enhancements across the Council | B&NES  | Largely within existing budgets. Potential of 'top-up' funding from the CIL to be investigated | Ongoing  | Regeneration, improvement, and enhancement schemes implemented   |
| 11   | Continue to support the reduction of vehicular traffic impact within the Site, especially in the city centre, where there is a valid case for doing so  | B&NES, developer contributions                               | Combination of existing budgets, City Region Strategic Transport Settlement (CRSTS) and CIL    | As developments come forward<br><br>As yet unknown | Schemes implemented  |
| <b>Objective 4 Traffic, transport &amp; mobility (Key Priority):</b> Work to control traffic growth & harm, & encourage & promote less car use, especially in the city centre    |   |  |  |  |  |
| 12   | Engage with the delivery of the Journey to Net Zero Transport Strategy objectives in so far as they relate to the WHS to ensure they have no detrimental impact on the OUV of the WHS & its setting                   | B&NES, Historic England, Bath Preservation Trust             | Key elements of the Transport Strategy already have provisional approval within B&NES budgets  | Ongoing  | Evidence that WH has been taken account of in the preparation & final design of projects<br>Delivery of the proposals without unacceptable impact to the OUV |
| 13   | Continue to identify & implement opportunities to make the historic environment and public realm more accessible for those with limited mobility  | B&NES, WH Advisory Board members as historic property owners | Within existing budgets  | Ongoing  | Evidence of further measures undertaken  |
| <b>Objective 5 Promotion, interpretation, inclusion &amp; presentation (Key Priority):</b> Work to increase interpretation of the OUV (especially intangible values) continue to |   |  |  |  |  |

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| encourage co-ordination amongst providers & promote citizen involvement & ensure this is inclusive for all |   |  |  |                                    |  |
| 14   | Support measures aimed at increasing the diversity of audiences & inclusivity of interpretation relating to the OUV   | B&NES & Advisory Board members             | Largely within existing budgets                            | Ongoing                            | Visitor analysis (Heritage Services, Visit West, National Trust etc) |
| 15   | Support the ongoing and emerging research to explore the relationship between Georgian Bath and the transatlantic slave trade and British colonialisation to further interpretation relating to OUV                                       | B&NES, WH AB                               | Within existing budgets                                    | Ongoing                            | Research and initiatives that flow from it                           |
| 16   | Continue to support WH Day  | B&NES plus other partners and stakeholders | B&NES plus budget contributions from host site or partners | Annually in April                  | Event staged, participant numbers & feedback                         |
| 17   | Continue to use and promote the UNESCO World Heritage emblem throughout the site within brand guidelines  | B&NES, GSTE, Advisory Board members        | Largely within existing budgets                            | Ongoing                            | Evidence of emblem use, plus measures of community awareness of WH   |
| 18<br>GSTE   | Create a project website within the GSTE to<br>i) promote the concept<br>ii) create links to the websites of component towns<br>iii) provide a model for presenting the GSTE concept<br><br>and continue to maintain the Bath WHS website | GSTE lead, B&NES input                     | Within GSTE resources                                      | Revised website in place from 2024 | Ensure website kept up to date and fit for purpose                   |

|                |   |   |                                 |   |   |
|----------------|---|---|---------------------------------|---|---|
| 19<br>GSTE     | Produce within the GSTE<br>i) a design handbook for all component sites (with current procedure for the use & authorisation of the UNESCO & WH emblems in all GSTE material)<br>ii) an information pack in all participating mother tongues for briefing local politicians, municipal officials & in particular the staff in the local tourism information centres concerning the inscription on the World Heritage List. | GSTE lead<br>B&NES input  | Currently no resources          | Dependent on identifying and securing resources   | Completion and production of the handbook         |
| 20<br>GST<br>E | Organise a bi-annual event within the GSTE:<br>i) for community representatives of the WHSs to meet & share experience & recognise the wider vision The GSTE, &<br>ii) workshops for strategic tourism officers   | GSTE lead<br>B&NES input<br><br>Note: Any community mtg will have to be on-line | Within GSTE resources           | As and when resources become available.<br><br>NB: workshop for strategic tourism officers already successfully taken place | Successful organisation and staging of the events |
| 21<br>GST<br>E | Create an electronic newsletter at least twice per annum & develop a data base for circulation through the municipal offices of   | GSTE Secretariat,<br>B&NES input  | GSTE and B&NES existing budgets | Ongoing   | Circulation numbers and feedback                  |

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|  | the component<br>GSTE towns  |  |   |                                    |   |
| 22   | Support outreach work to help people (especially the young) engage in WH, working with local societies & interest groups   | Advisory Board members                               | Within existing budgets                                     | Ongoing                            | Record of outreach work undertaken  |
| <b>Objective 6 The natural setting and nature recovery</b> (Key Priority): Ensure that the natural setting and environment of Bath, as a key attribute of OUV, is afforded equal importance to the built element & is protected, conserved, enhanced & interpreted |  |  |   |                                    |   |
| 23   | Continue to support the Bathscape Landscape Partnership to deliver projects aimed at conserving the landscape setting of the WHS & seek to ensure it has a legacy beyond the current funding end date of 2025. | B&NES & Bathscape partners                           | Anticipated as being within existing budgets, Bathscape bid | Ongoing                            | Implementation of the project & achievement of project monitoring targets   |
| 24   | Continue to investigate SSSI (or similar) protective status for the Hot Springs  | B&NES & Natural England                              | No budget requirement anticipated                           | Within Plan period                 | Evidence of consideration of the matter. Accreditation as an SSSI or geological site as appropriate                               |
| 25   | Continue to monitor the Hot Springs & seek to secure protection from hydrocarbon extraction or any other mineral extraction operation  | B&NES & others as required                           | Within existing budgets                                     | Ongoing                            | Evidence of ongoing monitoring<br><br>Evidence of intervention on issues such as influencing of new policy or issuing of licences |
| 26   | Engage with proposals to establish guidance for responsible lighting in the WHS  | B&NES & partners including Bath Preservation Trust & | Within existing budgets                                     | Scoping study underway August 2023 | Production & adoption of best practice guidance   |



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|  |  | Cotswolds National Landscape  |   |                   |  |
| 27   | Continue to support the establishment of holistic management of the River Avon & Kennet & Avon Canal. Bath river line sits within Landscape City Programme   | B&NES   | Jointly funded by project and partner funding: Wessex Water and Canal and River Trust | Ongoing           | Implementation of the project & achievement of project monitoring targets                          |
| <b>Objective 7 Maintenance and Repair:</b> Ensure that damaged and disused historic structures within the site are monitored, repaired maintained and where appropriate reused |  |   |   |                   |  |
| 28   | Ensure that damaged & disused historic structures are monitored, repaired, maintained & where appropriate re-used  | B&NES, Advisory Board members, other property owners, WH Enhancement Fund | Within existing budgets   | Ongoing           | Number of entries on the national & local Heritage at Risk registers. Record of other action taken |
| <b>Objective 8 Conservation:</b> Ensure that measures in place to provide ongoing conservation of the attributes of OUV  |  |   |   |                   |  |
| 29   | Support for progressing the B&NES Locally Listed Heritage Assets SPD for formally registering locally important heritage.  | B&NES   | Within existing budgets   | As of August 2023 | Process in place   |
| 30<br>GST<br>E   | Establish a joint project within the GSTE to create a model framework to develop an understanding of the various methods & systems in place for recording the state of conservation, & promote & disseminate an understanding of the WH Convention | GSTE lead and B&NES input   | None yet identified   | Not known         | Project established & delivered  |

|  |   |   |  |                                     |   |
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|  | & OUV to Local Communities  |   |  |                                     |   |
| <b>Objective 9 Tourism &amp; visitors:</b> Ensure that visitor management is sustainable in that it benefits the site & does not harm the OUV                |   |   |  |                                     |   |
| 31   | Encourage and support the production & adoption of a Sustainable Tourism Strategy for the WHS, complimentary to and consistent with GSTE Responsible Tourism Strategy   | Visit West, B&NES   | No project budget currently allocated to this  | As opportunity arises               | Strategy developed & adopted<br><br>Evidence of implementation of strategy  |
| 32   | Continue to explore options for a 'visitor tax' or levy & use proceeds to conserve & interpret the fabric & economy of the WHS  | B&NES   | No project budget currently allocated to this  | As opportunity arises               | Evidence of active measures taken to pursue this  |
| <b>Objective 9 National and Regional Strategies:</b> Ensure that other national and regional bodies take full account of the WHS in their strategic planning |   |   |  |                                     |   |
| 33   | Engage with national & regional bodies, plus central government to ensure that WHS is recognised in strategic planning engage & the impact of major road traffic routes passing through the WHS is addressed. | B&NES, Wiltshire Council, Highways England, Dept. for Transport | An objective of improving the national trunk road network for inclusion in Highway England's funding programme was confirmed in B&NES cabinet budget proposal 2016/17. | Dates for discussions not yet known | Evidence of discussions<br><br>Inclusion of provisions within the Road Investment Strategy 2 2020 to 2025 funding programme |
| 34   | Engage with & support the current programme of cycling improvements & ensure that they deliver sustainable  | B&NES, Canal & River Trust                                      | Within existing budgets  | Ongoing                             | Delivery of the schemes within the programme<br><br>Successful take up of the schemes as                                    |

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|--|--|---|--|---------|---|
|  | travel option whilst protecting OUV  |   |  |         | evidenced by scheme specific monitoring indicators  |
| <b>Objective 10 Policies &amp; the WHS:</b> Ensure that all relevant new policy documents take full account of the WHS & do not propose actions which would harm the OUV |  |   |  |         |   |
| 35   | Review & engage with all relevant emerging strategies to ensure that they take full account of the WHS & do not propose actions that would result in harm to OUV   | B&NES, Historic England & other authors of strategies | Within existing budgets  | Ongoing | Evidence that full account of WH has been taken account of in the plan/strategy<br>Evidence that The OUV has been considered in actions |
| 36   | Review and update the WHS Setting Study to ensure it provides relevant policy protection   | B&NES   | None yet identified  | Ongoing | Successfully adoption as SPD following review   |
| <b>Objective 11 Conservation skills &amp; training:</b> Ensure that craft skills necessary to conserve the attributes of OUV are in place and are of sufficient quality  |  |   |  |         |   |
| 37   | Support initiatives which help ensure that craft skills necessary to maintain the fabric & conserve the attributes of OUV are in place & are of sufficient quality   | WH Enhancement Fund, Advisory Board partners          | Relies on targeted use of existing budgets rather than new money   | Ongoing | Evidence of incidences of use of craft skills<br><br>Availability of companies offering craft skills                                    |
| 38<br>GTSE   | Ensure that contacts are made within the GSTE with the academic institutes, universities & college responsible for training conservation specialists in each spa town region & that dialogue & joint projects are developed. | GTSE lead B&NES input,                                | Currently no funding identified, although potential opportunity to bring WECA skills funding via Adult Education Budgets to support this | Ongoing | Evidence of incidences of use of craft skills<br><br>Availability of companies offering craft skills                                    |

| <b>Objective 12 Leadership, Liaison and Communication:</b> Ensure that key decision makers have a good understanding of the OUV of the site & their role in the management of the WHS |  |   |                                 |                                |   |
|---|--|---|---------------------------------|--------------------------------|---|
| 39  | Provide training as required to elected members, officers, visitor ambassadors & others on WH issues.  | B&NES, Chair of the WHAB & other partners | Largely within existing budgets | Repeated periodically          | Dates of training sessions, feedback on training, evidence of training being used |
| 40<br>GSTE  | Create a network of officials for the state of conservation in each spa town &:<br>i) establish a collaborative forum & mechanism for the early recognition of significant development proposals that require input from GSTE Executive Board & the IGC<br>ii) Address the additional requirement from the WH Committee for the GSTE Executive Board & the IGC to contribute to the assessment of emerging proposals that pose a threat to the OUV of the GSTE | GSTE lead, B&NES to respond               | Within GSTE resources           | Ongoing and partially underway | Successfully establishing early warning system                                    |
| 41  | Create an electronic newsletter at least twice per annum & develop a data  | GSTE lead, B&NES to respond and support   | GSTE, within existing budgets   | Ongoing                        | Publishing and circulation of newsletter  |

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|   | base for circulation through the municipal offices of the component GSTE towns.  |  |                         |                      |   |
| <b>Objective 13 Research.</b> Ensure that research & information about the site is produced, collected, archived & analysed, & made available to partners in ways that assist implementation of this management plan      |  |  |                         |                      |   |
| 42<br>GSTE  | Create a network within the spa towns to develop research proposals for application to the various EU programmes for financial support for, and participation in European and global projects  | GSTE lead, B&NES input   | Within GSTE resources   | Underway and ongoing | Successful application to programmes and projects   |
| <b>Objective 15 Education &amp; youth.</b> Ensure that the city is used widely and effectively as a resource for learning in all sectors and phases of education and training   |  |  |                         |                      |   |
| 43  | To ensure that the city is used widely & effectively as a resource for learning in all sectors & phases of education, including global citizenship, sustainable development and climate change | B&NES, Advisory Board members, GSTE  | Within existing budgets | Ongoing              | Monitor progress through engagement   |
| <b>Objective 16 Governance.</b> Ensure that management systems are appropriate for the effective implementation of the Plan, encourage community involvement, enable partnership working and secure the required funding. |  |  |                         |                      |   |
| 44  | Continue to maintain and resource an effective WH Advisory Board. Provide training to Advisory Board on World Heritage and World Heritage Management   | WH Advisory Board SMG members, B&NES & external WH organisations & professionals | Within existing budgets | Ongoing              | Advisory Board meetings held and well attended & productive. Advisory Board Chairperson has been recruited & is in place. |

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|   |  |                                  |                                 |         | Mid-term review undertaken. Evidence of training.              |
| 45  | Produce progress monitoring reports on this Management Plan at mid-term & end of term points   | B&NES                            | Within existing budgets         |         | Reports produced, circulated & presented to the Advisory Board |
| 46  | Improve the Bath WHS website to allow it to become an accessible repository for all key WH information                                       | B&NES                            | Within existing budgets         |         | Project instigated & completed                                 |
| <b>Objective 17 The wider UNESCO family:</b> Ensure continued liaison with other sites for learning from & helping others |  |                                  |                                 |         |  |
| 47  | Continue liaison with other UNESCO sites to learn from & help others. Maintain links with appropriate local, national & international bodies | B&NES, WH Advisory Board members | Largely within existing budgets | Ongoing | Evidence of liaison with other bodies. Evaluation of benefits  |