

[REDACTED]

From: Steve Baker (Place) [REDACTED]
Sent: 05 May 2026 12:35
To: Planning (HPBC)
Cc: James Stannard
Subject: HPK/2026/0134 The Natural Baths, The Crescent, Buxton. Internal works to alter and extend the hygiene room system, removal of existing doors, removal of internal walls and below ground works to create 3 no. new drainage trenches - archaeology

[REDACTED]

Dear James,
Thank you for consulting on this listed buildings application.

The Natural Baths are the most probable location of the Roman baths at Buxton, although the evidence is vague and it must be assumed that much has been lost during more recent activity on the site from the construction of The Crescent in the 1780s onward. There is an entry on Derbyshire HER (MDR337) for the approximate site of the Roman baths as reported in the Victoria County History of 1905 – this appears to be drawing on descriptions of something that was observed prior to construction of the Crescent itself. The HER entry concludes ‘The site of the bath is given as 6 yards from the then ‘Bathroom’ which is probably now represented by the Natural Baths close to St Anne’s Well [SMR 2836], at the west end of the Crescent’. We also have a record (MDR358) of material found in 1975 below ‘a swimming pool floor in the natural baths, ahead of the Canada Dry Commercial Development’, including a hoard of Roman coins in a fissure at the side of the spring, 17th century bronze pins and bracelets, a gold ring, a musket ball and a gold crown. A ‘brick structure’ is also described. Unfortunately the archaeological recording applied in 1975 seems no better than that when building Buxton Crescent in 1780.

We could conclude on the basis of this that the Natural Baths site is very archaeologically sensitive. Though clearly the phases of building and remodelling since 1780 are likely to have disturbed and removed a lot of the archaeology, it is entirely possible (as evidenced in 1975) that more remains below ground. The applicant has put together a heritage statement which summarises this potential (despite a little internal inconsistency).

Because the groundworks arising from the development are fairly limited, comprising the 3 proposed new drainage trenches, it is appropriate for the archaeological response to be secured by planning condition in line with NPPF para 218, and to comprise archaeological monitoring during the groundworks, scalable as appropriate in the event of significant remains or sensitive deposits being encountered.

The following condition should therefore be placed upon any listed building consent:

“No development shall take place until a written scheme of investigation (WSI) for archaeological work has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives; and:

- The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.”

Regards

Steve Baker MA MCIfA | **Archaeologist** | Conservation, Heritage and Design | Place | Derbyshire County Council | direct dial: [REDACTED]

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