

NOTE ON HISTORIC ENGLAND COMMENTS

The authors received comments from Historic England via the local authority on 7 October, 2025. Initial site boundaries were received at the same time, and it is understood the Historic England comments referred to those boundaries, or to an earlier version.

Updated boundaries were received on 11 December, 2025, and these reports were updated to reflect the revised boundaries. However, updated comments have not been received from Historic England, and their comments relate to the earlier site boundaries.

IDENTIFICATION OF HERITAGE ASSETS

Site Historic Background

The Site consists of three parcels of land located north of Leamington Spa, in the area of Blackdown Hill.

The land within the Site is agricultural. During the medieval period, areas of ridge and furrow indicate it was under cultivation. The agricultural nature of the landscape continued through the post-medieval period.

During the late 19th and early 20th centuries, several substantial gentlemen’s residences were built on the margins of the Site with some gardens extending into it, but the majority of the land remained agricultural.

Type of Asset	Name and Designation of Asset
Listed Building	<p>There are no listed buildings located within the Site.</p> <p>There are seven Grade II listed buildings within 500m of the Site, including:</p> <ul style="list-style-type: none"> – Three listed dwellings on Kenilworth Road, between 300m and 500m south of Site: <ul style="list-style-type: none"> ○ 36 Kenilworth Road (NHLE 1381338) ○ 38 Kenilworth Road (NHLE 1381339) ○ 46 Kenilworth Road (NHLE 1381340) – Three listed buildings in Old Milverton, 370m to 470m west of Site: <ul style="list-style-type: none"> ○ Church of St James (NHLE 1035192) ○ Barn 24 yards to east of Cottage Farmhouse (NHLE 1087101) ○ Cottage Farmhouse (NHLE 1364960) – Manor Farmhouse (NHLE 1427587)
Scheduled Monument	There are no scheduled monuments located within 500m of the Site.
Conservation Area	There are no Conservation Areas within the Site. Royal Leamington Spa Conservation Area adjoins the Site to the south.
Registered Parks and Gardens	Guy’s Cliffe Registered Park and Garden (RPG) lies 510m west of the Site, ie, just beyond the study area. It is included here for consideration as it was mentioned as a concern by Historic England.
Non-designated	<p>There are areas of ridge and furrow within the western parcel of the Site (MWA33878), and to the west and north of the Site within the study area.</p> <p>Within the Site to the east are the gardens of three 19th century houses: Bericote House garden (MWA12734); Blackdown Hill (hotel) garden (MWA12736); West Hill garden</p>

	<p>(MWA12986). Although these gardens are now partly used for agriculture, some mature planting remains.</p> <p>Adjacent to the Site to the north is a locally listed building, Jepson House and gardens (MWA12989), with Wallercote House garden just beyond (MWA12977). These are partly under residential development.</p> <p>Within the eastern parcel of the Site are clustered findspots indicating multiple phases of occupation, including prehistoric or Bronze Age (MWA22705, MWA22706), Romano-British (MWA22727, MWA22233), medieval (MWA22722, MWA22190, MWA22184, MWA22185) and post medieval finds (MWA22231). There are further findspots immediately east, including a Roman gold finger ring (MWA5936).</p> <p>Within the western parcel of the Site are further findspots of a flint flake (MWA2884), an Anglo-Saxon bead (MWA1384) and medieval artefacts (MWA22907)</p> <p>West of the Site, in the Old Milverton area, are indications of multiple phases of occupation including deserted medieval settlements (MWA4926, MWA5246); remains of a post-medieval settlement with medieval and post-medieval pottery (MWA5247); and a Roman coin hoard (MWA2241).</p>	
SIGNIFICANCE AND CONTRIBUTION OF SETTING TO SIGNIFICANCE		
Name of asset	Significance (heritage value) of the asset and setting (the surroundings in which the asset is experienced)	Contribution of the site to the significance of the asset
Within the Study Area		
<p>Royal Leamington Spa Conservation Area with 36 Kenilworth Road (NHLE 1381338), 38 Kenilworth Road (NHLE 1381339), and 46 Kenilworth Road (NHLE 1381340)</p>	<p>The Royal Leamington Spa Conservation Area (CA) covers the historic core south of the river and its 19th century extensions as it developed into a spa town. It is divided into numbered areas, those adjacent to the Site are 18 Kenilworth Road and 33 Northumberland Road. Within the study area, but not adjacent, is area 34 Lillington Road (North).</p> <p>Kenilworth Road, which includes the listed properties 36, 38 and 46, was laid out in 1834 to 1838 and consists of a series of large villas, of similar styles and spacings. Not all are listed, 36, 38 and 46 are very good examples of the type. The street is tree-lined and forms the gateway from the north into the CA. At the northern point, at the junction with the Site, is an unlisted but imposing Edwardian manor, now a legal business HQ known as Gables House.</p> <p>Northumberland Road consists of a later Victorian extension, with some 1950s infills. The CA appraisal notes that the gardens are important to the setting of the houses, and linking of plots for redevelopment is not appropriate. Most of the rears of the houses in the Area between Flyer Avenue and Bamburgh Grove are adjacent to the Site. These houses are in an imaginative mixture of styles, with long back gardens backing onto arable fields.</p> <p>Area 34 Lillington Road is a similar late Victorian development of large villas with good gardens and</p>	<p>These Areas of the CA are located to the south of the Site. The western parcel of land is adjacent to the CA at Areas 18 and 33. The Site contributes to the setting of the CA at these points as its immediate surroundings. It makes some contribution to its significance, as marking the limit of the historical development of the town.</p> <p>The Site does not contribute to the setting or significance of Area 34 of the CA due to encircling modern development.</p>

	<p>many trees lining the street. Beyond it to the north, outwith the CA, are more recent developments.</p> <p>The significance of the CA is principally evidential (in terms of the development of the town) and architectural</p> <p>The setting of Areas 18 and 33 of the CA are a mixture of more recent development and the open fields of the Site, with the town centre to the south. The setting makes some contribution to the significance of the CA, particularly at the south, and at the northern end of Area 18 where the fields mark the gateway to the town and the CA at the landmark Gables House.</p> <p>The setting of Area 34 Lillington Road of the CA is formed by modern development. Setting does not contribute to the significance of this part of the CA.</p>	
<p>Old Milverton group: Church of St James (NHLE 1035192) Barn 24 yards to east of Cottage Farmhouse (NHLE 1087101) Cottage Farmhouse (NHLE 1364960)</p>	<p>St James the Great church is a mid-Victorian adaptation of an early English church. The site has been a place of worship since the 12th century, but the current sandstone church was built in 1880, with only the foundations and base of the tower remaining of the earlier building. The tower has an unusual pyramidal roof and arcading around the upper storey. It is set in its own churchyard, with a small cluster of dwellings to the north. These include Cottage Farmhouse and its associated barn.</p> <p>The farmhouse is three bay, two storey brick house in its own gardens. The barn, a long, low structure, is timber framed with brick infill and tiled roof, and is adjacent to the road.</p> <p>The group's significance is principally derived from the assets' individual architectural interest and evidential group interest as representing the evolution of a village.</p> <p>They contribute to each other's setting, within a wider rural setting, which includes Manor Farmhouse to the south and Guy's Cliffe designed landscape to the west. This wider setting is bounded in a rough triangle by the A46 dual carriageway and A429 Coventry Road to the west, the Coventry-Leamington railway line to the east, and the suburbs of Leamington Spa to the south. The setting contributes to the significance of the listed assets.</p>	<p>The listed assets lie to the west of the western boundary of the Site. Although the Site forms part of the wider rural landscape, the listed assets are separated from the Site by the Old Milverton Road and by the Coventry-Leamington railway line, which passes through a shallow cutting at this point lined with mature trees.</p> <p>There is very limited, if any, intervisibility between the Site and the listed assets.</p> <p>The Site makes no contribution to the significance of the group of listed assets.</p>
<p>Manor Farmhouse (NHLE 1427587)</p>	<p>This very substantial, three bay, three storey farmhouse dates to the mid 19th century. It is constructed of red brick with tiled roof. The principal elevation is to the south west gardens, with fields</p>	<p>The listed asset lies to the west of the western boundary of the Site. Although the Site forms part of the wider rural landscape, the listed</p>

	<p>beyond. The asset's significance is principally derived from its architectural interest.</p> <p>It is set in its own gardens to the south and west, with agricultural buildings of various dates to the north and east around various farm yards. The wider setting is agricultural, including the designed landscape of Guys Cliffe House to the west. This wider setting is bounded in a rough triangle by the A46 dual carriageway and A429 Coventry Road to the west, the railway to the east, and the suburbs of Leamington Spa to the south. The setting contributes to the significance of the listed asset.</p>	<p>asset is separated from the Site by the Old Milverton Road and by the Coventry-Leamington railway line, which passes through a shallow cutting at this point lined with mature trees.</p> <p>It is also separated from the site by its own ancillary farm buildings, and its principal facade faces south west, away from the Site.</p> <p>There is very limited, if any, intervisibility between the Site and the listed asset.</p> <p>The Site makes no contribution to the significance of the listed asset.</p>
<p>Guy's Cliffe Registered Park and Garden (NHLE 1001602)</p>	<p>This Grade II listed Registered Park and Garden (RPG) surrounds the ruined shell of Guy's Cliffe House and its associated buildings.</p> <p>The landscape was designed in the early 19th century by Uvedale Price, but incorporates 17th century riverside walks and mid 18th century rococo gardens. The RPG includes various listed assets including a triumphal arch and entry lodge, and the Grade II* listed Chapel of St Mary Magdalene. The River Avon winds through the RPG roughly north to south, all the listed assets being on the west side. The east side consists of arable farming with some mature trees. Its significance is principally derived from its historic interest, due to its association with figures such as Guy, Earl of Warwick, and is also derived from aesthetic interest.</p> <p>The RPG is set in a wider rural landscape to the north, with the suburbs of Royal Leamington Spa and Warwick adjoining it to the south. The A46 Warwick Bypass also divorces it from the wider landscape to the west, as does, to a lesser extent, the railway to the east. The setting makes some contribution to its significance, though modern development has reduced this.</p>	<p>The listed RPG and its associated assets lie to the west of the western boundary of the Site. The RPG is just beyond the 500m study area, though an RPG may be considered to have a wider setting than an individual asset such as a farmhouse.</p> <p>The original rural landscape around the RPG has been greatly altered by modern residential development and infrastructure to the west and south.</p> <p>Although the Site forms part of the wider rural landscape to the east, the listed assets are separated from the Site by the Old Milverton Road and by the Coventry-Leamington railway line, which passes through a shallow cutting at this point lined with mature trees.</p> <p>There is very limited, if any, intervisibility between the Site and the listed assets. The Site makes no contribution to the significance of the group of listed assets.</p>
POTENTIAL IMPACT OF ALLOCATION ON SIGNIFICANCE		
Name of asset	Description of impact	
<p>Royal Leamington Spa Conservation Area with 36 Kenilworth Road (NHLE 1381338), 38 Kenilworth Road (NHLE 1381339), and</p>	<p>Development of the central and eastern parcels of the Site would have no impact on the significance of the CA or its listed assets. However, development of the western parcel of the Site would have some impact on the setting of the CA, particularly with regards to the gateway to the CA on Kenilworth Road.</p> <p>Although it would not affect the listed buildings of Kenilworth Road, it would have a minor negative impact on the significance of the CA.</p>	

46 Kenilworth Road (NHLE 1381340)	Historic England has expressed concerns about the impact of the development of this western parcel of land on the CA.
Old Milverton group: Church of St James (NHLE 1035192) Barn 24 yards to east of Cottage Farmhouse (NHLE 1087101) Cottage Farmhouse (NHLE 1364960)	Development of the central and eastern parcels of the Site would have no impact on the significance of the group of listed assets. Development of the western parcel of the Site would affect the wider setting of the listed group. Due to distance and intervening infrastructure (the road and railway line) this would have no impact on the significance of the listed assets. However, Historic England has expressed concerns about the impact of the development of this western parcel on the Old Milverton group.
Manor Farmhouse (NHLE 1427587)	Development of the central and eastern parcels of the Site would have no impact on the significance of the listed building. Development of the western parcel of the Site would affect the wider setting of the listed building. Due to distance and intervening infrastructure (the road and railway line) this would have no impact on the significance of the CA.
Guy's Cliffe RPG (NHLE 1001602)	Development of the central and eastern parcels of the Site would have no impact on the significance of the listed RPG. Development of the western parcel of the Site would affect the wider setting of the RPG. Due to distance and intervening infrastructure (the road and railway line) this would have no impact on the significance of the RPG. However, Historic England has expressed concerns about the impact of the development of this western parcel on the RPG.
Non-designated assets	Multiple find spots within the eastern parcel of the Site suggest there may be further remains. Although this is hard to assess, it seems likely that modern development of the Site has the potential to have a major impact on any buried remains. Modern development of the western parcel of the Site would also have a major impact on the remaining ridge and furrow areas.

MAXIMISING ENHANCEMENT AND MITIGATING HARM

Maximising Enhancement

Development in this area should respect the scale and mass of present settlements and buildings. They could also use traditional materials in keeping with the present buildings, such as brick, stucco and tiled roofs as well as having heights of buildings in keeping with those in Royal Leamington Spa. This could allow for the development of villas similar to those on Northumberland Road, or mansion flats similar to those on Kenilworth which have been divided. In addition, planning to allow for trees to line the streets would allow for a continuation of the style of the CA.

Mitigating Harm

Creating a large buffer around the Guy's Cliffe RPG would protect the rural setting of both it and the listed assets between the RPG and the Site, including Manor Farmhouse and the Old Milverton cluster.

Creating a buffer around Areas 18 and 33 of the Royal Leamington Spa Conservation Area would protect the setting of the CA. In particular, a buffer or green space could be created to protect the entrance to the CA at Kenilworth, to clearly delineate the historic limit of the town from the new development.

Due to the known presence of Roman and medieval assets within and close to the Site, it would be advisable to carry out archaeological investigations prior to any development in the Site as there is potential for previously unrecorded archaeological remains to survive within the undeveloped fields.