

Statement of Agreement between Bath & North East Somerset Council and English Heritage– December 2011

Introduction

English Heritage made representations on the Draft Core Strategy during the seven week consultation period (16 December 2010 – 3 February 2011). The Council, as part of its consideration of representations under Regulation 30 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, summarised the main issues arising from duly made representations from all respondents including those from English Heritage. The Council provided responses to the main issues identified as documented in the Regulation 30(1)(e) Statement (CD5/9).

Following consultation on a Schedule of Significant Proposed Changes(CD5/22) to the Draft Core Strategy and a Schedule of Potential Changes arising from the Draft NPPF (CD5/23) during the Examination period (19 September – 21 October 2011)English Heritage submitted further representations. Whilst these representations were received outside the consultation period and include some comments that do not directly relate changes in the two Schedules, English Heritage has since referred their representations to the Inspector for his consideration. In view of English Heritage’s status as a statutory consultee, in recognition of the importance of heritage issues to Bath & North East Somerset and in light of the fact that English Heritage considers that these are matters of soundness, the Council has agreed to provide a response with the intention of resolving their outstanding concerns. The schedule below reflects the outcome of the informal discussions between the Council and English Heritage. These changes are included in the ‘Schedule of Rolling Changes (CD6/E2) for consideration by the Inspector.

Please note that the changes to the Core Strategy suggested below update the latest version of a policy or paragraph as indicated. Deletions to existing text are shown as ~~strike through~~ and additional text is shown as underlined.

English Heritage Representations (October 2011)	B&NES Council consideration	English Heritage’s response
NPPF1 (Policy DW1)		
<p>1</p>	<p>The proposed adjustment to Policy DW1 suggests the delivery of sustainable development can be promoted by an exclusive number of policy highlights.</p> <p>English Heritage considers the only reference to the historic environment as a design qualification for the provision of modern offices in Bath is misleading, inaccurate and therefore unsatisfactory.</p>	<p>Concerns acknowledged. In recognition of the range and significance of Bath & North East Somerset’s important heritage assets and landscapes and their contribution to the economic well-being of the District, and its social, cultural and environmental distinctiveness as highlighted by English Heritage, it is conceded that Policy DW1 should be amended to this effect by the inclusion of an additional bullet point. It should bring the policy more into line with national planning policy.</p>
<p>Agree</p>		

English Heritage Representations (October 2011)	B&NES Council consideration	English Heritage’s response
<p>The draft NPPF and PPS5 is clear that to deliver sustainable development the historic environment needs to be conserved and enhanced. This matter is most apparent in Bath and North East Somerset due to the range and significance of nationally important heritage assets and landscapes and their contribution to the economic well-being of the District, and its social, cultural and environmental distinctiveness.</p> <p>We note at point 6 of DW1 that the generic <i>protection and enhancement of the Districts biodiversity</i> is a one of the Plans explicit key factors in the effective promotion of sustainable development. Isn’t the national importance of Bath and North East Somerset’s renowned historic environment as significant?</p> <p>The policy as it stands fails to recognise the balanced nature of the definition of sustainable development. It emphasises the importance of promoting various matters over and above protecting and enhancing the historic environment, contrary we believe, to the national planning policy.</p> <p>An effective conservation of the District’s cultural heritage is a determinant of relative sustainable development and should therefore be recognised in policy DW1.</p>	<p>SUGGESTED CHANGE(amends NPPF1)</p> <p>Amend Policy DW1 by inserting the following clause between existing clauses 5 and 6 (to be renumbered in the final version of the Core Strategy):</p> <p>‘Protecting, conserving and enhancing the district’s nationally and locally important cultural and historic assets’</p>	

Significant Proposed Changes			
<p>2</p>	<p>PC19 (Policy B1)</p> <p>The proposed adjustment to B2 8.b removes reference to Bath RFC and a generic sports stadium is now advocated including “and associated uses”. Has the nature and justification for the principle for a stadium in central Bath now fundamentally changed?</p>	<p>The proposed change to Policy B1 8 (b) (PC19) is not intended to suggest that the principle of a stadium in central Bath has changed but merely to make the policy less site specific since it appears to promote the interests of a particular organisation (see Regulation 30 1(e) consultation report, Key Issue: New Stadium, page 25). However in view of the clear townscape implications of successfully incorporating any major scheme within the sensitive locality of Bath it is suggested that text is added to Policy B1 to make it explicit that all the proposals specified in Policy B1 (including a stadium) are expected to protect and conserve Bath’s heritage assets as set out in Policy B1 (1) Natural and Built Environment.</p> <p>SUGGESTED CHANGE</p> <p>Insert the following text after Objective 1 in Policy B1:</p> <p>‘All of the following objectives will be considered in the context of part 1 of this policy.’</p>	<p>Agree</p>
<p>3</p>	<p>PC42 (Policy B4)</p> <p>With the changes now proposed it will be essential for the LDF to clarify what actually constitutes the indistinct statement, “<i>demonstrable public benefit including mitigating and adapting to climate change</i>”; and what level of development could harm the “<i>integrity and authenticity to the universal value of the world heritage site</i>”. Where is the tipping point? Previously deferring to PPS5 and by implication</p>	<p>Comments noted. The policy has been reworded to reflect national policy in PPS5 (HE.1 and HE.9) and is in line with the emerging NPPF (para 184). It is considered that a more ‘general’ caveat was needed given the requirement to weigh any proposed ‘public benefit’ against any harm to the significance of a designated site, in this case the OUV of the World Heritage Site and its setting. This means that where there is a demonstrable public benefit a potentially harmful proposal cannot be refused automatically without a full and proper evaluation of the pros and cons of the scheme. In view of imminent replacement of existing PPSs by the NPPF</p>	<p>Agree</p>

	<p>the associated PPS5 Good Practice Guide had provided greater clarity than now proposed. As such is it now necessary to include this sentence at all in this introductory passage? Isn't this matter best dealt with at Policy CP1; CP6 and PC84 para 6.41 a (as proposed to be amended)?</p>	<p>reintroducing a reference to PPS5 in the policy does not seem advisable. Nonetheless, in line with advice in the PPS5 Good Practice Guide, there is now a reference in Policy CP6 to the commitment to preparing further strategies and guidance which will help provide greater clarity (see below) and reference in para 6.41a to the production of a SPD which will identify opportunities for heritage assets to mitigate and adapt to effects of climate change.</p> <p>NO CHANGE SUGGESTED</p>	
<p>Outstanding significant issues</p>			
<p>4</p>	<p><i>“The LDF should establish a proactive conservation response to the relative condition of the heritage assets in the district (PPS5, policy HE3). What is the Core Strategy’s intended approach to addressing the conservation areas, listed buildings and scheduled monuments (e.g. the Wansdyke) under threat as highlighted in the evidence base (heritage@risk surveys)”.</i></p> <p><i>“We note a commitment to the preparation of for example, a Green Infrastructure Strategy to be applied to secure contributions towards the upkeep of ‘natural’ assets and to undertake new initiatives across the District. English Heritage recommends the preparation of an equivalent heritage strategy to do likewise and conserve and enhance its ‘historic’ infrastructure. This could draw together the various heritage related initiatives to be undertaken, as above, and confirm how they will be applied”.</i></p> <p>The expression of the Core Strategy’s positive and</p>	<p>A heritage strategy for B&NES is set out in the Core Strategy and a range of other initiatives are being undertaken by the Council and its partners. It is accepted that this could be drawn together and expressed in a more proactive coherent manner within the Core Strategy. Policy CP6 could better reflect existing and emerging national planning policy but also to provide a more positive policy framework for other LDF documents and heritage related projects and programmes the Council might undertake. Therefore it is suggested that Policy CP6 is amended to this effect with the intended strategy for the historic environment clearly set out in the Delivery section to Policy CP6(2).</p> <p>SUGGESTED CHANGE(further amends PC86)</p> <p>Amend Policy CP6(2) to read:</p> <p>2. Historic Environment</p> <p>The cultural and historic environment will be preserved or enhanced, and sites, buildings, areas and features of recognised national and local importance and their</p>	<p>Agree</p>

<p>proactive strategy for the conservation of the District's historic environment in Policy CP6 is inadequate. We note the inclusion of 2 indicators (ref FPC26) relating to conservation areas and listed buildings at risk but there could and should be much more to the Districts strategy for its historic environment. Consider the approach taken at pt 4 of the same policy CP6 relating to Nature Conservation. The same degree of consideration to the historic environment should be given in response to the historic environment to satisfy PPS5 HE3.1. <u>Throughout the Core Strategy, and this letter, there are references to potential components of a satisfactory strategy for the conservation of the Districts historic environment. The Core Strategy needs to draw these matters together at CP6 in a more coherent fashion. This should be achievable in a relatively straightforward manner.</u></p>	<p>settings will be protected.</p> <p><u>The sensitive management of Bath & North East Somerset's outstanding cultural and historic environment is a key component in the delivery of sustainable development. The Council will protect, conserve and seek opportunities to enhance the historic environment including the character and setting of designated and other heritage assets.</u></p> <p><u>The sensitive reuse and adaptation of historic buildings and spaces will be supported, and in areas where regeneration is required the integration of new development with the historic environment will be promoted.</u></p> <p>Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against any harm to the significance of the heritage asset.</p> <p><u>The Council will develop strategies and guidance which ensure the historic environment and its significance is understood, recorded, promoted and enjoyed, and is sensitively and proactively managed, including those historic assets most under threat. A positive and proactive conservation strategy will be promoted through the Placemaking Plan.</u></p> <p><i>Delivery:</i></p> <p><i>Historic Environment</i></p> <p><i>Delivery will be principally through the Development Management process. And Conservation Area Appraisals and other supplementary planning documents and guidance</i></p>	
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5	<p><i>“English Heritage would encourage the preparation and adoption of a ‘local list’ of heritage assets in partnership with the local community; the identification of areas and/or sites of potential archaeological interest; and village design statements (refer to PPS5 and the associated practice guide)”.</i></p>	<p>Consideration of the preparation of a ‘local list’ can be made in the Delivery section for Policy CP6(2) subject to the availability of resources. Policy CP6 Delivery section does already state that the preparation of management plans and other proactive strategies will be encouraged to support policy delivery. Nonetheless it is recognised that the intention to prepare management plans etc. should be expressed in more positive terms and suggest that ‘will be encouraged’ is replaced by ‘will be developed’ in the Delivery section for the policy.</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2) DELIVERY SECTION</p>	Agree
6	<p><i>“Having regard to your evidence including heritage at risk surveys, you may also wish to consider whether the exercise of permitted development rights undermines the aims for the historic environment. Might article 4 directions be advocated to ensure any development is given due consideration?”</i></p> <p>There appears no consideration of this matter? It could form part of the Core Strategy’s positive and proactive strategy for the conservation of the District’s historic environment.</p>	<p>Comments noted. Agree that the use of Article 4 Directions could form part of a positive and proactive strategy for the conservation of the historic environment if considered appropriate. The suggested rewording of Policy CP6 would set in place a proactive framework within which this course of action would be considered (see Point 4 above). Reference to Article 4 Directions as one measure for resolving conservation issues can be made in the Delivery section to Policy CP6(2).</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2) AND DELIVERY SECTION</p>	Agree
7	<p>Transport - <i>“Greater emphasis therefore must be placed upon the need for transport infrastructure to be of high quality design that respects local</i></p>	<p>Concern acknowledged. Policy CP6 is a high level strategic policy which requires, as its overarching principle, <i>high quality and inclusive design which reinforces and contributes</i></p>	Agree

	<p><i>context and character, including the historic environment. The Core Strategy provides an opportunity to make this case at a strategic level”.</i></p> <p><i>“What design principles will apply to highway/traffic/transport schemes within sensitive historic locations? How can you ensure the works associated with showcase bus routes are appropriate to a world heritage site? How will excessive signage and lighting be avoided for example? How can sensitive practice be assured?”</i></p> <p>There appears no reference to the above in the Regulation 30 consultation report. Were these matters considered?</p>	<p><i>to its specific local context, creating attractive, inspiring and safe places. This applies to all design including transport infrastructure and schemes. More detailed policies can be considered through the Placemaking Plan as appropriate within planning powers. The Council will liaise closely with English Heritage through the preparation of the Placemaking Plan to ensure heritage issues are properly reflected. See also the suggested changes to Policy CP6(2).</i></p> <p>SUGGESTED CHANGE(amends FPC9)</p> <p>Amend Policy CP6(1) to read:</p> <p>1. High Quality Design</p> <p>The distinctive quality, character and diversity of Bath and North East Somerset's environmental assets will be promoted, protected, conserved or enhanced through:</p> <p>a: <u>high quality and inclusive design of schemes, including transport infrastructure,</u> which reinforces and contributes to its specific local context, creating attractive, inspiring and safe place.</p> <p>b: <u>assessing</u> all major development schemes with a residential component should be assessed using the Building for Life design assessment tool (or equivalent methodology). As a guide development should meet its “good” standard.</p>	
<p>8</p>	<p>Green Infrastructure – <i>“The heritage value of open spaces with regard to Green Infrastructure planning should be explicitly recognised. For example many of the open spaces that form the network are of historic origin in terms their design, relationship with their surroundings and</i></p>	<p>These points were broadly addressed in the Regulation 30 1(e) consultation report the under Issue 8.08: Green Infrastructure, point 8 (page 94) as follows:</p> <p>‘Issue 8. The heritage value of open spaces with regards to Green Infrastructure planning should be explicitly recognised - not all of the open spaces are naturally</p>	<p>Agree</p>

	<p><i>continued management. Not all of the open spaces are naturally derived”.</i></p> <p><i>“Also the term ‘green’ can be misleading, as many of the key open spaces that help define the network are hard in landscape character. Many include a hard surface but ‘greened’ by tree planting or managed borders. ... It is important to ensure that it is developed from a basis of understanding the heritage value of open spaces and historic landscapes across the district. Many of which are Registered Historic Parks and Gardens, represent a component part of the special character of conservation areas or provide the setting to listed buildings and schedule monuments”.</i></p> <p>There appears no consideration of these matters or reference in the Regulation 30 consultation report. Were these matters considered?</p>	<p>derived.</p> <p>Response: 8. Paras 6.56 and 6.57, which are not intended to be an exhaustive list of green assets, nonetheless recognise the importance of the historic environment as an important feature of Green Infrastructure.’</p> <p>Preparation of the Green Infrastructure Strategy is underway and recognises the importance of heritage assets as an integral part of the developing a coherent Green Infrastructure network as reflected in the suggested change to the Delivery section for Policy CP6(2). English Heritage continues to be a key stakeholder and has been actively involved in the development of this strategy.</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2) AND DELIVERY SECTION</p>	
<p>9</p>	<p>Delivery – <i>“Heritage assets should be recognised (at 2.49 for example) as key ‘infrastructure’, as historic buildings, spaces and places are essential components that contribute to the quality of the local environment and are highly valued by their local community”.</i></p> <p><i>“English Heritage wishes to draw attention to the potential for promoting improvements to the historic environment, in order to support the delivery of emerging core strategy policy that relate to the historic environment. This is particularly relevant given the new emphasis given to plan making and the historic</i></p>	<p>Concerns noted. This representation raises matters similar to those in Point 4 above. Whilst the Council will need to demonstrate more explicitly how it is promoting a positive and proactive conservation strategy through the preparation of the Placemaking Plan (through characterisation appraisals and more detailed policy wording etc.) it is considered that many of these aspects could also be addressed through the development of a Heritage Strategy or equivalent within the context of the suggested amendments to Policy CP6 as set out above (see Point 4). There may also be the potential to consider the funding of historic environment improvements and/or mitigation through the review of Planning Obligations SPD and through preparation of the Regulation 123</p>	<p>Agree</p>

<p><i>environment in PPS5 Policy HE3 ‘...Local Development Frameworks should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area’”.</i></p> <p><i>“In the context of the Community Infrastructure Levy (see CLG Community Infrastructure Levy – An overview, November 2010, and the Planning Act 2008), a wide definition of infrastructure continues to be promoted in terms of what can be funded to support the development of an area. The key areas include: Open space: as well as parks and green spaces, this might also include wider public realm improvements, conservation area appraisal and management plans, and green infrastructure; ‘In kind’ payments, including land transfers: this could include the transfer of an ‘at risk’ building; repairs and improvements to heritage assets where they are an infrastructure item as defined by the 2008 Act, such as cultural or recreational facilities”.</i></p> <p><i>“Section 106 agreements also offer further opportunities for funding to enhance and/or mitigate the impact on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets”.</i></p> <p><i>“Significant new development in Bath will increase the use, demand and impact on the built heritage and townscape features. Is it reasonable therefore to expect development value generated by the historic environment to contribute towards</i></p>	<p>statement (CIL prioritisation). These points are reflected in the suggested changes to Policy CP6(2) and its Delivery section.</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2) AND DELIVERY SECTION</p>	
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	<p><i>its upkeep”?</i></p> <p>How were these matters considered? Might they form part of a positive and proactive conservations strategy?</p>		
<p>10</p>	<p>English Heritage drew to your attention that “...<i>the survey undertaken demonstrating Keynsham town centre conservation area ‘at risk’ was undertaken by BANES not English Heritage (para 3.19).</i>” It appears this matter has not been corrected.</p>	<p>Agree that reference to English Heritage should be removed from within the context of this section. The text could be improved to more accurately reflect the condition of Keynsham Town Centre Conservation Area.</p> <p>SUGGESTED CHANGE(amends para 3.19(a) of the Draft Core Strategy)</p> <p>Amend 3.19(a)to read:</p> <p>‘English Heritage currently considers the historic characteristics of the town centre Conservation Area to be are currently undermined‘at risk’ due to by unsympathetic post-war development, resulting in damage to the historic grain and character, loss of traditional shop fronts and loss of small building frontages <u>and therefore on the national Heritage at Risk Register.’</u></p>	<p>Agree</p>

<p>11</p>	<p>English Heritage posed the question “Will significant heritage assets be included on the proposals map?” In response you stated “<i>The district's significant heritage assets as identified through the Local Plan remain on the Proposals Map and will be updated as changes arise</i>”. Could you please confirm this is correct, and if so what Proposals Map is being referred to?</p>	<p>The Local Plan Proposals Map remains part of the Development Plan and forms the basis of the LDF Proposals Map. It currently and will continue to show heritage assets where they relate to a policy, i.e. Conservation Areas, the World Heritage Site, Historic Parks and Gardens, Lansdown Battlefield, Scheduled Ancient Monuments. This will be updated as changes occur as previously mentioned, through the Placemaking Plan the first instance.</p> <p>NO CHANGE SUGGESTED</p>	<p>Agree</p>
<p>Regulation 30 1(e) consultation report</p>			
<p>12</p>	<p>Issue number 8.03 (pg 91) Council response point 1 “<i>it is considered that including 'where appropriate' makes the policy(CP6) too ambiguous</i>”.</p> <p>We repeat our concern regarding policy CP6 that refers to “preserving or enhancing” the historic environment. To have due regard to national planning policy (Draft NPPF section 24; PPS5 Annexe 2; PPS5 Practice Guide 3) 11) we request “or” is replaced with “and”. If a qualification is deemed necessary, “and where appropriate” could be employed.</p>	<p>The inclusion of ‘preserved or enhanced’ in Policy CP6 (2) is a reference to the requirements of primary legislation. However the Council is aware that PPS5 defines ‘conservation’ as <i>the process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance</i> and that PPS5 Practice Guide talks about conserving heritage assets and requiring change to them to be managed in ways that sustain and where appropriate enhances their heritage significance. In the light of this guidance and the emerging policy advice in the draft NPPF that Local Plans should <i>contain a clear a clear strategy for the environmental enhancement of an area</i> the Council agrees that Policy CP6 could be reframed to reflect this more positive approach.</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2)</p>	<p>Agree</p>
<p>13</p>	<p>Likewise, again to address national planning policy (Draft NPPF section 24; PPS5 Annexe 2; PPS5 Practice Guide 3) policy B1 section 1 should</p>	<p>In view of the declaration at para 6.42 of the Draft Core Strategy that policy will complement PPS5 and to reflect emerging national planning policy it would be prudent to</p>	<p>Agree</p>

	<p>be adjusted to replace to “Protect, conserve and where <u>possible</u> enhance” to “protect, conserve and where <u>appropriate</u> enhance” as the distinction lies in an expectation that development makes a positive contribution where the circumstances demonstrate it would be appropriate to do so. The specific expressed concern of English Heritage regarding policy B1 does not appear in the Regulation 30 1(e) consultation report.</p> <p>The Core Strategy is clear at paragraph 6.42 of the intention to complement PPS5. The above requested change should be made to demonstrate this is the case.</p>	<p>amend the wording of Policy B1 as suggested (see also Point 12 above).</p> <p>SUGGESTED CHANGE(amends Policy B1 of the Draft Core Strategy)</p> <p>Amend Policy B1(1)to read:</p> <ol style="list-style-type: none"> 1. ‘Natural and Built Environment Protect, conserve, and where possible<u>appropriate</u>, enhance:’ 	
<p>14</p>	<p>Issue number 8.03 (pg 91)</p> <p>Council response point 5 “<i>Conservation Area Appraisals and their review are outside the scope of the Core Strategy. Commitment to undertake CA reviews is expressed in para 6.43</i>”.</p> <p>English Heritage would contend that a commitment to up-to-date Conservation Area Appraisals are not outside the scope of the Core Strategy but an essential component of delivering the Districts own commitments to its cultural heritage and the governments expectation expressed in national policy that adequate evidence is available to deliver a “positive, proactive strategy for the conservation and enjoyment of the historic environment” (PPS5 HE3.1). If Conservation Area Appraisals are clearly out of date and unable to be applied to inform</p>	<p>The Council would stress there is a commitment to undertake <i>Conservation Area Appraisals and their reviews</i> as expressed in para 6.43. The Delivery section to Policy CP6 also acknowledges that <i>Conservation Area Appraisals and other supplementary planning documents and guidance will be used to guide decisions on development proposals that affect the historic environment</i> and therefore clearly recognised as being an essential component in delivering a strategy for the historic environment. The Council’s response to Issue 8.04 (Regulation 30 1(e) consultation report, page 91, point 5) related to the fact that the actual process/preparation of the Conservation Area Appraisals and their reviews are outside the scope of the Core Strategy. Nevertheless a change is suggested to the Delivery section for Policy CP6(2) to make it clear that the Council will seek to maintain up-to-date Conservation Area appraisals will be maintained as a key component of the heritage strategy for the district.</p>	<p>Agree</p>

	<p>effective conservation practice an explicit commitment needs to be made when they will be updated in the relevant Delivery section to the Plan.</p>	<p>SEE SUGGESTED CHANGE TO POLICY CP6(2) AND DELIVERY SECTION</p>	
15	<p>Issue number 8.03 (pg 91)</p> <p>Council response point 6&7 <i>“Para 6.42 makes it clear that Policy CP6 complements the policies in PPS5. The detail in PPS5 does not need to be repeated in the Core Strategy”</i>.</p> <p>The Council should review the need to introduce the suggested additional text in light of the lack of a conservation strategy – see above – and the emerging NPPF (suggested additional text summarised at point 6 of the Regulation 30 1(e) consultation report issue number 8.03 pg 91).</p>	<p>Concerns noted. English Heritage is commenting on the Council’s response to issues raised by the Bath Preservation Trust and Cadbury Kraft Foods. The ‘suggested additional text’ referred to was:</p> <p>6. Para 2 of Policy CP6 should set out the two or three key aspects of protection of the historic environment - encouragement of sensitive adaptation/reuse of historic buildings, paying particular attention to building heights/view management, and reduce the pressure on historic assets by reducing vehicle movements in sensitive areas. Delete second sentence of para 2 unless there is a robust method of assessment of ‘contribution to climate change’.</p> <p>The suggested changes to Policy CP6(2) now set out the broad framework within which the issues identified can be addressed with the inclusion of a reference to the Placemaking Plan having a role in promoting a positive and proactive conservation strategy. If needed, more detailed policies can be developed through the Placemaking Plan.</p> <p>SEE SUGGESTED CHANGE TO POLICY CP6(2)</p>	<p>Agree</p>
16	<p>Issue number 3.12 (pg 55)</p> <p><i>“Policy B5 relating to Bath Spa University should include a caveat as follows “...should seek to optimise opportunities...and having regard to sites environmental capacity and the significance</i></p>	<p>Comments acknowledged. The Council agrees that in recognition of the Newton Park’s special environmental constraints and historic assets particularly associated with its destination as a Registered Historic Park and Garden the wording suggested by English Heritage would usefully strengthen the policy to ensure that these issues were</p>	<p>Agree</p>

<p><i>of the heritage assets”.</i></p> <p>We note that this specific suggestion regarding policy B5 does not appear to have been referred to or addressed in the Regulation 30 1(e) consultation report.</p>	<p>addressed from the outset.</p> <p>SUGGESTED CHANGE(amends PC47)</p> <p>Amend Policy B5 to read:</p> <p>Bath Spa University - Newton Park Campus</p> <p>Within the context of a strategic framework for all twelve sites that the University occupies the strategy seeks the redevelopment and intensification of the Newton Park Campus to provide additional study bedrooms and academic space. Proposals should seek to optimise opportunities within the Major Existing Developed Site in the Green Belt Designation (MEDS)and in accordance with Policy GB.3 of the B&NES Local Plan before seeking to justify very special circumstances for development beyond it, <u>having regard to site’s environmental capacity and the significance of the heritage assets.</u></p>	
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