

ID7 2.1 Has the Council had appropriate regard to the balance of factors listed in PPS3, paragraph 33?

ID7/ 2.2 If the requirements of the draft NPPF in relation to planning for housing and employment were to become national policy before the close of the Examination, would planned provision meet those requirements (in particular paragraphs 13, 14 first bullet, and 20-30)?

ID/7 2.13 If the assumptions in the Stage 2 Report/TP9 are reasonable/justified in calculating a need for 12,100 dwellings (as now corrected):

- **Is the Council justified in planning for 9% less at 11,000 dwellings?**
- **Prior to TP9, all the Council's justification has been in the context of a smaller gap a need of 11,600 – where/when has the Council weighed this larger gap in its decision making?**
- **What are the consequences of planning for less than the assessment?**

1. In relation to **ID7 2.1**, our view is yes, noting the findings of the sustainability appraisal in relation to the environmental aspects of development in Bath's green belt, the AONB and the setting of the World Heritage Site. BPT's submission reference **224/3S** suggested that DW1 should recognise that the special status and qualities of Bath – particularly those underlying Bath's World Heritage status - would limit its capacity for growth. This is referred to in Core strategy Section 1d, para 1.21, but unless it is included in the overarching strategy it remains weakened.
2. We proposed a textual change to DW1 to reinforce the reference to national and international designations, which we further recommend in light of the fact that it has not been included to date in the Council's subsequent changes. We believe that unless the Council assert the special qualities of the City, in its overarching sustainable development policy, there will be an inadequate policy framework to ensure that the environmental aspects of sustainable development are properly defined to give clarity to developers for sites both within and immediately outside the City.

3. We note that while there are no separate statutory protections for a WHS there are statutory protections for the historic environment. The landscape setting – a City **inside** a bowl of hills – features within the World Heritage Site designation.
4. In relation to **ID7/ 2.2** , we note further that some rewording has been proposed by the Council in relation to DW1 in response to the draft NPPF. We believe their changes have not fully taken into account the emphasis in the NPPF of the historic environment and the environmental elements of sustainability.
5. The draft NPPF makes several references to the fact that local authorities should treat World Heritage Sites and their settings as of the **highest significance**: for example (*para 181, draft NPPF*) *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset [BPT emphasis]) taking account of the available evidence and any necessary expertise. They should use this assessment when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.*
(*para 183, draft NPPF*) *Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites,[BPT emphasis] should be wholly exceptional.*
In the Prime Minister's letter to the National Trust in relation to the draft NPPF, he says:
'I believe that sustainable development has environmental and social dimensions as well as an economic dimension, and we fully recognise the need for a balance between the three. [the reforms will] increase local discretion by giving residents greater choice than ever before, through local and neighbourhood plans, to decide the look and feel of the places that they love...[...].our reforms will maintain protections for the green belt, for national parks and for Areas of Outstanding Natural Beauty.'
6. There are also significant economic benefits to Bath of its special urban and rural setting. Some £400m of tourist income flows into the economy of B&NES as a result largely of the unique architectural heritage in its rural setting.

7. We therefore believe that the provisions of the draft NPPF with regard to housing must be read in tandem with the provisions of the draft NPPF for the protection of the historic environment and green belt, and that seen as a whole the Council is entitled to argue its case as presented in the context of the draft NPPF.

8. In relation to **ID/7 2.13**, it is unfortunate that the Council has presented inconsistent figures. We believe that in planning for housing numbers in and immediately around Bath there must be proper regard for the constraints related to site availability .We do not believe Objectives 3 & 5 should be considered in isolation from Objective 2. As argued above we believe the Council can justify its strategic case in light of the unique environmental constraints of the City of Bath World Heritage Site.