

**ID/7 6.4 Are the expectations of development consistent with the retention of the Outstanding Universal Value of the World Heritage Site? What evidence underpins the Council's assessment on this point?**

**ID/7 6.5 Are proposed significant changes PCs 42, 43, 44, necessary for soundness? Are proposed minor changes PCs 40, 41 and 45 so complementary to the above that they should also be treated as significant changes?**

1. Our answer is broadly yes to both questions.
2. Bath Preservation Trust understands that the Council's assessments of the development capacity of sites within the World Heritage Site have been informed by the Bath Building Heights Strategy (**CD4/UDL2 to 5**), the Urban Design Led Reviews of the City Centre and Bath Western Riverside East/Green Park (**CD4/UDL 15 and CD4/UDL16**) and the World Heritage Site Setting Study (**CD6/01 and CD6/57**). BPT played an active part in the development of both the Bath Building Heights Strategy and the WHS Setting Study and we consider that they provide a sound basis for assessing the impact of development proposals on the Outstanding Universal Value of the WHS.
3. We strongly support the Council's intention to press ahead with regeneration of the Avon river corridor and the redevelopment of the under-developed and soon to be redundant **MoD sites**.
4. We support the intention to concentrate development within the city boundaries so as to protect the green landscape setting.
5. We agree with the implication in question 6.5 that changes **PCs 40 to 45** should be considered together. The new wording of Policy B4 and its supporting text in Section 2e is a considerable improvement over the consultation draft. We particularly welcome PC 44 (paragraph 2.33a) which reflects the intention behind our representation 244\36.
6. However we continue in our view that the Core Strategy will be **unsound** unless it contains a firm commitment that both the Bath Building Heights Strategy and the WHS Setting Study will be incorporated into Supplementary Planning Documents, thereby ensuring the appropriate level of protection for

the Outstanding Universal Value within the framework of planning law (see representations 224\33 and 224\37).

7. We welcome the statement in **CD/57 para 4.4** that the Building Heights Study 'will form the basis of a Supplementary Planning Document'. The last sentence of para 2.35 needs to be amended to reflect this commitment.
8. In the case of the WHS Setting Study, we remain unconvinced by the Council's argument in **CD6/57** that a formal buffer zone is not necessary. We agree **that the area of protection needs to reflect the topography, landscape features and views** and that a uniform boundary of say 2km around the city would be inappropriate. However we consider that the Setting Study provides all the evidence necessary to define a flexible 'smart' buffer zone and that formal designation of the zone is essential to comply with the Government's obligations under the UNESCO operational guidelines (**CD1/19**). See also our representation **224\33**.
9. In addition, the Council must commit to producing a comprehensive Conservation Area Appraisal for the City of Bath. This is an essential tool for developers seeking to understand the context of the World Heritage Site so that they can bring forward proposals which comply with new paragraph 2.33a (PC44) thereby reducing consultation time, costs and uncertainty for all concerned. The current City-Wide Character Appraisal (CD4/UDL1) is superficial and not fit for purpose.
10. **Chapter 7 (Monitoring and Review)** still requires amendment to ensure that it properly reflects the development policy objectives set out in the Strategy. For example, the expectation is that virtually all the 6,000 new homes and the net increase in employment space to be delivered in Bath will be on previously developed land, consistent with the Council's clear and very welcome commitment to prioritise the use of brownfield sites. It is therefore illogical to set an objective of 60% of new homes to be delivered on brownfield sites (4<sup>th</sup> bullet point of section 5, page 113/114), particularly when that figure no longer reflects Government policy.
11. In relation to CP6 and the monitoring of the Historic Environment, we welcome the addition of indicators covering the Buildings at Risk Register and the WHS Management Plan. We welcome the inclusion of **Conservation Area Appraisals** and Management Plans but are concerned that the Council is concentrating its limited resources on the numerous smaller Conservation Areas across the District (for example, Claverton Village). The Core Strategy

must instead give priority to producing an up-to-date **Appraisal and Management Plan for the large and complex City of Bath Conservation Area**. An indicator which refers simply to the number of Conservation Area Appraisals in place, irrespective of their size and significance, risks skewing priorities.

12. We are unsure what the Council has in mind for the indicator relating to the adoption of Historic Environment related SPDs. **PC 84 (para 6.41a)** mentions the SPD relating to the modification of heritage assets to mitigate and adapt to the effects of climate change, which we strongly support. We recognise that other SPDs may well be needed to fill policy gaps, particularly given the intention to cancel PPS5 and the recent announcement of the Government's intention to consult on simplification of the Listed Buildings Consent regime (Implementation of the Penfold Review BIS November 2011). The Core Strategy or the LDS must identify which aspects of the Historic Environment are to be prioritised in drawing up new SPDs.