

Core Strategy Proposed Hearing 17 September 2013–submission for consideration by the Inspector

1. Bath Preservation Trust has read the documents issued by the Inspector and the Council as well as other submissions. **We request that this additional submission is taken into account in determining attendance at the first hearing.**
2. While some of the Trust's submissions in relation to housing provision in the Green Belt might appear to be site-specific, our key point is a general one about the realistic housing capacity for Bath given the constraints of the World Heritage Site Setting, the AONB and the openness and purposes of the Green Belt.
3. Bath is the UK's only city to be designated as a World Heritage Site in its entirety, and its setting should according to the UNESCO convention be protected. The NPPF is quite clear that conservation areas, AONBs, WHSs and their settings and the Green Belt should be protected according to law and/or planning guidance. It follows that Bath, with its unique accumulation of these constraints, has an environmental capacity which should be clearly expressed as a limit on housing land supply capacity and thus on capacity to meet housing numbers. In other words, Bath should be recognised as needing to fail to meet its theoretical housing numbers in order to meet its nationally and internationally designated environmental and cultural constraints.
4. Under NPPF 14 and its footnote 9 and the core planning principles in NPPF 17, we believe that B&NES can and should present an NPPF-compliant Core Strategy which recognises that not all the desired housing can be placed in and around Bath as the major conurbation and economic centre within the authority. Such a strategy would comply with the NPPF provisions regarding AONB, Green Belt and the protection of heritage assets including World Heritage Sites and their setting.
5. We make this point at this stage because we believe it should inform any decisions about the extent to which B&NES attempts to meet Bath's calculated housing need overall, rather than only being presented as a site-specific argument.
6. We recognise that B&NES might be expected to find its housing requirement either in other parts of B&NES, or indeed through dialogue with the 2 HMAs which it straddles. However, if West Wiltshire/Mendip on the one hand, and Bristol on the other, insist that they can meet their own housing targets and do not want to absorb any of B&NES' requirement, what does B&NES then do? It seems the answer of many of the Inspector's correspondents is simply to build on Bath's green belt willy-nilly to meet the calculated requirement.
7. This cannot be correct, and fails completely to meet the NPPF guidance and the UNESCO requirement that the 'State Party', here represented by PINS as the Secretary of State's agent, should explicitly '*act on the reinforced protection of the landscape surrounding the property (City of Bath) to prevent any further development which could have an adverse and cumulative impact on the OUV of the property and its integrity*'.
8. In our earlier submissions we have asked for there to be a clear instruction to consider and determine the environmental capacity for Bath and to determine how its integrity as a WHS is to be maintained before finally concluding the housing numbers for the City and in turn the authority.
9. **If it is appropriate for this to be clarified at the 17 September hearing, therefore, we request to participate.**