



Historic England

Bath & North East Somerset Council  
Planning Policy Team  
Lewis House  
Manvers Street  
Bath BA1 1JG

07 October 2021

**Response by email:** [planning\\_policy@bathnes.gov.uk](mailto:planning_policy@bathnes.gov.uk)

Dear Sirs,

### **B&NES Local Plan Partial Update (LPPU) – Regulation 19 (Publication) consultation**

Thank you for consulting Historic England. As the Government's adviser for the historic environment, we are keen to ensure that the conservation of the historic environment is taken into account in the preparation of the LPPU and associated Sustainable Construction and Retrofitting Supplementary Planning Document (SPD).

The following comments have regard to the National Planning Policy Framework 2021 (NPPF) in relation to the conservation, enhancement and enjoyment of the historic environment, and relevant information and advice provided by Historic England on plan making for the historic environment; available on our website <https://historicengland.org.uk/advice/hpg/historic-environment/devplan/>

Our ongoing and constructive engagement with you is reflected in the latest iteration of the changes to the LPPU and they appear to satisfactorily address the aforementioned NPPF and advice in relation to the historic environment. If however contentious heritage related matters do arise following this period of consultation do please contact me.

Previous Historic England correspondence (notably 22 May 2020 and 16 February 2021) acknowledge your intention to fully review the Local Plan alongside the WECA Spatial Development Strategy (SDS), which is scheduled for publication in 2023. This will provide an opportunity to:

- Consider an update of the plan's positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- Address the relative progress of the City of Bath World Heritage Site Management Plan, and the implications of the recent inscription by UNESCO of Bath as one of the Great Spa Towns of Europe.
- Set out an (indicative) programme for the preparation of the outstanding Conservation Area Appraisals in the District, and ideally associated management plans, mindful that under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 local planning authorities have a statutory duty to draw up and publish proposals for the preservation and enhancement of conservation areas in their districts from time to time.



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Previous correspondence also highlighted the importance of you sharing the evidence that you have gathered and applied to demonstrate that the historic environment has informed the LPPU. Proposed allocations and policy are caveated with heritage conditions to help ensure future applications positively respond to historic interest; however, the aforementioned evidence does not appear to be available. This is likely to be easily clarified/addressed.

### Climate change

The global climate crisis is the most significant threat to people and their cultural heritage. We recognise the urgent need for positive action and as such welcome the principle of the LPPU initiatives including the associated Sustainable Construction and Retrofitting Supplementary Planning Document (SPD). We note that you recognise, and advocate, appropriate initiatives that can safeguard the significance of heritage assets that are vulnerable to change, whilst improving energy performance.

In addition to considering changes to historic fabric, we are keen to encourage a recognition of the positive contribution that the historic environment can make to understanding sustainability and addressing climate change mitigation and adaptation, such as the inherent sustainability of reusing existing structures to ensure embedded energy is retained. We consider that the goals of addressing the causes of climate change, reducing greenhouse gas emissions, sustainability and conserving our heritage are compatible. Historic England's website contains a lot of relevant information and advice, especially on energy efficiency and energy generation, and you may wish to provide links to these in the related LPPU proposals.

### High Streets

The Milson Quarter initiative in Bath that is referred to in the LPPU recognises the need to proactively respond to the changing nature of the high street. The Keynsham and Midsomer Norton [High Street Heritage Action Zones](#) are another example of a proactive planning initiative seeking to promote and improve the historic, cultural and place offer, and in doing so help revitalise the fortune of those centres. Might the LPPU also acknowledge these?

Thank you once again for consulting Historic England. Please do not hesitate in contacting me if you would like to discuss our comments further, or any other heritage related issue that may emerge following this consultation.

Sincere regards

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