

**This composite document represents Bath Preservation Trust’s further submissions to all the post-examination papers and questions.**

Document reference	Subject	Relevant previous BPT rep?	BPT comment
ID/23  CD6/E2.2/53	Duty to cooperate	<b>Examination Statement 224, Topic 1</b>  <b>Also 224/7S, 224/9,224/45 and 224/46</b>	We reiterate our concern, set out in our previous submissions to the Examination, that the core strategy does not fully recognise the importance of collaboration with Wiltshire. The Council’s rolling change CD6/E2/53 fails to acknowledge the importance of cross-border relationships between Bath and the western area of Wiltshire.
CD6/E2.2/16	The Recreation Ground	<b>224/18, 224/26</b>	The Council’s preferred proposed change makes their intentions clear and takes account of our representation on the need to specify more precisely the type(s) of development which might be considered for the Recreation Ground. The second draft implies that there is another possible location adjoining the Central Area which would be appropriate for the development of an arena. If the legal/planning constraints were to prevent development of such an arena on the Rec, it would be highly unlikely that another suitable location adjoining the Central Area could be identified.
CD6/E2.2/18	Description of		In order to achieve accuracy and clarity, the change should read <i>“the Central area lies at</i>

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	Central Area		<i>the heart of the World Heritage site. All of the City Centre, and much of the extended Central Area, lies within the Bath Conservation Area.”</i>
CD6/E2.2/21			Spelling/grammar – should be ‘complementary’ not ‘complimentary’
CD6/E2.2/22			Spelling/grammar – in the 5 <sup>th</sup> sentence, delete the first ‘consider’
CD6/E2.2/23	Setting of WHS	<b>Examination Statement 224, Topic 6</b>  <b>Also 224\33</b>	We stick by our representations that a buffer <b>zone</b> is required. If however the Inspector holds that a buffer policy is sound, for clarity we suggest following wording <u>modification</u> to proposed change to para 2.32:  ‘It includes a range of elements such as views and historical, landscape and cultural relationships <u>which cannot all be captured by a single fixed defined boundary. For this reason the Council operates a buffer policy as a means of protecting the setting. The World Heritage Site Setting Study....</u>
CD6/E2.2/25 BNES/18	Transport Strategy		We made an oral representation at the hearing which highlighted the need for any changes and description to PC51 to acknowledge the transport-related commitments in the historic environment amendments agreed with English Heritage, notably the commitment to context-related high quality design for transport infrastructure and the reduction the volume of traffic using historic streets and spaces through implementation of the Bath Public Realm and Movement Strategy. We do not feel that the changes to PC51 fully reflect this. We would suggest that the phrase ‘reducing the

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			<p>volume of traffic using historic streets and spaces’ is added to the first part of the text in para 2.44, and that the beginning of the next paragraph is amended to read</p> <p>‘This will be achieved through a variety of measures, <u>whose design will be of a quality and style appropriate to their context</u>, including’</p> <p>The last bullet point (relating to Eastern park and rides) should be amended to add <u>‘if an appropriate location can be found which would achieve the strategic aims’</u>.</p>
CD6/E2.2/42			<p>Spelling/grammar:</p> <p>CP6(1) the last word should be ‘places’ not ‘place’.</p>
CD6/E2.2/44			<p>Our representations made at the hearings, which were noted by the Inspector, have not been adequately covered in the drafting here (and also see monitoring section).</p> <p>The 5<sup>th</sup> bullet point should read ‘ensuring that Conservation Area Appraisals and management plans are kept up to date’ (ie deleting ‘seeking to’ as these words dilute any commitment).</p> <p>The 6<sup>th</sup> bullet point should include a commitment to making the WHS management plan an SPD.</p> <p>Spelling/grammar – in the 8<sup>th</sup> bullet point ‘significance’ should read ‘significant’ .</p>

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CD6/E2.2/45	Green Belt	<b>Examination Statement 224, Topic 7</b>	We welcome this addition. However in order to achieve clarity and consistency with CD6/E2.2/3, a new final sentence should be added as follows: ‘Exceptional circumstances will need to be demonstrated through this review process in order for the detailed boundary to be changed.’
CD6/E2.2/53	Review dates		Spelling/ grammar – the new paragraph 7.05b does not read clearly.
CD6/E2.2/53	Duty to cooperate	<b>Examination Statement 224, Topic 1</b>  <b>Also 224/7S, 224/9,224/45 and 224/46</b>	The new para 7.05c should either remove reference to the West of England or add after West of England ‘and Wiltshire’. See our comment on ID/23 above.
CD6/E2.2/54	Monitoring of Strategic Objectives	<b>224/62</b>	We welcome the additional target for listed building consents, but believe that the other Solar PV target should have added the words ‘to unlisted buildings’ for sake of clarity.
CD6/E2.2/54	Monitoring of Strategic Objectives: Conservation Area	<b>224/62</b>	We see no reference in the rolling changes to the discussions at the hearings where a modification for the target relating to Conservation Area appraisals was suggested. The current numerical targets give a perverse incentive to undertake small relatively unimportant Conservation Area appraisals and fail to tackle the large, out of date Bath

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	appraisals		<p>Conservation Area Appraisal for the World Heritage Site.</p> <p>We suggest that the target should be changed to read</p> <p><u>Significantly increased percentage area of district's Conservation Areas covered by up to date Conservation Area Appraisals</u></p> <p>and</p> <p><u>Rolling Programme for updating CAAs, prioritised by size of Conservation Area</u></p>
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