

## Historic England response to the BANES Draft Placemaking Plan and Limited Changes, March 2016

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Plan ref and relevant extract of the Placemaking Plan	Historic England (HE) comment	Recommendation/ suggestion / advice to support the relative sustainability and soundness of the Plan	Historic England response following proposed Limited Changes, March 2016
<b>POLICY SCR2</b> <b>Roof mounted/            Building integrated            scale solar pv</b>	Such development has the potential to affect the significance of individual heritage assets, townscapes and landscapes. However the policy only refers to a limited number of matters to be considered and unfortunately does not include a requirement to consider, and avoid harm to the significance of effected heritage assets.	Cross reference to HE policy (para 230) or include specific heritage criteria.	The proposed <i>Limited Changes</i> fail to respond to this concern.  As decisions are to be made in accordance with the Development Plan this Policy should recognise the potential harm to the HE caused by such development and adjust the Policy as suggested.
<b>POLICY SCR3</b> <b>Ground Mounted            Solar Arrays</b>	Solar Arrays have the potential to cause harm to the significance of individual heritage assets, including their setting, and historic landscapes. However the policy makes no reference to such important matters.	Cross reference to HE / Landscape policy (para 230) or include specific heritage / landscape criteria.	The proposed <i>Limited Changes</i> fail to respond to this concern.  As decisions are to be made in accordance with the Development Plan this Policy should recognise the potential harm to the HE caused by such development and adjust the Policy as suggested.
<b>POLICY SCR4</b> <b>Community Renewable Energy            Schemes</b>	This policy makes reference to a series of policy considerations to be applied to such development. However no reference is made to the potential impact on heritage assets, and their setting.	Cross reference to HE / Landscape policy (para 230) or include specific heritage / landscape criteria.	Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.
<b>HIGH QUALITY            DESIGN            POLICY D.1:            General Urban</b>	This welcome policy highlights certain extracts from NPPF section 7 <i>Requiring Good Design</i> . However the preamble to the policy fails to refer to the importance of	Adjust criteria b to Policy D1. <i>b) Development should enrich the character and qualities of places and should contribute positively to</i>	Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.

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<p><b>Design Principles</b></p> <p>(b) Development should enrich the character and qualities of places and should contribute positively to locally distinctiveness</p>	<p>responding to local character, identity and history as reflected the local surroundings and materials, as encouraged by NPPF paragraph 58 4<sup>th</sup> bullet.</p>	<p><i>locally distinctiveness, <b>identity and history.</b></i></p>	
<p><b>POLICY D.6: Amenity</b></p> <p>(d) Include adequate storage and functional arrangements for refuse and recycling</p> <p>(e) Ensure communal refuse and recycling provision is appropriately designed, located and sized.</p>	<p>Might the Plan refer to good practice examples of appropriately designed and located bin storage?</p>		<p>The proposed <i>Limited Change</i> does not respond to this suggestion however the matter is not a significant concern and does affect the Soundness of the Plan.</p>
<p><b>POLICY D.8: Lighting</b></p>	<p>It may be helpful to refer to the potential positive and negative implications for the historic environment of lighting and the policy response as a consequence. It may also be useful to refer to <i>External Lighting for Historic Buildings</i> Guidance produced by Historic England.  <a href="https://content.historicengland.org.uk/images-books/publications/external-lighting-for-historic-buildings/external-lighting2.pdf/">https://content.historicengland.org.uk/images-books/publications/external-lighting-for-historic-buildings/external-lighting2.pdf/</a></p>		<p>Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.</p>
<p><b>POLICY HE1: Historic Environment</b></p>	<p>Historic England note, welcome and endorse HE1 however to streamline the policy one might consider combining criteria 1 and 3 as follows.</p>	<p><i>Within the scope of Core Strategy Policies B4 and CP6, development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to enhance or better reveal its significance and setting, and make a positive contribution to its character and appearance.</i></p>	<p>Historic England welcomes the proposed <i>Limited Change</i> to satisfactorily address the suggestion.</p>

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<p><b>POLICY HE2: Somersetshire Coal Canal And The Wansdyke</b></p>	<p>Both the Wansdyke scheduled monument and many of the surviving locks and bridges on the Northern Branch of the Canal are on the national heritage at risk register. In accordance with the requirements of NPPF paragraph 126 we would have expected the Plan and this specific policy to set out a positive strategy for their conservation and future enjoyment. However there is no indication of how the local authority via the Local Plan intends to positively address the condition of these assets and therefore it does not accord with the NPPF.</p> <p>Surprisingly Policy HE2 fails to cross reference to the positive initiative agreed in relation to POLICY B3a: Land adjoining Odd Down, Bath Strategic Site Allocation.</p>	<p>Policy HE2 should set out a positive strategy for these heritage assets at risk.</p>	<p>Proposed changes only partially address the concern expressed and as a consequence the Plan fails to accord with the NPPF.</p>
<p><b>POLICY RE6: Re-Use Of Rural Buildings</b></p>	<p>Whilst most of the District’s traditional rural farm buildings and farmsteads may not be formally designated, many will be of architectural and historic interest and of communal, aesthetic and evidential value. Whilst adaptation and re use can help secure their future it is vital related works are appropriate to ensure the aforementioned values are recognised and the integrity and significance of the buildings and farmsteads are safeguarded.</p> <p>Consequently it is important this policy reflects such concern and ensure such non designated heritage assets are conserved.</p>	<p>The Policy could either cross reference to Policy HE 1 or include additional criteria (preferred).</p>	<p>Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.</p>

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<p><b>Promoting sustainable travel</b> paragraph 592, 596</p>	<p>At paragraph 592 the Plan makes a welcome reference to the benefits to the historic environment of a positive transport strategy. It is therefore disappointing and surprising this is not reflected in paragraph 596 in relation to the policy's aims and objectives.</p>	<p>At paragraph 596 refer to the aim and objective of safeguarding the Districts historic areas, heritage assets, landscapes and townscapes and making improvements where the opportunity arises.</p>	<p>The proposed Changes (March 2016) do not respond to this concern.</p> <p>As decisions are to be made in accordance with the Development Plan this Policy should recognise the potential harm to the HE caused by inappropriate development, and adjust the Policy as suggested.</p>
<p><b>POLICY ST1: Promoting Sustainable Travel</b></p>	<p>To accord with national policy for the historic environment Policy ST1 should include reference to safeguarding affected heritage assets, historic areas, townscapes, landscapes, streets, places and spaces.</p>		<p>Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.</p>
<p><b>POLICY ST3: Transport Infrastructure</b></p>	<p>The Policy fails to accord with national policy for the historic environment, providing the necessary policy safeguard for the District's heritage assets, historic areas, townscapes, landscapes, streets, places and spaces, except for the WHS and its setting.</p>	<p><i>1 There is no unacceptable impact on <b>heritage and</b> environmental assets including the World Heritage Site and its setting, Areas of Outstanding Natural Beauty and Natura 2000 sites (SACs/SPA);</i></p>	<p>Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.</p>
<p><b>POLICY ST6: Park And Ride</b></p>	<p>Historic England recognise the local authority's efforts to find suitable ways to promote <i>sustainable</i> methods of travel, help reduce congestion and enhance the ambience of the Bath WHS. Noting the recent debate (P&amp;R Consultation September/October 2015) as to the effectiveness of a P&amp;R to the east of the city it will be important for B&amp;NES to set out a very clear and robust case for such a facility, within the context of all other potential measures that may have been suggested.</p>		<p>Historic England welcome the proposed <i>Limited Change</i> to satisfactorily address the concern expressed.</p>

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	<p>If, following Examination, the principle for a facility is accepted evidence should be prepared including using ICOMOS guidance* (if within or affecting the WHS) and the B&amp;NES WHS Setting Study SPD to appreciate the likely relative impact, and any potential mitigation.</p> <p>*<a href="http://www.icomos.org/world_heritage/HIA_20110201.pdf">http://www.icomos.org/world_heritage/HIA_20110201.pdf</a></p> <p>In so far as the Policy is expressed we would suggest the following adjustment to acknowledge the relevance of considering all heritage assets and not just the WHS</p> <p><i>(a) that there is no unacceptable impact on environmental <b>and heritage</b> assets and amenity including the World Heritage Site and its setting, the Cotswolds AONB and Natura 2000 sites (SACs/SPA);</i></p>		
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