

Bath & North East Somerset Placemaking Plan

COUNCIL'S RESPONSE TO ID/3: Matter 9 – Natural and Built Environment

Issue: Whether the policies in the Placemaking Plan will sustain and enhance the significance of the city's heritage assets and green infrastructure as set out in Policy B1: Bath Spatial Strategy.

Q1. Are the management of development policies justified and consistent with the Bath Spatial Strategy and vision contained in the CS and national policy?

1. The Core Strategy is adopted policy and is conformity with NPPF, and it forms the basis on which the production of the Placemaking Plan was produced. It is the Council's view that the Placemaking Plan is in conformity with the Core Strategy, including the Bath Spatial Strategy and the vision.
2. To inform the production of the Placemaking Plan, the Council commissioned a suite of further evidence to complement the existing body of evidence related to the city's heritage assets and green infrastructure. These include, but are not limited to, the following documents:
 - WHS Attributes (CD/PMP/B8)
 - WHS Setting SPD (CD9/W1)
 - Bath City-Wide Character Appraisal(CD4/UDL1)
 - Building Heights Strategy(CD/PMP/B8)
 - Draft Conservation Area Character Appraisals(CD/PMP/B13/1-6)
 - Morphology Study (CD/PMP/B3)
 - Historic Overview of Development Sites (CD/PMP/B6)
 - Green Infrastructure Strategy(CD/PMP/G27)
 - Public Realm and Movement Strategy(CD4/UDL13)
 - Pattern Book (CD/PMP/B14/1-3)
 - Natural Environment Evidence Base for the Enterprise Area Masterplan (CD/PMP/B11)
 - Bath Building Height Strategy (CD4/UDL2-5)
3. This robust and comprehensive evidence base has informed the preparation of both the site allocations and the development management policies of the Placemaking Plan.
4. It is useful to note the representation received from Historic England (Rep No. 0279-01) (see Appendix) which states:

‘Historic England recognise the significant merits of this impressive Plan that demonstrates a thorough and robust positive strategy for the conservation of the District’s historic environment, and the great care and attention taken in seeking to sustain the OUV of the Bath WHS.

It is apparent an informed understanding and consideration of the significance of the District’s cultural heritage has shaped the Plan and will inform its future implementation’

5. In addition, the development management policies as well as the development requirements and design principles contained in the site allocations were subject to the Sustainability Appraisal that tested the appropriateness of the policies against a set of sustainability objectives (CD/PMP/G9). ‘Table 4: Development Management Policies’ and objectives 6, 7 and 8, are of particular relevance. These were used to shape the Core Strategy. This process demonstrates that the policies are justified and consistent with the approach set out in the Core Strategy.

6. The table below illustrates the policy criteria from Policy B1 of the Core Strategy that relate to heritage assets and green infrastructure, and cross references these to the policies in the Placemaking Plan that will ensure that these elements are sustained and enhanced:

Core Strategy Policy B1: Bath Spatial Strategy	Related Placemaking Plan policies
<p>The strategy for Bath is to: 1 Natural and Built Environment Sustain and enhance the significance of the city’s heritage assets and green infrastructure, including:</p>	<p>General:</p> <ul style="list-style-type: none"> • POLICY BD1: Bath Design Policy • All site allocations seek to address these issues (see SA) • See also Sustainable Assessment Table 4: Development Management Policies relevant to SA objectives, particularly objectives 6, 7 and 8.
<p>a The Outstanding Universal Value of the City of Bath World Heritage Site and its setting.</p>	<p>POLICY HE1: Historic Environment</p>
<p>b Listed buildings, the Bath conservation area and their settings.</p>	<p>POLICY D.1: General Urban Design Principles, POLICY D.2: Local Character & Distinctiveness POLICY D.3: Urban Fabric POLICY D.4: Streets and Spaces POLICY D.5: Building Design POLICY D9: Advertisements & Outdoor Street Furniture POLICY D10: Public Realm</p>

	POLICY HE1: Historic Environment
c Archaeology, scheduled ancient monuments, and historic parks and gardens.	POLICY HE1: Historic Environment POLICY HE2: Somersetshire Coal Canal And The Wansdyke
d Non-designated heritage assets of local interest and value.	POLICY HE1: Historic Environment POLICY NE2A: Landscape Setting Of Settlements
e Giving great weight to conserving landscape and scenic beauty in the Cotswolds Area of Outstanding Natural Beauty	POLICY HE1: Historic Environment POLICY NE2: Conserving And Enhancing The Landscape And Landscape Character
f The network of green spaces and wildlife corridors including the River Avon and Kennet and Avon Canal, Local Nature Reserves, formal and informal parks and recreational areas, trees and woodlands.	POLICY HE1: Historic Environment POLICY HE2: Somersetshire Coal Canal And The Wansdyke POLICY NE2A: Landscape Setting Of Settlements POLICY NE3: Sites, Species And Habitats POLICY NE4: Ecosystem Services POLICY NE5: Ecological Networks POLICY CP7 Green infrastructure POLICY NE1: Development And Green Infrastructure POLICY ST2A: Recreational Routes
g The biodiversity resource including species and habitats of European importance.	POLICY NE3: Sites, Species And Habitats POLICY NE4: Ecosystem Services POLICY NE5: Ecological Networks POLICY NE6: Trees And Woodland Conservation POLICY CP7 Green infrastructure POLICY NE1: Development And Green Infrastructure

7. Lastly, it is important to emphasise that the plan should also be read as whole. For example, Core Strategy Policy HE1 provides the overarching policy framework for the Placemaking Plan with regards to the historic environment. This adds to Core Strategy Policy CP6, and complements the Bath Spatial Strategy B1.

Comments from Historic England ref para 4 in Statement:

Dear Sirs,

Please find attached our response to the draft Placemaking Plan.

Our relatively modest observations seek to clarify or confirm certain points and supplement specific components of the document to improve its clarity, consistency and subsequent effectiveness in the delivery of sustainable development. We would be happy to discuss any of these matters, or issues arising further if that would be useful.

Historic England recognise the significant merits of this impressive Plan that demonstrates a thorough and robust positive strategy for the conservation of the District's historic environment, and the great care and attention taken in seeking to sustain the OUV of the Bath WHS.

It is apparent an informed understanding and consideration of the significance of the District's cultural heritage has shaped the Plan and will inform its future implementation.

The positive and on-going dialogue with Officers of B&NES Council during the preparation of the Plan has been very much appreciated and we look forward to the continuation of this constructive working relationship.

Sincere regards

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