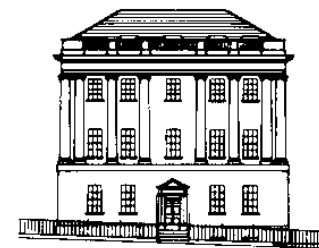


## **B&NES CORE STRATEGY SPATIAL OPTIONS CONSULTATION OCTOBER 2009**

### **BATH PRESERVATION TRUST RESPONSE**

JANUARY 2010



#### **Introduction**

The Bath Preservation Trust was set up in 1934 to safeguard the historic city of Bath, now the only complete city in the UK afforded World Heritage Status. The purposes of the Trust are to:

- encourage and support the conservation, evolution and enhancement of Bath and its environs within a framework appropriate both to its historic setting and its sustainable future, and;
- provide educational resources, including museums, which focus on the architectural and historic importance of the city.

The Trust does this by:

- Campaigning and providing expert advice and opinion of planning applications, planning policy and legislation, and other matters affecting the World Heritage site and its environs;
- Running museums with specific themes and collections relating to the Georgian period, its economy, its buildings, social life and personalities;
- Providing educational resources, lectures, talks and events for all ages, in particular relating to the Georgian buildings in Bath; and
- Having the active membership of involved and concerned subscribers.

The Trust is a registered charity supported by over 1400 members, who share a passionate concern and interest in the city. We receive no government funding, but are financially supported by our members, by grants and donations, and by income from our museums.

## Executive Summary

The Trust's detailed response to the Core Strategy Options Consultation is set out below. Our key concerns are as follows:

1. The two District-Wide Spatial Options fail to achieve the Council's stated objective of regenerating brownfield sites ahead of greenfield development. Both of these options risk delivering the worst outcome for the District as a whole, with major new development taking place in the City's Green Belt while the River Corridor, the three MoD sites and other brownfield opportunities within the city remain blots on the landscape of the World Heritage Site. **We therefore propose an alternative Option 3** which would drive the regeneration of brownfield sites across the District and particularly within Bath, and would increase employment and housing in Midsomer Norton and Radstock thereby reducing the excessively high levels of commuting from these towns. Under this option, no planning applications for an urban extension to the City of Bath would be considered before 2018 at the earliest, and then only if it has been clearly demonstrated that the need for growth cannot be satisfied on brownfield sites within the city boundary. **Work on the options for an urban extension to Bath must cease, with the effort being transferred to developing clear visions for the MoD sites, the River Corridor and other brownfield locations within the city.**
2. The Council's preferred option for protecting the setting of the World Heritage Site fails to comply with the UNESCO operational guidelines on buffer zones, the UNESCO decision on July 2009 that the protection of the setting of Bath needs to be strengthened, and Planning Circular 07/09 on protection of World Heritage Sites. **We therefore call on the Council to introduce an 'intelligent' buffer zone** based on the landscape setting study which was published alongside the Core Strategy Options consultation document.
3. We recognise the importance of responding to the challenges posed by climate change. **We are concerned that the Options document focuses too much on renewable energy generation and not enough on reduction of energy use and conservation of energy. There is a pressing need to develop clear policies and guidance on the adaptation of existing buildings and on the acceptability (or not) of microgeneration installations within the WHS and its environs.** The Trust is keen to work with the Council to develop these policies and guidance, drawing on the work done by English Heritage and other heritage organisations.

4. The River Corridor offers huge opportunities to help meet Bath's need for sustainable new commercial and residential development. But we have yet to see evidence that the constraints, including in particular the flood risk issues, are fully understood. **Confirmation must be obtained from the Environment Agency that the ambitions for the River Corridor are realistic before the Core Strategy is finalised, and mechanisms must be put in place to prevent premature development proposals coming forward for decision before the relevant planning policies are in place .**
5. **The Core Strategy needs to recognise the continuing importance of tourism to the economic and cultural vitality of Bath.** Greater diversification of the economy is important, but should not be at the expense of our existing strength as an internationally renowned tourist and cultural destination.
6. **The Council should clarify the status in planning terms of the Core Policies identified in the consultation document.** The list of Core Policies is considerably more extensive than the Development Plan Documents and Supplementary Planning Documents set out in the current Local Development Scheme. Developers must be in no doubt that compliance with core policies such as the Historic Environment Policy and the World Heritage Site Management Plan is mandatory. **Conflicts between the strategic objectives need to be resolved in a transparent and objective fashion by a weighted options appraisal where the weightings applied take account of the special characteristics of different parts of the district.**

Consultation reference	Issue	BPT Response
Page 20 Q DW1	Spatial Vision for B&NES	<p><b>The Spatial Vision for 2026 is</b> deficient in two respects. Firstly, it fails to reflect the Council's stated priority of regeneration of brownfield land (paragraph 1.11) and secondly it undervalues the importance of Bath's unique heritage which is what gives the City and the District as a whole its distinctive identity. These deficiencies should be rectified by redrafting the second and third bullets as follows:</p> <ul style="list-style-type: none"> <li>• <b><i>New homes and jobs have been provided in a balanced way in sustainable locations. The necessary infrastructure is in place at the right time to support any new development, and new attractive and vibrant communities have been created on all the available brownfield sites. Development of greenfield sites anywhere in the District continues to be restricted to the absolute minimum needed to meet demonstrated need for growth, and the landscape setting of the World Heritage city of Bath remains protected</i></b></li> <li>• <b><i>Bath's internationally renowned heritage is respected and sustained as the foundation of its role as an important international tourist destination and sub-regional economic, service and cultural centre</i></b></li> </ul>
Page 24 Q DW2 and DW3 Para 2.26	Spatial Objectives for B&NES	<p>These appear to be the right broad objectives. But the Core Strategy needs to make the tough choices between conflicting objectives, as recognised in para 2.26, and the core policies need to provide the mechanisms for implementing these choices.</p> <p>In particular,</p> <p><b>(a) the proposed levels of growth will lead to huge pressure on the finite</b></p>

		<p><b>supply of land within the District. The Core Strategy will need to set out the criteria for reconciling the tensions between competing demands for land for food production, new housing and employment, and production of energy;</b></p> <p><b>(b) robust and effective planning policies are needed to implement the Council's stated objective of regenerating brownfield sites before permitting any urban extension in the Green Belt. The Council should make clear how this is to be achieved.</b></p> <p>We acknowledge the importance of Objective 1 and agree that it makes sense to put it first. However we are concerned that there is an implication throughout the document that any development proposal which claims 'green' credentials will be accepted, even if it fails to meet one or more of the other strategic objectives. Moreover, there are inescapable tensions between Objective 4 (Conserve and enhance the District's high quality natural and cultural heritage) and Objectives 3 (housing), 5 (economic prosperity) and 6 (transport). <b>The Core Strategy will need to explain how the appropriate balance will be struck between meeting carbon reduction targets and the other strategic policy objectives.</b></p> <p>Some parts of the District (notably the World Heritage City and its setting) are of such lasting cultural significance that their conservation and enhancement must be given priority, even at the expense of meeting inappropriate growth targets arbitrarily imposed by the Government of the day and maximising the production of visually intrusive renewable energy. <b>Conflicts between the strategic objectives need to be resolved in a transparent and objective fashion by a weighted options appraisal where the weightings applied take account of the special characteristics of different parts of the district. The Core Strategy must set out the weightings to</b></p>
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		<p><b>be used and explain how the appraisal system will operate, including the opportunities for community involvement in the process.</b></p> <p>Detailed comments on the Spatial Objectives (pp 21-24) are as follows:</p> <p><b>Objective 1:</b></p> <p>Add a new point at the beginning of the delivery list as follows: <b><i>‘Design places which encourage sustainable lifestyles and lifestyle choices that demand less energy and resource consumption’</i></b>. Delivering this objective can be achieved by the design of places, including urban design, public realm and landscape. Adaptation by design is not just about building. (ref TCPA/CABE Climate Change Adaptation By Design - A Guide for Sustainable Communities 2007).</p> <p>Add <b><i>‘maximise the sustainable use and reuse of existing buildings’</i></b> in 1.3. Building conservation is a key aspect of sustainability, and the District’s high numbers of traditional buildings hold a huge amount of embodied energy.</p> <p>Add a new section between points 1.3 and 1.4 as follows: <b><i>‘encourage energy efficiency and energy conservation including improved levels of insulation for all existing buildings’</i></b>. Core policies for this objective need to include policy for upgrading the energy efficiency of existing buildings and infrastructure (see also reply to Q DW8)</p> <p>Add <b><i>‘promote climate proofing in the existing built environment’</i></b> in 1.5. (e.g. the impact of increased rainfall on historic buildings and flood risk from surface runoff).</p> <p>Add <b><i>‘promote the management of water’</i></b> in 1.7 – e.g. saving, drainage (policy tool Water Management Plan)</p>
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		<p><b><i>land and that full use is made of the scope to provide modern commercial premises on brownfield sites'</i></b>. Why is there no mention of the Public Realm and Movement Strategy?</p> <p><b>Objective 6:</b></p> <p>Point 6.2 should read '<b><i>Locate and design new development and infrastructure in a way that reduces the need and desire to travel, particularly by car'</i></b>. Also, add a reference to the need to require/encourage zero emission public transport vehicles.</p> <p>Policy tools - Why is there no mention of the Public Realm and Movement Strategy or of a Transport Management Plan for Bath?</p>
Page 31	Key Infrastructure and delivery requirements	Under Transport, there should be a reference to the need for B&NES to co-operate with neighbouring local authorities, including Wiltshire as well as the West of England Partnership, on public transport links as recommended by CABE in its guidelines on the preparation of Core Strategies. There should also be a reference to the need to consider what improvements to transport infrastructure are needed to facilitate the development of new industrial employment opportunities in the Radstock/Midsomer Norton area.
Page 35 Q DW 4 and DW5	The two District-Wide spatial strategy options	<p><b>The Trust proposes a third District-Wide spatial strategy option which we believe will better meet the Council's priority of the regeneration of brownfield land, as set out in paragraph 1.11 of the consultation document.</b></p> <p>We believe that the RSS policy of concentrating all development on the Strategically Significant Towns and Cities condemns many existing communities to an unsustainable future as dormitory towns or villages, dependent on commuting but not large enough to justify investment in public transport systems which will persuade</p>

		<p>people out of their private cars. The Core Strategy therefore needs to focus on ways of achieving greater self-containment of existing communities, particularly Midsomer Norton and Radstock. Map 12 on page 33 of the Sustainability Appraisal Scoping Report demonstrates that in 2001 57% of local residents in these towns commuted out. Measures must be put in place to make it possible for more of them to work where they live.</p> <p>Of the two options outlined, the Trust prefers option 2 which places more emphasis on development of housing and employment opportunities in Keynsham, Midsomer Norton and Radstock and regeneration of their town centres and brownfield sites. However, <b>Option 2 fails to demonstrate sufficient commitment to regenerating the brownfield sites within the City of Bath. It therefore increases the risk that developers will focus on the greenfield sites identified as potential locations for a new neighbourhood in preference to the much more challenging brownfield sites.</b> Bath's attractiveness as a centre for employment and tourism, and therefore its ability to continue to be the economic driver for the District, depend upon the very special qualities of its built environment and its relationship with its landscape setting. <b>The worst outcome for the District as a whole would be one in which major new development takes place in the City's Green Belt while the River Corridor, the three MoD sites and other brownfield opportunities remain under-exploited.</b></p> <p><b>The Trust believes therefore that the Council should consider an Option 3.</b> We are not in a position to develop this in detail, but the top level growth plans would be as follows:</p> <ol style="list-style-type: none"> <li>1. Total new development as in Option 2 (about 15,500 homes and 17,000 jobs)</li> <li>2. SE Bristol urban extension and Keynsham development as in option 2 – about</li> </ol>
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		<p>4,900 homes and 3,600 jobs</p> <ol style="list-style-type: none"> <li>3. Bath up to 6,500 homes and 10,000 jobs (regeneration within city boundary only: no urban extension) Midsomer Norton and Radstock up to 2,200 homes and 2,400 jobs</li> <li>4. Rural Areas about 2000 homes and 800 jobs</li> <li>5. Need for an urban extension to Bath to be reconsidered in 2018 in the light of updated economic forecasts and progress in regenerating existing communities.</li> </ol> <p>The key features of Option 3 would be as follows:</p> <ul style="list-style-type: none"> <li>• The two key priorities are to drive the regeneration of the brownfield sites across the District and particularly within the City of Bath, and to increase the self-containment of the towns and larger villages to the south of the District</li> <li>• New housing development will be driven by new or existing employment opportunities</li> <li>• Expansion into greenfield land will not be permitted where alternative brownfield sites are available.</li> <li>• No planning applications for an urban extension to the City of Bath will be considered before 2018 at the earliest, and then only if it has been clearly demonstrated that the need for growth cannot be satisfied on brownfield sites within the city boundary</li> <li>• Midsomer Norton and Radstock will provide additional industrial floorspace as well as office and service-based jobs, building on their industrial heritage. There</li> </ul>
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		<p>may be opportunities for them to become a centre for manufacturing low-carbon products in addition to a centre for low-carbon skills training</p> <ul style="list-style-type: none"> <li>• Investment in transport infrastructure will be needed to support a reinvigorated manufacturing economy in the south of the District</li> <li>• Small-scale infill development in the rural settlements will be permitted where it will contribute to the self-containment of individual settlements, is supported by the local community and does not have an adverse impact on Conservation Areas</li> <li>• Within the City of Bath, the priorities are to deliver the development of the River Corridor and the three MoD sites.</li> </ul> <p>In order to make this option deliverable, the Council will need to</p> <ul style="list-style-type: none"> <li>• <b>Cease work on developing the vision and options for a new neighbourhood to the south/southwest of Bath.</b> Putting resources into this work now conflicts with the stated priority of developing brownfield sites first, and risks encouraging developers to press ahead with applications for greenfield sites.</li> <li>• Give top priority, with the Environment Agency, to developing the Flood Risk Management Strategy for the River Avon Corridor</li> <li>• Work with landowners to incentivise the earliest possible release of brownfield sites for development, and in particular persuade central Government to release the three MoD sites for redevelopment (including new office space to meet MoD's needs) <b>early</b> in the Core Strategy period</li> </ul>
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<p>Page 39 Q DW6</p>	<p>Targets for renewables</p>	<p>The Trust does not have the expertise to comment on whether the targets suggested by the research are appropriate, although we do not believe it is credible to set targets for the sub-region which are lower than the national renewables targets which Government has now adopted. B&amp;NES will need to make a contribution to meeting the national/regional targets which is proportionate to its particular local circumstances. A local energy strategy is needed to establish local targets. These may be higher or lower than neighbouring authorities, depending on the opportunities for hydro and wind energy and the availability of land for production of biomass.</p> <p>In our view, the optimum location of wind farms should be decided at a sub-regional rather than District level, having regard to the international importance of Bath's setting. B&amp;NES must however develop a robust and appropriately ambitious set of policies for increasing solar energy, both in new developments and on existing buildings. New buildings must make the fullest possible contribution to carbon reduction, in order to balance those historic and architecturally important buildings where this is not possible.</p> <p>We suggest that a District approach takes account of the historic building stock's limitations on retrofitting and energy generation, and that targets for the district are met by off-site community power generation. District targets could also be met by a potential surplus feed-in from larger new major developments and retrofitting larger commercial development and industrial buildings of lesser architectural value. The owners of buildings with limitations on their own energy generation could enter into off-</p>

		<p>site power purchase agreements (a specific green tariff).</p> <p>We have a number of observations on paragraphs 2.61 and 2.62.</p> <p>The 6<sup>th</sup> bullet of para 2.62 needs to refer to the need for a clear definition of how improved insulation as well as renewable energy could be used in listed buildings. The policy framework will need to recognise that there is no single solution which will be appropriate for all listed buildings. What is and is not acceptable will depend, among other things, on the reasons for listing, the individual and group value of the building(s) and the extent to which they are visible from important viewpoints and routes.</p> <p><b>The Trust is keen to work with the Council to review national policy and guidance in this important area and develop specific policies tailored to the unique character of the World Heritage City and its setting, drawing on the work which has already been done by English Heritage and other heritage organisations.</b></p> <p>The 7<sup>th</sup> bullet of 2.62 suggests that the authors of the consultation document and their CAMCO advisers may have misunderstood the relevant legislation (SI 2008 No. 675) which makes clear that under most circumstances the installation of domestic microgeneration equipment <b>does not constitute permitted development within a World Heritage Site or Conservation Area</b>, unless it is on the rear elevation of a non-listed building and is not visible from a highway. The fact that planning permission continues to be required for most microgeneration installations within the City of Bath and the District's 37 Conservation Areas does not, of course, mean that nothing can happen. But it does mean that it is essential for the Council to develop specific policies which identify the options which are suitable for these sensitive parts of the District and ensure that the LPA takes a consistent approach in determining applications.</p>
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		<p>The tree-covered hilltops which surround the World Heritage City are a key element of its landscape setting and must be conserved and enhanced. The buffer zone or buffer policy to be introduced to protect the setting will need to protect against visual intrusion by wind turbines as well as other forms of development which individually or cumulatively would detract from the Outstanding Universal Value of the WHS. The impact of wind turbines on the landscape of our AONBs and Conservation Areas outside the WHS also needs careful evaluation. Within the city of Bath, the useful output of small scale urban wind turbines is still considered unproven.</p> <p>If there is to be a significant increase in reliance on biomass, careful consideration will need to be given to the sourcing of the material. Presumably the intention would be to rely on locally-grown material rather than transport it over long distances. The impact on the protected landscapes (AONBs, setting of the WHS) will need to be taken into account in determining the targets which are adopted.</p> <p>The River Avon valley is a key element of the World Heritage Site and its setting. Careful consideration should be given to the siting of hydro generation and stations in locations within the WH site and its setting.</p> <p>Increasing the uptake of solar energy on existing building stock in the City and the environs will require careful guidance (see below and DW8).</p> <p>The integration of PV panels and solar collectors in facades or roof slopes, or the use of solar slates in the design of new development is far more discreet than retro-fitting them to existing buildings. Where they are designed in from the start they can be combined with more traditional materials. There is potential to cause much harm to the group value of listed buildings and the character of traditional streets in the conservation area and World Heritage city by the accumulation of solar installations on a piecemeal basis. The visual impact of solar panels of varying sizes and in differing</p>
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		<p>positions on the front elevations would cause real damage to the visual and architectural coherence and rhythm of the planned townscape which earned Bath its World Heritage status.</p> <p>Heritage solar slates would be less intrusive than other solar installations and should normally be the first choice for listed buildings, conservation areas and the World Heritage Site. The inner slope or M valley of double pitched roofs may in some instances provide a discreet and therefore acceptable location for solar panels, although close attention needs to be paid to the impact on views from elevated locations such as Alexandra Park or Sham Castle.</p>
<p>Page 39 Q DW7 Q DW8</p>	<p>Any other planning framework to support renewable energy production</p> <p>A local policy to support retro-fitting</p>	<p><b>There is insufficient emphasis in the consultation document on energy conservation and energy efficiency rather than energy generation.</b> Specific targets are needed for reduction in energy consumption of existing buildings, with specific guidance and support for this in relation to listed buildings. Specific targets are also needed for reduction in car use and size of car for public sector employees. Congestion charging and other disincentives for unnecessary use of the private car should also be part of the mix.</p> <p>See our comments on Q DW6 above. There is an urgent requirement for clear guidance to householders on what is and is not acceptable in the local area. While in some parts of the District it may be sufficient to rely on national planning policy, bespoke local guidance needs to be developed to address the retro-fitting of listed Georgian and other historic buildings, and external alterations to buildings in the WHS and Conservation Areas. The policy should include a requirement that all applications for planning permission for microgeneration should not be granted unless it can be demonstrated that the applicant has made provisions for energy conservation,</p>

		<p>including evidence of an appropriate level of insulation.</p> <p>Policy and guidance for retrofitting must address more than just energy generation. There will also need to be specific guidance on energy conservation for local historic building types including; draught proofing, upgrading windows, using shutters , fitting secondary glazing roof and wall insulation, boilers and central heating, lighting, electrical products, ventilation, water; including rainwater collection, showers, taps and toilets.</p> <p>Thermal inefficiency of older buildings can be reduced without compromising their historic character. A retrofitting policy must make clear that the integrity and authenticity of Bath's historic environment should be protected. It must also fit with other policies for the historic environment. See Q DW24.</p> <p>Appropriate new guidance on the thermal performance of traditional windows recently published by English Heritage (October 2009) has showed that even the simplest repair and basic improvements will bring significant reduction of draughts and heat loss, and that using a combination of these methods will upgrade a window to meet Building Regulations targets.</p> <p>This research showed that air infiltration through a sash window in good condition can be reduced by as much as 86% by adding draught proofing. Heat loss through contact with the glass and frames can be significantly reduced by adopting simple measures like closing thick curtains and plain roller blinds. In the test, heat loss was reduced by 41% and 38% respectively. More elaborate measures reduce heat loss even more and can improve windows to meet modern Building Regulations, which target a U value for windows of 2 or below. In a test with good quality secondary glazing, this value was 1.7. Well-fitted, closed shutters also produce similarly good results. The best result is</p>
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		<p>when the two methods are used together, resulting in a 62% reduction in heat loss and a U-value of 1.6.</p> <p>The retention of traditional sash windows will almost always be required so as to protect the historic integrity, authenticity, character and group value of listed buildings. However, there may be particular instances where the Trust can consider supporting slim-line timber double and triple glazed windows within listed buildings and Conservation Areas.</p> <p><b>We are keen to work with B&amp;NES to develop guidance on retro-fitting of historic buildings in Bath</b> (as we have done recently on the new Stone Cleaning guidance).</p>
<p>Page 41</p> <p>Q DW11</p> <p>Q DW12</p>	<p>Sustainable Construction and Energy Efficiency</p> <p>Major developments to have higher targets than national standard.</p> <p>Threshold level</p>	<p>We agree that, ideally, major development should meet higher targets than the national standard. This will be necessary to enable the District as a whole to meet the headline objective of tackling the causes and effects of climate change, by helping to balance out the lower efficiency levels of existing buildings (even when these have been upgraded). Care will however need to be taken to ensure that the standards required for brownfield regeneration sites are not so high as to make them economically unviable.</p> <p>The threshold level should not be lower.</p>
<p>Page 41</p> <p>Q DW13</p> <p>Q DW14</p>	<p>Sustainability Checklist</p>	<p>In principle, the Checklist should be required for all applications, at least in part. As a minimum, the full checklist should be required for all sites over 10 dwellings or over 1000m<sup>2</sup> non-residential space, as with the proposed renewable policy framework (page 39). But some questions should be answered by every applicant. There is scope to develop a bespoke version of the Checklist with even stronger emphasis on place making and heritage settings, for use within the World Heritage City and its</p>

		environs.
Page 43 Q DW15	Specific local policy on flood risk management	<p>We have not yet been able to study the Interim Sequential and Exception Tests for Strategic Sites which was published very late in the consultation period. In theory, a separate policy might be unnecessary if the full Sustainability Checklist is required and national/regional policy is fully applied. <b>However, absolute clarity about what is and is not practicable is essential, particularly along the River Corridor. Confirmation must be obtained from the Environment Agency that the ambitions for the River Corridor are realistic before the Core Strategy is finalised.</b> The Dyson experience demonstrated the risks of nugatory effort and expenditure when inappropriate proposals are put forward for sites at risk of flooding.</p> <p>We understand that work is on-going to develop a policy for flood management for the whole of the Avon catchment. There is a need to liaise with neighbouring authorities, in particular Wiltshire, to ensure that each authority's Core Strategy delivers optimum solutions for the whole catchment, and does not just focus on its own patch.</p> <p>We would welcome confirmation that the EA flood risk models take full account of the cumulative impact of run-off from new and potential new developments on greenfield sites (new and expanded P&amp;R sites, new neighbourhoods etc).</p> <p>SUDS and water conservation measures need to be emphasised, with appropriate descriptions and explanation, in all relevant policy documents (eg green infrastructure, development, housing etc).</p> <p>Bath's topography, with the historic city located in the bottom of the bowl of surrounding hills, makes effective management of surface run-off particularly important. Local policies need to include, for example, measures to prevent the creation of new hard standing for cars in front gardens and perhaps incentives for</p>

		householders to replace tarmac front drives with more sustainable surfaces.
Page 44 Q DW16	Policy for Infrastructure Provision	The policy needs to include provision of technology infrastructure. This needs to be factored in to all new developments so as to minimise the need for digging up of the roadways.
Page 45 Q DW17	Policy for Green Infrastructure	<p>We welcome the intention to develop an Implementation and Delivery Plan co-ordinated with those of neighbouring authorities.</p> <p>The policy elements need to include reference to the role of GI in protecting the historic environment, particularly Scheduled Ancient Monuments such as the Wansdyke.</p> <p>The policy should also include a requirement to identify and deliver new GI to compensate local residents for any loss of existing amenity space (as the Trust advocated, unsuccessfully, in relation to the Bus Rapid Transit proposal).</p>
Page 46 Q DW28	Policy for Community Services and Facilities.	We support the broad outline of the policy framework, and note that the UNESCO decision on Bath WHS in June 2009 highlighted the importance of including community facilities in new developments.
Page 47 Q DW 18	Safeguarding Minerals	<p>Given the fundamental importance of Bath stone for the character of the World Heritage City, the focus of the policy framework for safeguarding the local limestone must be to meet current and future requirements in Bath and its environs, rather than contributing to national requirements as stated in the draft RSS. Certain previously active Bath Stone mines have closed in recent years and their presence should be mapped and recorded in the interests of identifying resources in the future.</p> <p>We welcome the final bullet of the proposed policy framework, and emphasise the need to ensure that effective mechanisms are available to enforce it.</p>

<p>Page 51 Q DW19</p>	<p>Affordable housing</p>	<p>We claim no particular expertise on affordable housing policy options and will leave it to others to comment in detail. We would however urge that new affordable housing should be designed to high standards of disability provision, given the difficulty of retrofitting existing housing stock for this purpose and the likely needs of an aging population.</p>
<p>Page 55 Q DW21</p>	<p>High Quality Urban Design policy</p>	<p>The proposed core policy does not include all the necessary elements. The following reordering of bullets 1-5 is suggested for clarity with additional points highlighted in <b><i>bold italic</i></b>.</p> <p>Main policy elements to include:</p> <p>Bullet Point 1 - <b><i>The impact of development proposals on addressing &amp; seeking to mitigate the effects of climate change</i></b></p> <p>Bullet Point 2 - <b><i>Development proposals should be informed at an early stage by the relevant national standards of excellence, for example:</i></b></p> <ul style="list-style-type: none"> <li>- <b><i>By Design DTLR 2001 [DETR &amp; CABE 2000]</i></b></li> <li>- <b><i>Manual for Streets DCLG &amp; DfT 2007</i></b></li> <li>- <b><i>Safer Places ODPM &amp; Home Office 2004</i></b></li> <li>- <b><i>Building in Context CABE 2002</i></b></li> <li>- <b><i>Streets for All Southwest English Heritage</i></b></li> <li>- <b><i>Start with the Park CABE 2005</i></b></li> <li>- <b><i>Code for Sustainable Homes DCLG 2006</i></b></li> <li>- <b><i>Building for Life CABE 2005 &amp; 2007</i></b></li> </ul> <p>Bullet Point 3 – <b><i>Development proposals must show evidence in the Design &amp; Access Statement that the Building for Life criteria are addressed, and a score of at least 14/20 [assessed by an independent BfL Assessor] is achieved. BfL standards for all completed schemes will be reported in the Annual Monitoring</i></b></p>

		<p><b>Report [AMR].</b></p> <p>Bullet Point 4 – <i>Development proposals must take into account relevant local design guidance and appraisals, including</i></p> <ul style="list-style-type: none"> <li>- <i>Character Appraisals</i></li> <li>- <i>Conservation Area Appraisals</i></li> <li>- <i>Local Design Statements, e.g. Village Design Guides</i></li> <li>- <b><i>The Bath World Heritage Site Management Plan, for sites in Bath and surrounding area</i></b></li> <li>- <b><i>The B&amp;NES Streetscape Manual</i></b></li> </ul> <p>Bullet Point 5 reordering to incorporate Bullet Point 7 – <i>Development proposals must meet locally specific design and access policies which will reflect PPS1 [para.35] recommendations, and require provision of:</i></p> <ul style="list-style-type: none"> <li>- <i>durable and adaptable buildings</i></li> <li>- <i>response to local context, reinforcement of local distinctiveness, <b>including the use of local materials</b></i></li> <li>- <i>safe and accessible environments</i></li> <li>- <i>accessibility &amp; inclusiveness</i></li> <li>- <i>visual attractiveness resulting from good architecture &amp; landscape design</i></li> </ul> <p><i>And aim to benefit the wider community, <b>by 'designing out crime'</b> [to reduce anti-social behaviour] and considering community aspirations found in</i></p> <ul style="list-style-type: none"> <li>- <i>Community Plans</i></li> <li>- <i>Parish Plans</i></li> <li>- <i>Community engagement activities</i></li> <li>- <i>Strategies and Plans produced by the Council or other public service providers</i></li> </ul> <p><b>ADDITIONAL COMMENTS</b></p> <p>Bullet Point 6 – (allocated sites) Building heights, building massing and view management guidance for Bath and its setting must be a priority. This should also refer</p>
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		<p>to potential linkages to neighbouring communities and the Green Infrastructure network.</p> <p>Local design guidance and conservation area appraisals must be completed and adopted as a matter of priority to provide the appropriate policy framework.</p> <p>Development proposals should be informed by a focus on, and locally specific design and access policies in response to PPS1 should make mention of:</p> <ul style="list-style-type: none"><li>- Appropriate massing: energy efficiency in design is also a question of massing. For example a terrace of housing is better than semi-detached and much better than detached. Three storeys are generally better than two. Building at high density is generally better than sparse. It's better to avoid deep-plan for offices, in general.</li><li>- The grain of existing building and urban design needs respecting in the case of new developments. Very large single use developments should be avoided.</li></ul> <p>Policy tools also need to include the review and adoption of a new Bath City Conservation Area Appraisal, Urban Design SPD and District Design Guide SPD, Sustainable Buildings Design Guide, Shop Front and Advertising Design SPD, as a matter of priority. B&amp;NES must adopt the Public Realm and Movement Strategy and include it in the Policy Framework for High Quality Urban Design. There is also a need to build on the Streetscape Manual and establish and adopt a pattern book for Bath.</p> <p>Paragraph 2.92 rightly makes the case that developments should be of high quality, but the closing statement could leave the impression that it is copying in particular that leads to poor quality. Better to say "It is vital we avoid architecture which is poor in quality, both in terms of design and materials."</p>
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		<p>Paragraph 2.93 line 3. Suggest: "...variety of <b>local</b> building materials..."</p> <p>The advisability of favouring local materials could also be given more emphasis elsewhere in these pages, since this bears on both local distinctiveness and sustainability.</p> <p>Paragraph 2.95 (minimum space standards). The Trust supports Option 3. This would raise the quality of 'ordinary' homes. Adaptability is important to help meet the challenge of future demographic change. Adaptability should also be required for commercial buildings (offices, hotels, educational establishments etc.</p>
Page 58 Q DW23	Landscape policy	<p>Landscape policy should take account of the impact of lighting and make provision for the protection of dark skies in Bath and the District.</p> <p>The policy framework should take account of the World Heritage Setting Study and the need to strengthen protection of the setting of the World Heritage Site (see also our comments on the need for a buffer zone).</p> <p>The policy framework also needs to recognise the importance of preserving and protecting the Green Belt and the AONBs.</p>
Page 59 Q DW24	Historic Environment policy	<p><b>We do not agree that the core policy for the historic environment covers all the necessary elements.</b></p> <p>There is a danger that bullet point 1, which places emphasis on Climate Change, will prioritise measures for climate change mitigation even where these are unsatisfactory in other significant respects. A balance has to be found between energy issues and the protection of the significance, architectural interest and authenticity of the historic environment and the outstanding universal values of the World Heritage Site.</p>

		<p>Bullet point 2 should specifically include support for Local Buildings at Risk and buildings on the National BAR register.</p> <p>Bullet point 3 – <b>See our response to Q DW6 and DW8.</b> The implications of climate change on the historic environment are well documented by English Heritage. The potential impact of climate change; i.e. the direct impact of a changing climate and the impact of responsive policies (energy conservation, adaptation, future-proofing, and mitigation) would need to be supported by Bath and district specific supplementary planning guidance. There is need for a clear definition of how energy conservation (insulation, water, and efficiency) and renewable energy could be used in and near to historic assets as well as the implications of changes in weather (increased temperatures, rainfall and flooding). A risk and adaptation study would need to be undertaken to inform policy.</p> <p>The policy framework will need to recognise that there is no single solution which will be appropriate for all historic assets. What is and is not acceptable will depend, among other things, on the significance, the individual and group value of the asset and the impact on important viewpoints and routes.</p> <p><b>The Trust is keen to work with the Council to review national policy and guidance in this important area and develop specific policies tailored to the unique character of the World Heritage City and its setting, drawing on the work which has already been done by English Heritage and other heritage organisations.</b> Bullet point 4 or a separate point should refer specifically to the use of landscape studies (ie the World Heritage Setting study) to ensure that that significance of the setting of historic assets is understood and views are preserved or enhanced.</p> <p>Bullet point 5 should refer to the use of local <b>materials</b> and craftsmanship as a means</p>
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	<p>to reinforce local distinctiveness and high quality architecture.</p> <p>Bullet point 6 - an <b>informed understanding</b> of the place/asset and the local context should be promoted in all regeneration, growth and change, together with the <b>positive management</b> of the historic environment.</p> <p>Bullet point 7 - It is vital that architecture which is poor in quality, whether in terms of design and/or materials, is avoided. The highest quality regeneration in Bath must be supported by appropriate guidance for design and architecture in a distinctive world-class historic city.</p> <p>Bullet point 8 - Conservation Area Appraisals are fundamentally important. The Bath Citywide Character Appraisal is not up to scratch. <b>The Trust would like to work with the Historic Environment Team to develop an achievable programme for expanding and updating the Citywide Character Appraisal so that it becomes a useful tool for ensuring that the significance of the historic environment is understood, and its character is sensitively managed and where possible enhanced.</b></p> <p>Further elements of the policy framework should include the potential impact of new technologies including digitalisation which will require specific guidance.</p> <p>The policy framework fails to take into account buildings of local importance which are not designated historic assets. The policy framework should put in place the support for the retention of buildings of local importance.</p> <p>The policy framework fails to take into account the need for effective use of Article 4 Directions. The Bath Conservation Area currently makes use of two such directions to control the demolition of walls and erection of estate agents boards. Directions for the</p>
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		<p>removal of specific permitted developments that would harm the historic environment (e.g. replacement windows) should be considered.</p> <p><b>The Policy Framework should therefore include;</b></p> <ul style="list-style-type: none"> <li>- <b>The City of Bath WHS Management Plan.</b></li> <li>- <b>Support for a World Heritage SPD, especial studies and SPD to preserve and enhance views.</b></li> <li>- <b>Support for buildings at risk (national and local.)</b></li> <li>- <b>Support for the preservation and enhancement of buildings of local importance.</b></li> <li>- <b>Support for the application of Article 4 Directions.</b></li> </ul> <p>The list of key heritage assets on page 59 should include the Wansdyke.</p> <p>There will be a need to identify the boundaries of designated land on a <b>plan</b>, including the Conservation Areas, the World Heritage Site boundary (and also the Green Belt and AONB).</p>
<p>Page 61 Q DW25</p>	<p>Policy for protecting the setting of the WHS</p>	<p><b>We do not agree with the Council's preferred option</b></p> <p><b>The Trust's reading of the UNESCO operational Guidelines is that B&amp;NES is obliged to have a buffer zone rather than a buffer policy, since the landscape setting requires additional protection, as was confirmed by the UNESCO Decision in July 2009.</b></p> <p><b>The Council's own landscape setting study indicates that a setting boundary</b></p>

	<p><b>should be established. Other WHSs who do not use the buffer zone terminology nevertheless have a ‘Defined Local Setting’.</b></p> <p><b>We believe that it would be possible to devise an ‘intelligent’ buffer zone which might average 2km from the City Boundary, but which was set at varying distances from the City boundary dependent on topography and other considerations and rooted in the work relating to the Council’s landscape setting study already undertaken.</b></p> <p><b>The treatment of this buffer zone requires a supporting policy framework, and adopted supplementary planning guidance, as a matter of urgency, which the Council is obliged to put in place under Planning Circular 07/09. Policies could include land use as well as planning matters.</b></p> <p><b>The obligations of the World Heritage planning circular should be fully reflected in the text of the Core Strategy. It is to be noted that, for instance, climate change mitigation should not be at the expense of authenticity or integrity [of a WHS].</b></p> <p>The text from the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO, 2008), states that ‘Wherever necessary for the proper conservation of the property, an adequate buffer zone should be provided’ (para 103). We would contend that since the Landscape setting is part of the description of the Outstanding Universal Values, and that currently, as the consultation document notes, there is no specific protection to the landscape setting of the WHS in place, <b>a buffer zone is required.</b></p> <p>The Council’s landscape setting work has identified and mapped the topographical, historical and visual aspects of the setting. Since these are mapped it should be possible to define a flexible boundary with sufficient character description to provide a</p>
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		<p>framework which can be used practically.</p> <p>The Core Strategy Options document implies that the buffer zone is an area where measuring the impact on the WHS 'is considered'. However, the UNESCO Operational Guidelines are explicit in seeking planning <b>restrictions</b> in a buffer zone, as follows:</p> <p><i>For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection. The area constituting the buffer zone should be determined in each case through appropriate mechanisms. Details on the size, characteristics and authorized uses of a buffer zone, as well as a map indicating the precise boundaries of the property and its buffer zone, should be provided. A clear explanation of how the buffer zone protects the property should also be provided. Where no buffer zone is proposed, the nomination should include a statement as to why a buffer zone is not required. Although buffer zones are not normally part of the nominated property, any modifications to the buffer zone subsequent to inscription of a property on the World Heritage List should be approved by the World Heritage Committee. [paras 104-8].</i></p> <p>This concept of restriction, or added layer of enforceable protection, is confirmed by the WH Circular, which states that local planning authorities should aim to satisfy the following principles:</p> <ul style="list-style-type: none"><li>• protecting the World Heritage Site and its setting, including any buffer zone, from</li><li>• inappropriate development</li></ul>
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		<ul style="list-style-type: none"> <li>• striking a balance between the needs of conservation, biodiversity, access, the interests of the local community and the sustainable economic use of the World Heritage Site in its setting</li> <li>• protecting a World Heritage Site from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect</li> <li>• enhancing the World Heritage Site where appropriate and possible through positive management</li> <li>• protecting World Heritage Sites from climate change but ensuring that mitigation is not at the expense of authenticity or integrity.</li> </ul> <p>The Circular adds that it will be necessary to enshrine the designation and its accompanying policies in LDF documents, (which includes SPD's). We regard this as a matter of urgency.</p> <p>It is essential that development proposals which are demonstrated through the impact assessment to have significant adverse effects on the WHS setting are not allowed to proceed unless there is clear evidence of genuine compensatory benefits to the WHS which are substantial enough to outweigh the damage. For further detail, see our comments on the proposed New Neighbourhood to South/South West Bath below.</p>
<p>Page 65 Q DW26 Q DW27</p>	<p>Policy framework for a prosperous economy</p>	<p>We support the emphasis in the proposed policy framework on ensuring that people's everyday needs can be met close to where they live, thereby reducing the need to travel, particularly by car, and on the need to consider the risks of over-concentration of growth in the centre of Bath.</p> <p>The policy framework should emphasise the scope to learn from the past in thinking about how our city and town centres could operate without reliance on the motor vehicle. It also needs to recognise the value of the tourist industry to the City of Bath and the District as a whole, and to highlight the strategic importance of sustaining this</p>

	Hierarchy of centres	<p>economic driver.</p> <p>While we agree that it is necessary to identify the hierarchy of centres in order to provide a framework for future development, care needs to be taken to ensure that the hard and fast delineation of primary shopping frontages does not result in an over-concentration of other uses on the edge of the delineated area. For example, the protection of the Bath city centre primary shopping frontage has led to the proliferation of A3 and A5 uses in the adjacent streets, with the result that Milsom Street is dead after the shops close and George Street has become a hot-spot for the night-time economy which impacts adversely on the character of this part of the Conservation Area. A slightly more flexible policy approach would generate a better mix of uses and therefore a more attractive ambience, both in the primary shopping areas and in the adjoining streets.</p> <p>Similarly, care needs to be taken to ensure that policies designed to avoid the loss of office space do not have the perverse effect of preventing the conversion of unsuitable office accommodation in period buildings back to its original residential use.</p> <p>We are concerned that the list of local centres in Bath covers a very wide variety of locations, not all of which could realistically be described as catering for local needs (eg Lansdown Road has many shop fronts but not many functioning shops, and none of these are food shops).</p>
Page 67 Q DW29	Core policy for Accessibility and Transport	<p><b>The core policy needs to explain how the Council will seek to manage the conflicts inherent in the local transport objectives set out in paragraph 2.138.</b> Is it the intention to provide additional road capacity to accommodate the travel generated by housing and employment growth, or will the capacity to be provided under objective 1 be restricted to public transport and cycling/walking routes only? Similarly, will</p>

		<p>measures to improve journey time reliability on principal roads be confined to encouraging people to use alternatives to the private car, or is it the intention to build new or wider roads? How will the impacts of transport on the World Heritage Site, Conservation Areas and their settings, and landscapes including the AONBs be minimised, as suggested in objective 6? By definition, policies to deliver improved transport links between communities, new strategic transportation infrastructure to support economic growth and new and expanded Park and Ride facilities will all have an adverse impact on the landscape.</p> <p>The proposed policy framework needs to address the need for disincentives to use of the private car (reduction in provision for car parking in Bath city centre, congestion charging etc) as well as the need for improvements to the alternatives to the car.</p> <p>Improving affordability of public and school transport is the single most important factor in persuading people to reduce their reliance on the private car. The Core Strategy needs to set out specific and achievable mechanisms for securing high quality and affordable public transport.</p> <p>We are pleased to see the reference to promoting the adoption of enforceable travel plans at workplaces, schools and further education establishments. A reliable and affordable network of school bus services, servicing both the public and private sectors, operating from the Park and Ride sites and possibly one or two other sites on the edge of Bath could make a significant contribution to reducing congestion in the city.</p>
Page 74 and 75	Portrait of Bath	<p>The Trust has the following comments on the Portrait of Bath set out on pages 71 to74.</p> <p>We welcome the recognition of the importance of the City’s World Heritage Status, and of the need to ensure that future development does not undermine the integrity of the</p>

<p>Q B1</p> <p>Q B2</p> <p>Q B3</p>		<p>WHS and its setting. As paragraph 3.4 acknowledges, development over the last 150 years has had a significant impact on the picturesque framing landscape of the Georgian city. It is therefore essential that the remaining elements of the landscape setting are safeguarded in order to maintain the authenticity and integrity of the WHS.</p> <p>The Portrait needs to recognise the positive contribution which tourism makes to the economy and the cultural vitality of the city. While diversification of the economy is desirable, this should complement rather than displace the tourism sector. The cultural sector is also undervalued in the Portrait. We would like to see a new section covering Tourism, Culture and Leisure, all of which help to distinguish Bath from other sub-regional cities of comparable size.</p> <p>Paragraph 3.13 is too focussed on sport: health and wellbeing is about more than just active recreation, important though that is.</p> <p>The fifth bullet point in the list in paragraph 3.20 needs to be clarified. We assume that the 'new neighbourhood' referred to is Western Riverside, which we agree needs to be successfully integrated into the fabric of the city, as do the other brownfield potential development sites. If the reference is to the proposed urban extension, it should be deleted pending reassessment of the need for development beyond that which can be accommodated on the brownfield sites.</p> <p>The 6<sup>th</sup> bullet point should be split into two, with one point covering the need to maintain and enhance the shopping experience and a separate point covering the need to turn around the deterioration of the public realm. The public realm is important for more than just shopping!</p>
<p>Page 77</p>	<p>Spatial Vision for Bath</p>	<p>The fifth and seventh paragraphs of the Spatial Vision should be deleted and replaced</p>

Q B4		<p>by the following:</p> <p><i><b>'Bath will draw on its unique history of city building to create a contemporary model for urban renewal, demonstrating par excellence in the regeneration of its brownfield sites the integration of architecture, landscape setting and functionality. New development will be designed to enhance its surroundings, and the wider environmental impact will be minimised through sustainable construction methods.'</b></i></p>
Page 78 Q B5	Spatial objectives for Bath	We found the ordering of the Spatial Objectives on pages 77 and 78 confusing. Objective 11 should become No 1, followed by 4, 8, 3, 7, 1, 10, 2, 9, 5, 12, 6, 13 and 14.
Page 79 Q B6	Are these the questions the Core Strategy needs to address?	<p>Broadly these seem to be the right sort of questions. <b>It will be particularly important to develop a robust consensus on the values, principles and concepts to be deployed to shape and manage change.</b></p> <p>In relation to demonstrating the deliverability of new housing, the Core Strategy needs to be clear that in the early years the focus will be on bringing forward the sites within the existing urban area. It will also need to set out the decision criteria which will be used to review the need for an urban extension mid-way through the life of the Strategy.</p> <p>Other questions which the Strategy will need to address include how to secure significant improvements in transport and accessibility and how to achieve high standards of architecture and design, informed by Bath's historic environment.</p>
Page 80, para	Meeting Bath's future	The fourth sentence of para 3.30 states that 'the future socio-economic needs of Bath cannot be met within the existing city alone which is why an urban extension has been

3.30	socio-economic needs	<p>proposed'. <b>The Trust continues to believe that the case for the urban extension has not been made.</b> The economic shocks of the last couple of years, together with the rapid changes in the balance of power in the global economy which will inevitably have repercussions for future growth in the UK, mean that it is no longer appropriate to commit to achieving targets which were set during a period of apparently stable economic growth. <b>The 'plan monitor manage' approach requires a much more cautious strategy during the next few years, while keeping open the option to reconsider the need for an urban extension part way through the Core Strategy period.</b></p> <p>Paragraph 3.30 concludes that "Many areas will experience little or no direct physical change over next 20 years". This statement underplays the need to consider the need to improve community facilities and infrastructure (particularly public transport) in those areas where there is little opportunity for major new development.</p> <p>Diagram.15 splits the outer areas into very broad zones: N [of the R.Avon], SE, &amp; SW [split by Wellsway]. A finer mesh is needed recognizing internal differences and the special character of 'villages' which encourages local activity/community.</p>
Page 81 Q B7	Fixed elements of the emerging core strategy	<p>If progress is to be made in delivering new development the Core Strategy will need to fix the key areas of change.</p> <p>We agree that the River Corridor represents the most significant opportunity to provide new housing and new employment space, as well as regeneration of the areas which currently detract from the quality of the Bath experience. This area must be the top priority for development of a comprehensive suite of masterplans, SPDs and design briefs, and with very early engagement with the Environment Agency about any limitations.</p>

		<p>We continue to believe that it is premature to commit to an urban extension in the Green Belt to the South/South West of Bath. <b>The Core Strategy should state explicitly that land will not be released from the Green Belt before 2018 at the earliest and only then if (a) development is under way on all the significant (100+ dwellings) brownfield sites available within the city boundaries, and (b) a review of the Core Strategy demonstrates that the socio-economic need for an urban extension is so pressing that it outweighs the need to protect the setting of the WHS.</b> The new neighbourhood should not therefore be a fixed element of the Core Strategy. The realistic alternative is to consider the scope for locating more employment growth and associated housing at Radstock, Midsomer Norton and possibly Peasedown St John and Paulton. Employment-driven growth in these locations should help to address the headline objective of tackling the causes and effects of climate change by reducing the need to commute. It would also make a stronger contribution to all 5 of the other strategic objectives than concentrating 75% or more of the employment growth in Bath.</p> <p>As section 3 in Box 1 makes clear, there is the potential for outer Bath to accommodate at least as many dwellings as is envisaged for the urban extension, as well as some employment workspace. This, rather than the urban extension, is where the effort needs to be devoted in the early years of the Core Strategy. <b>Work on the urban extension must be put on hold, and clear signals given</b></p> <p><b>(a) to central Government that the MoD land must be made available for redevelopment;</b></p> <p><b>(b) to developers that if they want to come to Bath then the brownfield sites are the only option;</b></p>
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		<p><b>(c) to landowners to the South/South West of the city that no permissions will be granted for new greenfield development for at least the next eight years, and then only if it is clear that growth is required which cannot be accommodated on the brownfield sites.</b></p> <p>Our comments on Q DW4, para 3.30 and Q B11 include our views on alternative options for accommodating growth across the District.</p>
Page 85 Q B8	The River Corridor approach	<p>We strongly support the intention to adopt a strategic approach to the whole of the River Corridor and broadly agree with the rationale set out in paragraph 3.35, although once again <b>we emphasise the importance of obtaining firm assurances about the acceptability of the ambitions in terms of managing flood risk.</b> While we acknowledge that the Core Strategy strategic site policy will not address detailed design issues, it will need to set clear parameters for the supporting Regeneration Delivery Plan. <b>Mechanisms will need to be put in place to prevent premature development proposals coming forward for decision before the RDP and other relevant planning policies (particularly those relating to high quality urban design including building heights and massing and view management) have been put in place.</b> BPT will want to play a full part in helping to develop the RDP and other development policies.</p>
Page 86 Q B9	Positive/negative features of the Central Bath River Corridor	<p>The description of the Multi-Functional City on page 85 should begin by identifying its role as the heart of the UK's only complete city to be designated a World Heritage Site. This status is the foundation of the leisure, cultural and tourism functions and also underpins the city's attractiveness as a commercial and shopping centre and an internationally recognised university town. We suggest that this first section should read as follows:</p>

		<p><b><i>The Central Area of the city is the heart of the UK's only complete World Heritage City. It contains a number of activities which are inter-related and inter-dependent. They include such functions as:-</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>A tourist attraction of international status</i></b></li> <li>• <b><i>A nationally recognised leisure and cultural centre</i></b></li> <li>• <b><i>A university town with an international profile</i></b></li> <li>• <b><i>An important shopping centre and transportation interchange for the sub-region</i></b></li> <li>• <b><i>A commercial centre for the local area and beyond</i></b></li> <li>• <b><i>A convenience shopping centre for many local residents and workers</i></b></li> </ul> <p>Views within the city and beyond to the open country side are also a positive characteristic. The lists of positive and negative characteristics are broadly accurate, but <b>it is not appropriate to say that the quality/ambience of the central area is undefinable</b>. Defining the special qualities and ambience – in other words character – is precisely what Conservation Area Appraisals and character assessments are meant to do. Although the Bath Citywide Character Appraisal falls short of present-day standards for a Conservation Area Appraisal, there is much useful recent material in the Vision for Bath and the Public Realm and Movement Strategy which can provide the foundation for a robust Appraisal which could underpin the Regeneration Delivery Plan.</p> <p>On a point of detail, the penultimate bullet point should reflect the unusually high number of city centre residences of all types, not just the 'high quality' residences. A</p>
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		<p>significant omission from the 'positive' list is the views of the surrounding green hills from almost every part of the city centre (though, sadly, not the new SouthGate development).</p>
<p>Page 89 Q B10</p>	<p>Themes and spatial response for the expansion of the city centre</p>	<p>We support the development principles and strategic spatial response outlined in paragraph 3.49.</p> <p>The first bullet point should read '<b>Complement and be well linked to the historic core in use, look and feel, including the height and massing of new buildings</b>'.</p> <p>We would like to see specific reference, perhaps in the second bullet point, to the need for new development to enhance the views into the WHS from the surrounding hills, and to share the essential Bath characteristic of providing attractive and unexpected vistas and views out to the surrounding green landscape.</p> <p>It should be explicitly stated that in all new developments provision for the private car will be subservient to the needs of pedestrians, cyclists and public transport. Car parking is not an efficient use of the very scarce space available in the central area.</p>
<p>Page 95 Q B11 and B12</p>	<p>Maximum vs minimum concentration options.</p>	<p><b>The Trust believes that none of these options are satisfactory.</b> Our proposed District Wide Option 3 (see our response to Questions DW 4 and 5) is closer to Option 2, but has important differences in relation to housing supply. Option 3 reduces the pressure on the historic core of the city but also offers opportunities to make the outer Bath neighbourhoods more self-contained, as well as allowing scope to locate additional employment growth and associated dwellings in Norton Radstock and possibly other settlements (Peasedown St John, Paulton), thereby reducing the need for commuting into central Bath or Bristol.</p> <p>In order to make the Trust's preferred option 3 deliverable <b>it will be essential to</b></p>

	Comparison retail within the central area	<p>secure the release of all three MoD sites for mixed use redevelopment, preferably including the development of new office space to meet MoD's future requirements for space in Bath as well as providing office space for new employers, new housing and additional convenience retailing. Development of detailed visions, objectives and spatial options for each of these sites and securing their early release must take precedence over work on a new neighbourhood to the South/South West of the city.</p> <p>Bulky goods retailing (DIY, white goods etc) is not a suitable land use for the city centre of Bath, or for sensitive edge-of-town locations, but in the interests of reducing the need for residents to travel out of the city for this type of purchase it would be desirable to include some provision in the plans for the Lower Bristol Road. In the days of online retailing, large floor area for items such as domestic appliances is not needed. The major shed retailers could be encouraged to have a small showroom where customers could be assisted to make online purchases.</p>
Page 98 Q B13 Q B14	Options for Lower Bristol Road	In line with our comments on the Central Zone, we prefer Option B for the Lower Bristol Road.
Pages 99 to 101	Outer Bath (No questions posed)	It is evident that there are a number of significant possible development sites in outer Bath, most of which could potentially enhance the WHS and its setting rather than damage it. <b>Detailed plans for the development of these sites (in particular the three MoD sites, the land expected to be released at the RUH and the secondary school site) must be fully worked up and contracts in place for the construction before any firm commitments are entered into for a new neighbourhood in the</b>

		<p><b>Green Belt.</b></p> <p>The Council must take all possible steps to secure the release of these sites in good time, so as to achieve the objective of developing brownfield ahead of greenfield sites.</p> <p><b>We are concerned that no detailed information has been made available during the options consultation concerning the expansion plans of the two Universities.</b> We reserve the right to comment in more detail when further information becomes available. We would however emphasise that both Universities should be required to provide purpose-built teaching and residential accommodation, preferably on campus, to cater for their future expansion plans. The Council must continue to lobby central Government to ensure that purpose-built student accommodation is counted in calculating the delivery of new dwellings.</p> <p>On a point of detail, Odd Down does not feature in the list of outer Bath neighbourhoods. We consider that it should appear in both the south eastern and the south western neighbourhoods, divided by Wellsway.</p>
Pages 102 to 117	New Neighbourhood to South/South West Bath	<p><b>The Trust's position is that no further work should be done in relation to a new neighbourhood on Green Belt land to the South/South West of Bath until it is clear that the scope for brownfield development has been exhausted and there is genuine need for further growth of the City.</b> See our response to Questions DW4 and DW5 for further explanation of our preferred option 3.</p>