

**Statement to Cabinet re the LDS from
Bath Preservation Trust, 13 July 2011 – as delivered**

Bath Preservation Trust welcomes the publication of the revised LDS and in particular the recognition of the need for a compliant and responsive planning framework.

We would like to make the following observations.

- 1) The current Core Strategy was a substantial improvement on the earlier draft and we have welcomed many of its changes. The Inspector now wants to examine about the evidence base for the removal of urban extensions from the Strategy. For this, we think it is essential to emphasise Bath's **special national and international status** as a World Heritage Site and would be willing to support the Council in doing so.
- 2) We hope the proposed delay in the Examination in Public will offer the opportunity to strengthen the arguments in support of the Core Strategy and hope that if the EIP takes place after the Localism Bill is enacted, the need to comply with the RSS will pass. Has the Council taken legal advice on this matter?
- 3) We have repeatedly asked that the 'stock' statement of corporate priorities recognises the existing qualities of the area, with the priority areas always expressed in terms of enhancing and building on the existing strengths of

environment and built infrastructure which play such a significant part in Bath's World Heritage designation.

- 4) We welcome the fact that the Council sees the need to take a lead on neighbourhood forums, especially in Bath. We would ask that in doing so they recognise the key role that various amenity groups such as ourselves play within neighbourhoods and in particular in the City of Bath.
- 5) We particularly welcome that the WHS management plan, the World Heritage Site Setting Study and the Retrofitting Policy are to have SPD status. On the setting study, the work is complete and the Trust is keen that its methodology for assessing potential harm to the setting is used now, in advance of the SPD's adoption, to inform LPA decision making as soon as possible. On the retrofitting policy we hope our publication 'Warmer Bath' has done much of the groundwork for Council officers in preparing the SPD.
- 6) However we believe there is a notable omission in the LDS in the form of a building heights strategy for the City of Bath. This is an essential tool to inform sustainable development in various locations. Its work should be incorporated into the Placemaking Plan and we would like to see an explicit reference to it.
- 7) The Placemaking Plan will give the Core Strategy meaning. It must be location-specific, with separate plans for different areas. As part of the work in delivering the

plan, the Conservation Area Appraisal for Bath needs to be upgraded and made compliant with current expectations. It is ironic that this has happened in many of B&NES villages, but not in its World Heritage City.

- 8) We would encourage the Council to look closely at whether its planning services team are sufficiently resourced to undertake the challenging work ahead of them.
- 9) Finally the Trust hopes constructively to engage with this, as with the previous, Council and Cabinet in delivering benefit to Bath. We reserve the right to be critical but we would like to emphasise that we all have Bath's successful future, built on its past, at heart.