

B&NES CABINET MEETING 14 JANUARY 2009

DRAFT LOCAL DEVELOPMENT SCHEME

STATEMENT BY BATH PRESERVATION TRUST

The Bath Preservation Trust wishes to draw the Cabinet's attention to three significant issues relating to the Draft Local Development Scheme:

- The addition to the LDS of new SPDs to implement the Urban Extensions at South West Bath and South East Bristol
- The removal from the LDS of the Locally Important Buildings SPD and the absence of other key SPDs needed to protect the special character of the World Heritage Site
- Inadequate engagement with the local community, particularly the heritage sector, over the changes proposed to the Local Development Scheme and the preparatory work on the Local Development Framework more generally.

The Trust welcomed the Council's Resolution at its meeting on 20 September to oppose the unsustainable levels of growth proposed in the draft Regional Spatial Strategy and the emphasis placed by the Council on maintaining the principles of the Green Belt, the Area of Outstanding Natural Beauty and the World Heritage Site. We are therefore surprised and disappointed that the draft LDS includes SPDs to implement the Urban Extensions even though final decisions on the RSS are not expected for some months. We question whether the officers' decision to include these SPDs in the LDS fully reflects the strong political steer given by Councillors in September.

We deplore the proposal to remove the Locally Important Buildings SPD from the LDS. In November, Councillor Gerrish said that funding was being sought to complete this important piece of work. It is now clear that the Heritage Protection Bill is unlikely to proceed in the current Parliament. It is therefore up to the Council to ensure that our locally important buildings are adequately protected, and this needs to be done before the pressure for development builds up after the current downturn. A decision to drop the SPD would be a dereliction of duty which would seriously damage the Council's credibility. Furthermore, the Trust repeats its call for the Council to put in place an SPD to protect the special character of the World Heritage City, in particular setting policies on building heights and view management. It is vitally important to get these policies in place during the recession so as to facilitate appropriate development when the economy recovers.

Thirdly, we very much regret that the Council is not engaging effectively with us over the preparatory work on the LDF. Two examples:

- We have had no contact from the Council over the proposal to drop the Locally Important Buildings SPD, despite the detailed response which we submitted to the recent consultation exercise.
- We offered in July to assist with the work on the Regeneration Delivery Plan for Bath, and have made repeated requests for a meeting to discuss how we might help. John Betty's Progress Report to the Overview and Scrutiny Committee on 13 January claims that the LDF and the Regeneration Delivery Plans are being developed 'via local partnership engagement'. We have seen no evidence of any meaningful engagement with the heritage sector. Just yesterday we were offered a meeting 'in the spring' to discuss the communication strategy for the Delivery Plans. We welcome this invitation, but what we are looking for is the opportunity to engage at an early stage on the substance of the Plan, not on how it is communicated. We know that work has been going on for many months, but our offer to become constructively engaged in the all-important early stages appears to have been spurned.

We therefore ask the Cabinet

- To remove the references to the Urban Extension SPDs from the LDS
- To include a Historic Environment SPD covering all the relevant policies in the Local Plan, including world heritage management with particular reference to views and vistas, and locally important buildings
- To ensure that officers engage effectively with us **now** over the substance of the Regeneration Delivery Plan for Bath.