

# Cabinet

**Date: Tuesday 20th May 2025**

**Time: 6.30 pm**

**Venue: Council Chamber - Guildhall, Bath**

## Agenda

### **To: All Members of the Cabinet**

Councillor Kevin Guy (Leader of the Council, LD Group Leader, Member Advocate for Armed Forces and Veterans), Councillor Tim Ball (Cabinet Member for Neighbourhood Services), Councillor Alison Born (Cabinet Member for Adult Services), Councillor Mark Elliott (Cabinet Member for Resources), Councillor Paul May (Cabinet Member for Children's Services), Councillor Matt McCabe (Cabinet Member for Built Environment, Housing and Sustainable Development), Councillor Manda Rigby (Cabinet Member for Highways), Councillor Paul Roper (Cabinet Member for Economic and Cultural Sustainable Development), Councillor Sarah Warren (Deputy Council Leader (statutory) and Cabinet Member for Climate Emergency and Sustainable Travel) and Councillor David Wood (Deputy Council Leader (non-statutory) and Cabinet Member for Council Priorities & Delivery)

Chief Executive and other appropriate officers  
Press and Public

The agenda is set out overleaf.



**Marie Todd**

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## NOTES:

1. **Inspection of Papers:** Papers are available for inspection as follows:

Council's website: <https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1>

2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

### 3. Recording at Meetings

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control. Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators. We request that those filming/recording meetings avoid filming public seating areas, children, vulnerable people etc; however, the Council cannot guarantee this will happen.

The Council will broadcast the images and sounds live via the internet [www.bathnes.gov.uk/webcast](http://www.bathnes.gov.uk/webcast). The Council may also use the images/sound recordings on its social media site or share with other organisations, such as broadcasters.

### 4. Public Speaking at Meetings

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition.

**Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Tuesday notice must be received in Democratic Services by 5.00pm the previous Thursday.**

Further details of the scheme can be found at:

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942>

### 5. Emergency Evacuation Procedure

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are signposted. Arrangements are in place for the safe evacuation of disabled people.

### 6. Supplementary information for meetings

Additional information and Protocols and procedures relating to meetings

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505>

## Cabinet - Tuesday 20th May 2025

### in the Council Chamber - Guildhall, Bath

#### A G E N D A

1. WELCOME AND INTRODUCTIONS

2. EMERGENCY EVACUATION PROCEDURE

The Democratic Services Officer will read out the emergency evacuation procedure as set out in the notes.

3. APOLOGIES FOR ABSENCE

4. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

- (a) The agenda item number in which they have an interest to declare.
- (b) The nature of their interest.
- (c) Whether their interest is **a disclosable pecuniary interest** or an **other interest**,  
(as defined in Part 4.4 Appendix B of the Code of Conduct and Rules for Registration of Interests)

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

5. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

6. QUESTIONS FROM PUBLIC AND COUNCILLORS

Questions submitted before the deadline will receive a reply from an appropriate Cabinet member or an undertaking to respond within 5 working days of the meeting. Councillors may ask one supplementary question for each question they submit, up to a maximum of two per Councillor.

7. STATEMENTS OR PETITIONS FROM PUBLIC OR COUNCILLORS

Councillors and members of the public may register their intention to make a statement if they notify the subject matter of their statement before the deadline. Statements are limited to 3 minutes each. The speaker may then be asked by Cabinet members to answer factual questions arising out of their statement.

8. MINUTES OF PREVIOUS CABINET MEETING - 13TH MARCH 2025 (Pages 5 - 10)

To be confirmed as a correct record and signed by the Chair.

9. CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET

This is a standard agenda item, to cover any reports originally placed on the Weekly List for single Member decision making, which have subsequently been the subject of a Cabinet Member requisition to the full Cabinet, under the Council's procedural rules.

10. MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

This is a standing agenda item (Constitution rule 3.3.14) for matters referred by Policy Development and Scrutiny bodies. The Chair of the relevant Policy Development and Scrutiny Panel will have the right to attend and to introduce the Panel's recommendations to Cabinet.

11. SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING (Pages 11 - 18)

To note the list of Cabinet Single Member decisions taken and published since the last Cabinet meeting (no debate).

12. CORPORATE STRATEGY 2023-2027 - END OF YEAR REVIEW FOR 2024-2025 (Pages 19 - 46)

The report updates the Cabinet on the progress made in delivering the Council's Corporate Strategy 2023-27 in 2024-25.

13. RULE 3.5.15 - COMBINED CITY OF BATH AND GREAT SPA TOWNS OF EUROPE WORLD HERITAGE SITES MANAGEMENT PLAN (2024-2030) (Pages 47 - 236)

The report seeks endorsement of the Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030).

14. HIGHWAYS SERVICE OVERVIEW (PRESENTATION)

To receive a presentation from the Highways, Traffic and Passenger Transport Service (Place Directorate) covering the work undertaken by the service.

The Democratic Services Officer for this meeting is Marie Todd who can be contacted on 01225 394414.

### BATH AND NORTH EAST SOMERSET

### CABINET

These minutes are draft until confirmed as a correct record at the next meeting.

Thursday, 13th March, 2025

#### **Present:**

Councillor Kevin Guy	Leader of the Council, LD Group Leader, Member Advocate for Armed Forces and Veterans
Councillor Tim Ball	Cabinet Member for Neighbourhood Services
Councillor Alison Born	Cabinet Member for Adult Services
Councillor Mark Elliott	Cabinet Member for Resources
Councillor Paul May	Cabinet Member for Children's Services
Councillor Matt McCabe	Cabinet Member for Built Environment, Housing and Sustainable Development
Councillor Manda Rigby	Cabinet Member for Highways
Councillor Paul Roper	Cabinet Member for Economic and Cultural Sustainable Development
Councillor Sarah Warren	Deputy Council Leader (statutory) and Cabinet Member for Climate Emergency and Sustainable Travel

#### **84 WELCOME AND INTRODUCTIONS**

The Chair welcomed everyone to the meeting.

#### **85 EMERGENCY EVACUATION PROCEDURE**

The Senior Democratic Services Officer read out the emergency evacuation procedure.

#### **86 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Cllr Dave Wood.

#### **87 DECLARATIONS OF INTEREST**

Cllr Matt McCabe declared a non-registerable interest in agenda item number 12, Heritage Services Business Plan, because his wife is a Trustee for the Fashion Museum Foundation. Cllr McCabe left the meeting when this item was discussed and took no part in the debate or decision.

#### **88 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR**

There was no urgent business.

## **89 QUESTIONS FROM PUBLIC AND COUNCILLORS**

There were three questions from Councillors and no questions from members of the public.

*[Copies of the questions and responses, including supplementary questions and responses if any, have been placed on the Minute book as Appendix 1 and are available on the Council's website.]*

## **90 STATEMENTS OR PETITIONS FROM PUBLIC OR COUNCILLORS**

There were no statements from members of the public or non-executive councillors.

Cllr Manda Rigby, Cabinet Member for Highways, drew the attention of the Cabinet to the article published in the Bath Chronicle regarding the recommendations from the M4 to South Coast study. The recommendation is that the primary strategic route to the South Coast will be the A350 from the M4, passing via Chippenham, Melksham and Westbury before connecting to the A36 at Warminster and continuing south. The current network utilises the A36 and A46 through Bath as the main designated route. Cllr Rigby was delighted with this outcome and thanked all officers and councillors that had worked towards this conclusion.

## **91 MINUTES OF PREVIOUS CABINET MEETING - 13TH FEBRUARY 2025**

**RESOLVED** that the minutes of the meeting held on Thursday 13<sup>th</sup> February 2025 be confirmed as a correct record and signed by the Chair.

## **92 CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET**

No single member items were requisitioned to Cabinet.

## **93 MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES**

No matters were referred by Policy Development and Scrutiny Panels.

## **94 SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING**

The Cabinet agreed to note the report.

## **95 HERITAGE SERVICES BUSINESS PLAN 2025-30**

(Note: At this point Cllr Matt McCabe left the meeting having declared a non-registerable interest in this item.)

Cllr Kevin Guy introduced Rob Campbell, Head of Culture and Heritage, and invited him to make a presentation regarding the Heritage Services Business Plan.

The presentation covered the following issues:

- The vision for the service is to “learn from the past, understand the present and shape the future”.
- B&NES Heritage Services comprise The Roman Baths, The Victoria Art Gallery, Bath Record Office, World Heritage Centre, Clore Learning Centre and the Fashion Museum.
- The money from tourists is fed directly back to the community in which the tourism occurs.
- The challenging sector-wide conditions have been met with cost saving and entrepreneurship.
- Heritage Services will return an approximate surplus of £12m in 2024/25 which is equivalent to £145 per Council Tax household.
- The service was awarded the “Best of the Best” award in Tripadvisor’s Travelers’ Choice Awards in 2024. This is the highest level Tripadvisor award and means that B&NES is in the top 1% of listings worldwide.
- The Fashion Museum proposals have been developed into one of the most cultural significant projects in the UK.
- In 2025/26 challenging market conditions are anticipated but a range of proactive measures will be introduced to give the best opportunity to succeed.

*A copy of the presentation slides is attached as an appendix to the minutes.*

Cllr Paul Roper, Cabinet Member for Economic and Cultural Sustainable Development, introduced the report, moved the amended officer recommendation and made the following points:

- Cllr Roper highlighted the extensive activities and plans for Heritage Services for the next 5 years.
- He emphasised the uniqueness and beauty of Bath and North East Somerset, highlighting its two UNESCO World Heritage Classifications.
- Heritage Services operates as a separate business unit but is owned by Bath and North East Somerset Council.
- The Roman Baths attract over one million visitors annually, making it the second most visited payable attraction in the UK after Stonehenge.
- Visitors significantly contribute to the local economy, with many staying in the city for extended periods.
- Positive feedback and high ratings on Tripadvisor help maintain a steady flow of visitors.
- Heritage Services engages in community activities, targeting learning and engagement, and supporting the neediest in the area.
- The Clore Learning Centre and Victoria Art Gallery offer award-winning learning and engagement activities.
- The Bath Records Office provides access to a vast archive, with plans to digitize records for greater accessibility.
- Despite the closure of the Fashion Museum, the collection remains curated and is showcased globally.
- Plans are underway to establish a new Fashion Museum in the Old Post Office building, a project of international significance.
- Cllr Roper commended the Heritage Services team for their excellent work and highlighted the Liberal Democrat administration’s ambition and achievements.

Cllr Mark Elliott seconded the motion and made the following points:

- Heritage Services are a valuable asset to Bath & North East Somerset residents.
- They demonstrate expertise, business acumen, and creativity.
- Heritage assets enrich the cultural depth of the city.
- Financially, Heritage Services deliver significant value, saving each household £145 in council tax for the financial year ending April 2025.
- There is anticipated growth in visitors to the Roman Baths for 2025/26.
- The projected financial surplus is £12 million in 2024/25, rising to £14.2 million in 2025/26.
- This is equivalent to a 12% rise in council tax, or 18% when including visitor parking revenue and business rates.
- Few councils have such valuable assets and the contributions from Heritage Services are highly appreciated.
- The reopening of Jolly's store is imminent, this is an iconic Bath landmark owned by the Council.
- This latest development is more proof that, assisted by our tourism and heritage footfall, the city's retail sector and wider economy are doing very well.

Cllr Sarah Warren highlighted the proactive efforts of Bath & North East Somerset Council's Heritage Services in advancing the Net Zero commitments. The department has made environmental sustainability a core aim, with initiatives such as optimising the Roman Baths Heat Exchange System, engaging suppliers for sustainable procurement, and working towards zero waste to landfill. A sustainability manager has been recruited to oversee these efforts, including the development of a decarbonisation plan based on three years of carbon emissions data. The service is also pioneering a sustainable tourism strategy and seeking external accreditation for their sustainability work. Cllr Warren expressed pride in these achievements and thanked officers and Cllr Roper for their contributions to the council's net zero aspirations.

Cllr Manda Rigby drew attention to the Remarkable Books exhibition which will take place on 27<sup>th</sup> and 28<sup>th</sup> June 2025 at the Guildhall, Bath. The free two-day event will showcase, for the first time since 1923, a wide range of extraordinary books, manuscripts and fine bindings acquired by what was then the Bath Municipal Library, now in the care of the Bath Record Office.

Cllr Paul May noted how well the Heritage facilities are run and praised their contribution to Health and Wellbeing and the local economy. He also highlighted the inclusive nature of the service, and the efforts made to engage with all sectors of society.

Cllr Tim Ball stated that he is pleased to see the business plan being taken forward and is proud of the work that is taking place.

Cllr Kevin Guy thanked local residents for giving this administration the opportunity to deliver these projects and services.

**RESOLVED** (unanimously):

- (1) To approve the Heritage Services Business Plan 2025 – 2030.



- (2) To delegate approval to the Executive Director Sustainable Communities, in consultation with the S151 Finance Officer, to approve a capital budget of up to £2,135,000 towards the development of detailed designs (RIBA Stage 3) and associated work, to support the future redevelopment of the Fashion Museum Bath. This is in-line with the activity outlined in the Business Plan and the overall Council commitment to the project, included as part of the Council's Capital Programme and recently approved as part of the Council's budget setting for 2025/26.
- (3) To delegate approval to the Executive Director Sustainable Communities, in consultation with the Leader of the Council, S151 Finance Officer and Monitoring Officer to accept grant awards and philanthropic contributions made towards the Fashion Museum Bath project in-line with the fundraising strategy identified in the Heritage Services Business Plan.

The meeting ended at 7.15 pm

Chair \_\_\_\_\_

Date Confirmed and Signed \_\_\_\_\_

**Prepared by Democratic Services**

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Bath & North East Somerset Council

## **Cabinet Single-Member Decisions and Responses to Recommendations from PDS Panels**

published from 5<sup>th</sup> March until 12<sup>th</sup> May 2025

Further details of each decision can be seen on the Council's Single-member Decision Register at <http://democracy.bathnes.gov.uk/mgDelegatedDecisions.aspx?&dm=3>

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### **Somer Valley Enterprise Zone (SVEZ) s.172 Powers**

To approve the use of s.172 Housing and Planning Act (HPA) (2016) Powers.

**Decision Maker:** Cabinet Member for Economic and Cultural Sustainable Development

**Decision published:** 24/04/2025

**Effective from:** 02/05/2025

**Decision:**

(1) To agree to exercise s172 Powers as required for the purpose of undertaking surveys on private land.

(2) To delegate to the Director for Capital and Housing Delivery, the power to authorise the issue and service of notices to landowners, to carry out surveys. This includes the issue of warrants for entry to the land as required.

**Wards affected:** Paulton

**Lead officer:** Ellie Wintrup

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### **CRSTS Bath City Centre Phase 2 Handover**

Decision to approve the acceptance of project responsibility and grant funding from the Mayoral Combined Authority associated with Phase 2 of the Bath City Centre CRSTS scheme.

**Decision Maker:** Cabinet Member for Climate Emergency and Sustainable Travel

**Decision published:** 07/04/2025

**Effective from:** 15/04/2025

**Decision:**

To agree that:

(1) The position of responsible body be assumed by B&NES Council for Phase 2 of the Bath City Centre project, to be delivered according to milestones agreed with the Combined Authority.

(2) Approval be delegated to the Executive Director of Sustainable Communities, in consultation with the S151 Officer, to accept the Grant Offer Letter (GOL) from the West of England Mayoral Combined Authority when it is provided.

(3) Capital budget of £711k be approved to develop the Full Business Case (FBC), final Preliminary and Detailed Designs for the scheme. This is entirely funded by CRSTS grant.

(4) The intention for further approval of grant funding acceptance be sought at an appropriate time, following Combined Authority approval of the Full Business Case, for delivery of the works associated with the Bath City Centre Phase 2 project.

**Wards affected:** All

**Lead officer:** Ryan Duncan

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### **Adopting the Bath Air Quality Action Plan 2024**

The Plan outlines the action we will take to improve air quality in the city of Bath between 2024-2029.

**Decision Maker:** Cabinet Member for Climate Emergency and Sustainable Travel

**Decision published:** 02/04/2025

**Effective from:** 10/04/2025

**Decision:**

To adopt the Bath Air Quality Action Plan 2024.

**Wards affected:** Bathwick; Kingsmead; Lambridge; Lansdown; Newbridge; Oldfield Park; Walcot; Westmoreland; Widcombe & Lyncombe

**Lead officer:** Michelle Tett

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### **Amendment to: Fixed Penalty Notice charging schedule re Public Space Protection Orders (for anti-social behaviour related to alcohol)**

Amendment to decision on report 14.12.2024 (Ref: E3592): Fixed Penalty Notice charging schedule re Public Space Protection Orders (for anti-social behaviour related to alcohol).

**Decision Maker:** Cabinet Member for Neighbourhood Services

**Decision published:** 01/04/2025

**Effective from:** 09/04/2025

**Decision:**

To agree the following amendments:

The Fixed Penalty charge for breach of Public Spaces Protection Orders to be fixed at the following levels:

- The Fixed Penalty Notice must be paid within a maximum of 14 days (updated from 28 days).
- An early payment amount of less than £100 can be offered if paid within a period of less than 14 days (in our case: £75 if paid within 10 days).
- On failure to pay a Fixed Penalty Notice, the maximum penalty on conviction for a section 63 offence is level 2, which is £500.

**Wards affected:** Bathwick; Combe Down; Kingsmead; Lambridge; Lansdown; Midsomer Norton North; Midsomer Norton Redfield; Moorlands; Newbridge; Odd Down; Oldfield Park; Southdown; Twerton & Whiteway; Walcot; Westmoreland; Weston; Widcombe & Lyncombe

**Lead officer:** Emily Patterson

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### **Fairfield House and 27 Burleigh Gardens - New Lease**

To consider the grant of a short term lease at a less than market rent, prior to and in preparation for a Community Asset Transfer by 28.09.2028.

**Decision Maker:** Cabinet Member for Adult Services

**Decision published:** 01/04/2025

**Effective from:** 09/04/2025

#### **Decision:**

To delegate to the Head of Corporate Estates & Development authority to:

(1) Grant a new lease to 28.09.2028, which will be outside of the security of tenure provisions set out in the Landlord and Tenant Act 1954 at an annual rent of £1,200 per annum.

(2) The lease will be predominantly on the basis of the Tenant taking on the responsibilities for the property with a costs transition by way of grants from the Council. Revenue costs to the Council to 31.03.2024 were £54,200 with anticipated for the current financial year to be £47,300 pa, with a similar level for running/revenue costs to the end of the lease. The ultimate aim is for the Tenant to assume full responsibility for the property and to be ready to do so by 28.09.2028 without any council grants or other assistance from the Council.

(3) There are no current delegations or resolutions to allow these transfers to take place at less than best consideration; best consideration being based on market values. The report, therefore, seeks to give such authorisation to the Head of Corporate Estates & Development [in consultation with the Monitoring Officer and s.151 Officer].

(4) During this next lease period the tenant intends to further develop plans to apply for a further Community Asset Transfer (CAT) for a new longer lease [25 years]. The Tenant will during the lease period arrange and develop stand-alone funding, business and any partnership plans in consultation with the Council. The Tenant under the CAT will become responsible for all aspects of the property, including repairs, utilities etc. The lease would enable them to apply for external funding for repairs and other works, subject to any listed building consents.

(5) To note that the Tenant has not managed to obtain funding and develop plans for taking ownership of the property under a longer-term lease and CAT in the last granted lease. This current lease should be regarded as the last opportunity.

(6) An independent valuation confirms that the property is a valuable asset which could be utilised for other council services and programmes including realising capital for other capital requirements/services or paying down debt.

**Wards affected:** Newbridge  
**Lead officer:** Richard Holden

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### **School Streets - Prioritisation and Funding**

Report to enable transfer of £250k Clean Air Zone funding to the School Streets programme and outline work done to date.

**Decision Maker:** Cabinet Member for Resources  
**Decision published:** 31/03/2025  
**Effective from:** 08/04/2025

**Decision:**

(1) To fully approve the capital budget of £250,000 funded by CAZ reserves, which are already received and committed for this purpose.

(2) To note the work done to date on the programme.

(3) To approve the initial shortlist of schools that will be subject to further feasibility and design work. These will be subject to further Single Member Decisions to enable delivery at the appropriate time.

**Wards affected:** All  
**Lead officer:** Jon Legge

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### **Bath Quays North (BQN) Budget Request**

The Legal & General development agreement for Bath Quays North expired on 19th July 2024 having not secured a viable or proceedable development. The Council has taken back full control to consider alternative delivery options. Consequently, a new delegation to commit further project expenditure against the budget provision is now required.

Two routes to delivery are being evaluated:

Firstly, through a Memorandum of Understanding with the University of Bath to explore how their occupation of the site could be developed to meet both parties' objectives.

Secondly, to establish occupier interest and explore further market appetite to deliver the scheme.

Costs are funded via approved WECA grant.

**Decision Maker:** Cabinet Member for Economic and Cultural Sustainable Development

**Decision published:** 27/03/2025

**Effective from:** 04/04/2025

**Decision:**

To provide authority for the team to use the proposed 2025/26 budget in pursuit of the project aims set out in the report.

**Wards affected:** Kingsmead

**Lead officer:** Richard Holden

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### **Renewal of Keynsham Community Energy Cooperation Agreement**

Decision to renew cooperation agreement with Keynsham Community Energy which was previously in place between 2018-2022.

**Decision Maker:** Cabinet Member for Climate Emergency and Sustainable Travel

**Decision published:** 25/03/2025

**Effective from:** 02/04/2025

**Decision:**

To agree that the Council enters into a renewed Cooperation Agreement with Keynsham Community Energy for five years, from 2025 to 2030.

**Wards affected:** Keynsham East, Keynsham North, Keynsham South, Clutton and Farmborough, Publow with Whitchurch, Saltford

**Lead officer:** Nicola Brain

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### **NDR Discretionary Relief Policy - Amendment 2025/26**

To review and amend policy to allow for changes due from 25/26 and to consolidate existing rules.

**Decision Maker:** Cabinet Member for Resources

**Decision published:** 18/03/2025

**Effective from:** 26/03/2025

**Decision:**

To adopt the new policy in full.

**Wards Affected:** All

**Lead officer:** Amanda Dalton-Jones

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## **School Term and Holiday Dates 2026/27 Academic Year**

Following consultation to fully approve the school term and holiday dates for the 2026/27 academic year.

**Decision Maker:** Cabinet Member for Children's Services

**Decision published:** 18/03/2025

**Effective from:** 26/03/2025

**Decision:**

To approve the Council's preferred calendar of school term and holiday dates and to recommend these to all schools for the 2026-27 academic year.

**Wards affected:** All

**Lead officer:** Josephine Rees

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## **Environment Act 2021**

The Environment Act 2021 introduces new enforcement provisions that applies to buildings that emit smoke from a chimney within a Smoke Control Area. These include new legal notices and financial penalties.

**Decision Maker:** Cabinet Member for Climate Emergency and Sustainable Travel

**Decision published:** 10/03/2025

**Effective from:** 18/03/2025

**Decision:**

(1) To authorise officers under the Environment Act 2021 to enforce provisions that apply to buildings that emit smoke from a chimney within a Smoke Control Area.

(2) To support the introduction of Financial Penalties set at £175 for a first offence, and £300 for subsequent offences. There will be no reduction in the amount of the fine, if paid early.

(3) To authorise the relevant team manager and/or service manager responsible for the function, to have the discretion to review and vary the amount of the financial penalty upon consideration of objections received to the 'Notice of Intent to issue a financial penalty'.

**Wards affected:** Bathwick; Combe Down; Kingsmead; Lambridge; Lansdown; Moorlands; Newbridge; Odd Down; Oldfield Park; Southdown; Twerton & Whiteway; Walcot; Westmoreland; Weston; Widcombe & Lyncombe

**Lead officer:** Michelle Tett

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## **CIL for Bath Advisory Board Recommendations Round Seventeen**



This sets out the recommendations of the Advisory Board for the seventieth funding round of Bath Neighbourhood CIL. The Leader is asked to agree the funding allocation of £49,905 for one project.

**Decision Maker:** Council Leader

**Decision published:** 04/03/2025

**Effective from:** 12/03/2025

**Decision:**

To approve the funding request of £49,905 for Ride to work by Bike, Transition Bath for implementation over a five-year timeframe.

The initiative aims to motivate Bath residents to transition from car commuting to using electric bikes for their daily work journeys. This shift is intended to assist both commuters and local businesses in alleviating traffic congestion, reducing carbon emissions, and improving air quality.

**Wards affected:** All

**Lead officer:** Mark Hayward

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Bath & North East Somerset Council		
MEETING:	Cabinet	
MEETING DATE:	20 May 2025	EXECUTIVE FORWARD
		PLAN REFERENCE: <b>E3598</b>
TITLE:	Corporate Strategy 2023-2027- End-of-Year Review for 2024-2025	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Annex 1 Corporate Strategy 2023-2027 – End-of-Year Review		

## 1. THE ISSUE

- 1.1. This report updates Cabinet on the progress made in delivering our Corporate Strategy 2023-27 in 2024-25.

## 2. RECOMMENDATION

- 2.1. The Cabinet is asked to:
- Note the progress in delivering the Corporate Strategy during 2024-25 as set out in the Appendix.
  - Approve the indicator set commentary on performance.
  - Provide guidance on any potential revisions to the indicator set, including involvement by the Corporate Policy Development and Scrutiny Panel.

## 3. THE REPORT

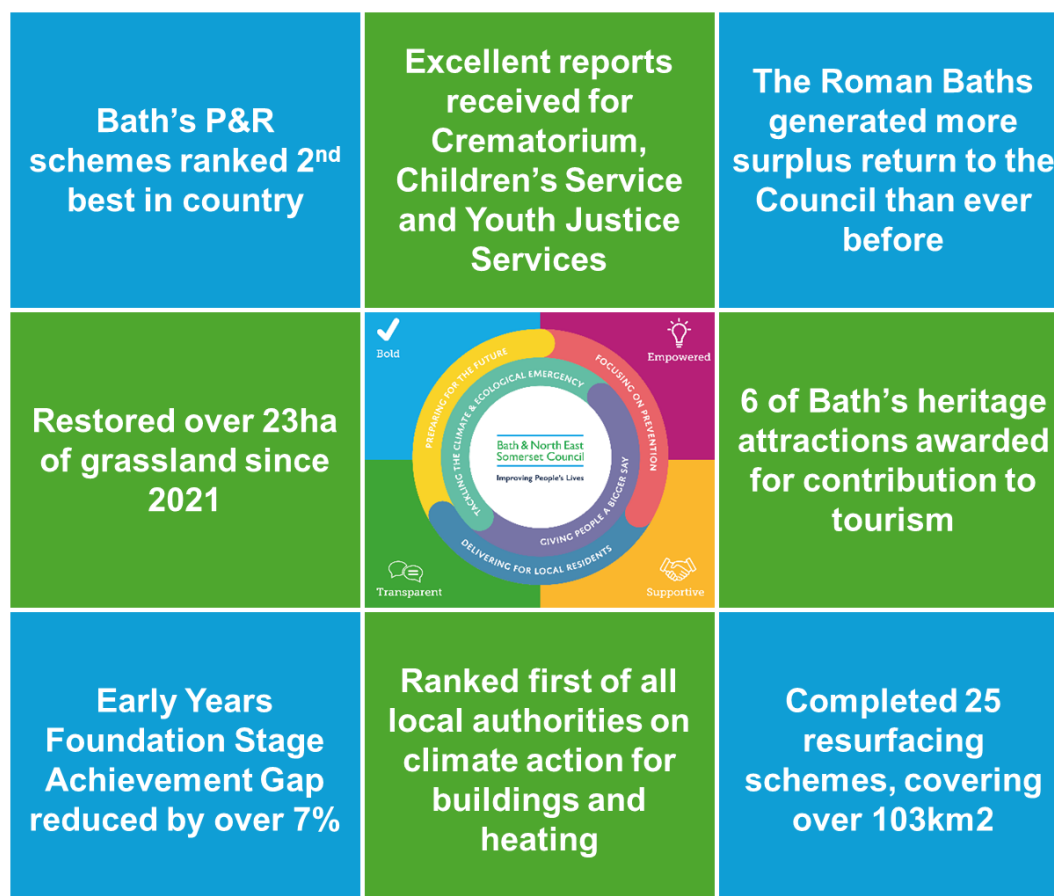
- 3.1. Council adopted a new four-year Corporate Strategy at its meeting on 20 July 2023. The document set a new direction for the council, reflecting the aims of the administration elected in May 2023. It provides a clear approach to deliver the council's activities and priorities.
- 3.2. The Corporate Strategy is the council's overarching strategic plan. It sets out what we plan to do, how we plan to do it, and how we will measure performance over the next four years. The Corporate Strategy framework is set out below:

- 1) We have one overriding purpose - **to improve people's lives**. This brings together everything we do, from cleaning the streets to caring for our older people. It is the foundation for our strategy, and we will ensure that it drives our commitments, spending, and service delivery.
- 2) We have two core policies - **tackling the climate and ecological emergency** and **giving people a bigger say**. These will shape our work.
- 3) To translate our purpose into commitments, we have identified three principles. We want to **prepare for the future, deliver for residents** and **focus on prevention**. These, in turn, help us to identify specific delivery commitments across our services.

3.3. On 20 July 2023, the council adopted an updated strategy which highlights a number of key priorities driven by our principles. These set out how we will improve people's lives over the next four years:

Delivering for local residents	Focusing on prevention	Preparing for the future
<ul style="list-style-type: none"> <li>The right homes in the right places</li> <li>More travel choices</li> <li>Clean, safe and vibrant neighbourhoods</li> </ul>	<ul style="list-style-type: none"> <li>Support for vulnerable adults and children</li> <li>Delivering for our children and young people</li> <li>Healthy lives and places</li> </ul>	<ul style="list-style-type: none"> <li>Good jobs</li> <li>Skills to thrive</li> <li>Cultural life</li> </ul>

3.4. This report brings together the work undertaken to deliver the Corporate Strategy in 2024-25, including reference to relevant performance indicators to measure progress as agreed by Cabinet in July 2024. A snapshot of key successes achieved in 2024-25 is set out below:



3.5. Performance reporting is conducted against the council's [strategic indicators](#), as approved by [Cabinet](#) on 11 July 2024. The indicator set provides a basis for assessing performance against the delivery of the [Corporate Strategy 2023-2027](#). A new set of Strategic Indicators was agreed in July 2024 to give a better balance of performance across the key services. Each indicator is accompanied by three parts:

- 1) **RAG rating:** Each indicator is assigned a green, amber or red RAG rating to demonstrate the current delivery status of its target, alongside a brief summary explaining the assigned rating:

	On target
	Behind target but still delivering well.
	Off target, and identified as requiring additional activity

- 2) **Trend:** This shows the overall direction of the indicator. An upwards arrow means the figures are increasing, while a downwards arrow means that figures are decreasing. If this word is in a green box, it indicates a positive trend, meaning progress is moving in the desired direction. A red box signifies a negative trend.
- 3) **Narrative:** This provides context for the performance, explaining the associated trend and RAG rating. The narrative also outlines future actions aimed at improving performance.

3.6. We are inviting comments on any potential changes to the indicator set twelve months on, including future involvement by the Corporate Policy Development and Scrutiny Panel.

## 4. STATUTORY CONSIDERATIONS

4.1. The council has a wide range of powers which allow it to deliver the Corporate Strategy adopted in July 2023.

## 5. RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1. The council's financial planning and budget setting process is the key resource mechanism for delivering the Corporate Strategy. Council agreed the resourcing requirements for the 2024-25 at its Budget meeting in February 2024.

## 6. RISK MANAGEMENT

6.1. Any risks relating to the issues identified in this report will be captured as part of the Council risk management approach and strategy and will be recorded on the corporate or directorate risk registers. An assessment of those risks identified will take place along with any mitigating actions.

## 7. CLIMATE CHANGE

- 7.1. The Annual Climate and Nature Progress Report was presented to Council in April 2024 on our progress in tackling the climate and ecological emergencies. The current report provides an opportunity to re-emphasise how these commitments are reflected as “core policies” in delivering the Corporate Strategy. A new Annual report will be presented to Cabinet later this year.
- 7.2. Monitoring the effectiveness of delivering our core policy of tackling the climate and ecological emergency is a key component of the progress report.

## 8. OTHER OPTIONS CONSIDERED

- 8.1. None

## 9. CONSULTATION

- 9.1. This report has been cleared by the Executive Director of Resources and the Head of Legal Services.

<b>Contact person(s)</b>	Simon Parker, Executive Director of Resources
<b>Background papers</b>	<a href="#">Corporate Strategy 2023-2027</a>
<b>Please contact the report author if you need to access this report in an alternative format. Please contact them at <a href="mailto:leanne_wilkinson@bathnes.gov.uk">leanne_wilkinson@bathnes.gov.uk</a></b>	

## Corporate Strategy – assessment against outcomes framework

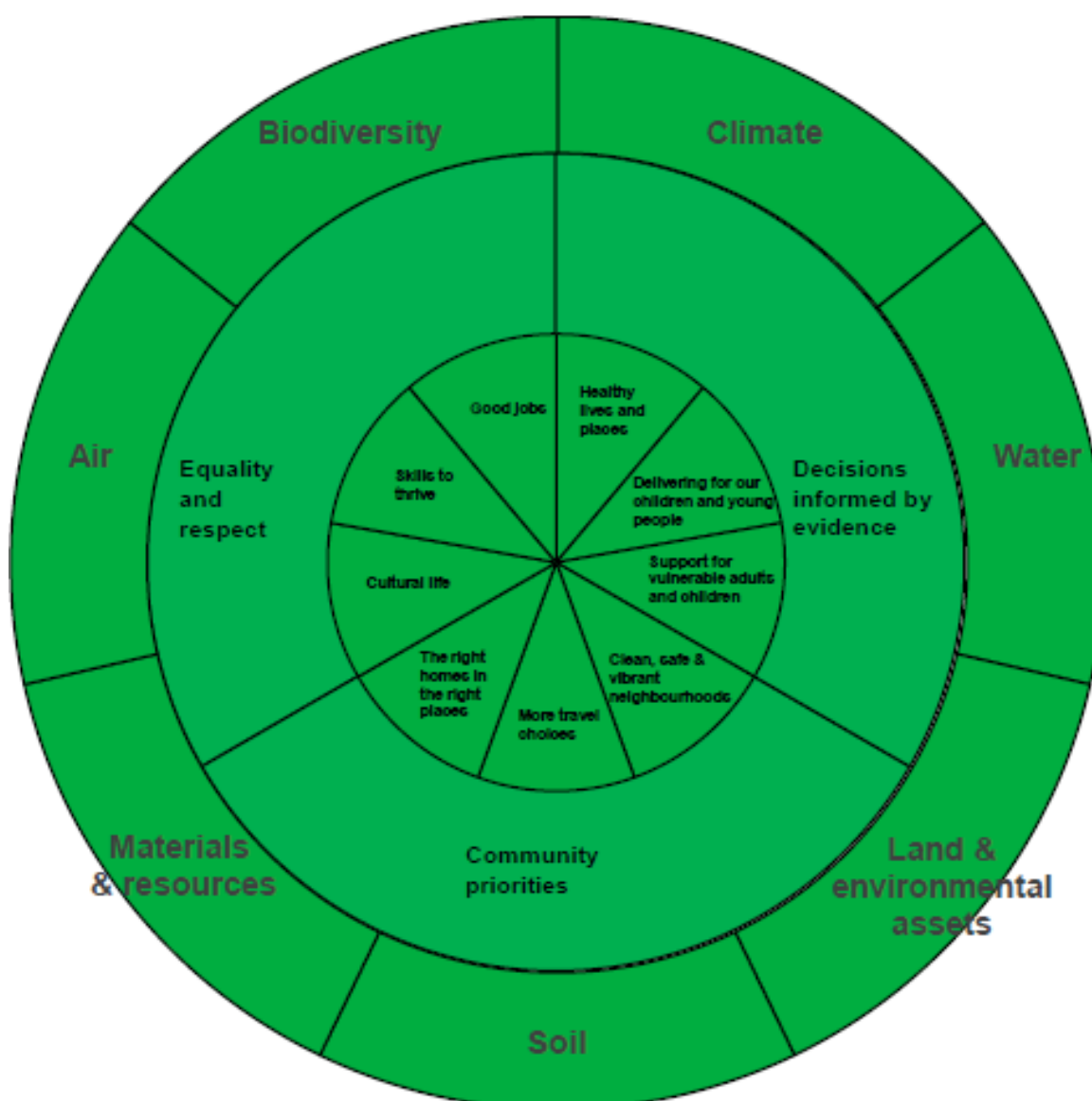
Provide a traffic light assessment for each of the priorities listed on the framework.

Positive impact	
Positive & negative impacts	
Negative impact	
No impact	

The [Corporate Strategy](#) 2023-2027 provides more context to each of the priorities.

Where a priority is assessed as green, amber, or red please add additional comment (inside the box) to provide context.

Please contact [Ceri\\_Williams@bathnes.gov.uk](mailto:Ceri_Williams@bathnes.gov.uk) for any questions relating to completing the assessment tool.



Climate, ecological and environmental ceiling	Space for local communities and organisations to collaborate and innovate	Social and economic foundation	Equalities Impact
Biodiversity	Equality and respect	Delivering for local residents	
		The right homes in the right places	
		More travel choices	
Air		Clean, safe and vibrant neighbourhoods	Sex...
			Pregnancy and maternity ....
			Gender reassignment ...
Climate			
Water	Community priorities	Focusing on prevention	Disability...
		Support for vulnerable adults and children	
		Delivering for our children and young people	
Soil		Healthy lives and places	Age...
		Preparing for the future	Race...
		Good jobs	Sexual orientation...
Land and environmental assets	Decisions informed by evidence	Skills to thrive	Marriage and civil partnership –
		Cultural life	Religion/belief
			Socio-economically disadvantaged
			Armed forces community
			Looked after children
Materials and resources			



# Corporate Strategy 2023 to 2027

End of Year Review  
2024 to 25



**Bath & North East  
Somerset Council**

**Improving People's Lives**

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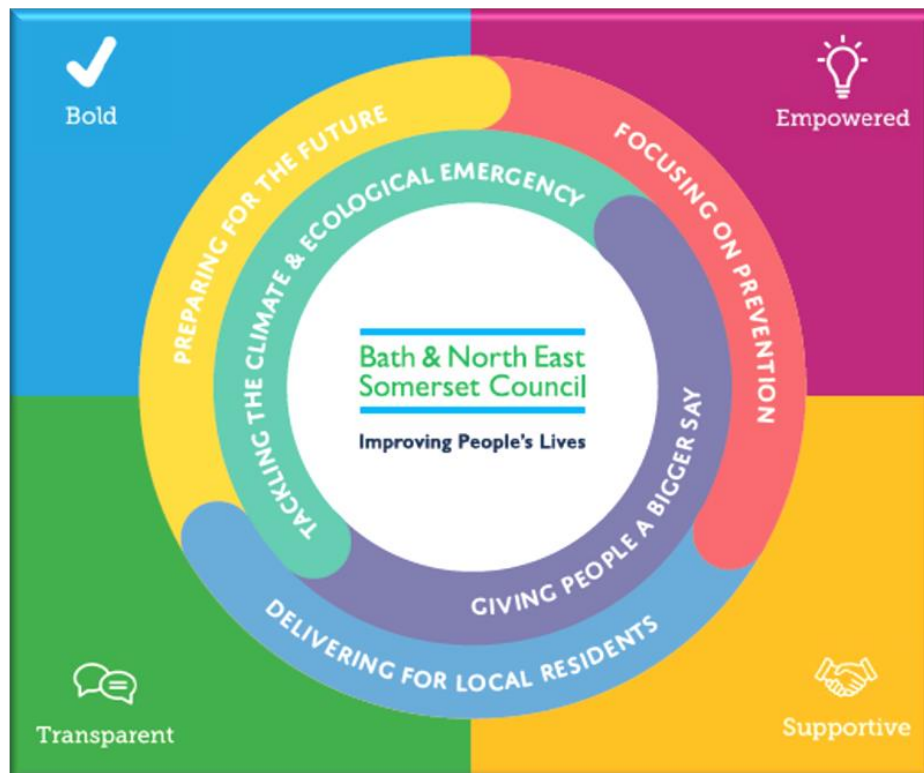
## 1. Introduction and Context

2024 to 2025 marks the second year of the council's Corporate Strategy adopted in July 2023. This review highlights how we have improved peoples' lives through the delivery of the commitments set out in it.

The [Corporate Strategy 2023 to 2027](#) is the council's overarching strategic plan and guide to future changes. It was adopted by Full Council on 20 July 2023, and retains the purpose, policy and principles set out in our [previous strategy](#):

1	Overriding purpose - To IMPROVE PEOPLE'S LIVES
2	Core Policies - Tackling the climate and ecological emergency, Giving people a bigger say
3	Principles - Delivering for local residents, Focusing on prevention, Preparing for the future
4	Values that underpin all our work - Bold, Empowered, Supportive, Transparent

These elements shape everything we do:



Our Corporate Strategy to 2027 builds on our achievements and reflects the ambitions and priorities of the council's administration elected in May 2023. It provides a **clear and ambitious framework for delivery** and sets out how shared outcomes will be embedded through partnerships such as our Future Ambition Board, and Health and Wellbeing Board.

## Here are some of the key achievements from 2024 to 2025



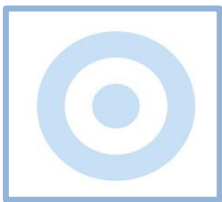
### Tackling the Climate and Ecological Emergency

Bath & North East Somerset Council partnered with Bath and West Community Energy, Bath University and the Community Wellbeing Hub to successfully bid for £1.5m funding from The National Lottery Climate Action Fund. This will fund a programme of community-led action on energy across B&NES.



### Giving People a Bigger Say

We began a series of Community Conversations in Bath and continued with our Area Forums and community consultations on specific topics. We have also held Climate Conversations so that residents can tell us what climate emergencies mean for them. This helps us to work in partnership with communities, to identify what matters to them and tailor solutions to local needs.



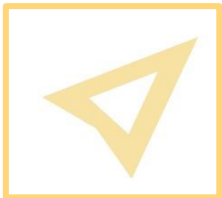
### Delivering for Local Residents

Planning permission has been approved to deliver a new Bath Recycling Centre for residents in the city. The plans underwent a programme of public engagement including a dedicated website to provide members of the community the opportunity to provide comments. Construction is due to start in Autumn 2025 and the hub is expected to open in Summer 2026. This will complement the recently opened Keynsham Recycling Hub.



### Focusing on Prevention

The Lifelong Links programme secured additional funding from the Department for Education to further develop the service so that more children in care can maintain relationships with important people in their lives. Support was extended to children in care who need it most including care experienced young people and Unaccompanied Asylum-Seeking Children.



### Preparing for the Future

With our partners, we have adopted a 10-year Economic Strategy. The strategy will be delivered through six strategic pillars: Good Work, Inclusive Innovation and Creativity, Greener Economy, Resilient Businesses Housing Affordability, and Stronger Places.

Bath's P&R schemes ranked 2<sup>nd</sup> best in country

Excellent reports for Crematorium, Children's Service and Youth Justice

The Roman Baths generated more surplus return to the Council than

Ranked first on climate action for buildings and heating

Restored over 23ha of grassland since 2021

Early Years Foundation Stage Achievement Gap reduced by over 7%

6 of Bath's heritage attractions awarded for contribution to tourism

Completed 25 resurfacing schemes, covering over 103km<sup>2</sup>

To read more please visit our [newsroom](#)

2. Delivering our Priorities

Our core policies help translate our purpose into commitments and ambitions which set out how we will improve people’s lives.

Our core priorities, established in July 2023, are framed by the three principles which we adopted in 2019. They set out how we will improve people’s lives over the next four years. This report reflects our work to deliver these priorities. Our core priorities and how they relate to our core policies are outlined below:

Delivering for local residents	Focusing on prevention	Preparing for the future
<ul style="list-style-type: none"><li>• The right homes in the right places</li><li>• More travel choices</li><li>• Clean, safe and vibrant neighbourhoods</li></ul>	<ul style="list-style-type: none"><li>• Support for vulnerable adults and children</li><li>• Delivering for our children and young people</li><li>• Healthy lives and places</li></ul>	<ul style="list-style-type: none"><li>• Good jobs</li><li>• Skills to thrive</li><li>• Cultural life</li></ul>

For each of these elements, we have highlighted key achievements and progress made in 2024 to 2025 in this review. We have also included some methods we have used to measure performance. These strategic indicators are drawn from the indicator set agreed upon by Cabinet in July 2024. Throughout this report, they will be referenced to provide a clear and comprehensive overview of our achievements and highlight any areas for improvement. They will be rated as follows:

	On or above target
	Behind target
	Off-target and identified as requiring additional activity

↑ Up	Figures are increasing
↓ Down	Figures are decreasing

	If the box is green, it is trending in the right direction. If it is red, it is trending in the wrong direction.



### 3. Tackling the Climate Emergency

Over the last year:

**We have launched our Carbon Reduction Accelerator**, a 12-week pilot programme to help SMEs reduce their carbon footprint and increase energy efficiency.

**We have planted new trees**. We are working in partnership with the Western Forest project which aims to create at least 2,500 hectares of new woodlands and other habitats created across Bath and North East Somerset over the next five years.

**We have continued investing in green initiatives**, with over £5.435 million to be allocated to capital schemes, including renewable energy projects, active travel and nature recovery projects such as the Chew Valley Recreational Trail. Additionally, we are working to decarbonise our corporate estate.

**We have supported community led-action on energy** by securing over £1.5 million in grant funding. We also helped open a **new base of operations for Climate Hub B&NES**, a climate group set up by local residents to engage the community and advise on the climate crisis.

**We have improved and created Green spaces** across the area. These aim to improve biodiversity and conserve the landscape. We have completed a **wild meadow footpath in Somer Valley** and started work on a 10km linear park alongside the Avon called the **Bath River Line project**.

**We received national recognition on our work tackling the climate emergency**. We were awarded a B by the Carbon Disclosure Project for progress on tackling the climate emergency and were ranked 7th on Climate Action for all UK councils. Additionally, 6 of our parks have received Green Flags of excellence.



## Here are some ways we have measured our progress:

Number of air quality monitoring locations exceeding the targeted level of Nitrogen Dioxide	Current 3 Mar 23	Previous 7 Mar 22	Trend ↓ Down
<p><b>Indicator update</b></p> <p>This indicator has been rated as amber because 3 locations exceed the local objective target of 36µg/m<sup>3</sup> - Bath New Rd, Radstock (37) &amp; Walcot Parade 2 Bath (38). The UK national objective target of nitrous dioxide (NO<sub>2</sub>) levels set by Government is 40 µg/m<sup>3</sup>. We want to be aspirational in further protecting public health and reducing pollution. In 2022, in a Cabinet Report, we referenced an ambition to create our own local target for NO<sub>2</sub> of 36µg/m<sup>3</sup>.</p> <p>In the <a href="#">2024 Air Quality Annual Status Report</a>, we monitored air quality at over 169 locations. At all these sites, all but one monitoring result was below the national objective, with two other sites exceeding our own local objective of 36µg/m<sup>3</sup>.</p>			Amber

## What we are doing

Whilst air quality has improved significantly in recent decades, we still aim to take the actions needed to protect people and the environment from the effects of air pollution:

- We continue to deliver the Clean Air Zone in Bath, which has seen NO<sub>2</sub> concentrations fall by 32% within the zone since 2019.
- We have formed the Environmental Improvement Plan that sets out actions to improve air quality.
- We have consulted residents for feedback on the new Air Quality Action Plan for Bath, which is designed to reduce nitrogen dioxide.

CO <sub>2</sub> or equivalent emissions (ktCO <sub>2</sub> e) for B&NES (district)	Current 717 Jan 22	Previous 760 Jan 21	Trend ↓ Down
<p><b>Indicator update</b></p> <p>This indicator has been rated red because, whilst emissions have fallen, we are not on track to achieve 2030 net zero targets. Total greenhouse gas emissions across the Bath and North East Somerset area have fallen by 43% between 2005 and 2022, returning to a falling trajectory after the temporary increase recorded in 2021. Despite significant progress in reducing these levels, we are currently not on track to achieve 2030 net zero targets, in common with most other local authorities.</p>			Red

## What we are doing

We recognise it is crucial to continue working to reduce our emissions as much as possible.

- We have allocated over £5.435 million of investment in capital schemes to support renewable energy, active travel and nature recovery over the next five years.
- £39.316 million of schemes are in the pipeline including renewable energy projects and more tree planting.
- We have provided funding to decarbonise our fleet by replacing it with electric vehicles and allocated £4 million for a programme to decarbonise our corporate estate. For instance, we have just been awarded grant funding to install air source heat pumps at Keynsham Civic Centre and Carrswood Day Centre, and have installed solar panels in multiple locations.

Total installed renewable energy capacity B&NES district (MW)	Current 30 Dec 23	Previous 27 Mar 22	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated as green because it has increased significantly over the past 3 years. We have seen a 50% increase in installed capacity during this period, with a known pipeline of 80MW in development that will help us to achieve our interim targets at a district level.			Green

### What we are doing

Further work is needed to confirm the pipeline beyond 2027, however progress to date, along with new large-scale investment programmes being developed at a regional level, give us confidence that this target can be achieved. Some of the investment programmes include funding to make the council net zero through:

- Decarbonising the fleet and corporate estate to make the council net zero.
- Installing heat pumps and solar panels.
- Investing £45k of revenue funding to continue supporting a Renewable Energy post to help deliver this priority.

EPC Score A-C for B&NES residential	Current 35% Sep 24	Previous 31% Sep 23	Trend ↑ Up
This indicator has been rated green because it is on target. Through the enforcement of minimum energy efficiency standards (MEES), we have seen improvements in more than 70 privately rented homes, enabling a saving of more than 125 tonnes CO <sub>2</sub> .			Green

### What we are doing

Funding has been granted from the National Lottery Climate Action Fund of £1.5 million, which we are using to help drive community-led action on sustainable energy. This will allow the creation of a network of Energy Champions, individuals within communities who can support residents with home energy, retrofitting and renewables. The council is also working closely with WECA on the Retrofit West programme, which provides grant funding and free advice to residents and the second phase of Solar Together West of England, a group buying scheme offering residents and local businesses an easy way to invest in solar panels and battery storage.

% of water bodies in B&NES with good ecological status	Current 11% Jan 22	Previous 11% Jan 21	Trend
<b>Indicator update</b> This indicator has been rated red because not improved. In May 2024, government reports indicate that only 16% of assessed surface waters achieved good ecological status nationally. Improvements to the water quality ratings for whole water bodies are immensely challenging and require significant long-term investment and changes to land management practice from many stakeholders.			Red

### What we are doing

We are currently drafting a new Climate and Nature strategy to create better joined working practices that will allow us to meet our climate and nature goals.



## 4. Giving People a Bigger Say

### Over the last year:

**We have consulted local communities on where to allocate funding.** We used public consultation to help inform where to allocate the funding for the Bath neighbourhood portion of the Community Infrastructure Levy (CIL), leading to eight new projects sharing over £325,000 in funding. Some of these projects include extra activities for young people, playpark improvements and a new pedestrian crossing.

**We began new Community Conversations** to provide avenues for residents and community organisations to discuss topics and address concerns. At the 9 events held from November 2024 to March 2025, we heard from more than 130 people, with over 150 issues raised.

**We have invested in improved communication services.** This will ensure that all individuals are able to easily access and use our services. Over £251,000 in funding is being invested to enhance customer contact services by replacing outdated telephony and contact centre systems. This is part of our Unified Communications strategy, which will see us move to a single phone number to help residents get their issues resolved first time.

#### What have we done?

**30** public meetings and events

**92** partners involved

**660+** people actively engaged

**1,600+** people kept informed

**£325,000** funding secured for partnership goals

**£372,063.63** funding granted to community projects

### Key Consultations

Trial Liveable  
Neighbourhood  
schemes

Improvements  
to Queen  
Square

CIL funding  
allocation

Implementation  
of a new Air  
Quality Action  
Plan for Bath

Long-term  
transport  
strategies

Changes to  
parking  
charges

Speed limit  
changes on the  
A368

Bath Active  
Travel

Budget 2025 fo  
2026 proposals

There were over 10,600 submissions across 30 online consultations.

### Consultation Case Study: Changes to parking charges

Residents participated in a four-week consultation on parking charge proposals. The consultation received over **4,322 individual responses** and two signed petitions. Over **77%** of respondents expressed concerns about air quality and its impact on health and **58%** emphasised the importance of improving it.

Following the consultation, the council adjusted its proposals to include two hours of free parking at Midsomer Norton and Radstock, lowered the hourly rate of parking in these towns and withdrew plans for emission-based parking charges for motorcycles.

### Here are some ways we have measured our progress:

Percentage of residents who feel they can inform decision making	Current 11% Dec 23	Previous 20% Dec 22	Trend ↓ Down
<b>Indicator update</b> This indicator has been rated red because the figure has fallen, although comparative data with other councils is not readily-available.			Red

### What we are doing

Work has taken place to enhance and drive opportunities for public engagement. We are:

- Continuing our Community Conversations forums to give residents a chance to voice concerns and influence decision making.
- Creating explainer videos to outline ways for people to get involved such as our video around the [Local Plan](#).
- Investing £50k to trial new approaches to communications and engagement with residents.
- Exploring use of different engagement platforms, including digital services, to reach a wider variety of individuals and make engagement more accessible.
- Continuing to consult on our key projects.

## 5. Healthy Lives and Places:

### Over the last year:

[We have equipped people to save lives.](#) We have installed twelve emergency first aid kits in Bath and Keynsham , providing the tools needed to care for someone suffering a life-threatening injury.

[We have provided healthier options for smokers.](#) Swap to Stop is a campaign designed to help individuals quit smoking. We offer a free vape kit from our Stop Smoking Service, allowing residents to swap cigarettes for vapes, which are less harmful than smoking.

[We have set-up plans to help tackle the increasing challenges of food insecurity.](#) To help mitigate its damaging consequences, we launched [Tackling Food Insecurity in B&NES: Rising to the Challenge](#). Alongside this, we are producing a Local Sustainable Food Resilience Strategy.

We were shortlisted as a finalist in the MJ Achievement Awards in the “Innovation in Public/Private Partnership” category for our [Community Wellbeing Hub \(CWH\)](#).

Established during the COVID-19 pandemic to help respond help support residents seeking help, it has since evolved into a model of integrated, multidisciplinary care. Its vision is to provide a collaborative approach for prevention and early help support for residents across Bath & North East Somerset. In 2024, the partnership grew to 37 partners who deliver over 85 services.

They celebrated their 5<sup>th</sup> anniversary this year, here are some of the successes they have had so far:



Over  
15,000  
helped



Over  
32,000  
referrals



Supported more  
than 1,200 people  
discharged from  
hospitals

We have continued to deliver the [Joint Health and Wellbeing Strategy](#). The Bath and North East Somerset Health and Wellbeing Strategy for 2023-2030 aims to improve the overall health and wellbeing of residents by addressing inequalities and promoting healthier lifestyles. It sets out four priorities:



Here are some ways we have measured our progress:

% of mothers known to be smokers at the time of delivery	Current 7% Dec 24	Previous 8% Dec 23	Trend ↓ Down
Indicator update This indicator has been rated green because it is falling, in line with target goals. This number has been decreasing since 2021, where it was 9%. B&NES out performs regional and national statistics which are 8% and 7% respectively.			Green

What we are doing

We have launched campaigns such as Swap to Stop which provides vaping alternatives to help people quit smoking.



## 6. Delivering for Children and Young People

### Over the last year we have:

**We have provided additional support to our Lifelong Links programme.** We have secured additional funding to ensure children in care have access to a positive support network. The service currently works with 20 children and young people, and this funding will enable the service to be extended to more children who desperately need support.

**We have been recognised for the support we provide to young people.** Our Children's Services were praised by Ofsted for their support and commitment to care-experienced young people, noting that children are well supported and "benefit from enduring relationships with people who care for them and about them". A **HM Inspectorate of Probation report**, highlighted the outstanding work of Youth Justice Service staff, rating the service as "Good" overall.

**We have secured funding for more facilities and activities for young people.** The **Lux Youth Project**, a charity that works with young people from Bath, Peasedown St John and Timsbury, was awarded community funding of over £52,389 to help deliver more activities and improve their facilities. Its services include breakfast clubs, 1:1 mentoring, a street dance academy and a food pantry.

### Here are some ways we have measured our progress:

<b>Key Stage 4 Average Attainment for all pupils</b>	Current 49.2 Jul 24	Previous 49.7 Jul 23	<b>Trend</b> ↓ <b>Down</b>
<b>Indicator update</b> This indicator has been rated green because it is on target and above regional and national statistics. <u><b>KS4 attainment remained strong in 2022/23</b></u> ; pupils in B&NES achieved a higher proportion of grades (9-5) in English and Maths (51%), compared to the South West (45%) and England (45%). Nationally, we have one of the highest performances outside of London.			<b>Green</b>

### What we are doing

The council continues to collaborate strategically with schools and partners to enhance educational outcomes for its Key Stage 4 students.

<b>Child Protection Plans stepped down or closed</b>	Current 80% Mar 25	Previous 70% Mar 24	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated green because it is performing well. The number of <a href="#">child protection plans</a> , which are made when a child is judged to be at risk of significant harm, ending per quarter with a reason for 'plan end' or risk reduced has dramatically improved.			Green

### What we are doing

Our performance on this target is due to the work of our social workers who have been working effectively to de-escalate risk in the child protection process. This effort was recently recognised by [OFSTED](#), who highlighted the quality support provided to our care leavers.

<b>Early Years Foundation Stage Achievement Gap</b>	Current 32% Jul 24	Previous 39% Jul 23	Trend ↓ Down
<b>Indicator update</b> This indicator has been rated green because it has improved significantly over the last year. B&NES has a long-standing attainment gap between the educational outcomes of disadvantaged pupils and non-disadvantaged pupils. This gap starts in the early years and is particularly concerning in Key Stage 2 (year groups 3-6). This indicator is improving with the current gap falling from 39% seen in July 2023.			Green

### What we are doing

Given the importance of continuing to narrow the attainment gap, the council implemented a coordinated, whole-systems approach, including a draft action plan led by Public Health. Specific schemes in place include:

- Three key projects with St John's Foundation and the Big Education Trust to support the performance of our early years.
- Auto-enrolment for free school meal eligible children, which will attract pupil premium and provide further opportunity to address the attainment gap.

### The Children and Young People's Plan

To help deliver the Health and Wellbeing Strategy's first priority of "ensuring that Children and Young People are healthy and ready for learning and education", we have created the Children and Young People's Plan (CYPP). This sets out how children and young people will be supported to achieve the best possible outcomes by focusing on the following four objectives:

- Strengthen family resilience to ensure the best start in life
- Improve timely access to appropriate family and wellbeing support
- Reduce the existing educational attainment gap for children and young people
- Ensure services for children and young people who need support for emotional health and wellbeing, from early help to statutory support services, are needs-led and tailored to respond and provide appropriate care and support.



## 7. Support for Vulnerable Adults and Children

**Over the last year we have:**

**We have set up plans to open new schools for vulnerable children** in Bath and North East Somerset. These include proposals to **redevelop the former site of the Bath Community Academy School** into a school to support children with SEND. There are also plans to develop a **new special residential and day school** in Keynsham that would cater for young people aged 11-17 with special complex educational needs. Additionally, we have **hosted events** to raise awareness of the local support available for SEND individuals and their families.

**We have developed the first ever co-produced carers strategy**. The plan was created with the help of more than 380 adult carers, identifying what is and isn't working for them and how support for carers can be made as effective as possible in the future.

**We have continued to run the Community Contribution Fund**, launched in March 2021. This gives residents the chance to contribute to good causes that help local charity, community and voluntary groups to reduce health inequalities in the area. To date, residents have donated more than **£44,000** to the fund. The scheme is continuing for 2024 to 2025. Full details of previous **successful applicants** can be found on the council's website.

### Support for refugees in Bath and North East Somerset

Bath and North East Somerset (B&NES) Council has been actively involved in supporting refugees through providing support, securing safe housing and collaborating with local organisations like Bath Welcomes Refugees and Julian House.

To date, **48** people have been resettled in B&NES through the **Afghan Citizens Resettlement Scheme (ACRS)** and over **74** people have been resettled through the **UK Resettlement Scheme**.

Since the Russian invasion of Ukraine in February 2022, residents in Bath and North East Somerset have welcomed **400** Ukrainian guests since March 2022, with over **250 residents providing host accommodation** through the **Homes for Ukraine Scheme**. **84 households (201 people)** are now renting their own accommodation in B&NES

**Here are some ways we have measured our progress:**

<b>Mental health: Adult service users in employment</b>	Current 11% Mar 24	Previous 9% Mar 23	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated green because in line with national averages. Our adult service users in employment dropped significantly from 13% in December 2019 to 7% in September 2022. However, it is currently rising.			Green

## What we are doing

We have undertaken significant work to bring more people back into employment.

Our [Employment Support Services](#) assist individuals with mental health challenges in the workplace, helping them find and maintain employment.

% of adults at home 91 days after reablement service	Current 77% Dec 24	Previous 76% Dec 23	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated green because it is on target. It shows sustained improvement in performance by the <a href="#">reablement service</a> .			Green

## What we are doing

The [reablement service](#) which provides short term therapy and support by working with adults in their own home or care home to prevent, reduce or delay the need for longer term support. This sustained improvement is in response to a detailed robust improvement plan to increase productivity in the service.

In our 2025-2026 budget, we recognise the increasing costs and demand for adult and children's social care. We have allocated over £5 million in additional funding to address the pressures on adult care packages and to expand placements for children and young people with special needs. Our goal is to ensure that we continue to meet the needs of the most vulnerable in our society and their families.

## 8. Clean, Safe and Vibrant Neighbourhoods

### Over the last year:

[We have worked to make our streets cleaner and greener.](#) We have introduced a [chewing gum littering task force](#) and to help make recycling easier a new trial for [reusable red bags](#) has been established across five hundred households. We are also investing an additional £1 million in neighbourhood services.

[We have also invested over £251k for demand-led rapid response teams](#) to tackle weeds, graffiti and litter in the 2025-26 budget to keep our streets cleaner and greener

[We have developed a new streets strategy](#) to help manage and support outdoor trading and events whilst ensuring that streets remain safe and accessible for highway users. This strategy will detail how we use our outdoor spaces, including permissions for street trading, events and filming and what items can be placed on the highway.



### Here are some ways we have measured our progress:

<b>% of household waste reused, recycled, composted or recovered</b>	Current 94% Dec 24	Previous 96% Dec 23	<b>Trend</b> ↓ <b>Down</b>
<b>Indicator update</b> This indicator has been rated green because, even though the trend is decreasing, it is still on-target.			<b>Green</b>

### What we are doing

The council adopted its new waste strategy, [Towards Zero Waste 2030](#), on 16 March 2024, which placed an escalated priority on the climate emergency and working with residents to continue to deliver against our ambitious recycling targets. The delivery of the [Keynsham Recycling Centre](#) has been instrumental in achieving this high performance, and the council proposes to grow its investment as part of its 2025-2026 [budget](#).

<b>Road traffic collisions resulting in personal injury</b>	Current 228 Dec 24	Previous 275 Dec 23	<b>Trend</b> ↓ <b>Down</b>
<b>Indicator update</b> This indicator has been rated green because the number of road traffic collisions has been falling consistently. There was a small rise to 275 in 2023, but this is likely to be due to the increase in traffic following the easing of COVID-19 measures.			<b>Green</b>

### What we are doing

We have undertaken several projects designed to address this increase such as our Liveable Neighbourhoods programme, which aims to divert traffic away from residential streets. We have also installed crossings across the area to improve the safety of pedestrians.



## 9. More Travel Choices

Over the last year:

**We have invested in extending our Park and Ride hours.** This service will now run until 11:30pm from Monday to Saturday on a trial basis until 31 August. This aims to help support local businesses and offer greater opportunities for tourists and workers. The National Highways and Transport Network Satisfaction survey saw us rated 2nd for our Park and Ride services out of 96 local authorities.

**We have launched a Transport Action Map.** Over the next three years we are planning to deliver an unprecedented number of transport schemes. This interactive tool allows people to view over 200 of our current and future transport projects.

**We have approved funding for improvements to walking, cycling, wheeling, public transport infrastructure across the region.** The Somer Valley Links scheme aims to improve links and reduce congestion along the A37 and A367. The next steps including a full business case, further consultation and detailed designs are set to go ahead.

**We have been recognised for the excellent work of our staff.** The National Highways and Transport Network Satisfaction survey ranked 1st for the speed and quality of response from our staff.

**We have improved roads across the area.** We have completed our annual resurfacing programme for another year. This has seen:



Over 103,000m<sup>2</sup> of  
highways  
resurfaced



5,149  
potholes  
repaired



Over 21km of highway  
brought back to a high  
standard



9,130m<sup>2</sup> of  
footway  
resurfaced

**Here are some ways we have measured our progress:**

<b>Traffic volumes</b>	Current 601,502 Dec 24	Previous 635,437 Dec 23	<b>Trend</b> ↓ <b>Down</b>
<b>Indicator update</b> This indicator has been rated red because traffic volumes are higher than our target. This is reflected nationally. In 2023, <b><u>overall traffic levels</u></b> in Great Britain were higher than in 2022 although still 2.3% lower than 2019 pre-pandemic levels. B&NES has a similar <b><u>profile</u></b> to the national one.			<b>Red</b>

### What we are doing

We are currently delivering an extensive programme of investment in walking, wheeling, cycling and public transport improvements across the district, making alternative forms of travel more accessible to reduce transport emissions. We have plans in place, such as the **Journey To Net Zero**, to promote sustainable alternatives and add to the 3.6 billion miles cycled nationally on public highways and the paths next to them.

## 10. The Right Homes in the Right Places

Over the last year:

We progressed the delivery of the council's Housing Plan 2025-30, which outlines commitments over the next five years to provide affordable, safe and high-quality homes. This plan sets the strategic direction for meeting future housing need and outlines how the council will use council land resources, new land acquisition opportunities and partnering arrangements to unlock and deliver homes that meet local housing needs and priorities.

We have increased the availability of affordable homes. Construction of 18 new affordable homes for social rent is underway at the Argyle Works site. They will be energy-efficient apartments, three of which will be set aside for young people.

We have received planning permission for homes in Bath city centre for the development of 96 energy-efficient homes, located in Bath Quays North.

We have begun work on Bath's Western Riverside Development to develop over 900 quality, sustainable market and affordable homes, as well as a riverside park. This will transform a 12.4-acre redundant brownfield site into a new landmark place to live in the centre of Bath.

We have developed plan to provide much-needed accommodation for adults with learning disabilities at Englishcombe Lane. We have approved the construction of 16 community housing units which are designed to support adults with learning difficulties and autism.



## Here are some ways we have measured our progress:

<b>Housing delivery targets – net new homes</b>	Current 712 Mar 24	Previous 511 Mar 23	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated amber because, while the number of homes built is progressing, it is not in line with the new extended Government targets. Our past delivery of homes has comfortably exceeded targets set by central government. However, in December 2024, the <a href="#">National Planning Policy Framework</a> was updated. It now outlines a target of 1.5 million homes.			Amber

## What we are doing

To reach these extended Government targets, B&NES must double the current goals outlined in its Local Plan from 717 homes built per year, to 1466. We have started the process of [resetting the Bath and North East Somerset Local Plan](#) and are developing a District Wide Spatial Strategy to help deliver these new ambitious housing and infrastructure developments.

<b>Households in temporary accommodation</b>	Current 85 Mar 25	Previous 58 Dec 24	Trend ↑ Up
<b>Indicator update</b> This indicator has been rated amber because the numbers have risen slightly, but based on 2024 data, the council is in the top 30 <sup>th</sup> percentile of national authorities. Demand for temporary accommodation remains high locally and nationally with no sign that demand is decreasing.			Amber

## What we are doing

Through the [B&NES Homes programme](#), we aim to develop support and social housing by repurposing our own accommodation and surplus land. We have built a range of high-quality temporary accommodation, which means that we do not need to place families in hotel or bed and breakfast accommodation. Not only is this cheaper, but it also significantly benefits vulnerable people by allowing them to access support from our Housing Service to find appropriate onward accommodation.

## 11. Cultural Life

### Over the last year:

[We have secured funding for Fashion Museum Bath](#), one of the leading fashion collections in the world. This grant will see a prototype developed for an online catalogue, allowing people to engage with the collection while plans for its new home remain undecided.

[We have renovated Midsomer Norton's town centre](#). In February 2025, we successfully completed a £2.39m project to make the centre more easily accessible and usable for hosting events. The revitalisation of this central area is integral to championing a vibrant, successful community, where more residents are encouraged to shop, socialise and visit the town centre.





Our [Heritage Services and attractions](#) have seen unprecedented successes this year:



The Roman Baths generated more surplus return than ever before



*Toulouse-Lautrec and the Masters of Montmartre* became the most successful paid exhibition in the Victoria Art Gallery's history, with nearly 30,000 visitors



Bath's heritage sites won six awards at the Bristol, Bath and Somerset Tourism Awards



Roman Baths was visited by more than 1 million people

[Bath Christmas market](#) returned this year, here are some of the highlights:



£41.5 million turnover for businesses



Over 444,000



73% of visitors said the market was their reason for visiting the city



More than 500 jobs supported



More than £60 million in additional spending to the city

## The Heritage Services Business Plan

The Heritage Services Business Plan sets out the strategic priorities for the next five years to achieve its vision “Learn from the past, understand the present, and shape the future.”

It focuses on:

- Adapting to economic challenges
- Developing the Fashion Museum
- Investment in new research to strengthen the council’s visitor attractions
- Opening a new learning and community engagement space at Victoria Art Gallery
- Improving environmental sustainability

## 12. Skills to Thrive

### Over the last year:

We have launched a new early years careers workforce recruitment and careers website. Shape Your Future aims to increase the number of early years education and childcare practitioners so that our children will have the support they need.

We have provided specialist skills training support to Bridges Electrical Engineers to upskill staff and create new jobs. So far, Skills Bootcamp funding has seen more than 70 existing staff upskilled and 14 unemployed learners going on to gain long-term employment.

We have promoted volunteering activities through our Volunteers Fair. Our Employment and Skills Pods ran this for the second time in Bath, offering opportunities from employers such as Guide Dogs for the Blind and Dorothy House.

### Here are some ways we have measured our progress:

<b>Median wage for B&amp;NES residents</b>	Current £40,218 <i>Apr 24</i>	Previous £38,669 <i>Apr 23</i>	<b>Trend</b> ↑ Up
<b>Indicator update</b> This indicator has been rated green because our median wages for B&NES residents have increased over 4% from 2023. This is higher than the national and regional median wages, which are £37,617 and £36,112 respectively.			<b>Green</b>

### What we are doing

To support this continued progress, building on the adopted of the Economic Strategy 2024 to 2034, officers have been supporting residents through several programmes:

- Our Employment and Skills Pod has done outstandingly. Since May 2023, they have supported 115 residents into work, with 77 of them going on to get Real Living Wage jobs, despite having medium/high intensity needs.
- Our Future Bright Team have supported 17 people on low incomes increase their wages since March 2024.
- We have been engaging employers to increase awareness of the Good Employment Charter, which encourages the Real Living Wage.

13. Good Jobs

Over the last year:

**We have created more job opportunities.** The council have secured the future of Jolly’s store on Milsom Street, Bath. This will not only bring a new shopping destination for residents but also new employment opportunities to the local area.

**We have helped businesses connect through our Business Show.** This two-day event provided opportunities for local businesses to explore new opportunities and network. The show included specialist clinics and talks from organisations such as Radio Bath and Bath & North East Somerset Council’s **Invest in B&NES** service.

Future Ambition Board

The council local businesses and the local anchor institutions have been working together as part of the **Future Ambition Board**. This is a voluntary arrangement seeking to deliver a shared ambition for the place and to increase our influence locally and nationally. The Partnership has been working on themes developed from the One vision document published in 2021 and further developed by the Economic Strategy. We have recently appointed a new independent chair to challenge and inspire partners so the partnership can meet its full potential.

Here are some ways we have measured our progress:

Median wage for people who work in B&NES	Current £36,382 Apr 24	Previous £34,945 Apr 23	Trend ↑ Up
Indicator update This indicator has been rated green because it has increased 4.1% over the last year. Our workplace gross full-time pay has increased 4.1% since 2023 and the average pay has increased 8.0% since 2023, now reaching £44,398. We perform well in the region, with the median wage for the South West being £35,634.			Green

What we are doing

We have been working hard to engage with employers to increase their awareness of incentives such as the Good Employment Charter, which encourages the Real Living Wage. We have hosted several workshops for businesses, distributed flyers, utilised social media and working closely with the Combined Authority to raise awareness.

Economic Strategy

Cabinet have adopted a new **Economic Strategy - Building A Fair, Green, Creative and Connected Bath with North East Somerset**, which will run from 2024 to 2034.

The new Economic Strategy sets out a clear vision for a more sustainable local economy, with a new strategic approach built upon six pillars of Good Work, Inclusive Innovation and Creativity, Greener Economy, Resilient Businesses, Housing Affordability, and Stronger Places.

Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Cabinet	
MEETING/ DECISION DATE:	20 May 2025	EXECUTIVE FORWARD PLAN REFERENCE:
		E3615
TITLE:	Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030)	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
1. Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) <a href="https://secure.bathnes.gov.uk/secureshare/index.php/s/Rj9wLKKMmwqTTnQ">https://secure.bathnes.gov.uk/secureshare/index.php/s/Rj9wLKKMmwqTTnQ</a> Password: WHSMp2430. (please include full stop)		
2. Equality Impact Assessment / Equality Analysis		
3. Risk Assessment		
4. SMG & Council Consultation Response Table		
5. Public Consultation Response Table		

## 1 THE ISSUE

- 1.1 The Combined City of Bath and Great Spa Towns of Europe combined World Heritage Sites Management Plan (2024-2030).

## 2 RECOMMENDATION

**The Cabinet is asked to:**

- 2.1 Endorse the Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) following Cabinet endorsement on 14 November 2024 for an 8-week public engagement/consultation between December 2024 and January 2025 (see section 10: Consultation below).

## 3 THE REPORT

- 3.1 This report relates to the Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) and seeks endorsement of the Management Plan.

- 3.2 The Management Plan is included as a link in Annex 1 to this report.
- 3.3 In summary the report outlines the following:
- Background, purpose and scope of the Management Plan
  - Format and content
  - Council Corporate Strategy and the Management Plan
  - Community engagement
  - Budgetary considerations
- 3.4 World Heritage Sites (WHS) are inscribed and overseen by UNESCO. UNESCO Operational Guidelines (2021) require each site to produce a management plan and reviewed and renewed (in the case of Bath) every six years, describing what the site consists of, why it is of global significance, how it is managed, what challenges it faces, its priorities, and how (through an action plan) these will be addressed. This Management Plan will replace the previous plan that covered the period of 2016-2022 and has been reviewed to include the second Great Spa Towns of Europe (GSTe) WHS inscription. The two-year delay between the end of the previous Management Plan and the new Management Plan is due to personnel changes and resourcing issues. UNESCO requested, when inscribing the GSTe in 2021, that a revised, combined management plan was produced. There are therefore external drivers for the programme to review the Management Plan. This is the first time a double-inscribed WHS has been combined into one management plan, and therefore this is a ground-breaking and unique moment in the history of WHS.
- 3.5 UNESCO WHS inscription remains a highly respected global brand and the highest and most prestigious heritage designation and accolade that can be achieved. Bath is one of only 22 sites out of 1223 worldwide to achieve a double inscription: The City of Bath (1987) and Great Spa Towns of Europe (2021). The benefits it brings are substantial, including economic, deriving from the global status and profile for the city, which is significant, and other comparable UK cities that recognise these benefits have attempted to gain this status so far without success.
- 3.6 The National Planning Policy Framework (NPPF) 2024 recognises World Heritage Sites as designated assets of the highest significance. Associated historic environment guidance states that WHS management plans should inform the Development Plan or Local Plan policies. The Management Plan informs, works alongside and is complementary to the Council's Development Plan. However, it is the Development Plan which guides and influences development proposals, contains planning policies used in the determination of planning applications, and protects land which is valued for a variety of reasons.
- 3.7 The Management Plan addresses the following:
- why the Bath WHS is of global importance and significance



- what its Outstanding Universal Value (OUV) and the attributes that convey them are
  - how the Site will be protected and managed
  - what the issues are impacting upon its OUV
  - what the priorities are for management and the actions proposed to address these
- 3.8 Bath World Heritage (including reviewing and preparation of the Management Plan) is managed through an Advisory Board, a roundtable bringing together 33 representatives from 21 organisations. The Advisory Board is convened and supported by Bath and North East Somerset Council but chaired independently.
- 3.9 In addition to Council officers and members, representatives from the following organisations sit on the Advisory Board: Historic England, Great Spa Towns of Europe, National Trust, Bath Preservation Trust, ICOMOS UK, World Heritage UK, University of Bath and Bath Spa Universities, The Mayor's Guides, Canal and River Trust, Wessex Water, Local business community, including Bath Bid and Visit West.
- 3.10 The review and preparation of the Management Plan has been undertaken through a collaboration of these organisations led by the Council and the Chair of the Advisory Board. A steering group was established approximately 18 months ago made up of and to represent the Advisory Board to review the format of the Management Plan, consider how this could be updated to include the two inscriptions and, in particular, to review in some detail shared views of the issues, challenges and opportunities for the World Heritage Site in order to establish a new set of priorities and a partnership action plan to address these.
- 3.11 The Management Plan is set out in two main sections. The first part explains the aims of the Management Plan and gives details of both inscriptions and how the World Heritage Site is 'managed':
- Introduction: summarises the double inscription, considers the scope, status and priorities of the Management Plan.
  - Description of the site: this is a scene setting overview of the World Heritage Site, including its location, boundary, setting, history (of the inscription) the condition of the site and some key facts.
  - Significance of the site: this sets out in full why Bath is of Outstanding Universal Value (OUV), in respect of both inscriptions, and describes the Attributes that convey or express the OUV of the site. It also sets out the individual Elements such as archaeology, buildings and setting. It provides helpful and easy access to this key information.
  - Management of the site: this addresses the complexities of 'management' which, as Bath is a living, dynamic urban city, has many facets and is dependent upon factors such as land ownership, legislation, governance systems, resources and how the many stakeholders interact. The number of partners involved and the relationships between them are complex.

### 3.12 The second part of the plan focusses on active management:

- Issues, challenges & opportunities: these have been the significant focus of the partnership work to prepare this new Management Plan, now and going forward, together with the priorities and actions identified to seek to address them. This has resulted in the identification of six headline priorities:
  - Addressing Climate Change
  - Development Management
  - Public Realm
  - Traffic, Transport and Mobility
  - Promotion, Interpretation, Inclusion and Presentation
  - Natural Setting and Nature Recovery
- Action plan: setting out actions, ownership across the partners, resource implications as far as can be detailed at this point, planned timescales and monitoring.

### 3.13 The Management Plan priorities and process for preparation align well with the Council's Corporate Strategy:

- Tackling the Climate & Ecological Emergencies: two of the six headline priorities identified in the Management Plan relate to these critical issues - Addressing Climate Change; Natural Setting and Nature Recovery, together with actions including research in identifying and understanding the risks posed by climate change, to both the WHS and the community, and the actions and interventions required as a result; also preserving, enhancing and promoting the Green Setting of the WHS, supporting nature recovery initiatives.
- Giving People a Bigger Say: the preparation of the Management Plan though 'participatory means' is a key UNESCO concept and requirement. The 8-week public consultation on the Management Plan was an essential stage of its preparation and provided the opportunity for the local and wider community to have their say and contribute. At the heart of the Management Plan and the World Heritage Site inscriptions is the founding concept of World Heritage Sites being for all, promoting participation, inclusivity, accessibility and equality.
- Delivering for Local residents: the Management Plan recognises that Bath is a living, dynamic city with a local population and community that live within the WHS that, unusually, covers the entire city. It recognises that there are both local community needs as well as those of visitors. Through its priorities and associated actions, the Management Plan promotes and supports many initiatives and projects that improve and enhance the quality of life and well-being of the city's residents, including improvements to both the built and surrounding natural environment.

- Preparing for the Future/Focusing on Prevention: the Management Plan focuses on enhancing and improving the WHS and futureproofing, closely aligning with these two Council priorities and also with Tackling the Climate & Ecological Emergencies.

3.14 The World Heritage Sites Advisory Board endorsed the Management Plan on 25 April 2025, and both the Department of Culture, Media and Sport (DCMS) and UNESCO will be notified following Council (Cabinet) endorsement.

## **4 STATUTORY CONSIDERATIONS**

4.1 The preparation, endorsement and publication of the Management Plan is not a statutory requirement.

4.2 Cabinet will consider the endorsement of the Combined World Heritage Sites Management Plan 2024-2030 as an urgent item (General Exception) under Rule 3.5.15 of the Constitution for the following reasons:

- there is a need and pressure to submit the updated plan to UNESCO as soon as possible now that it is completed.
- the previous Management Plan covered the period of 2016 to 2022, and that this Plan covers the period of 2024 to 2030 and into the second year of the Plan period and therefore overdue.

## **5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)**

5.1 The review and preparation of the Management Plan, including public consultation, was undertaken utilising existing resources and within existing budgets.

5.2 The Management Plan identifies actions going forward for the Council and partners. In respect of the Council's actions, many of these will sit within existing budgets, although there will be some that will require the sourcing of additional funding, potentially as part of partnership approaches, and will be reported individually as required and appropriate.

## **6 RISK MANAGEMENT**

6.1 A risk assessment related to the issue and recommendations have been undertaken, in compliance with the Council's decision-making risk management.

## **7 EQUALITIES**

7.1 Preparation of the Management Plan has been subject to an Equalities Impact Assessment (EqIA) which ensures that the Council understands the implications for people with protected characteristics

## **8 CLIMATE CHANGE**

8.1 Climate Change is one of the Management Plan's headline priorities, consistent with UNESCO's own priorities and also with the Council's Climate Emergency and Corporate Priorities. The associated action supports continued research into understanding and identifying the risks associated with climate change to the WHSs and the development of mitigation strategies.

## **9 OTHER OPTIONS CONSIDERED**

9.1 None.

## **10 CONSULTATION**

- 10.1 Consultation on the Management Plan has been extensive and is the culmination of one and a half years of partnership working with the SMG, consulting with many local, national, and international experts and specialists, and the community during an 8-week public consultation between 2024 and 2025.
- 10.2 Commencing in January 2024 with the Advisory Board's Strategic Management Group (SMG) acting as 'steering group' for the review of the Management Plan in collaboration with the Council's World Heritage Site Manager. This consisted of regular monthly online meetings, with a workshop in May 2024 involving the Advisory Board members, Council officers and invited external specialists and experts, including the Stonehenge World Heritage Site Manager. Council officers were also provided with the opportunity throughout 2024 to offer advice and comments on the draft Management Plan. This consultative, collaborative and participatory exercise in preparing the draft Management Plan for the Public consultation resulted in over 500 comments and substantial and positive amendments (see Annex 2: SMG & Council Consultation Response Table).
- 10.3 On 14 November 2024 Cabinet endorsed the draft City of Bath and Great Spa Towns of Europe World Heritage Site Management Plan (2024-2030) for formal public engagement/consultation.
- 10.4 The public consultation was eight weeks in duration from December 2024 to January 2025 and was well-publicised with the draft Management Plan deliberately presented in a basic text format rather than a fully designed document. This was largely undertaken online on the Council's website, and hard copies were made available including in libraries and the World Heritage Centre. The consultation resulted in nearly 500 responses and comments, and included both local residents and high-level stakeholders, including Historic England, ICOMOS International, ICOMOS-UK, National Trust, and others in the Advisory Board's Strategic Management Group. Again, this resulted in substantial and positive amendments to the draft Management Plan (see Annex 3 Public Consultation Response Table).
- 10.5 Following consultation with the SMG to discuss the amendments to the draft Management Plan a detailed 'in-house' design process was commenced. This was then presented to the SMG for comments, and this resulted in some additional minor amendments including to the images and text. This final designed version was endorsed by the Advisory Board on the 25 April 2025.
- 10.6 In preparing this Report the Cabinet Member for Built Environment, Housing and Sustainable Development, the Executive Director for Sustainable Development, the S151 Officer and Monitoring Officer have been consulted. It has been cleared for publication by the S151 and Monitoring Officer.
- 10.7 This report seeks endorsement for the amendments to the Management Plan following consultation.

<b>Contact person</b>	Adrian Neilson – Principal Officer, World Heritage Tel: 07555 441496
<b>Background Papers</b>	None
<b>Please contact the report author if you need to access this report in an alternative format</b>	

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# Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Item name	Details
<b>Title of service or policy</b>	Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030)
<b>Name of directorate and service</b>	Sustainable Communities, Planning and Building Control
<b>Name and role of officers completing the EIA</b>	Adrian Neilson City of Bath World Heritage Site Manager
<b>Date of assessment</b>	May 2025

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

## 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> <li>• How the service/policy is delivered and by whom</li> <li>• If responsibility for its implementation is shared with other departments or organisations</li> <li>• Intended outcomes</li> </ul>	<p>The Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030). World Heritage Site management plans are not a statutory requirement, however UNESCO require each site to produce a management plan (Operational Guidelines (2021) para 108), to be renewed every six years. The Bath World Heritage Sites (WHSS) Management Plan (MP) describes what the site consists of, why it is of global significance, how it is managed, what challenges it faces and how (through an action plan) these will be addressed. This MP will replace the previous plan covering the period of 2016-2022 and has been drafted to include the second inscription.</p> <p>The MP is a collaborative, working partnership document that advocates and promotes collaborative, partnership working with stakeholders, the community and across the Council. It has been prepared through participatory means and in close cooperation with the WHS Advisory Board, which is made up of key stakeholders including, the National Trust, Bath Preservation Trust, representatives from both universities, Wessex Water, elected local members and B&amp;NES Council officers.</p>



	<p>There will be ongoing engagement and communication on the MP during the 6-year MP period</p> <p>The MP identifies 6 key priorities:</p> <ul style="list-style-type: none"> <li>• Addressing Climate Change</li> <li>• Development</li> <li>• Public Realm</li> <li>• Traffic, Transport and Mobility</li> <li>• Promotion, Interpretation, Inclusion and Presentation</li> <li>• Natural Setting and Nature Recovery</li> </ul> <p>These priorities are consistent with both UNESCO's and the Council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies, preparing for the future, delivering for local residents and focusing on prevention.</p> <p>Following Cabinet endorsement, the MP (2024-2030) will replace the previous MP (2016-2022) and the actions will be delivered and involve various Council departments and teams, including Heritage Services, Planning Services, as well as other public service providers and the private sector. The intended WHS management outcomes from the MP will be variously monitored as set out in the Actions section of the MP.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>Local authorities, as identified by UNESCO as 'chief stewards' of WHS, are required to prepare and ensure that an up-to-date MP is in place, which is an international requirement. The UK government identified by UNESCO as the 'state party' and signatory to the World Heritage Convention (1972), through DCMS hands down this requirement. This national requirement is likely to be reiterated in the emerging and forthcoming Historic England guidance on management plans. The MP, as stated above, will replace the previous MP, and represents both a continuum of the core purpose of previous management plans as required by UNESCO, which is to safeguard the Outstanding Universal</p>

	<p>Value (OUV) of the WHS, i.e. the special characteristics that are of global importance that form the basis for WHS inscription or designation. However, the key differences from this MP to the previous MP (2016-2022) are that it includes the Great Spa Towns of Europe inscription (Bath is one of only 22 of the 2223 WHS globally to be inscribed twice, and this will be the first ever combined MP), and a number of additional actions, including those carried over from the previous MP.</p>
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	<p>As stated above, the key priorities of the MP are regarded as being entirely complementary and in alignment with the Council's own priorities and objectives outlined with the Council's Corporate Strategy, including:</p> <ul style="list-style-type: none"> <li>• <b>Tackling the Climate &amp; Ecological Emergencies:</b> 2 of the 6 key priority objectives identified in the Plan relate to these critical issues - Addressing Climate Change; Natural Setting and Nature Recovery, together with actions including research in identifying and understanding the risks posed by climate change, to both the WHS and the community, and the actions and interventions required as a result; also preserving, enhancing and promoting the Green Setting of the WHS, supporting nature recovery initiatives.</li> <li>• <b>Giving People a Bigger Say:</b> the preparation of the Management Plan though 'participatory means' is a key UNESCO concept and requirement. Public consultation on the Management Plan is therefore an essential stage of its preparation and will provide the opportunity for the local and wider community to have their say and contribute. At the heart of the Management Plan and the World Heritage Site inscriptions is the founding concept of World Heritage Sites being for all, promoting participation, inclusivity, accessibility and equality.</li> <li>• <b>Delivering for Local residents:</b> the Management Plan recognises that Bath is a living, dynamic city with a local population and community that live within the WHS that,</li> </ul>

	<p>unusually, covers the entire city. It recognises that there are both local community needs as well as those of visitors. Through its priority objectives and associated actions, the Management Plan promotes and supports many initiatives and projects that improve and enhance the quality of life and well-being of the city's residents, including improvements to both the built and surrounding natural environment.</p> <ul style="list-style-type: none"> <li>• <b>Preparing for the Future/Focusing on Prevention:</b> the Management Plan focuses on enhancing and improving the WHS and futureproofing, closely aligning with these two Council priorities and also with <b>Tackling the Climate &amp; Ecological Emergencies</b>.</li> </ul>
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## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<b>2.1</b> What equalities training have staff received to enable them to understand the needs of our diverse community?	Service deliverers within the Council have received corporate equalities training. Equalities training is now mandatory for all B&NES employees.
<b>2.2</b> What is the equalities profile of service users?	<p>The MP covers the City of Bath WHS Council local authority area. Link to the most up to date for the B&amp;NES area (including Equalities data) can be found at:  <a href="https://beta.bathnes.gov.uk/strategic-evidence">https://beta.bathnes.gov.uk/strategic-evidence</a></p> <p>The MP includes some analysis of the socio-economic makeup of the City of Bath.</p>

<p><b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>This report seeks endorsement of the MP. Customer satisfaction will be considered as part of the delivery of the actions within the MP.</p>
<p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The MP has been reviewed following extensive consultation with key stakeholders over a year and a half period, and members of the public during an 8-week public consultation. Comments and advice from all have resulted in significant amendments to the MP.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>There will be ongoing engagement and communication on the MP and its priorities and actions throughout the MP period of six years. It is envisaged that this process will provide opportunities for communities and stakeholders, including seldom-heard groups to be involved. The overall intended outcome is to ensure that all communities and stakeholders are involved, including local, national and international consistent with the UNESCO's core principle of WHS being for everyone regardless of national boundaries.</p> <p>The MP will be made available on the Council's website in an accessible format consistent with legal requirements regarding accessible online content and information, and there will be a variety of opportunities to provide feedback, and Equalities data and feedback will continue to inform how we measure performance and improvement in relation to equality and diversity.</p>

### 3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

## **Combined City of Bath and Great Spa Towns of Europe World Heritage Site Management Plan (2024-2030)**

Throughout the public engagement process the equalities impact of the MP will be carefully considered. The MP includes priorities relating to climate change, the natural environment and nature recovery, local economy, health, well-being of communities, heritage and design, sustainable development, sustainable transport.

<b>Key questions</b>	<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.1 Issues relating to all groups</b> and protected characteristics	Opportunities for the MP to address equalities issues and needs of people with protected characteristic include through its actions include: <ul style="list-style-type: none"><li>- sustainable development</li><li>- inclusive design within the public realm</li><li>- promote the WHSss for everyone</li><li>- inclusive access for older people, students, disabled people, service families etc.</li><li>- addressing climate change, identifying risk and required mitigation, and support sustainable energy and residents with rising energy costs to benefit all</li><li>- support nature recovery initiatives and to ensure access for all to green infrastructure, open spaces and nature recovery opportunities to benefit well-being of all, including the local community and visitors alike.</li></ul>	

<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	Through the delivery of the MP actions, it will support initiatives that ensure the WHSs will benefit all regardless of gender or sex. This is consistent with government strategy on Violence against Women and Girls (VAWG), Safer Streets Strategy, and Open Spaces Design for Women and Girls.	
<b>3.3 Pregnancy and maternity</b>	Support for inclusive design and access for all to meet access needs of not only older and disabled people, but the whole community, including pregnant & breastfeeding/feeding parents & parents with pushchairs. - The location and design of development is accessible to all and secure by design, including open space, the public realm and transport infrastructure.	
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	The MP supports inclusivity and equal access for all within the WHSs.	
<b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	The MP supports the delivery of inclusive design within the WHSs.	
<b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups	The MP promotes access and enjoyment of the WHSs for all and inclusivity regardless of age. The risks of digital exclusion particularly for older people will be considered.	

<b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups	The MP supports inclusivity within the WHSs regardless of ethnicity. There is awareness of the potential requirement for translation services on request and engaging with different ethnicities to enable a global view on the needs of the community who access World Heritage Sites.	
<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	The MP supports inclusivity within the WHSs regardless of sexual orientation. For instance, engaging with the LGBTQ+ community to understand how to include diversity of thoughts and needs within the design stage of the strategy.	
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	The MP promotes equality and inclusivity within the WHSs regardless of individual relationship choices.	
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	The MP has been prepared in the spirit of UNESCO's founding principles for WHS as being for everyone regardless of differing religious groups and belief systems, including the local Jewish community.	
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood,	The MP promotes access to the WHSs for all regardless of socio-economic status and notes the success of the Council's Discovery Card initiative that provides free access to heritage for all local residents.	

employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b>		
<b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities	The WHSs are largely an urban site, although it has a formally identified indicative setting that comprises the rural and natural landscape that surrounds the WHSs. However, this is not regarded as disadvantaging those living within the rural areas that the WHSs setting consists of.	
<b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	The MP promotes inclusivity and equal access for all, and the WHSs are not regarded as disadvantaging members of the community associated with the armed forces.	

\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.



## 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) promotes inclusivity and engagement for all.	The MP to meet the statutory and B&NES Council requirements.		City of Bath World Heritage Sites Manager	Within the 6-year MP period
Accessible format of the MP and on the B&NES website and opportunities for feedback and comments during the 6-year MP period.	The MP will be made available on the B&NES website and will be published in an accessible format and include contact details for further accessibility requirements. There will be opportunities to provide feedback.		City of Bath World Heritage Sites Manager	Within the 6-year MP period

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.




**Signed off by:** Sophie Broadfield (Executive Director of Sustainable Communities)  
**Date:** 21 October 2024

## Risk Assessment – Cabinet Report

### Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030)

No	Risk	Likelihood	Impact and where appropriate actions to reduce likelihood	Significant risk yes/no
1	There is a risk that if the decision is not taken that:  Duty of central government as State Party and signatory of the UNESCO World Heritage Convention (1972), and the local authority as 'Principal Steward' of the world heritage sites to 'identify, protect, conserve, present and transmit' the World Heritage Sites, and to ensure that an up-to-date management plan is in place (UNESCO Operational Guidelines 2021, para 108). Not progressing and endorsing the Management Plan would mean there is a risk that we would fail to demonstrate to UNESCO and our community that our WH status is valued, held in high esteem, and the commitment to effectively managing it.	High	High (long-term detrimental impact)	yes
2	The review and preparation of the WHSs Management Plan has been undertaken through a collaboration of a number of partner organisations and the community through an 8-week public consultation led by the Council and the Chair of the Advisory Board. Not progressing and endorsing the management plan would mean there is a risk that the Council is seen not to value partnerships established and the value partners place on the Management Plan hence	High	High (long-term detrimental impact)	yes

	a risk to continued positive partnership working.			
3	The Management Plan provides an important opportunity to engage with stakeholders, communities and others in the reasons Bath is double inscribed as a World Heritage site. Not progressing and endorsing the Management Plan would constitute a missed opportunity to ensure that shared key objectives of both UNESCO and the Council to promote, interpret, transmit and engage visitors and the local community alike regarding the value of World Heritage as shared global heritage for everyone to enjoy and experience, regardless of national boundaries and identities.	High	High (long-term detrimental impact)	yes
4	The Management Plan and its actions are a critical tool for managing, improving and enhancing the WHS, and therefore not progressing and endorsing the Management Plan would result in not being able to carry out one of its core functions, therefore resulting in a risk to the WHS.	High	High (long-term detrimental impact)	yes

<p><b>City of Bath &amp; Great Spa Towns of Europe World Heritage Sites (combined) Management Plan 2024-2030</b></p>	<div>   </div> <div> <p>United Nations Educational, Scientific and Cultural Organization</p> <p>City of Bath inscribed on the World Heritage List in 1987</p> </div>
<p>Table of comments and responses resulting from consultation and participation with WHSs Advisory Board's Strategic Management Group (SMG) and Council officers (January – September 2024)</p>	<div>   </div> <div> <p><b>unesco</b></p> <p>The Great Spa Towns of Europe Inscribed on the World Heritage List in 2021</p> </div>

The table below details the feedback received during the six-month consultation period on the combined City of Bath & Great Spa Towns of Europe World Heritage Site Management Plan 2024-2030. In addition to feedback received the table also lists the response and actions, where applicable, that will be taken to address the consultation respondent's points: total comments received 433 (38 pages).

No	Name	Org.	Comments	Date	Response to comment
1	Karen Renshaw	B&NES	Preface to include climate change and nature emergency	17.6.24	Accepted
2			Introduction should be embellished to state greater significance of the double inscription and how this impacts on management	17.6.24	Accepted
3	Marion Harney	UoB	Introduction should include all OUV's	17.6.24	Accepted
4	Di Sheppard	B&NES	1.4 wording clarification on scope	17.6.24	Accepted
5	Marion H	UoB	1.4 wording should be amended to be clearer	17.6.24	Accepted
6	Di		1.4 ditto	17.6.24	Accepted
7	Karen	B&NES	1.4 clarification on why spa towns declined	17.6.24	Too much detail for section
8	Di		1.5 wording should be changed from used to managed	17.6.24	Accepted
9	Karen		1.5 ditto	17.6.24	Accepted
10	Marion		2.5 footnotes should be at end of sentence and not at foot of page	17.6.24	Noted and will consider at desktop publishing stage
11	Dan Merrett	B&NES	2.5 boundary of indicative setting states 5 miles, but is less	17.6.24	Accepted
12	Di		2.5 Core Strategy policy B4 better way to protect	17.6.24	Accepted
13	Karen		2.5 Bathscape should be referenced	17.6.24	Accepted
14	Marion		2.7 University of Bath correct title	17.6.24	Accepted

15	Karen		2.7 stats re employment and pay queried	17.6.24	Noted no room for further detail in this context. It is noted in the MP that stats likely to require updating
16	Di		2.8 requires rewriting to be undertaken	17.6.24	Accepted
17	Di		2.9 registered parks and gardens within setting?	17.6.24	Noted and to be clarified and amended if required
18	Karen		2.9 quote added re nature depletion	17.6.24	Rejected as not appropriate to include a quote here
19	Karen		3.2 significance of double inscription and and what a WHS is should be embellished.	17.6.24	Accepted and structure to be amended so this appears in introduction
20	Marion		3.3 wording commented upon	17.6.24	Wording of UNESCO inscription and Statement of OUV so cannot be amended. However, can be made clear.
21	Karen		3.3 ditto	17.6.24	ditto
22	Di		ditto	17.6.24	ditto
23	Di		3.4 requires rewording	17.6.24	Accepted and changed

24	Dan	B&NES	3.4 green setting should include hollow in the hills		Noted and to be clarified in original UNESCO Statement of OUV and inscription
25	Di		3.9 typo		Accepted
26	Di		3.9 reference to river and canal		Accepted and to be clarified
27	Di		3.11 Bathscape should be referenced		Accepted
28	Karen		4.1 questioning wording		Noted
29	Karen		4.1 responsibility for sustaining OUV's		Noted
30	Dan		4.2 offering updated stats		Accepted
31	Dan		4.3 should include Bathscape website address		Noted but not appropriate here
32	Dan		4.3 reference should be made to Bathscape		Noted but not appropriate here
33	Di		4.6 typo		Accepted
34	Di		4.8 reference should be made to LURA and legal protection of WHS's		Accepted
35	Marion		4.10 reference should be made to WHS's		Accepted
36	Di		4.11 Building Heights Strategy study should be SPD		Accepted and included in Actions
37	Di		4.11 Bath WHS Setting Study SPD requires update		Accepted and included in Action 26
38	Di		4.11 questioning value of land ownership in WH setting		Noted however all land ownership regarded as important, for instance NT major land owner



39	Di		4.11 suggesting need for buffer zone		Noted, however not a priority of this MP
40	Di		4.13 budget for the AB?		Noted but not pertinent at this point
41	Di		4.13 AB powers and effectiveness		Noted, however the governance is regarded as effective in its current form
42	Karen		4.13 AB role questioned within the planning process		Noted, however not regarded as an appropriate role for the AB and the most recent ToRs specifically addressed this point
43	Di		4.15 Suggests inclusion of GI strategy and Bathscape landscape character assessment within B&NES list of strategies		Accepted
44	Dan		4.15 supplied links to various Bathscape docs		Accepted
45	Dan		4.17 Bathscape stats provided		Accepted
46	Di		4.19 periodic reporting		Not practical to do so due to length
47	Di		4.19 no regular fixed point photography monitoring included to monitor changes over time		Accepted and potential to address this under GSTE inscription
48	Di		4.19 confusion between monitoring of MP and site		Noted, however considered as covered

49	Di		5.2 additional issues should be identified and included		Accepted, and MP acknowledges greater scope for increased monitoring needed (see point 47)
50	Di		5.2 AB should be effective		Noted and is regarded as an exemplary community and stakeholder participation form of governance
51	Marion		5.2 notes role name change		Noted
52	Di		5.3 who sets objectives and how do they relate to the Issues		This is the key role of the AB
53	Chiara Ronchini	GSTE	5.3 not standalone objective for focusing on communities/community engagement		Accepted
54	Di & Chiara		5.3 use of word liaison questioned – would leadership be more appropriate?		Accepted
55	Di		5.4 use of heading Objective rather than Issues more appropriate?		Accepted
56	Di		5.4 ash die-back should be more prominent as a risk to green setting		Accepted
57	Di		5.4 objectives should include sources of funding		Accepted
58	Chiara		5.5 suggests climate change should phrased in more positive manner		Accepted
59	Di		5.4 questions AB 2030 commitment to zero carbon targets		Noted, however this is an AB decision
60	Chiara		5.4 are maintenance and repair issues pertinent to Bath?		Accepted

61	Di		5.4 Action Plan Table refers to historic buildings only and no other aspects of the WHS's		Accepted
62	Chiara		5.4 climate vulnerability studies look at entire aspects of the WHS's		Accepted
63	Chiara		5.4 installing solar panels within central valleys of roofs		Like Edinburgh B&NES working positively towards heritage partnership agreement regarding installation of solar panels
64	Chiara		5.4 suggests specific ref to world heritage list		Accepted
65	Karen		5.4 ref to brown field development sites now nearly exhausted		Accepted
66	Di		5.4 Building Heights Strategy should be SPD		Accepted and fully supported
67	Chiara		5.4 Action for view cones		Noted and supported, however currently no B&NES funding identified
68	Marion		5.4 LURA requires reference		Accepted
69	Di, Karen and Chiara		5.4 Action 6 – ensure relevant development proposals take full account of impact on OUV		Noted and supported. Ref to UNESCO HIA guidance made elsewhere in MP
70	Di		5.4 Architect in residence and DRP's should fully understand Bath WHS's and be appropriately qualified		Noted and supported

71	Chiara		5.7 Identifies numbering inaccuracy		Accepted & amendments made 24/06/2024
72	Marion		5.8 typo		Accepted
73	Di		5.10 ref to urban trees but no Action for this or assessment of where greening the urban city is appropriate		Noted and text will be reviewed
74	Di		5.10 how does MP support Bathscape and its effectiveness? Is Bathscape the only mechanism for protecting green setting		Bathscape is regarded as a primary mechanism for preserving and enhancing the green setting through multi-agency partnership and collaboration
75	Chiara		5.11 GSTE have produced Responsible Tourism Strategy that should be referred to		Accepted
76	Di		5.14 Action to engage with all strategies coming forward – who is responsible?		Accepted – WHS's Managers to work collaboratively with both internal and external teams/agencies
77	Chiara		5.14 assessment screening for all strategies?		Noted however resourcing implication issues involved
78	Dan		5.15 dry stone wall training required?		Noted
79	Di		5.15 wording from liaison to leadership regarding greater understanding and awareness of WHS status values etc required internally and externally		Accepted

80	Chiara		5.15 as above		Accepted
81	Chiara		5.16 Action should be under conservation heading?		To be reviewed
82	Chiara		5.16 GSTE Actions could be placed under different headings?		To be reviewed
83	Chiara		5.12 Rewording of Actions to align with GSTE Property Plan		Accepted
84	Marion		5.14 suggested ref to Clore Learning Centre		Accepted
85	Marion		6.2 notes role name change		Noted
86	Chiara		6.2 Acronym 'SMART' should be explained		Accepted
87	Di		6.3 No ref to funding of Actions		Covered under resources column of Action Plan
88	Chiara		6.3 add column under successful delivery?		Noted however already covered under monitoring indicators
89	Di		6.3 questioning climate vulnerability exercise too focused on built environment		Noted and addressed above
90	Chiara		6.3 as above		Noted
91	Di		6.3 Building heights should be more effectively managed		Noted, see above comments re support for Building Heights Strategy to be SPD. Also, building heights already successfully managed through development process

92	Di		6.3 Monitoring of tall buildings?		Noted. Monitoring to be done through GSTE update reports
93	Di		6.3 Placemaking Plan ref out of date		Accepted as above
94	Chiara		6.3 cones and key views		Noted, but no funding currently identified as above
95	Di		6.3 ensure emerging development proposals do not only focus of built environment		Noted
96	Di		6.3 who coordinates monitoring/what is role of WHS Manager?		WHS's Manager
97	Di		6.3 public realm street works not consistent with Pattern Book		Accepted
98	Di		6.3 natural setting objective requires further consideration		Noted
99	Di		6.3 what form of support for Bathscape does this take?		Continue to attend meetings, work collaboratively and Bathscape Chair member of the WH AB
100	Di		6.3 SSSI status for Hot Springs?		Natural England commissioned report but appears not to have been progressed currently. Further action needs clarifying
101	Chiara		6.3 reiterating comment regarding need for visitor strategy		Noted as above

102	Di		6.3 reviewing engagement of emerging strategies		Noted as above
103	Di		6.3 reiterating need for accurate photographic monitoring		Noted and encourage commentator to fully engage with this as suggested
104	Di		6.3 widespread WHS's training to raise awareness required		Agreed and supported
105	Marion		6.3 notes change in name of role		Noted as above
106	Chiara		6.3 newsletter to be placed under promotion heading		Accepted
107	Chiara		6.3 suggests new wording for Action re GSTE		Accepted
108	Di		6.4 Reiterates WHS's training		Noted as above
109	Di		6.4 questioning who takes part in reviewing of AB ToRs and governance generally		Noted
110	Di		6.4 wider conversation regarding funding that appears currently inadequate		Noted and agreed
111	Di		6.4 monitoring review of Actions needs to be more effective and fully resourced		Noted
112	Chiara		6.4 Action 44 GSTE Database not needed		Accepted
113			Discovery Card statistics added 8 July 2024		Para 4.17 amended
	Alex Sherman	BPT			
114	24.6.24		Vision – city to adapt to decarbonising/climate change and achieving net zero. Nature emergency		MP already prioritises climate change and resilience and dealing with nature emergency. Ref to achieving zero carbon not necessary here

115			<b>Vision – proposals for change and protecting OUV's and use of words material consideration</b>		<b>Regarded as UK planning terminology not regarded as appropriate for a UNESCO document</b>
116			<b>Recognition of green spaces and important views, recognising the threat of loss – Green Belt, High Common, parks, canopy and impacts / mitigation to recover from ash dieback</b>		<b>Nature emergency and recovery already a priority, but document will be re-examined to ensure that this is given sufficient emphasis</b>
117			<b>The need to enable the adaptation of historic buildings for the climate emergency – retrofit, alternative energy. RIBA see this as a major risk with historic homes becoming more difficult and expensive to heat and therefore, becoming less desirable / too expensive to maintain</b>		<b>Noted and document will be re-examined to ensure that this is given sufficient emphasis</b>
118			<b>Dispersed interpretation is still important to tell the story of the city</b>		<b>Agreed and noted</b>
119			<b>Access and inclusion is essential. Still big access problems for people with disabilities, social mobility, intellectual inclusion</b>		<b>Agreed and noted and MP responds to UNESCO's requirement for comprehensive inclusion</b>



120			Promotion of Bath as a green city (sustainability as well as biodiversity) in a green setting		Agreed and noted. MP recognises work of Bathscape and will continue to support it
121			Walkable city – small, compact and 15 minutes (with drop kerbs throughout)		Noted and MP recognises this, and city regarded as walkable and pedestrian friendly
122			Introduction of (or at least feasibility) of a tourism levy or ‘tax’ – enabling knowledge of how many bed spaces are for tourists (also providing data to inform new housing requirement) + imposing limits		Noted and agreed, responded to in Actions
123			Effective pre-emptive solutions for waste management is the key to longer term reduction in pests / vermin and more effective than extermination		Generic city management issue not relevant to be addressed in MP
124			Extension of thorough street cleaning – currently limited to and delivered by Bath BID area		Generic city management issue not relevant to be addressed in MP
125			Building heights to become an SPD, engagement with Design Codes		Noted and agreed and responded to in Actions
126			1.3 regarding respect for diversity, equity, gender equality etc		No need for definition of participation etc
127			1.4 green setting, hot springs etc		Agreed, text amended to add further explanation

128			1.4 implied conflict MP and Local Plan		Noted, text amended to provide clarification
129			1.4 Participation and consultation to be clarified		Noted and details to be added
130			2.8 questioning wording		Noted and agreed
131			4.2 2009 UNESCO mission and recommendations		Noted – included in appendix
132			4.9 Requirement of LVIA's		Noted and requirement for LVIAs specified in Placemaking Plan, Policy NE2: Conserving and Enhancing the Landscape and Landscape Character
133			4.10 Ref to Placemaking Plan		Noted, Policy Team to advise
134			4.10 Building Heights Strategy wording		Agreed
135			4.15 Green Infrastructure Strategy		Agreed
136			4.18 Risk management requiring peer review		Noted, however this would impact on MP programme
137			5.5 stats not including embodied carbon		Noted
138			5.5 GB should be enhanced to increase tree coverage		Continue to work with and support Bathscape consistent with Action

139			5.6 should include ref to 174 also		Noted, however regarded as introducing unnecessary technical detail
140			5.9 Pattern Book to be SPD?		Noted, however already has great weight and furthermore will require updating
141			5.12 carbon influence of transport initiatives		Noted
142			5.12 public realm accessibility – drop kerbs etc		Noted
143			5.13 WHS to be more prominent and included in street furniture replacement		Agreed and noted
144			5.13 grammar query		Agreed and noted
145			5.10 Green landscape		Noted
146			5.11 Visitor annual stats		Noted and stats to be clarified if possible
	Sarah Simmonds	ICOMOS-UK			
147			p.2 call for more participation and involvement		Not possible within current programme and time frames
148			p.9 GSTE questioning whether Vision refers to it		Confirm that it does
149			p.9 ref to setting and urban management		Word urban omitted

150			<b>p.9 ref to OUV being consideration re carbon reduction and climate change as opposed to being safeguarded consistent with UNESCO</b>		<b>Wording considered to be within spirit of UNESCO and national policy requirements and</b>
151			<b>p.11 Exec Summary comments</b>		<b>Not yet finished, but advice acknowledged</b>
152			<b>1.2 Relationship between two inscriptions requires explanation</b>		<b>Noted but no change</b>
153			<b>1.3 Expand on detail of UNESCO requirement for WHSs to have an MP</b>		<b>Noted but no change</b>
154			<b>1.3 Explanation of combined MP</b>		<b>Noted but no change</b>
155			<b>1.4 Threats/vulnerabilities to OUV</b>		<b>Noted but no change</b>
156			<b>1.4 Ref to archaeological landscape and setting</b>		<b>Noted but no change</b>
157			<b>1.4 word ‘things’ not appropriate</b>		<b>Agreed and amended</b>
158			<b>1.4 Questioning role, status and aim of MP within planning policy</b>		<b>Noted and amended</b>
159			<b>1.5 Questioning degree of AB participation</b>		<b>Noted but not agreed</b>
160			<b>1.5 Development and its impact on OUV</b>		<b>Noted but no change</b>
161			<b>1.5 Questioning use of term nature emergency</b>		<b>Noted no change</b>
162			<b>1.5 Questioning term sustainable management as too general</b>		<b>Noted no change</b>
163			<b>2.5 Monitoring</b>		<b>Noted - captured in Chap 4</b>

164			<b>2.7 Updated stats</b>		<b>Noted and already amended in most recent draft</b>
165			<b>3.1 General amendments to text</b>		<b>Noted, amended where required/accepted</b>
166			<b>3.3 UNESCO inscription details</b>		<b>Noted and amended</b>
167			<b>3.4 Use of City of Bath and removed date of 1987</b>		<b>Noted and amended</b>
168			<b>3.4 Ref to OUVs and NPPF/LURA wording</b>		<b>Noted but no change</b>
169			<b>3.5 Ref to Elements</b>		<b>Noted but no change</b>
170			<b>3.5 Ref to additional mapping</b>		<b>Noted but no change</b>
171			<b>3.9 Use of wording Elements</b>		<b>Noted but no change</b>
172			<b>4.1 Questioning use of word sophisticated</b>		<b>Noted but no change</b>
173			<b>4.1 Benefits of the WHS inscriptions should be made clear</b>		<b>Noted and agreed. Paragraph of this to be drafted and inserted in intro</b>
174			<b>4.2 Beckford's Tower</b>		<b>Noted, but to be added in next MP</b>
175			<b>4.6 GSTE participation</b>		<b>Chiara and Tony heavily involved and have contributed</b>

176			<b>4.6 Appendix should include all relevant planning policy and guidance</b>		<b>Noted, however not necessary or appropriate within the MP</b>
177			<b>4.8 Refutes HIA wording</b>		<b>Noted, but wording is regarded as consistent with that of UNESCO</b>
178			<b>4.10 Building Heights Strategy should be SPD</b>		<b>Noted and agreed, and included as an Action</b>
179			<b>4.11 WH training for B&amp;NES Cllrs and officers</b>		<b>Noted and agreed, and included as an Action</b>
180			<b>4.13 Requirement for greater participation</b>		<b>Noted but not agreed</b>
181			<b>4.13 Role for AB to consider DM issues</b>		<b>AB ToR clearly sets out its role</b>
182			<b>4.13 Appendix of membership should be by organisation and include MPSG</b>		<b>Agreed in part, but should not include MPSG</b>
183			<b>5.2 Questioning use of word 'matters'</b>		<b>Noted and agreed, amended to issues</b>
184			<b>5.3 Cross referencing objectives, aims and actions</b>		<b>Noted, but MP required to avoid unnecessary complexity</b>
185			<b>5.3 Questioning climate change identified within MP as the key priority</b>		<b>Noted, but clarity from author</b>
186			<b>5.3 Typos and consistency</b>		<b>Noted and agreed</b>
187			<b>5.4 Climate change not the main priority</b>		<b>Noted – requires discussion</b>

188			<b>5.4 Questioning the 5 stated priorities and how they were arrived at</b>		<b>Noted – requires discussion</b>
189			<b>5.4 Questioning clarity re objectives, priorities, actions</b>		<b>Noted</b>
190			<b>5.5 Climate Change – requires complete redrafting to align more closely with UNESCO policy position</b>		<b>Noted – requires discussion to assist in redrafting and provide clarity re climate change as a priority and not the priority</b>
191			<b>5.6 Managing Development – ICOMOS HIA requirement and Building Heights Strategy adopted</b>		<b>Noted – already addressed</b>
192			<b>5.6 State Party as Signatory of Convention and ultimately responsible for preserving OUV needs to be emphasised</b>		<b>Noted and agreed</b>
193			<b>5.6 Green setting etc requires more emphasis</b>		<b>Noted and agreed</b>
194			<b>5.6 Requirement for WHS SPD, in addition to the character area appraisals that should include process for 172 notifications</b>		<b>Noted and potential for and merit of a WHS SPD could be discussed as a future ambition</b>
195			<b>5.6 What is ‘end note’?</b>		<b>Noted – requires clarification</b>
196			<b>5.6 Member and officer WHS training required</b>		<b>Noted and agreed</b>
197			<b>5.6 LURA update required</b>		<b>Noted and agreed</b>
198			<b>5.6 Action table required</b>		<b>Noted and could be discussed</b>
199			<b>5.7 Monitoring of impacts on OUV of cumulative change</b>		<b>Noted as worthy ambition</b>
200			<b>5.9 Highways clutter should be mentioned as issue</b>		<b>Noted and agreed</b>

201			5.10 Concerns that natural setting not given adequate prominence/emphasis/priority		Noted and agreed
202			5.10 Green setting and potential impacts of climate change needs to be stated		Noted and agreed
203			5.11 Need to outline economic benefits for local community from WH status		Noted and agreed
204			5.12 Sustainable tourism plan/strategy required		Noted and requires discussion
205			5.13 Pattern Book requires renewal/updating		Noted
206			5.13 Comments re WH Day		Noted
207			5.13 GSTE actions required		Noted and agreed
208			5.13 WH needs to be better considered in local strategies		Noted and agreed
209			5.14 Establishment of new history centre to accommodate record office etc should be retained as aspirational Action		Noted – could be discussed
210			6.1 Not enough SMART actions – SG should be given further time to participate		Noted
211			6.2 Aspirational actions should be retained/included		Noted
212			6.3 AB should be engaged in delivering actions		Noted and agreed
213			6.3 DM and preservation of OUV should be emphasised as action		Noted and agreed
214			6.3 Masterplans for DM should be promoted consistent with UNESCO guidance		Noted
215			6.3 Sustainable tourism should be lead with WHS focus		Noted and agreed
216			6.3 Progress reports should be annually, and not mid-term stated		Noted
	Stephen George	B&NES			



217			<b>4.11 Local Plan Policy update - comprehensive amends</b>		<b>Accepted</b>
218			<b>4.15 Table of Council strategies, policies etc – Local Plan wording amended</b>		<b>Accepted</b>
219			<b>5.3 Culture not included in Objectives ‘Maybe culture needs to be added as part of this priority objective? Maintain Bath as a living and working city ... social ambitions ... and reflecting its culture of health and wellbeing as part of its Great Spa Towns of Europe’</b>		<b>Noted and to be reviewed</b>
220			<b>5.6 Continuous quality improvement, enhancement, restoration of the public realm should be identified as a specific action – currently ‘lost’ and vague</b>		<b>Noted and accepted</b>
221			<b>5.6 Continuation of city character area appraisals less of a priority than other policy guidance that is required or requires updating</b>		<b>Noted but not accepted. Bath CA one of the most significant and important in country yet has no adopted character appraisal. Also work largely completed</b>
222			<b>5.6 Housing allocation paragraph deleted on grounds of inaccuracy</b>		<b>Noted and accepted</b>
223			<b>5.6 Use of DRP supported but questioning the need for an architect in residence</b>		<b>Noted but not accepted</b>
224			<b>5.7 Public realm needs to be identified as poor requiring improvement</b>		<b>Noted and accepted</b>
225			<b>5.9 Public realm and unified approach across Council teams using Pattern Book and championing use of appropriate natural materials</b>		<b>Noted and accepted</b>

226			5.12 Additional commentary required to include Bristol to Bath Strategic Corridor, Active Travel Masterplan proposals, Liveable Neighbourhood interventions, cycle routes, cycle hangers, cycle and scooter hire scheme etc and Council commitment to addressing the climate emergency		Noted and accepted
227			5.15 Could include ref to requirement for WHS training/awarenes etc and how this knowledge can inform and be used in decision-making		Noted and accepted
	Tom Boden	NT			
228			3.3 Destination Marketing Strategy – update?		Not aware of an update of this doc
229			4.2 Flooding of Bathampton Meadows in 2024		Accepted
230			4.2 NT land ownership not more than 10%		Accepted
231			4.17 Museum numbers and wording		Accepted
232			5.8 Suggested rewording re slave trade and colonialism and Bath history		Accepted
233			5.8 Suggested rewording re diversity etc		Accepted
234			5.8 Omit ref to ‘Upper’ Assembly Rooms		Accepted
235			Objective 16: Governance – should include wording that refs to requirement to provide WH training to AB members		Accepted
	Paula Freeland	B&NES			
236			1.4 Endorsed not ‘adopted’ by B&NES		Accepted
237			4.7 Inconsistency re numbers of reg parks and gardens and SAMs and Key Facts		Accepted
238			5.4 Need to add who actions are aimed at		Noted and will review where best to include

239			5.4 'Two extra Advisory Board meetings have been held' – comment requires clarification		Noted and will discuss with TC and review
240			5.5 Ref to Alex Best's role should include timeframe and include pilot		Accepted
241			5.5 Wording with ref to the LLBCO suggested amendment		Accepted
242			5.6 Wording with ref to character appraisals suggested amendment		Accepted
243			5.6 Wording with ref to AB's role in commenting on dev proposals		Accepted
244			5.11 Wording with ref to locally listed heritage assets SPD amendment		Accepted
245			6.3 Actions table should refer to just B&NES rather than specific teams		Accepted
246			6.3 Actions table – various minor amendments related to inaccuracies re Conservation Team projects/work		Accepted
	Marion Harney	UoB			
247			1.1 Incorrect WH stats		Accepted
248			1.4 Georgian timeframe dates confusing - omit		Accepted
249			2.7 Ward number inconsistency		Accepted
250			2.9 Some repetition in Key Facts and previous info		Noted but not amended
251			2.9 Visitor stats inconsistency		Accepted
252			3.4 Typo		Accepted

251			3.5 Element 49 – should refer to J Wood Elder not ‘Senior’		Noted, but ‘Senior’ is consistent with the UNESCO Criterion inscription wording. To review with TC
252			4.10 Policy B4 and weighing harm against public benefit doesn’t apply to WHS		Noted, but this is currently the wording of B4. Suggest a discussion required with B&NES
253			4.12 AB rep organisation numbers inconsistency		Noted but couldn’t identify
254			4.17 Use of UNESCO term emblem as opposed to logo inconsistent		Noted - will amend
255			5.3 Include sustainable development as objective		Accepted
156			5.6 Tension between UNESCO requirement to avoid harm, and UK planning system to balance harm against public benefits – doesn’t apply to WHS		Noted, but no obvious way currently to resolve this issue
257			5.6 Placemaking Plan to change		Noted and will amend as required
258			5.9 Use of word emblem		Accepted
259			5.13 Visitor stats inconsistency		Accepted and amended
260			5.15 Typo		Amended
261			5.21 WHS numbers		Amended

262			Objective 9 - Road Investment Strategy 2015 to 2020 out of date?		Accepted and amended
	Steve George	B&NES			
263			Suggested amendments to Chair's Preface		Noted and will review
264			Suggested amendments to Exec Summary		Noted and partially accepted
265			1.4 Plan focused on OUV comment for addition		Accepted
266			1.4 Planning policy amendments		Accepted
267			4.8 NPPF update		Accepted
268			5.1, 5.2, 5.3 confusion of wording Issues and objectives – need for consistency and clarity		Accepted and will review
269			Objective 4 – conservation of OUV needs clarifying		Noted
270			Objective 5 suggested additional wording		Accepted
271			Objective 8 suggested additional wording		Partially accepted
272			5.4 Questioning concept of identifying 6 main priorities		Noted but not accepted
273			5.6 Planning and LB app stats for Bath?		To be reviewed
274			5.6 Questioning character appraisals as a priority		Noted but not accepted
275			5.6 Questioning supporting Building Heights Strategy to become SPD		Noted but not accepted
276			5.6 Suggested amended wording Action 5		Partially accepted
277			5.7 Questioning wording that suggests we can't benefit from visitor tax contributions		Accepted
278			5.7 Action 11 suggested comment re funding/budget and public realm		Accepted
279			5.7 Action 12 suggested comment re use of concrete paving		Noted but not accepted

280			5.8 Action 21 suggested amendment to wording		Partially accepted
281			5.8 Suggestion to go beyond WHS and GSTE website to promote		Noted and to be reviewed
282			5.10 Support for Bathscape going forward		Noted
283			5.11 Refer to public realm		Accepted
284			5.13 Questioning wording re visitors and revenue		Noted but not accepted
285			5.13 Suggestion re revenue and council tax ' <i>And explore Bath / Charter Trustees charging a Council Tax precept that is in line with parishes or town councils throughout B&amp;NES?</i> '		Noted and could be reviewed
286			5.21 Questioning number of WHS		Accepted and amended
287			6.3 Suggested wording re planning policy		Accepted and amended
	Chiara Ronchini	GSTE			Accepted and amended
288			General typos throughout doc		
	Rohan Torkildsen				
289			General comments including HE's heritage at risk register correction		Accepted
	Sarah Simmonds	ICOMOS UK			
290			Vision suggested wording amendments		Partially accepted
291			Exec summary amendments		Accepted
292			1.2 UNESCO and sustainable development goals		Accepted
293			1.4 Suggested rewording re MP and Local Plan		Partially accepted
294			1.5 Suggested rewording		Partially accepted
295			3.1 Suggested minor rewording		Partially accepted

296			4.1 Suggested omission of minor section of wording		Accepted
297			4.2 Suggested ref to Cleveland Pools		Noted but already referenced
298			4.8 Suggested omission of wording and inclusion of action re requirement for HIA		Accepted and wording amended. HIA as action or incorporated within existing can be reviewed
299			4.10 Suggestions re planning policy		Not accepted
300			4.10 General comments re MP as evidence base and requirement for robust aims and objectives		Noted
			4.10 Building Heights Strategy as SPD supported		Noted and agreed
301			4.10 Policy docs/spd to be updated etc supported		Noted and agreed
302			4.10 Retention of policy B4 supported		Noted and supported
303			4.10 Renewal of Setting Study		Agreed and supported by MP
304			4.10 Questioning effectiveness of GB going forward following new G'vmt		Noted
305			4.10 Questioning lack of buffer and not pursuing this		Noted, but currently no plan to introduce buffer – indicative setting regarded as adequate
306			4.12 AB having no role in DM – update SMG ToR		Noted
307			4.16 Action for WHEF funding		Noted and will review

308			<b>4.18 Questioning how emerging risks reported to AB/SMG</b>		<b>Noted – SMG fulfils this function in collaboration with WHS Managers. No action required</b>
309			<b>2.19 Monitoring and how this is reported to AB/SMG</b>		<b>Noted – as above</b>
310			<b>5.2 Wording suggestions re ‘handing down’</b>		<b>Accepted and amended</b>
311			<b>5.2 List of GSTE identified Issues should be included in Appendices</b>		<b>Accepted</b>
312			<b>5.2 Comment re Actions and Issues</b>		<b>Noted and will review</b>
313			<b>5.3 Suggested revision to climate change wording</b>		<b>Partially accepted</b>
314			<b>5.3 Suggested revision to managing development wording</b>		<b>Noted</b>
315			<b>5.3 Suggested revision to public realm wording</b>		<b>Accepted</b>
316			<b>5.3 Suggested revision to natural setting wording</b>		<b>Accepted</b>
317			<b>5.3 Suggested revision to traffic, transport and mobility wording</b>		<b>Accepted</b>
318			<b>5.3 Suggested revision to national and regional strategies wording</b>		<b>Accepted</b>
319			<b>5.3 Research - typo</b>		<b>Accepted</b>
320			<b>5.3 Suggested omission of ref to intangible values</b>		<b>Partially accepted – wording amended</b>
321			<b>5.3 Youth and suggested ref to UNESCO (‘International’) Global Citizenship Education programme</b>		<b>Accepted</b>
322			<b>5.3 Wider UNESCO Family and suggested ref to best practice</b>		<b>Accepted</b>



323			5.3 Add objective re monitoring		Noted and can be reviewed, but likely issues re resourcing, as mentioned previously above
324			5.4 Questioning wording re Priorities and Objectives		Noted and to be reviewed
325			5.4 Suggested amendment to wording re climate change		Not accepted
326			5.5 Suggested amendment to Climate Change priority wording to include re to OUV		Not accepted – the requirement to safeguard OUV is made clear throughout the MP
327			5.5 Suggested amendment to wording re climate change from 'primary' to 'increasing' importance		Accepted
328			5.5 Suggested ref to UNESCO climate change policy doc		Accepted
329			5.5 Suggested wording re sensitive management		Accepted
330			5.5 Variously questioning the assertions of the wording and suggested ref to safeguarding OUV		Partially accepted and amended
331			5.5 Climate change action wording		Partially accepted
332			5.5 LLBCO action wording		Partially accepted
333			5.6 Suggested wording re inappropriate dev risk to OUV		Partially accepted
334			5.6 Ref to UNESCO reporting and 172 notices		Noted
335			5.6 Ref to setting		Noted but not appropriate here
336			5.6 Ref to OUV required		Accepted
337			5.6 Ref to setting required		Accepted

338			<b>5.6 Ref to Building Heights Strategy and support to become SPD</b>		<b>Noted</b>
339			<b>5.6 Suggested wording re providing WHS training for DRP and Architect in Res</b>		<b>Accepted</b>
340			<b>5.7 Suggested wording re highways clutter</b>		<b>Noted but already mentioned previously</b>
341			<b>5.9 Suggested wording re initiatives to promote greater understanding of WHS/OUV</b>		<b>Accepted</b>
342			<b>5.9 Suggested wording re engaging youth in WHS – local and global</b>		<b>Accepted</b>
343			<b>5.10 Suggested wording re landscape setting</b>		<b>Accepted</b>
344			<b>5.10 Suggested action re monitoring</b>		<b>Noted and can review</b>
345			<b>5.10 Suggested action re managing woodland</b>		<b>Noted but not accepted - already action for supporting Bathscape</b>
346			<b>5.12 Suggested monitoring wording to action</b>		<b>Noted and can be reviewed, but likely no budget</b>
347			<b>5.12 Questioning whether action would be better placed in education</b>		<b>Noted but not accepted</b>
348			<b>5.14 Questioning whether travel strategy regional or local</b>		<b>Noted – a regional WECA initiative</b>
349			<b>5.15 Questioning meaning of wording</b>		<b>Amended</b>
350			<b>5.16 Questioning that action relevant to CoB as well as GSTE</b>		<b>Noted and to be reviewed</b>
351			<b>5.17 Suggested minor wording</b>		<b>Partially accepted</b>

352			5.17 General comment re support for early alerting/reporting of potential emerging risks to WHS to AB/SMG		Noted
353			5.19 Suggested wording to action re <i>including global citizenship, sustainable development and climate change</i>		Accepted
354			5.20 Update required ToR for Ab and SMG		Accepted
355			6.2 Suggested omission of 'handed down'		Accepted
356			6.2 Suggestion to increase actions to include 'day to day' actions		Noted and to be reviewed
357			6.3 Suggested table title from Monitoring Indicators to 'Success Measures'		Noted and to be reviewed
358			Suggested following wording for Vision: 'The impact upon the Outstanding Universal Value will be a key consideration in all proposals for change, recognising that small-scale incremental change can be as influential as major interventions. There will be a strong presumption against development that would harm the Outstanding Universal Value of the World Heritage Site itself, or its setting.'		Noted but not accepted because akin to Local Plan policy wording. However, alternative wording added re development in response to the advice
359			Suggested omission of superfluous words in Vision para 5 – 'impact upon'		Agreed
360			1.5 Suggested additional para and wording re development		Partially accepted
	Alex Sherman	BPT			
361			1.4 Hyperlink added in footnotes but refers to web page that not available		Noted but not amended

362			<b>2.8 Need to add additional heritage at risk – Wansdyke etc</b>		<b>Accepted and amended</b>
363			<b>3.10 Suggested making ref to certain buildings</b>		<b>Noted</b>
364			<b>4.17 BPT volunteer number correction</b>		<b>Accepted</b>
365			<b>5.5 Questioning the LLBCO and its legality</b>		<b>Noted, but MP has since been amended to reflect progress to date</b>
366			<b>5.5 Suggested rewording to Warmer Bath and partners</b>		<b>Partially accepted</b>
367			<b>5.5 Questioning ref to Edinburgh initiative as case for solar panel LLBCO as not entirely relevant</b>		<b>Noted and will review</b>
368			<b>5.5 Cites various UoB and Buro Happold research/trials re decarbonisation in ref to action</b>		<b>Noted</b>
369			<b>5.6 Suggested ref to 174 notification procedure</b>		<b>Accepted</b>
370			<b>5.6 Ref to 174 notification re Bath Rugby</b>		<b>Noted, but 174 notice was Gasworks site instigated by BPT not Bath Rugby, which was 172 notice instigated by B&amp;NES</b>
371			<b>5.6 Questioning ref to DRP and Bath-specific panel</b>		<b>Noted, but not intended to mean Bath-focused panel. No change</b>
372			<b>5.8 Ref to action re improving historic environment (public realm) more accessible and being more ambitious</b>		<b>Noted</b>
373			<b>5.9 Makes ref to Clore Learning Centre and WH Centre</b>		<b>Noted</b>

374			<b>5.9 Suggested rewording re ref to transatlantic slave trade etc</b>		<b>Noted, but already amended following suggestion by Tom B</b>
375			<b>5.9 Suggested inclusion of action specifically related to support for research into transatlantic slave trade and development of Bath</b>		<b>Accepted</b>
376			<b>5.10 Suggested amendment to existing action re responsible lighting and a supporting lighting strategy</b>		<b>Noted but there is already a Bath Pattern Book Street Lighting Strategy in place and adopted</b>
377			<b>5.10 Suggested action re support for dark skies association for Bath to become Dark Sky City</b>		<b>Noted and will review with Karen Renshaw</b>
378			<b>5.17 Suggested action to ensure management of the WHS is equitable, diverse etc</b>		<b>Noted</b>
379			<b>5.17 Suggested action to support a review of the SOUV so it reflects current society and emerging narratives and research</b>		<b>Noted</b>
380			<b>5.20 Suggested action re changes to WHS governance to ensure more inclusive</b>		<b>Noted</b>
381			<b>6.3 New action re supporting partnerships for new and innovative technology re decarbonisation</b>		<b>Accepted</b>
382			<b>6.3 Suggested minor wording addition 'other Board partners'</b>		<b>Accepted</b>
383			<b>6.3 Suggested additional wording re responsible street lighting strategy</b>		<b>Noted but there is already a Bath Pattern Book Street Lighting Strategy in place (as also mentioned above)</b>

384			6.3 Suggested action re engaging with Dark Skies Assoc		Noted and will review with Karen Renshaw
385			6.3 Suggested ref to public realm and more accessible to people with limited mobility/disabled		Accepted
386			6.3 Suggested action re creating an EDI to ensure WHS equitable, inclusive etc		Noted
387			6.3 Suggested action to revisit wording of SOUV		Noted
388			6.3 Suggested action re supporting research into Bath and connection with historic slavery		Accepted
389			6.3 Suggested action to review WHS AB governance structures to ensure inclusive		Noted
	Robert Campbell	B&NES			
390			2.7 Check visitor stats with Visit West		All stats checked, amended and up to date
391			3.10 Include ref to Fashion Museum Collection		Accepted
392			5.3 'Priorities and Objectives' is confusing and potentially relegates objectives as of lesser importance		Noted and will review
393			5.3 Addressing climate changes implies not dealing decreasing environmental impact		Accepted and amended
394			5.3 How is sustainable defined within sustainable development?		Noted and will review
395			5.3 Public realm being referred to as 'poor quality' is subjective and alternative wording suggested		Accepted and amended
396			5.3 Transport etc wording 'inflammatory' and should be deleted		Accepted and amended
397			5.3 Promotion interpretation etc and suggested additional wording re inclusion		Accepted





398			<b>5.3 Natural setting and use of word ‘ensure’ problematical</b>		<b>Accepted and amended</b>
399			<b>5.3 Working with communities is duplication of 5?</b>		<b>Noted and will review to make distinction clearer</b>
400			<b>5.4 Climate change, decarbonising ambitions and safeguarding of OUV – are we willing to compromise?</b>		<b>Noted, but UNESCO require the State Party and Principal Steward (B&amp;NES) to ensure OUV is safeguarded and the primary purpose of the MP</b>
401			<b>5.4 B&amp;NES identified as having committed to net zero, but shouldn’t all business commitment to this ambition across WHS be noted?</b>		<b>Noted</b>
402			<b>5.4 Questioning use of word ‘harmful’ in terms of carbon emissions</b>		<b>Accepted and omitted</b>
403			<b>5.4 Suggesting more detail</b>		<b>Noted</b>

404			<b>5.4 Suggested could be more ambitious</b>		<b>Noted – this is an earlier draft, and more recent draft makes ref to ongoing research into climate risk research in collaboration with academic at Loughborough University that is using Bath as a case study. The AB and SMG will be involved in this</b>
405			<b>5.5 Suggested inclusion of socio-economic inequalities in housing provision</b>		<b>Noted</b>
406			<b>5.6 Suggested consult with regen team, city management team and highways</b>		<b>Noted and agreed – forthcoming public consultation will provide the opportunity</b>
407			<b>5.6 General comment re visitor tax and B&amp;NES competing monetary/budgetary pressures</b>		<b>Noted, but visitor tax/levy will be pursued to fund public realm improvements</b>
408			<b>5.6 Comment that current income from various sources (Roman Baths, parking) could be used to fund public realm improvements</b>		<b>Noted and agreed</b>
409			<b>5.6 LTNs politically sensitive – need to be clearer about specific area is being referred to i.e. city centre</b>		<b>Accepted and wording amended</b>



410			5.7 Inappropriate use of word harmful		Accepted and omitted
411			5.7 CAZ and inappropriate use of word fine		Accepted and changed for charge
412			5.7 Questioning action re support for net zero ambition		Noted
413			5.7 Questioning focus on museums re accessibility		Noted
414			5.7 Questioning action re accessibility and implementation		Accepted and wording amended
415			5.8 Questioning focus on Georgian period re interpretation		Noted – it's the basis of the WHS inscription along with Roman Baths
416			5.8 B&NES should be mentioned in its role of organising WH Day		Accepted
417			5.9 Questioning action re hot springs formal designation		Noted
418			5.9 Action re river/canal and management requires narrative		Accepted
419			5.12 Visitor economy wording requires amendment		Accepted
320			5.12 Suggested wording for action re Tourism Strategy		Noted
421			5.12 Visitor tax action		Noted
422			5.12 Visitor tax action and questioning being specific about potential recipient projects		Accepted
423			5.15 Suggested consultation with member of heritage team		Accepted – during public consultation
424			5.16 Questioning GSTE newsletter		Noted
	Amanda Hart	Heritage Services			
425			3.3 Make ref to HE and SMC		Noted

426			3.5 Suggested ref to earlier archaeological finds such as Mesolithic		Accepted
427			3.5 Suggested ref to newly excavated gym		Accepted
428			3.10 Replace Celtic with Brittonic		Accepted
429			4.17 Suggested ref to WH Day		Noted but not here – mentioned later on
430			5.8 Questioning is AB has an EDI policy/strategy		Noted – AB doesn't make policies or formulate strategy
431			5.8 Suggested ref to Bath and Colonialism Action Group		Accepted
	Karen Renshaw				
432			1.4 Suggested ref to stewardship, nurturing etc		Noted although requirement to maintain UNESCO wording – can review, and possibly make ref to this approach later on in MP
433			2.3 Suggested wording re hot springs		Accepted

<p><b>Draft City of Bath &amp; Great Spa Towns of Europe World Heritage Site (combined) Management Plan 2024-2030</b></p>	<div data-bbox="1624 183 2004 375">  <p>United Nations Educational, Scientific and Cultural Organization</p>  <p>City of Bath inscribed on the World Heritage List in 1987</p> </div>
<p>Table of comments and responses resulting from 8-week public consultation (25 November 2024 – 17 January 2025)</p>	<div data-bbox="1691 430 1960 662">   <p><b>unesco</b> The Great Spa Towns of Europe Inscribed on the World Heritage List in 2021</p> </div>

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The table below details the largely verbatim responses and comments received during the 8-week public consultation period on the combined City of Bath & Great Spa Towns of Europe World Heritage Site Management Plan 2024-2030. In addition to feedback received the table also lists the response and actions, where applicable, that will be taken to address the consultation respondent’s points: total 469 comments, 130 pages

No	Name/Org	Comments	Response to comment
1	Bath resident	I think scrap the LTN's and Clem air zones	Beyond the scope of the MP
2	Bath resident	Value the architecture;The quality and variety of historical sites	Noted
3	Bath resident	I believe the architecture and historical sites are what makes Bath special and there is a danger in diluting the uniqueness by spreading out the description of the WHS to cover the whole city some of which is far from special (!) and much of it - the shops food leisure, open spaces etc are replicated in so many other cities. I would concentrate on that very special area and not use the WHS as a rather blunt tool to stunt the development and improvment of housing, commercial and transport infrastructure on the outskirts of the city	The inscription covers entire city

4	Bath resident	<p>The city is congested with traffic and the parking facilities are inadequate. Bath has a very constrained railway station with inadequate parking and no room for a third bypass railway line to enable slow trains to wait and allow a faster train through so the timetable runs to the slowest service. The bus station is more like a large bus shelter very much at the bottom end of town - not a particularly pleasant place. There are large tracts of the city which contain little but 19th and 20th century housing and I can't understand why they are contained within the WHS. I suggest the city needs an out of town transport hub from which a highly efficient public transport system brings you into the city centre where the core WHS features are presented with appropriate infrastructure. I would also suggest that additional development to a very high architectural standard on the edge of the city would actually improve the setting rather having a margin of poor quality residential and commercial buildings fading the city out into the countryside as at present. There is a danger that the WHS tail simply continues to wag the dog of organic and beneficial development of the city for residents and locals</p>	Issues largely covered within the MP
5	Bath resident	<p>Concerns regarding development, in particular the heights of new buildings and their locations on main routes into the city</p>	The MP supports appropriate development within the WHS

6	Bath resident	The ban on building on the outskirts of Bath is killing the city for the residents of Bath. Many young residents can not afford to buy property in the city. The time has come to ease the boundary and allow sensitive building which will enhance the city and improve the threshold particularly when travelling from The Globe into Bath on the A4.	No review or amendment of the WHS boundary is envisaged
7	Bath resident	I do find that many of the numbered aims are rather broad and generic which I understand is necessary to a degree when we are talking about a large and diverse area over several years but I would value more specific as to what is actually intended to be achieved by a certain date. By a long way I believe item (v) is the most important. To truly understand and put in place Bath as a vibrant living breathing city for all purposes which happens to have a world heritage site at its centre	A schedule and programme for delivery is intended
8	Bath resident	I appreciate this is a consultation about the WHS but I do find it is too blinkered away from the other needs of citizens and visitors. Under 10., I would suggest there is a caveat that in creating policy for the WHS, proper account is taken of the other spatial, built and infrastructure needs of the city and its residents.	Beyond the scope of the MP
9	Bath resident	How to accommodate future development rather than sticking our heads in the sand	Plan supports sensitive and well-managed change

10	Bath resident	Define the key ingredients for the WHS and agree a smaller core area centred on the history and architecture. Agree a sensible way forward with the rest of the city and the setting which yes, respects the WHS but allows growth through sensitive expansion into the green belt in appropriate locations - in particular, allowing better transport infrastructure including railway station and coach parks. My fear is that the city will stagnate if matters are not loosened up somewhat!	Plan supports sensitive and well-managed change
11	Bath resident	A method to ease the pressure on housing in the city	Plan supports appropriate development
12	Bath resident	Bath is not a good place to go. Bath is very poor just full of coffee shops. The problem is with the concil run by a bunch of cowboys Too many chain stores/restaurants, which distract from Bath's distinctive character. Too few public toilets. Seagulls - which are aggressive and make a lot of noise and mess	Concerns noted
13	Bath resident	Concerns regarding cleanliness, pollution, condition of buildings, homelessness, Manvers Street	Concerns noted
14	Bath resident	The risks of climate change- E.G. flooding, I think the streets feel a lot more dirty and falling apart than they used to, far more graffiti, far less bins (we need more!), the amount of unhoused persons in the city now, feels far less safe, far less police than their used to be, public transport has got significantly worse and more expensive	Concerns noted

15	Bath resident	There is no joined up thinking when it comes to traffic flow and many of the LTN plans push local traffic to already congested routes. There is a huge lack of public toilets - and the conditions of many of the roads are not in keeping with a heritage city. Bath is walkable if you live in the city centre, but being surrounded by hills, the alternative available forms of public transport are not sufficient for local people, so driving is sometimes the only option. The scooters are dangerous and used by youths as recreational vehicles and do not reduce the amount of public transport journeys as they claim to do - they do not fit with the highway infrastructure. If I didn't live in Bath, I would not visit unless I was travelling by train - which in itself is unreliable and expensive	Concerns noted
16	Bath resident	Please do as much as possible to keep cars out of the city centre	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
17	Bath resident	Value the architecture; The general look and feel of the city; Parks, green spaces and natural setting	Noted
18	Bath resident	Concerns over congestion and pollution, the impacts of climate change e.g. flooding, development into the landscape, or within the city that isn't complementary to existing heritage	Concerns noted



19	Bath resident	Make absolutely clear that responding to climate change is not just about 'contributing positively' i.e. reducing carbon emissions, but perhaps more importantly in the context of safeguarding a specific World Heritage site, adapting and being resilient to the climate impacts that are already baked-in and will threaten the longevity	Plan makes it clear that all change and adaption in response to climate change needs to take account of the requirement to safeguard OUV
20	Bath resident	All of the above must be seen in the context of a changing climate and the impacts that is already having and will have on people who live within/rely on the city of Bath and visitors, that in turn local people rely on for jobs, etc. E.g. Public Realm needs to include efforts to respond to climate risks including flooding and heat, e.g. urban greening.	Noted. Plan includes action to support research into better understanding risks of climate change that can influence required change and adaption (see comment above)
21	Bath resident	It is disappointing that - to my knowledge - no-one from the climate team was asked to input into this work, especially given acknowledgement in the plan that addressing this challenge is a priority. If they had, the vision with regards to what OUV means in the context of a changing world looks like would be clearer, and we might then be in a position to talk about Bath being an exemplar.	Engagement, participation and consultation have been thorough and inclusive

22	Bath resident	Thinking about leadership (13) and policies (11)... I would like to see how this plans aligns with all of the other strategies and plans we have in B&NES. Do they all add up to a single vision and plan? If not, are we having the conversations we need to have, to address the difficult issues?	MP includes some explanation of how it works and aligns with Council corporate priorities, policies and initiatives
23	Bath resident	More disabled parking & public realm that allows those with disabilities to get around. The traffic flow round that City is also very more and I no longer have a clue how to drive round so it puts me off coming.	Beyond the scope of the Plan
24	Bath resident	Bath is a city of historical and cultural significance, renowned for its stunning Georgian architecture, Roman baths, and vibrant cultural scene. Its compact size makes it an ideal city for walking and cycling, allowing residents and visitors to easily explore its many attractions, from the iconic Royal Crescent to the serene beauty of the River Avon. However, this idyllic setting is increasingly being undermined by high traffic levels. With approximately 50,000 trips starting and ending in the city every day, Bath faces significant congestion issues. This not only detracts from the city's charm and walkability but also poses environmental and health concerns. The high volume of traffic contributes to air pollution, noise, and a less pleasant experience for pedestrians and cyclists. Addressing these traffic challenges is crucial to preserving Bath's unique character and ensuring it remains a welcoming and accessible city for all	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists

25	Bath resident	It needs to make explicit reference to the need to reduce traffic levels and rebalance Bath's transport system prioritising sustainable transport modes within the city. This will help protect the city, reduce traffic noise, improve air quality and make it a safer, more pleasurable city for everyone.	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
26	Bath resident	I would again like to see specific aims regarding transport and access to the city including the prioritisation of sustainable transport modes.	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
27	Bath resident	To better protect the World Heritage site of Bath and maintain it as a viable and vibrant place for both visitors and residents, it is essential to introduce firm traffic reduction targets as part of the city's management plan. These targets should be set on a year-on-year basis to ensure continuous progress and accountability. By implementing annual traffic reduction goals, we can systematically decrease congestion, improve air quality, and enhance the overall experience for pedestrians and cyclists. This approach will help preserve Bath's unique character and historical significance, ensuring that the city remains a welcoming and accessible destination for everyone.	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists

28	Bath resident	Coaches and traffic in the centre of town. Too many tourists. (We desperately need a tourist tax.) Too much antisocial behaviour, shoplifting, begging and amplified busking. A stadium development plan that is far too big and will absolutely ruin the unique setting and unique views. (If it goes ahead, this will be a shameful legacy for this council.)	Concerns noted, some of which are addressed within the Plan
29	Bath resident	The meddling by the Council in the visual appeal of the public realm, such as the constant installation of bollards, for example the view from the high street towards the Abbey now is horrendous and does nothing to meeting the Key Priority 3 as set out in the WHS management plan to protect the public realm. They also reduce the accessibility by reducing the width of pavements such as along Broad Street where you are forced to walk in the road because of the bollards blocking the pavement.	Concerns noted
30	Bath resident	Priority 4 isn't right, the area of Bath that is walkable already is walkable and doesn't need any help i.e. the city centre, other areas of Bath are not easily walkable for everyone due to the geography of the City and there isn't anything that can be done to remove the hills	Concerns noted
31	Bath resident	I think the low quantity / availability of toilets are very challenging for both the large amount of tourists and visitors. Another large toilet building / facility in the town centre is needed to meet demand. And clear signage to the toilets. The drainage and gutters and roofs to our Georgian buildings also need upgrading as they can no longer cope with the increased occupants and bad weather.	Concerns noted. Plan supports sensitive change and adaption in response to climate change and requirement to safeguard OUV

32	Bath resident	<p>I am a frequent visitor to Bath as live nearby, but I also work for our Property team and I can see how Bath is very lovely for tourists / visitors from a visitor perspective. But there are many problems and complications for the residents within the city centre due to our old heritage buildings. When maintenance to the external building is required (including roof and window areas), there are many restrictions due to LBC which is fair enough to protect the buildings; but the whole process of LBC takes too long for the many urgent repair issues, particularly when tenants have regular and severe leaks into their homes and shops. This can be both frustrating and upsetting and costly for those involved. The seagull nesting on the roofs in Bath is also a big problem, especially now the birds are protected, the bird nests or debris can no longer be moved along from a blocked outlet to the roof, unless a long and difficult process is requested with bird protection - which causes a great deal of damage and dread to residents every year. On a positive note, I am a regular user of the park and ride services and they are very good.</p>	Concerns noted
33	Bath resident	Value the architecture; The general look and feel of the city	Noted
34	Bath resident	<p>Key Priority 4 rightly recognises traffic as a major issue and this should be reflected in the Plan's Vision statement. Action12 rightly references the Journey to Net Zero transport plan but could usefully refer explicitly to the JNZ Vision of reducing traffic intrusion particularly in the historic core of the WHS.</p>	To be reviewed, and amend as required

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35	Bath resident	Bath is blighted by inappropriate street signage and furniture. BANES seem determine to install security bollards which are ineffective apart from one particular potential form of attack. BANES are also reducing available parking in favour of cycling initiatives which are then not monitored for results or cost effectiveness. The streets and pavements are littered with hazards and recycling bins left on pavements year round. The Lower Bristol Road developments are not in keeping with the city and are turning that area in a concrete canyon. Generally Bath infrastructure is poorly maintained unless it fits with BANES current climate and traffic management obsessions. The river is littered with sunken boats and grafitti and riverside paths are never swept. Blocked drainage and localised flooding is a direct result of BANES lack of maintainance.	Concerns noted
36	Bath resident	The main priority should be infrastructure maintainance BANES will just make the city worse by prioritising their climate change obsession.	Concerns noted
37	Bath resident	I don't see any reference to the majority population of Bath and addressing the very poor public services in Bath.	Concerns noted
38	Vineyards Residents' Association	Badly kept streets, broken paving; poor quality workmanship where repairs have been done.It is becoming more difficult for visitors to access the city. We need more and better park and ride facilities and we must clear the centre of large commercial vehicles travelling through. There has to be a way to do this. Many European historic cities have managed to create no go areas for heavy through traffic	MP supports improvement/enhancement of public realm

39	Vineyards Residents' Association	Many of us in Vineyards are long-term residents. We greatly appreciate the wonderful built environment and the compact nature of the central area that makes it easy to reach the shops, restaurants, theatre, cinemas etc on foot. The ease of access to the countryside (notably along the canal by foot or bicycle) is an enormous asset.	Noted
40	Vineyards Residents' Association	The historic buildings may be in good repair but the environment around them is not eg pavements, roads, street furniture ( dirty. And in poor condition) so that the impact of the historic buildings is lessened because they are not seen in the best possible context	Plan supports improvement/enhancement of public realm
41	Vineyards Residents' Association	The Vision should explicitly and specifically address the issue of traffic. Elsewhere in the draft plan you reference the Journey to Net Zero transport plan. That includes in its Vision the aim of "reducing carbon dioxide emissions and the intrusion of traffic particularly in the historic core". The plan also proposes a city centre Liveable Neighbourhood. The WHS Plan Vision should include a similar statement about traffic reduction. It cannot be acceptable to have a main road going through the centre of the WHS including one of its Key Elements (Queen Square). The point of origin of Georgian Bath should not be a traffic roundabout.	Vision is high level and largely avoids specific topics. But Plan supports reduction in vehicular traffic and improvement/enhancement of public realm

42	Vineyards Residents' Association	The traffic reduces the amenity of residents, prevents free movement of pedestrians, deters cyclists, blocks buses, imposes economic costs and spoils the city experience for residents, workers and visitors. Air pollution and vibration from traffic harms the fragile Georgian buildings. Buildings cleaned some years back are gradually blackening again. We are particularly conscious of heavy vehicles thundering along Paragon/Vineyards in the small hours and causing noticeable vibration. Traffic is a frequent complaint by the visitors on whom the city economy depends.	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
43	Vineyards Residents' Association	The existing aims are fine, but you need to add one about reducing traffic. Perhaps: "Support and encourage B&NES Council in its aim to reduce traffic intrusion, particularly in the historic core of the WHS."	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
44	Bath resident	Value the quality and variety of historical sites;The way that the museums and visitor attractions present the city's heritage	Noted
45	Bath resident	Wonderful City, slowly being ruined	Concerns noted
	Bath resident	Cleanliness is poor in places Way too many bollardsVERY unfriendly for disabled visitors. Uneven surfaces, parking being removed by stealth.LN scheme needs ditching	Concerns noted
46	Bath resident	Value the architecture;Parks, green spaces and natural setting	Noted



47	Bath resident	A GEAT CITY TO WALK IN AND AROUND, HOWEVER INCREASINGLY SNARLED UP WITH SIGNS, BOLLARDS AND OTHER UNSIGHTLY AND OFTEN UNNECESSARY ADDITIONS TO THE NEIGHBOURHOOD	Concerns noted
48	Bath resident	THE CITY IS INCREASINGLY UNTIDY WITH EMPTY SHOP FRONTS THAT GATHER LITTER IN ADDITION LONG BTRAFFIC QUAUEUES ARE OFF PUTTING TO VISITORS - I LIVE IN TEH CITY AND THEREFORE MAINLY WALK, HOWEVER I HEAR MANY COMPLAINTS FROM VISITORS	Concerns noted
49	Bath resident	It is difficult to diwcern much consideration of actual residents as oppossed to visitors and cultural bodies, A lot of what is presented is intrerestng and laudable, however please make sure that residents are consulted and considered as recent experience has shown that local authorities totally ignore the wishes of resident	Concerns noted
50	Bath resident	Surely we can manage the natural setting as the priority - climate change should be a key consideration but not the top issue considering steps already taken to reduce carbob emmissions	Priorities share equal weighting, but felt useful to have some headline (amended from 'key') priorities
51	Bath resident	Value parks, green spaces and natural setting, topology, a city surrounded by hills.	Noted
52	Bath resident	Bath has become less inviting in the past few decades. Its not as clean, has fewer loos, has far fewer independent shops. Its character has become bland compared to York or Chester, and Bath in Bloom is a joke to what it was.	Concerns noted

53	Bath resident	Active travel : If you want to reduce cars and increase public transport, make the pain of using a car higher and the ease of not using a car greater. Dedicate a route out northwards as car friendly and one bike friendly, same for southbound.	Plan supports reduction in vehicular traffic and improved access and environment for pedestrians and cyclists
54	Bath resident	These aims may well be laudable but will only cause ill will to the council when residents see money being wasted on flagship projects and they can't get a pothole filled or use a loo.	Concerns noted
55	Bath resident	Value the general look and feel of the city; Parks, green spaces and natural setting	Noted
56	Bath resident	It has all the facilities of a city but also lovely walks along the canal and surrounding hills, and cycle routes to Bristol and Wellow	Noted
57	Bath resident	Too much traffic, litter.	Concerns noted
58	Bath resident	All looks good! It would be nice if some tram routes could be constructed.	Noted

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59	Bath resident	Bath's recent builds are not sympathetic enough to the elegance of the original buildings in the city, yet keep getting approved. Queen's square traffic lights cause congestion and have created a new area for pollution as cars are stationary more than ever before. The cycle lanes and raised bus stops on upper Bristol Road are not in keeping with the history of the city, and with cars essentially having to park in the middle of the road it is a horrible road to navigate. The traffic lights in Southgate/entrance to the car park are terrible, with pedestrians unsure when to cross. Seagulls must be controlled in and around the city in the coming months - they are dangerous!! Why is there no tourist information point in the city? There are not enough public toilets. Too many empty shops and sites in need of development - including Hartwells, the Bath Press site. What will happen when Jollys closes down??	Concerns noted
60	Bath resident	Value the general look and feel of the city; Parks, green spaces and natural setting	Noted
61	Bath resident	Shops closed down. Min building, KES school an eyesore. No Park and ride buses after 8.30pm. All the signage and costs for LTN's. Jolly's closing down and yet it is or was a destination store for Milsom St.	Concerns noted

62	Bath resident	Consider local residents and our views and do not ignore them. In Ensleigh we need a doctors' surgery, a pharmacy and a P&R that works after 8.30pm. We need a police check on our 20mph zones. Motorists on Granville Road particularly pay nil attention to 20 mph. <b>CONSIDER LOCAL RESIDENTS AND OUR NEEDS BEFORE GETTING CARRIED AWAY WITH WORLD HERITAGE..</b> You want us to reduce car journeys_ where is the direct bus from Ensleigh to the RUH. <b>WHERE IS IT?</b>	Concerns noted
63	Bath resident	<b>CONSIDER RESIDENTS AND OUR NEEDS.</b> You are as ever getting carried away with left wing leaning policies that do not deal with our needs today. I am offended by this obsession with Climate Change.	Concerns noted
64 Page 124	Bath resident	You are setting too many objectives; your time targets are not specific. This is a heavily bureaucratic exercise which will absorb mountains of time to police. <b>CUT IT DOWN PLEASE.</b>	Concerns noted. The objectives are regarded as largely achievable within the Plan period based on what is a partnership working document involving multiple stakeholders and council teams
65	Bath resident	Value the architecture;The quality and variety of historical sites	Noted
66	Bath resident	The LibDems have ruined our city with the ugliest bollards; street furniture and far too many and confusing road signs - it's like big brother - the beauty of the city is lost in the regulation of the city.	Concerns noted

67	Bath resident	General mess and ugliness are of the hundreds of bollards; road signs; road markings; painted roads and floating bus stops - and empty cycle lanes - it's a mess	Concerns noted
68	Bath resident	You are fixated with creating paved sitting areas and blocking roads - they are ugly - some actual new functioning tourist attractions would help to make tourists feel welcome.	Concerns noted
69	Bath resident	People want to see old Bath - not closed shops and tons of coffee shops - Bath has lost its charm at the expense of your ridiculous terrorist bollards and metal gates and red lights on poles - you clearly don't get it	Concerns noted
70	Bath resident	Maintenance and repair is shoddy - tarmacing our pavements is a disgrace as are the ugly tarmaced road bollards	Concerns noted
71	Bath resident	The way Bath is looking - we don't even deserve Heritage status - I worked in the tourist area industry in Bath and was proud of our city - now we are increasingly ashamed of it.	Concerns noted
72	Bath resident	Priority 1As you have stated Climate Change is still not fully understood and you should remain aware of this and not make major change regarding the access for cars within the city. Shifting the traffic from one area to another does not improve the amount of carbon admissions - it just moves it. Residents want to be able to use their cars to carry out normal resident activities, especially because we have a poor public transport system.	Concerns noted
73	Bath resident	Value the quality and variety of historical sites;The way that the museums and visitor attractions present the city's heritage	Noted

74	Bath resident	Concerns re anti motorist policies, car park charges and the length of time it takes to drive through.	Concerns noted
75	Bath resident	End anti motorist policies	Concern noted
76	Bath resident	Make it easier for visitors to drive in and not pay high parking charges	Concern noted
77	Bath resident	Stop with the ( almost ) hidden surveys and leading Qs on social media Write to every council tax payer and ask them direct yes or no Qs Bollards Y/N LTNs Y/N Increase ( hardly used ) number of cycle lanes Y/N Use of other unsightly anti car contraptions littering the world heritage city Y/N Use of CAZ ( contradicted by the above ) Y/N	Concerns noted
78	Bath resident	Yes LTNs Bollards Anti car contraptions Bus lanes All slowing down the traffic	Concerns noted
79	Bath resident	Value the architecture; Shops, food, leisure and entertainment. The unique mix of beautiful architecture and great venues for leisure, food and entertainment	Noted
80	Bath resident	General lack of cleanliness of the streets and public realm together with difficulty of access, traffic congestion and lack of a park and ride to the east of the city	Concerns noted

81	Bath resident	The lack of a Tourist Information Office The disaster that is Cleveland Pools The derelict KES building The Derelict Min Hospital The broken pillar at the roundabout by Prior Park The derelict Bath Press site The ugly and excessive road signage The boarded up Old Post Office The mess around but excluding Southgate The broken pillar at he Thermae Spa The state of the High Common (Top of Victoria Park) The commercial development by the council leader's family at New Leaf Farm's holiday village at Bathampton Meadows The bollards everywhere look awful	Concerns noted
82	Bath resident	Reopen Winfred's Lane and remind Cllt Elliot and Bodge there at a whole lots of unhappy people...	Concerns noted
83	Bath resident	Get rid of the Winifred's Lane Road Block	Concern noted
84	Bath resident	I have lived in Bath for over 40 years and it has been a pleasure until recently...It's beautiful buildings set in 7 hills of wonderful greenbelt are just like Rome!	Noted
85	Bath resident	This is a well thought out and put together document; please stick to it and don't let BANES ruin our city!	Noted with thanks
86	Bath resident	The council will take zero notice of our comments so why bother?	Concern noted

Page 128	87	Bath resident	Sadly Bath has been spoiled by the following:- Heavy lorries passing thru from the M4 to the A36- we need that bypass.Imposition of LTNs, bus gates, one way systems and bollards which all stop the flow of traffic and push it to already congested roads like the London Road.Greedy rates and rents forcing independent retailers to close so we have dozens of empty shops.Too many cafes, cheap eateries, barber shops.Lack of flowers, plants trees- we used to win Britain in Bloom every year!	Concerns noted
	88	Bath resident	Value the general look and feel of the city	Noted
	89	Bath resident	Almost impossible to get to the centre thanks to stupid traffic flow restrictions. Parking is ever decreasing. Widening of pavements have made it impossible to cycle through as pedestrians now feel they can walk on the roads. It is particularly unsafe to cycle around the city thanks to thoughtless cycle lane structures!	Concerns noted
	90	Bath resident	Traffic and rat-running, not helped by the geography of the city with steep hills north and south that mean a lot of short journeys are by car. The road system, and geography, means through traffic often transits through the city and suburbs.Reticece of a small number of noisy, often older, residents who constantly resist change; Bath may be a World Heritage Site but it's not a museum.	Concerns noted
	91	Bath resident	Value the The quality and variety of historical sites;Shops, food, leisure and entertainment	Noted



92	Bath resident	Lovable neighbourhoodsResidents parkingClean air zoneAll of which are making impossible for residents to live a normal life	Concerns noted
93	Bath resident	I think Bath Rugby Club and their proposals to improve The Recreation Ground stadium should be included. The rugby brings a lot of money into the city which has a significant impact in sustaining shopping and restaurants which have to operate in a challenging economic environment. Many away fans come to matches purely because it's Bath, and they enjoy visiting. The fact that a small opposition has held this up for so long is not acceptable. The proposals for the ground merely tidy-up the rather ramshackle stands and will not create a monstrosity on the riverside.	Noted
94	Bath resident	The aims appear to be vague in nature. There are clearly zones in central Bath that require attention with no specific mention of.Resources are not infinite, so where do they get targeted? It "feels" that the are not aligning with the "aims" e.g. bollards	Concerns noted
95	Bath resident	The are many people that love Bath, but they do not love/like the people running it. Politics is ultimately divisive and stigmatising.I feel that Bath should have a Heritage Committee that is independent of the government/council. That has a guaranteed budget that is for the aid of Bath and nothing else. That has experts (not councillors) to decide the best course for Bath. That is above the pettiness of which party can do more/has done more.That is the way forward!	Concerns noted
96	Bath resident	Value the general look and feel of the city;Parks, green spaces and natural setting	Noted

97	Bath resident	Bath IS unique for its buildings and offerings. Despite being a city, it doesn't have the sense of one, in that classic busyness you get in other cities	Noted
98	Bath resident	There are buildings in Bath (King Edwards school, The Min') that have been left to "rot". I know we cannot be prescriptive over their occupancy but we can control their look. The rivers edge I feel has also been neglected, and this is very visible to visitors, and sets an impression.	Concerns noted
99	Bath resident	5 Citizen involvement; this is always fraught with problems because "citizens" don't know anything (look at Brexit). The involvement of "masters of their trade", "experts of their field" should be the right approach to change; I would not ask a person on the street the best configuration for a Microsoft Tenant.	Concerns noted
100	Bath resident	I find this extremely interesting. Points 7 & 8, to me, are clearly "not a thing", and I can give examples why.	Concerns noted
101	Bath resident	Value shops, food, leisure and entertainment ;The general look and feel of the city	Noted
102	Bath resident	Poor quality new developments	Concerns noted
103	Bath resident	The issue of climate change is huge both globally and specifically for the city. BANES needs to go much further to enable residents, especially in listed homes, to improve energy efficiency at lower costs	Plan supports appropriate and sensitive adaption of historic buildings
104	Bath resident	Too much traffic. Over tourism. New buildings that are too high.	Concerns noted

105	Bath resident	More emphasis needs to be given to managing over tourism downwards. It was chronic this year. Endless promotion of Bath will kill the goose that laid the golden egg. A significant tourist tax needs to be introduced. Other cities in France charge as much as 5 euro per night	Concerns noted
106	Bath resident	See above re overtourism	Concerns noted
107	Bath resident	The bird poo is not dealt with. There are no public toilets. Other historic places are better organised for the visitor economy. There is an obsession with getting people out of cars but no measures to help them get to the city if they live more than 5 miles away.	Concerns noted
108	Bath resident	It feels as though the climate and ecological emergencies have been arbitrarily added to the plan, with no explanation of what that might actually mean. Will double glazing be allowed? Will solar panels become acceptable? Will public transport suddenly improve? Will trees be allowed in Milsom Street ?	Plan supports appropriate, informed, and sensitive responses to climate change that safeguard OUV
109	Bath resident	I think that carbon reduction is important but it's not the first job of this plan which is about heritage. And the first priority ought to be presentation which is currently lacking.	Concerns noted
110	Bath resident	Slowly losing its appeal	Concerns noted
111	Bath resident	Congestion, cleanliness, the lengths to which Lib Dem councillors go to ignore the requests of the locals, empty shops, constant scaffolding and road works etc that are never done in a timely manner. A neglected city - ruined by those running it.	Concerns noted

112	Bath resident	Addressing climate change is a total waste of tax payers money. You have already implemented ridiculous LTNs that contribute increased pollution within the city.	Concerns noted
113	Bath resident	Priorities are right in most cases - but many associated actions to address these are wrong - whilst is agree with many priorities the actions to deliver are not well thought out and historically it is clear to locals you don't ACT.	Noted, and will be reviewed

114	Bath resident	<p>As per comments on the Vision, more needs to be made of the value and importance of Bath's Parks. There are good historical records about the importance and growth of the 'Pleasure Garden' in Georgian times and how the layout of the city was influenced by the inclusion of these Gardens. Sydney Gardens is the last remaining vestige of this time and following a £3m heritage lottery rejuvenation of the Gardens, this aspect of the development of the city should be up there in the key policies and actions...but the current document is silent on our wonderful array of parks and gardens. Bath recently hosted the landscape conference under the Great Spas of Europe themes [European Thermal Heritage Conference: 4th November 2022 Therapeutic Landscapes - Parks and Gardens]. The conference has recently published the papers and Bath Parks are featured, yet nowhere in the management plan is theme properly recognised (other than under the climate/ nature theme in the modern context - yet the Georgians were celebrating nature a few hundred years ago). We need further research that leads to clear conservation goals around the importance and value of the therapeutic landscape within the unique setting of Bath and its connections with the spa visitors. More action to protect/ conserve/ maintain the formal parks and gardens and their place within the fabric of the city of Bath.</p>	Plan recognises significance and importance of parks and within OUV that provides hook for any future projects
115	Bath resident	<p>Bath is a beautiful city....or was a beautiful city now spoilt by the bollard junkies and barriers erected that look hideous. Unfortunately all this means more congested traffic which doesn't help the beautiful city underneath.</p>	Concerns noted

116	Bath resident	As I've already said...congestion, pollution, pot holes, bollards, barriers so many signs!	Concerns noted
117	Bath resident	Too much attention given to tourists and too many students..seems the bathonions ie original residents are forgotten!	Concerns noted
118	Bath resident	Bath is a fantastic city. It used to be unique because of all the independent shops who have all left because of the expense. It is one thing that made Bath different from all other city centres. It is special because there is little traffic in the city centre, but if you want to encourage bikes I'd like to see more places to park them. The architecture and parks are wonderful. Diverting traffic down small residential streets is definitely not wonderful and only benefits very few.	Concerns noted. Plan supports improved access and environment for pedestrians and cyclists
119	Bath resident	Rubbish in the streets on bin day is shocking. Residents should be fined if they leave bags out overnight for the pigeons to open. To really improve Bath the Park and Ride buses should be free, in fact all the buses should be free. The Post Office in Smiths is a disgrace. Usually one person on duty and nowhere for elderly or disabled people to sit. What was wrong with the old system of issuing tickets and having chairs.	Concerns noted
120	Bath resident	Repair and repaint the doors to the Pumprooms etcA disgrace to the city	Concern noted
121	Bath resident	Small scale containing so much beauty and history	Noted

122	Bath resident	<p>Commenting on Page 46 of the Management Plan key priorities: 1. Addressing climate change3. Public realm4. Traffic, transport and mobilityQueen Square is a potentially wonderful part of the City of Bath World Heritage site public realm, but is currently inaccessible to many, including the young, elderly, disabled, and those with visual impairments, due to the surrounding roads being open to motorised traffic. It is proposed to give Queen Square access to all abilities by establishing a largely traffic free space linking directly to and from the city centre from the southeast corner. This would be for casual day-to-day use, but also events such as food markets and boules tournaments.This would be achieved by making the east, south and west sides of Queen Square access only for motorised traffic. The north side would become two-way to all traffic accessing the north side of the city centre from the Upper Bristol Road, and Charlotte Street car-park which would be unaffected.Motorised vehicle access would be for:</p> <ul style="list-style-type: none"> <li>• The small number of businesses requiring occasional admittance such as the Francis Hotel for drop-offs/pick-ups</li> <li>• Disabled and Resident Parking</li> <li>• Buses requiring a turn around 'loop' route when Milsom Street is closed to them and being used as an event venue</li> <li>• Emergency Services</li> </ul> <p>This traffic would enter at the northeast corner, moving around the square clockwise and exiting at the northwest corner with no change to the current direction of traffic.Such a measure complements an improved way ahead for the Bath Walking, Wheeling and Cycling Links scheme currently under consultation, the Walk Ride Bath response to which, with further details, is at <sup>29</sup>  <a href="https://walkridebath.org.uk/wp-content/uploads/2024/12/walk-ride-bath-bath-wwc-links-response-final.pdf">https://walkridebath.org.uk/wp-content/uploads/2024/12/walk-ride-bath-bath-wwc-links-response-final.pdf</a></p>	<p>Plan supports improved access and environment for pedestrians and cyclists</p>
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123	Bath resident	High volumes of motorised trafficThe general lack of access for people of all abilities	Plan supports improved access and environment for pedestrians and cyclists
124	Bath resident	Active Travel. Access for all abilities to the public realm.	Plan supports improved access and environment for pedestrians and cyclists
125	Bath resident	High volumes of motorised traffic. The general lack of access for people of all abilities	Plan supports improved access and environment for pedestrians and cyclists
126	Bath resident	Value the architecture, green setting and access to it, the parks and easy access to them	Noted
127	Bath resident	Value parks, green spaces and natural setting. The landscape which surrounds Bath and is so accessible is what makes Bath a great place to live and kept me sane during the pandemic	Noted
128	Bath resident	Traffic congestion and poor quality public realm let Bath down significantly close the centre to cars and make the whole city 20mph and then improve the pedestrian experience, it's too hilly to cycle for most but could be great to walk. I understand the whole city in the WHS site so focus on the neighbourhoods as well as city centre	Concerns noted



129	Bath resident	The meetings of the Bath World Heritage Site Advisory Board are held in private. There is no valid justification for this. These meetings should be public. It is claimed that the minutes of these meetings are published on the website - go on, go look. Try finding them via the search box.	AB meetings are held for purposes of guiding and reporting WHS management and not intended as a public forum, although membership consists of key stakeholders. Access to minutes is provided via a link, which will be checked
130	Bath resident	Needs more focus on climate resilience and nature	Plan considered to overtly and adequately prioritise and respond to both

131	Bath resident	<p>The availability of affordable housing within the city itself will increasingly make it difficult for the hospitality, tourism, service and healthcare sectors of the city to recruit and/or retain staff. Road transport for visitors (arriving by car and bus) is severely congested and this has been made worse by too many new housing developments being built outside the city. The significant amount of new student accommodation built on the Lower Bristol Road is a missed opportunity that could be rectified in the future by incentivising Bath's Universities to build student accommodation on their own campuses, funded by the conversion to affordable accommodation (apartments) and sale of the city based student accommodation.</p>	Concerns noted
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132	Bath resident	<p>Many of the Actions (1-27) are worth doing in their own right, regardless of the UNESCO World Heritage status. The UNESCO World Heritage status is likely to increasingly be a hindrance and not necessarily a help to how Bath develops to meet the needs of the 21st Century as decision-making should be the responsibility of BaNES Council, not an external third party. If BaNES Council took a decision to withdraw from the UNESCO status for Bath, and relied on Bath's famous and long-established reputation that already attracts UK and overseas visitors, and instead took a more European city approach to allow the city and its immediate surrounds to develop to meet Bath's needs this would have several benefits including • the provision of affordable housing for its local and growing workforce; • less commuter travel into Bath thereby reducing the city's carbon footprint, air pollution and congestion; • the ability to make decisions that suits Bath's needs unrestricted by UNESCO requirements that may not suit Bath; • reduce the pressure of the rural areas including the Green Belt in Bath &amp; NE Somerset that arise from housing targets imposed by central Government to meet a perceived need calculated from existing housing provision. That pressure, if not removed, will lead to a widespread reduction in farming land that will become increasingly necessary for food production both now and in the future, and loss of green, open spaces that contribute to the health and well-being of BaNES residents across the district (i.e. in villages, towns and in Bath itself); • a significant reduction in bureaucracy connected to maintaining the no longer necessary UNESCO status.</p>	Comments and concerns noted
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133	Saltford Parish Council	The architecture;Its architectural heritage, combined with the look and feel of the city, its shops, food, leisure (including visitor attractions and Victoria Park) and entertainment make Bath the unique city that it is.	Noted
134	Saltford Parish Council	The Green Belt landscape surrounding the outer reaches of the city provides a unique Somerset rural setting for this historic city.	Noted
135	Saltford Parish Council	Some of the actions will become unnecessary if the UNESCO World Heritage status is dropped.	Noted
136	Bath Alliance for Transport and Public Realm	Value the quality and variety of historical sites;The impact of traffic on the public realm and historic buildings	Concerns noted
137	Bath Alliance for Transport and Public Realm	The Alliance's vision of Bath is of 'A beautiful city in a green setting, with vibrant public spaces, a historic centre free of all but essential traffic, clean air, good mobility and excellent infrastructure.'	Noted

138	Bath Alliance for Transport and Public Realm	<p>Alliance comment on draft WHS Management Plan 2024-30</p> <p>The Bath Alliance for Transport and Public Realm is an informal grouping of twenty one Bath stakeholder organisations with a shared interest in excellent transport and public realm in our city, which have come together to support B&amp;NES Council's transport effort in Bath and to urge the Council to develop and deliver a comprehensive, long term transport plan for the city. See our webpage <a href="#">here</a></p> <p>The Alliance Vision is of Bath as: "A beautiful city in a green setting, with vibrant public spaces, a historic centre free of all but essential traffic, clean air, good mobility and excellent transport infrastructure."</p> <p>The current high volumes of traffic in Bath harm the amenity, and indeed the fabric, of the World Heritage Site (WHS) and the public realm of the city. We welcome the fact that the draft WHS management plan recognises transport and public realm as Key Priorities. We also welcome the fact that the plan references B&amp;NES Council's Journey to Net Zero (JNZ) transport plan, which the Alliance supports, as key to improving transport in Bath. In addition, the JNZ is referenced in the B&amp;NES Local Plan Update and in the draft Bath Air Quality Action Plan, so it is central to making progress.</p> <p>Two of the six Key Priorities of the draft plan are concerned with transport and public realm, but the Aims of the plan (paragraph 1.5, page 12) do not include anything related to reducing the impact of traffic on the WHS. We therefore propose the addition to paragraph 5.1 (page 45) of an Aim relating to transport and public realm, such as:</p> <p>"7. Engage with, support, and encourage measures to reduce the intrusion of traffic, especially in the city centre, and make Bath a more pedestrian-friendly and walkable city."</p> <p>This wording picks up on Actions 11 and 12. We also suggest that the Council reconsider the need for the qualification "where</p>	Plan supports improved access and environment for pedestrians and cyclists
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139	National Trust	Value the way that the museums and visitor attractions present the city's heritage; Parks, green spaces and natural setting	Noted
140	National Trust	Inappropriate development (within the WHS or its setting) has the potential to impact on the WHS and its OUV, whether it relates to individual sites or cumulative impacts. Traffic congestion can impact on public access and give rise to air pollution (the latter particularly because – topographically – the city sits within a bowl). Challenges in accessibility may limit the appreciation of the WHS by the widest possible audiences (ongoing need to improve access for all).	Concerns noted. Plan supports improved access and environment for pedestrians and cyclists

141	National Trust	<p><b>Key priority 1 Addressing Climate Change:</b> The inclusion of climate change as a key priority is supported. <b>Key priority 2 Development:</b> There have been recent changes to the NPPF, including the introduction of ‘grey belt’ to Green Belt policy, which may have implications for the setting of the WHS. Further changes may come down the line with new National Development Management Policies. Therefore, perhaps it would be appropriate to monitor the effects of the changes and engage with / influence new national policy as and when necessary. In addition, there is reference to housing numbers and respecting the special characteristics of the WHS, which is an ongoing matter for consideration. As well as numbers, prioritisation of areas of brownfield land and identification of areas where greenfield land may or may not be appropriate for development could be referred to, as well as the particular housing needs of the city that need to be prioritised, given the limited opportunities for new development. We support the renewal of the Building Heights Strategy and it being given greater weight as part of the decision-making process on planning applications. Lastly, given the size of the WHS (and pressures for additional housing), there needs to be a sensible approach to development around the University (Claverton Down) and Hospital (RUH) in particular in relation to active travel, car parking and building heights. <b>Key priorities 3, 5 and 6:</b> We support the management plan’s references to inclusion, mobility and accessibility, and to outreach work to help people (especially young people) engage in heritage issues; and would encourage any further relevant actions in this regard. <b>Key priority 4 Traffic, Transport and Mobility:</b> We support this Key Priority although the third paragraph – referring to the Clean Air Zone – could be read as implying the CAZ applies to all</p>	<p>Noted. MP acknowledges requirement for mid-term review that will act as a monitoring milestone</p>
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142	National Trust	<p>We are broadly supportive of the draft management plan, which appears to be a well prepared and informed document. However, there are a number of – mostly more detailed – matters we would also like to comment on... 2.7 Bath Today: This section states that building height is relatively consistent and low-rise, although (as per section 4.11) there have been recent taller buildings on brownfield sites, for example accommodation mainly for students in Lower Bristol Road. With the transport paragraph, it would be worth acknowledging the city is a through-route for traffic on the strategic road network (A36 / A46 corridor, albeit with vehicle weight restrictions in place). In respect of traffic and pollution, it would be worth noting that the local topography (sitting in a ‘bowl’) makes it more susceptible to air pollution. 2.8 Condition of the Site: This section is principally a short section focusing on physical condition, although the challenges of traffic volume (and air pollution) – which both arguably have an impact on the significance and appreciation of the WHS – might merit a mention. 2.9 Key Facts: One of the bullet points states: “107,161 people live within the site”, which is quite a specific figure – and higher than the 2021 census figure for Bath. Does this figure include the student population in the city? Also, it might be useful for context to include any data on the proportion of HMOs, rental properties, and second homes in the city. And on how many people travel into Bath for work due to the limits on available housing. 4.8 The UK national planning and legislative framework: This section may need updating in light of the revised NPPF of December 2024, including the introduction of ‘grey belt’ to Green Belt policy (which may have implications for the setting of the WHS and potential development therein). There is also due to be a Infrastructure</p>	<p>Noted with thanks. To be reviewed, and amended as required</p> <p>To be reviewed and amended as required</p>
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143	National Trust	<p>There is also due to be a new Planning and Infrastructure Bill introduced soon. And the possibility of National Development Management Policies being introduced (following the Levelling Up and Regeneration Act 2023). Potentially there could be considerable change to the planning and legislative framework during the course of the updated management plan. It might also be worth mentioning Biodiversity Net Gain, introduced early 2024 (following the Environment Act 2021), itself a major change to the planning system. 4.10 Design and Access Statement/ Heritage Statement: This section states that D&amp;A Statements are required “for all planning applications” – is this still the case? The link in the footnote indicates that a D&amp;A Statement is required for development in a designated area (including a WHS) where the proposal is for two or more dwellings or a building of 100m2 floorspace or greater. One other minor point: does “its setting” in the first paragraph need to change to “their setting” as it appears to be referring to heritage assets plural?</p>	<p>As an online document the MP can be updated to reflect changes in policy and legislation</p> <p>BNG, DAS, Setting wording to be amended as suggested</p>
144	Bath resident	Value the architecture;The general look and feel of the city	Noted
145	Bath resident	<p>The city has become filthy in recent years, rubbish everywhere, weeds overgrown on main paths, walkways and streets. An obsession with bollards has become an eyesore. Multiple confusing road signs everywhere. Massive concrete blocks to block entrance to the city are not befitting of a world heritage site. And homeless numbers seem to be everywhere. Drug users... Julian Road, Kingsmead Square .. unsafe at night.</p>	Beyond the scope of the Plan

146	Bath resident	A city the size of Bath is going to off set climate change? Get a grip. Spend the money of improving the way the city runs (electric buses) the way public transport should be better, help the homeless and clean the city. Offsetting climate change is a vanity project on this tiny ego driven scale.	Noted
147	Bath resident	Your order of priorities is actually quite frightening. Maintenance and repair should be number 1.	Noted
148	Bath resident	I don't think it matters what we say. BANES Council pretends to consult and then ignores us anyway. Democracy is broken as proven by your authoritarian LTN schemes.	Concerns noted
149	Bath resident	Bath is where I've lived pretty much all my life so much of what makes it special is simply familiarity. I like the warm Bath stone and the consistent architecture but not to the exclusion of modern life.	Noted
150	Bath resident	My personal opinion is that Bath's value as a World Heritage site is diminished when it can't surround the best of its heritage in a living breathing 2020's modern community with facilities appropriate to that. It cannot be a theme park which is just inhabited as a weekend bolt hole by those who live most of their time in London etc. Above all else it has to consider its role as home to its 80k+ residents because without their support for retaining heritage it will be lost. We cannot afford a "heritage vs facilities" battle to ensue because ultimately heritage will be lost.	Noted

151	Bath resident	Feels to me like the only reflection of Bath as a 2025 city is in item V which feels too low down the priorities. I'd say this should be first - we should be a 2025 city that embraces its heritage not a heritage city that might make a few compromises to 2025. I'm not happy with III - there may be times when development might not be consistent with heritage - we may need to suck it up and cope with that. For example we need a modern attractive rugby stadium and that cannot be entirely controlled by some trivial issues around views into the city from a specific point very few visitors ever go to.	Noted`
152	Bath resident	There's nothing in this about making Bath a great place to live for those who reside here and ultimately will be responsible for supporting and funding care of heritage assets. If it becomes all about how people come to see some "old buildings" its going to be hard to sustain support. We need to be thinking about clashes - for example priority 1 is about addressing climate change but there is a fundamental conflict here if heritage is going to dictate for example that most of the central housing has to retain single glazed inefficient windows and can't install say heat pumps.	Concerns noted
153	Bath resident	Again - very little for residents. 5.10 is interesting and worth further exploration - at the moment much of the heritage is maintained by private expense but for how long are people going to pay over the odds for a cold draughty property just because it looks pretty? If/when that becomes unpopular the balance of dereliction will change.	Concerns noted

154	Bath resident	A tram system similar to Dublin's LUAS would ease congestion and enhance public transport. To encourage more independent shops, attractive both to residents and tourists, requires the political will to control rents and zone areas as being affordable	Noted
155	Bath resident	I appreciate that the current Council seem to be much more consultative and are paying attention to the needs and desires of the residents. I like the development of the riversides with more cycling lanes and tree planting and I hope that the Lower Bristol continues to be developed with the creative industries in mind. The new footbridge is a refreshing break architecturally to 'heritage'	Noted
155	Bath resident	The amount of dog poo on the streets over the last couple of years is disgusting. The various LTN's are causing severe traffic in the city and the main roads are not capable of supporting this crazy system. Bath does not have the infrastructure capable of supporting LTN's and they should all be removed.	Concerns noted
157	Bath resident	Closing off certain roads does not give greater access to our city. Instead it creating a more frustrating experience for tourists and residents. It is also increasing pollution in certain areas. Either completely remove traffic and implement a transport network that allows everyone to move in and around the city or remove the LTNs completely so the city does not deteriorate into a no go zone.	Concerns noted
158	Bath resident	Access to our city is not working and future plans makes that worse.	Concerns noted
159	Bath resident	Value the general look and feel of the city; Parks, green spaces and natural setting	Noted

160	Bath resident	Bath is where I've lived pretty much all my life so much of what makes it special is simply familiarity. I like the warm Bath stone and the consistent architecture but not to the exclusion of modern life.	Noted
161	Bath resident	This is where the real problems begin, it's a battle between historic infrastructure and modern aspirations. Bath already and has always been a walking city, however transport infrastructure is very limited and cannot really be improved due to the historic nature of the buildings. Access from the M4 is very poor. Car parks are very limited which restricts the aspirations of this plan. There is no quick fix but a longer term plan to look at Access would help develop the long term future of Bath as a tourist destination.	Concerns noted
162	Bath resident	The hills, access to countryside and river/railway path feel unique	Noted
163	Bath resident	Air pollution from large vehicles is still a problem. International tourism generates very large CO2 from long haul air travel Bath's depiction in film and television warrants its own exhibition and museum	Concerns noted
164	Bath resident	Climate change action must incorporate reducing the effects of travel to/from Bath by domestic and international tourist. Known as 'scope 3 emissions', the Management Plan should both measure, report and act (encourage/tax) people's travel to the area. That could be a tourist tax. Or it could be a stated aim to reduce emissions from travel to Bath (often from other continents)	Noted. Plan supports sustainable travel to and within site, and tourist tax/levy

165	Bath resident	Priority 9 is right but should be bolstered.It references that Bath has "no tourism strategy as such"This should be rephrased to have a commitment to measure, report and manage global environmental impacts of travel from people visiting Bath (acknowledging they do also visit other sites in the UK).A commitment to measure and report is a minimum, I think.	Plan includes action supporting initiative for sustainable tourism strategy
166	Bath resident	Bath tourism also means measuring and advising on resident's international travel.For example, if the council feels a moral commitment to reduce negative local impacts, it should also visibly encourage resident's tourist choices to be ethical and sustainable (i.e. "you wouldn't like it if it happen like that here in Bath").One action would be improving the 'spa' connection with other sites.Could Bath offer some discounts with other European destinations to encourage people to visit there (and vis versa).What about preferable rates on hotels, attractions and even rail travel to other Great Spa Towns of Europe?	Under consideration by GSTE tourism officer's group
167	Bath resident	The quality and variety of historical sites;The way that the museums and visitor attractions present the city's heritage	Noted
168	Bath resident	Traffic and associated pollution. I cycle a lot and have adthma, and the clean air zone is actually anything but clean...	Concerns noted
169	Bath resident	The LTNs. People are so negative and this is spreading. Also tourists have to stay and often in ltn areas affected. The reputation of bath is declining due to the councils approach to this and other issues.	Concerns noted

170	Bath resident	You actually need to prioritise the river and along that corridor - European cities do and we have a disgraceful area. Our sustainable cycling network could go there rather than on the streets, already narrow.	Plan supports Bath Riverline Project Council initiative and improvement/enhancement of pedestrian access and cycling networks
171	Bath resident	The amount of traffic and associated pollution. Larger central areas of Bath should be pedestrianised.	Concerns noted
172	Bath resident	In principle I agree with what you are saying, but for your transport plan, ensure all groups/organisations/sections of the community are consulted and included in changes, for example people with disabilities, women groups, elderly, so they have easy access to move around. Other things you could do long term, is bring back electrified trams to Bath; charge a road toll on non-resident drivers who enter the city and encourage more people to use Park & Ride. Use the River Avon to put on shuttle services. Get rid of Fast Food chains like McDonalds. Install enforceable average speed cameras on the Upper Bristol Road in the 20 mph zone, I bet most traffic drive more than 20mph.	Plan supports improvement/enhancement of pedestrian access and cycling networks
173	The Springs Foundation	Value the Hot Springs and their environment and the intrinsic value - the uniqueness of the Hot Springs the British Isles as living current of spirituality and therapy flowing through them since time immemorial.	Noted

174	The Springs Foundation	Risks and concerns from the over exploitation of the WHS causing, at times, excessive numbers of visitors and traffic congestion which detracts from the overall experience of this special place	The Plan advocates and supports sustainable tourism
175	The Springs Foundation	Specific mention of the Hot Springs as the heart of the City of Bath and therefore of the WHS.	Noted
176	The Springs Foundation	Re Actions:Support Action 24 and Support 25 re the Hot SpringsBUT top of page 55 'Artificial lighting etc need to be REMOVED from inclusion in Action 25 and needs its own Action!	To be reviewed
177	The Springs Foundation	Page 70 Key priority 6: the natural setting and nature recoverySupport Actions 24 and 25 and willing to support and cooperate with the implementation	Noted with thanks
178	Bath resident	In recent years housing has been built in countryside on Lansdown and Sulis Down.I worry that with yet higher housing targets, many more greenfield sites will be developed such that the setting of the WHS is marred, and maybe that Bath loses its identity and becomes part of a Bristol/Keynsham urban area.	Concerns noted



179	Bath resident	That it is a landscape city - a phenomenon occurring "...where communities, culture and their built and natural environment are harmoniously connected spatially and temporally, in an inspiring way that promotes lasting economic, social and environmental wellbeing", a definition I developed in 2018 on joining the Bathscape Landscape Partnership Board as an organisationally-unaffiliated resident, and Andrew Grant, Chair of the Bathscape subsequently cited (with its conceptual underpinnings) in his chapter on Landscape Cities in Pomeroy, 2020 Cities of Opportunities: connecting culture and innovation, Routledge. Note that this definition is a holistic one greater than the sum of its parts, and is powerful in connecting all the parts listed above and more.	Noted
180	Bath resident	In addition to all those described in chapter 5 of the Draft Management Plan, a significant if not widespread perception that the site is a playground for the rich and privileged, where wellbeing, value and belonging do not filter through to all communities and demographic groups living in and around it.	Plan advocates and promotes WHS for all
181	Bath resident	Participatory governance should be part of an Inclusion Key priority, for as Other priority 18 is seems to perpetuate existing management and participation structures dominated by the stakeholders and influencers listed in Appendix 4	Bath WHS has well established governance in form of Advisory Board consisting of key stakeholders

182	BPT	Support and endorsement for climate change identified as one of the priorities. This demonstrates demonstrate an ambitious and progressive commitment to climate action	Noted with thanks
183	BPT	<i>Action 1 Continue to support and assist research into climate risk and vulnerability for the WHS</i>  Strongly supported but should be expanded to specifically include support the development of a climate risk/vulnerability strategy and index for the WHS which identifies priorities	To be reviewed. Unable to commit to climate risk/vulnerability strategy due to inability to identify resource, but remains an ambition within Action 1
184	BPT	<i>Action 2 Support the introduction of Local Listed Building Consent Order relating to solar panels on listed buildings and ensure OUV safeguarded</i>  Expand to specifically include support the research and development of additional Consent Orders for other elements of retrofit such as secondary glazing.	To be reviewed
185	BPT	<i>Action 3 Support innovative new projects and partnerships which trial new technology and approaches, which enable de-carbonised systems without compromising the OUV of the sites</i>  Greater emphasis should be placed on opportunities for strengthening and sustaining OUV because of decarbonised systems	Noted, but considered Plan strikes right balance

186	BPT	<p><b><i>Action 4 Support the continuing programme of work to complete full character area appraisals for Bath Conservation Area and formal B&amp;NES Council adoption</i></b></p> <p>Expand to support the continuing programme of work to complete character appraisal and management plan for the Bath City Wide Conservation Area and formal B&amp;NES Council adoption as an SPD.</p>	Noted, but already captured by current wording
187	BPT	<p><b><i>Action 5 Engage with national and regional local government to ensure that sub-regional growth and new housing numbers allocated to the city respects the special characteristics of the WHS and safeguards OUV</i></b></p> <p>Expand to include support for the development of design codes that identify special characteristics, if B&amp;NES are intending to take them forward</p>	Development of design codes considered as separate issue to housing numbers
188	BPT	<p><b><i>Action 6 Ensure that the issue of unacceptable building heights is effectively managed through the application of the Local Plan and the Building Heights Strategy, and continue to support and encourage its adoption as a Supplementary Planning Document</i></b></p> <p>Expand to include placemaking policies and design codes, which more clearly define appropriate heights as mechanisms to manage unacceptable heights.</p>	Building Heights Strategy already includes related Placemaking consideration

189	BPT	<p><b><i>Action 7 Ensure that relevant emerging development proposals have taken full account of the potential impact upon the OUV</i></b></p> <p>Drawing on expertise within the LPA, statutory consultees - Historic England, national and local amenity societies and World Heritage experts.</p>	Considered a process that already exists and is effective
190	BPT	<p><b><i>Action 8 Continue to encourage the use of a Design Review Panel and support and work with the Architect in Residence position to advise on design issues. Provide training to ensure all involved have a comprehensive understanding of the attributes of OUV and their spatial and design implications</i></b></p> <p>Expand to include national and local amenity societies who have the expertise to advise on design issues</p>	<p>WH training and promotion covered by existing action</p> <p>Membership of the DRP beyond the control of the Plan</p>
191	BPT	<p><b>3 Public Realm</b></p> <p>Continue to support and promote a high quality and consistent public realm approach across the city allowing good accessibility to all and enhance the WHS and its OUV</p>	Covered within existing Action

192	BPT	<p><b><i>Action 9 Ensure that new street works, and other developments are completed to high and consistent design standards and allow good accessibility to all, continue to implement improvements to pavements and public realm, and encourage and support in identifying budget and funding to improve and enhance the public realm</i></b></p> <p>Expand to include design standards that are in compliance with the Bath Pattern Book and Streetscape Manual.</p>	See Action 10
193	BPT	<p><b><i>Action 10 Ensure that the Bath Pattern Book is adhered to and updated as necessary to guide street works in the WHS. Pursue public realm condition survey to inform alterations, improvements and enhancements across the Council</i></b></p> <p>And Streetscape Manual SPD? Support updated Streetscape Manual SPD that aligns with the Bath Pattern Book</p>	Plan supports improvement and enhancement of the public realm, and adherence to the Pattern Book, and any other associated guidance

194	BPT	<p><b><i>Action 11 Continue to support the reduction of vehicular traffic impact within the Site, especially in the city centre, where there is a valid case for doing so</i></b></p> <p>The Aims of the plan (paragraph 1.5, page 12) do not include anything related to reducing the impact of traffic on the WHS. We therefore propose the addition to paragraph 5.1 (page 45) of an Aim relating to transport and public realm, such as: "7. Engage with, support, and encourage measures to reduce the intrusion of traffic, especially in the city centre, and make Bath a more pedestrian-friendly and walkable city."</p>	<p>Already provision within the Plan to encourage and support Bath as a more walkable city, cycle networks and reduction in vehicular traffic</p>
195	BPT	<p><b><i>Action 12 Engage with, support, and encourage the delivery of the Journey to Net Zero Transport Strategy objectives to deliver positive benefits for the WHS and that safeguard its OUV, including: reducing the negative impacts of vehicular traffic, improving access by more sustainable modes of travel, and making Bath a more pedestrian-friendly and walkable city</i></b></p> <p>This should be emphasised in the Aims of the Plan as stated above</p>	<p>As above</p>
196	BPT	<p><b><i>Action 13 Continue to identify and implement opportunities to make the historic environment more accessible for those with limited mobility</i></b></p> <p>Is it within the scope of the Plan to implement? Or only to support and encourage actions?</p>	<p>Wording to be amended as suggested</p>

197	BPT	<p><i>Work to increase interpretation of the OUV, including intangible values and continue to encourage co-ordination amongst providers, promote citizen involvement and WHS as being for everyone</i></p> <p><i>Section 5.8, page 52, paragraph 2,</i>  <i>“There remains more to do in the coming Plan period in working with communities.”</i></p> <p>This doesn't really explain what is meant and for what purpose, and what follows is not necessarily just about working with communities. We recommend rewording the paragraph so that other unrepresented heritage isn't lost between work on colonialism, as it is about more than that. Fairfield House should be cited as an example.</p> <p>line 8 - mentions publication of Beckford and the Slave Trade – this was a publication in 2007 of a document so not the general website the footnote leads to, and not recent enough for the scope of what the paragraph is referring to. This should be amended to ‘Associated projects include the redevelopment of Beckford’s Tower to interpret the Beckford family’s involvement in the transatlantic slave trade and...’ with the footnote 53 remaining the same link.</p> <p>It is recommended that the whole section is amended as follows:</p> <p>There remains more to do to further expand and enhance research, interpretation and presentation of the OUV, including working with communities to ensure it is inclusive and representative. Bath has recently seen increased awareness and interest in how Colonialism, particularly the transatlantic slave trade and the ownership of plantations and enslaved people, benefitted the city in the eighteenth century and helped finance the development of Georgian Bath. Several Advisory Board partners have established the Bath and</p>	<p>Noted and to be amended where required</p>
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198	BPT	<p><b><i>Support measures aimed at increasing the diversity of audiences and inclusivity of research, interpretation and programming relating to the OUV</i></b></p> <p>We tend to refer to audiences rather than audience, as the plural shows we acknowledge that our audiences are many and varied, not a single audience. We recommend changing audience to the plural throughout.</p>	Noted and to be amended where required
199	BPT	<p><b><i>Action 15</i></b>  <b><i>Support the ongoing and emerging research to explore the relationship between Georgian Bath and the transatlantic slave trade and British colonialisation to further interpretation relating to OUV</i></b></p> <p>We recommend omitting out ‘ongoing and emerging’ as it narrows focus to what is already happening. It should be wider in remit and about more than just research, therefore supporting all future projects as well. We recommend that this action is amended as follows:</p> <p><b><i>Action 15 Support research and initiatives exploring the relationship between Georgian Bath and the transatlantic slave trade and British colonialisation from a global perspective. Particularly those seeking to decolonise practice and narratives, and working with multiple diverse partners to enhance and expand interpretation relating to OUV</i></b></p>	Existing wording largely regarded as adequate but can be amended to include initiatives and omit ‘ongoing and emerging’



200	BPT	<p><i>Action 16 Continue to support the organising of WH Day and other initiatives, with key partners to increase understanding of the OUV of the City of Bath and GSTE, including through outreach, social media, and digital resources</i></p> <p>Recommended rewording as shown in red - expand to include organising the day with key partners, as well as other initiatives and digital and online resources.</p>	Accepted
201	BPT	<p>Action 17-22 Supported. No comment</p>	Noted with thanks
202	BPT	<p>Landscape Setting and Nature Recovery - Suggested amendments for clarity as follows:</p> <p>Whilst Bath Under both WHS inscriptions Bath is inscribed as a cultural rather than natural site, however, the natural landscape is an essential part of the OUV both within of the World Heritage Site city and its setting. As described in Chapter X?, the landscape must therefore be afforded equal importance to the built fabric and Objective 6 confirms this. A major advancement in managing landscape this land has been the establishment of the Bathscape Landscape Partnership. This partnership is fully funded until 2026. but Beyond this it is highly desirable that a the current partnership approach continues</p>	Current wording regarded as appropriate
203	BPT	<p>Action 23, 24, 25 Supported. No comment.</p>	Noted with thanks

204	BPT	<p><b><i>Action 26 Engage with proposals to establish guidance for responsible lighting in the WHS</i></b></p> <p>This section doesn't acknowledge the impact of artificial lighting on the WHS. We encourage the Plan to support further research and assessment of the impact of inappropriate bright lighting on the landscape setting, hillsides, and skyline and the views and interrelationships of the Georgian city with the landscape. In partnership with the NT, Cotswold National Landscape and BPT. Consider adding a further action to this effect as well as including the following action:</p> <p><b>Action XX. Engage with the Dark Skies Association, to explore the potential for Bath to become a 'Dark Sky City' recognising the significance of the cultural past, scientific discovery and the historic character of Bath.</b></p>	Existing wording of this Action amended based on suggested wording
205	BPT	<p><b><i>Action 27 Support the establishment of an effective holistic management structure for the River Avon and Kennet and Avon Canal</i></b></p> <p>This action would benefit from more context regarding the mechanisms that would facilitate this</p>	<p>Comments received from Bath Riverline Project lead in GI&amp;NR Team and suggested alternative wording for action. Amendment made accordingly</p>

206	BPT	<p><b>7. Maintenance and Repair</b>  <i>Ensure that damaged and disused historic structures within the site are monitored, repaired maintained and where appropriate reused</i></p> <p>5.10 needs to recognise the Heritage at Risk register and the buildings on it, including the Old King Edwards School, and the mechanisms of the register and further actions that can be considered to address maintenance and repair</p>	Existing action regarded as adequate
207	BPT	<p><b>Action 28</b> <i>Ensure that damaged and disused historic structures are monitored, repaired, maintained and where appropriate re-used, including regular appropriate maintenance and repair of the public realm</i></p> <p>This action should specifically include heritage at risk.</p>	Wording regarded as adequate
208	BPT	<p><b>Action 29</b> <i>Support <del>for</del> progressing the B&amp;NES Locally Listed Heritage Assets SPD for registering and protecting locally important heritage</i></p> <p>Reword as shown in red. Delete the extra 'for' above and strengthen to include protection.</p>	Accepted

209	BPT	<p><b><i>Action 31 Encourage and support the production and adoption of a Sustainable Tourism Strategy for the WHS in accordance with the principles and priorities outlined in the Responsible Tourism Strategy of the GSTE</i></b></p> <p>Include support for an amendment to the GPDO which would create a use class (C5) for short term holiday lets and air bnb's and a requirement for planning permission and a mandatory national register to provide local authorities with information on short-term lets. This will help prevent the excessive loss of housing to tourist accommodation.</p>	Beyond scope of the Plan
210	BPT	<p><b><i>Action 32 Continue to explore options for a visitor tax or levy and use proceeds to for appropriate projects and initiatives that improve, enhance, conserve and interpret the WHS and its OUV</i></b></p> <p>This is strongly supported</p>	Noted with thanks
211	BPT	<p><b>Action 33-34</b></p> <p>Supported. No comment.</p>	Noted with thanks
212	BPT	<p><b><i>Action 36 Review and update the WHS Setting Study to ensure it provides relevant policy protection</i></b></p> <p>This action requires greater emphasis on working with partners. The original study was undertaken in part by BPT. The Setting Study – is this the World Heritage Landscape Setting SPD? it needs to be given the correct title.</p>	To be reviewed and amended accordingly

213	BPT	<p><b><i>5.15 The availability of craft skills and building materials to maintain the site are essential and this is therefore an on-going issue (SEE BELOW). Skills include ornamental plastering, stonemasonry, metal working and joinery, and by nature this is specialist work undertaken by a small number of companies who are overstretched to meet demand. The WH Enhancement Fund (see 4.16) has helped by commissioning stonemasonry and ironwork craftworkers amongst others, and Bathscape has run a number of drystone walling courses.</i></b></p> <p><b>The whole para requires review. The first sentence lacks clarity and needs to be reworked to highlight and address the key issues with heritage craft skills shortages and the sourcing and cost of materials. It needs to explain why craft skills and training are both an issue and opportunity for the WHS.</b></p> <p><b>The last sentence with regard to the WHESF needs clarifying – helped what? e.g. the fund commissioned work from skilled crafts people which helps to sustain and strengthen local skills and practices who provide training and employment.</b></p> <p><b>There is no reference made to conservation specialists (professionals) and the risk of fewer trained conservation officers contributing to a national shortage of conservation officers.</b></p>	Partly accepted
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214	BPT	<p><b><i>Action 37 Support initiatives and training providers which help ensure that craft skills necessary to maintain the fabric and conserve the attributes of OUV are in place and are of sufficient quality</i></b></p> <p><b><i>Action 37 is strongly supported.</i></b></p> <p>This Amend to include support for training providers</p>	Accepted
215	BPT	<p><b><i>Action 38 Ensure that contacts are made within the GSTE with the academic institutes, universities and colleges responsible for training conservation specialists in each spa town region and that dialogue and joint projects are developed</i></b></p> <p>This action should also include shared learning with heritage craft skills programmes</p>	Action directly from GSTE Property MP and cannot be amended – needs to be consistent with all component parts
216	BPT	<p><b><i>Priority 13: Leadership, Liaison and Communication</i></b></p> <p><b>Actions 39-41 Supported.</b></p> <p><b>Additional actions recommended</b></p> <p><b>Action XX. Create an Equality Diversity and Inclusion (EDI) action plan which seeks to ensure the management of Bath's World Heritage is equitable, diverse and inclusive.</b></p> <p><b>Action XX. Revisit the qualifying supporting statements that underpin the OUV to ensure they are consistent and up to date with new and emerging narratives and research.</b></p>	Already exists within Advisory Board partnership organisations
217	BPT	<p><b><i>Priority 14: Research Action 42</i></b></p> <p><b>Supported. No comment.</b></p>	Noted with thanks

218	BPT	<p><b><i>Priority 15: Education and Youth</i></b></p> <p>5.18. This paragraph should say something about the impact of heritage education on social wellbeing – opportunities for learning through engagement with heritage and cultural institutions providing avenues for pride in place, appreciation for diversity, and opportunities for vulnerable young people and young people who come from marginalised or under-represented backgrounds</p>	Beyond immediate delivery of the Plan
219	BPT	<p><b><i>Action 43 To ensure that the city is used widely and effectively as a resource for learning in all sectors and phases of education, including global citizenship, sustainable development and climate change</i></b></p> <p>The action should be expanded to support investment in educational plans. Further actions should be added to support inclusive and diverse education and engagement with young people. And support outreach work to help people (especially the young) engage in heritage issues, working with local societies and interest groups.</p>	Existing wording considered appropriate
220	BPT	<p><b><i>Priority 16 Governance Action 44 – 46</i></b></p> <p>Supported.</p> <p>We recommend adding the following action: Action XX. Review the Governance structures which support the management of Bath's World Heritage inscriptions through inclusive practice with diverse partners, to ensure the whole city is represented and engaged</p>	Review of the Advisory Board took place in 2023 and to be continually monitored

221	BPT	<b><i>Priority 17: The Wider UNESCO Family Action 47</i></b>  Supported. No comment.	Noted with thanks
222	Friends of Bath Rec	The publishing of this Draft Management Plan for Stakeholder review as agreed at the B&NES Cabinet meeting of 14th November 2024 is wholly welcomed and this society wishes to express gratitude and congratulations to all concerned on achieving this landmark stage	Noted with thanks
223	Friends of Bath Rec	Organisation takes great reassurance of the commitment to this Management Plan expressed by the Chair of the UNESCO Bath World Heritage Site Advisory Board within the document	Noted with thanks
224	Friends of Bath Rec	We wish to wholly endorse the importance of ‘the setting’ and request that this aspect of the Plan is given due prominence to emphasise this.	Noted. Plan acknowledges importance of the green setting, and as a critical part of the OUV
225	Friends of Bath Rec	The expectation of the role of the Advisory Board is that of being the ‘Chief Steward’ to the evolution of determining appropriate new development and for maintaining the fabric of the WHS and the setting and therapeutic properties of the landscape	This isn’t role of the Advisory Board. The Council is ‘Chief Steward’ of the WHS, and development managed through statutory planning process
226	Friends of Bath Rec	To act effectively the newly appointed ‘Architect in Residence’ to Bath requires a full briefing regarding their role that reflects the expectation of the Advisory Board and the Local Authority	Noted – liaison underway



227	Friends of Bath Rec	Publish the Terms of Reference for the Advisory Board and should be collocated with the WHS Management Plan.	All ToR has been published to the WHS website, and links to it included within the Plan
228	Friends of Bath Rec	The 'strategic' and statutory Local Authority Development Plan requires to be acknowledged in the WHS Management Plan	Noted – it is referred to
229	Friends of Bath Rec	The document should give a strong understanding of 'what is understood as the Universal Outstanding Values' as they apply to Bath	Noted – OUV of both inscriptions as inscribed by UNESCO set out in full within the Plan
230	Friends of Bath Rec	The City of Bath as a Great Spa Town is represented by a sequenced historic built environment founded on medicinal springs, the associated baths and leisure buildings. Intertwined within the built fabric are verdant promenades, parks and gardens. All of which complement the true values of the therapeutic environment associated with a Spa. The linking of the surrounding countryside to the core of the City is achieved by 'fingers' of informal and formal parkland environment that are both small in scale and also of a grander scale. The Recreation Ground is one of the latter and a fundamental green lung to the City	Noted

231	Friends of Bath Rec	Object 7 item 28. Within the field of actions generated by the Plan we wish to see greater emphasis placed on the fragility of the historic buildings and the potential damage to Grade 1 and Grade 2 listed buildings by inappropriate intrusion. Highlighting here the historic use of timber foundation practices employed related to flood plain buildings that may be subject to changes in condition caused by ground water fluctuation	Noted
232	Friends of Bath Rec	The incorrect public impression has been given that this draft WHS Management Plan has already been approved and adopted by the Local Authority. This is, self-evidently incorrect, and action needs to be put in place to redress this inaccurate representation	Noted
233	Green Infrastructure and Nature Recovery Team, B&NES (GI&NR)	Preface: general comments and suggestions for amendment	Reviewed by Chair of WHSAB and amendments accepted
234	GI&NR	Executive Summary: general comments and suggestions for rewording	To be reviewed and amended where required
235	GI&NR	Vision: need to refer to climate change and nature recovery	Accepted
236	GI&NR	1.1 Various minor suggestions for rewording	Accepted
237	GI&NR	1.2 Typo	Accepted
238	GI&NR	1.3 Suggestion for rewording	Accepted

239	GI&NR	1.4 Typos and suggestions for rewording	To be reviewed and amended where required
240	GI&NR	1.5 Typos	Accepted
242	GI&NR	2.6 Typo	Accepted
243	GI&NR	2.7 Typos and suggestions for rewording	Accepted
244	GI&NR	2.8 Typo and suggestions for rewording	Accepted
245	GI&NR	3.11 Typos and updates on Green Infrastructure Strategy being replaced by GI Framework 2025-2035	Accepted
246	GI&NR	3.11 Suggested augmentation of Action 23 to go beyond support for Bathscape	Accepted
247	GI&NR	4.2 Typos and suggestions for rewording	Accepted
248	GI&NR	4.3 Suggestions for rewording	Accepted
249	GI&NR	4.4 Suggestions for rewording	Accepted
250	GI&NR	4.5 Typo	Accepted
251	GI&NR	4.6 Suggestions for rewording	Accepted
252	GI&NR	4.8 Suggestions for rewording	Partly accepted
253	GI&NR	4.11 Suggestions for rewording	Accepted
254	GI&NR	4.13 Suggestions for rewording	Accepted
255	GI&NR	4.14 Typo and suggestions for rewording	Accepted
256	GI&NR	4.15 Typo and suggestions for rewording	Partly accepted
257	GI&NR	4.15 Green Infrastructure Strategy 2013 to be replaced by Greener Places - Green Infrastructure Framework 2025- 2035	Accepted
258	GI&NR	4.16 Suggestions for rewording	Accepted
259	GI&NR	4.17 Suggestions for additional and rewording	Accepted
260	GI&NR	4.18 Suggestions for additional wording related to climate change risk	Partly accepted
261	GI&NR	4.19 Capitalisation suggestions and typos	Partly accepted
262	GI&NR	5.2 Typos and suggestions for rewording	Partly accepted

263	GI&NR	5.3 Suggestions for rewording	Partly accepted
264	GI&NR	5.3 Table and priority 6: Natural Setting and Nature Recovery – inclusion of word enhanced	Accepted
265	GI&NR	5.4 Typos and suggestions for rewording	Partly accepted
266	GI&NR	5.6 Typos and suggestions for rewording	Partly accepted
267	GI&NR	5.7 Suggestions for rewording	Accepted
268	GI&NR	5.8 Typos and suggestions for rewording	Accepted
269	GI&NR	5.9 Typos and suggestions for rewording	Accepted
270	GI&NR	5.10 Suggestions for rewording	Partly accepted
271	GI&NR	5.12 Suggestions for rewording re climate change	Not appropriate in this part of MP
272	GI&NR	5.15 Suggestion for additional wording	Accepted
273	GI&NR	5.17 Suggestion for additional wording re climate change	Not appropriate in this part of MP
274	GI&NR	5.18 Typo	Accepted
275	GI&NR	6.1 Suggested alternative wording	Accepted
276	GI&NR	6.2 Suggested alternative wording	Accepted
277	GI&NR	6.3 Suggested wording	Accepted
278	GI&NR	Action 1: Suggested rewording and additional wording	Partly accepted
279	GI&NR	Public Realm: suggested additional wording and new action re greening the city	‘Greening the city’ needs to be consistent with requirement to protect WHS and safeguard OUV
280	GI&NR	Action 12: suggested additional wording	Partly accepted
281	GI&NR	Action 13: suggested omitted word	Accepted
282	GI&NR	Promotion, interpretation, inclusion and presentation: suggested additional action re Bathscape Walking Festival	Accepted

283	GI&NR	The Natural Setting and Nature Recovery: suggested additional actions re supporting related enhancement initiatives	Accepted
284	GI&NR	The Natural Setting and Nature Recovery: suggested actions re WaterSpace Project (See Elizabeth Venning separate response for details)	Accepted
285	GI&NR	Maintenance and Repair: query related to parameters	Plan advocates holistic management, and wording of heading is correct
286	GI&NR	Action 31: suggested should be in Priority 9	Accepted
287	GI&NR	Conservation: suggested additional action re Bathscape	Bathscape already supported within other actions. Conservation Actions to be reviewed
288	GI&NR	Research: typos and suggestion of cross-referencing to climate action research	Not regarded as necessary
289	GI&NR	Education and Youth: action is not adequate	Agreed – amend wording, including pledging support

290	ICOMOS-UK	<p>From an ICOMOS-UK perspective aspects that contribute directly to the OUV of the City of Bath and GSTE and obligations under the World Heritage Convention and UNESCO policies should be the primary focus of the WHSMP. From the list provided: Value the architecture; the quality and variety of its historical sites, the way that the museums and visitor attractions present the city's heritage; the general look and feel of the city; parks, green spaces and natural setting). In fact, it is the harmonious and beautiful combination of these values as described in the Statement of OUV (criterion ii) where a significant part of Bath's uniqueness lies: the 'integration of architecture, urban design and landscape setting, and the deliberate creation of a beautiful city.' Being able to manage the WHS and guide development to ensure that this character remains legible is a priority.</p>	Noted
291	ICOMOS-UK	<p>Values relating to the WHS's contribution to sustainable development and the life of the community (the popularity of Bath among UK and foreign tourists; shops, food, leisure and entertainment) and the presentation are also important. The WHS needs to be managed holistically; neglecting none of these values while safeguarding the OUV of the WHS.</p>	Noted

292	ICOMOS-UK	Other values include: the sense of identity and pride of residents; the international links and opportunities to contribute to international understanding and exchange of best practice particularly with the GSTE; the spa and well-being culture offering opportunities for an improved quality of life for the local community and residents; the aesthetic beauty and harmonious bath stone of the city and setting promotes well-being; the sense of place and history promotes well-being; the feeling of closeness to the countryside created by the integration of the views to the landscape setting and the green spaces in the city; the universities and schools and opportunities to use the WHS to develop educational programmes, skills training and research related to the WHS; the BRLSI; the WHS as a venue for international, national and local festivals; the theatre and cinemas; impetus and opportunity to work with partners to develop exemplary conservation practices and sensitive climate adaptation approaches; catalyst for attracting significant funding	Noted and agreed
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293	ICOMOS-UK	<ul style="list-style-type: none"> <li>• Inappropriate development in the city and/or its setting which harms the OUV either directly or through cumulative impact</li> <li>• Insufficient clarity on the spatial implications of OUV. Although headings of attributes are useful short hand and the 'sub-attributes' helpful they need to be understood in concert. Currently there is insufficient guidance for developers, planners or councillors. Mapping and design of principles is not in place which can lead to varying interpretations. This can result in wasted time and resource for developers and planners and in the worst-case inappropriate development which harms OUV</li> <li>• Lack of SPD/guidance for developers and planners on the type and location of development appropriate in the city informed by principles derived from the OUV - location, scale, height, design, form and materials. All development proposals need to start from a position of clarity on the parameters of appropriate and beneficial development in Bath and its setting.</li> <li>• Building Heights Strategy is not yet an SPD. Height is only one parameter and inadequate alone to guide beneficial development.</li> <li>• There is no masterplan for development in the city informed by the SPD</li> <li>• Inadequate Council resource to deal with development and other pressures</li> <li>• Insensitive traffic measures that impact on the setting of buildings, the character and harmonious design of the city.</li> <li>• Failure to adhere to the Pattern Book within the centre and wider city.</li> <li>• Incremental changes to the materials of for example boundary walls in Conservation Areas. Lack of enforcement.</li> <li>its setting</li> <li>• Inappropriate shop fronts and LCD screens</li> </ul>	<ul style="list-style-type: none"> <li>• Existing management processes have largely been effective for safeguarding OUV</li> <li>• Improvements are foreseen through AiR and development of design guidance</li> <li>• Building Heights Strategy as SPD supported by existing action</li> <li>• No masterplan, but Local Plan covers this</li> <li>• Noted</li> <li>• Noted</li> <li>• Use of Pattern Book encouraged and support within Plan actions</li> <li>• Noted</li> <li>• Noted</li> </ul>
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294	ICOMOS-UK	<ul style="list-style-type: none"> <li>• In focussing on impacts on individual buildings and particular views, the harmonious whole can be neglected.</li> <li>• National pressures for housing numbers will need to be managed to avoid harm to the WHS and its setting</li> <li>• Over familiarity can lead to complacency and a failure to celebrate and embrace the unique and internationally important heritage and its potential to benefit Bath</li> <li>• Climate change and lack of management of trees. This could not only affect the character of the city but also its stability if on slopes</li> <li>• Potential for insensitive climate change adaptation when Bath should be an exemplar of sensitive</li> <li>• Need to invest in working closely with GSTE partners to ensure the serial nomination is protected</li> <li>• Inadequate monitoring of both major and incremental impacts on the WHS and its OUV so difficult to identify risks and adapt management strategies</li> <li>• Incomplete Conservation Area Appraisals</li> <li>• Need to integrate governance of the City of Bath and GSTE at an AB and SMG level</li> <li>• As yet, there is little awareness and understanding of the GSTE and its relevance in Bath</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• Noted and acknowledged within Plan actions</li> <li>• Noted</li> <li>• Noted</li> <li>• Noted as risk and acknowledged within Plan</li> <li>• Noted</li> <li>• Monitoring already takes place through multiple partners and information available to inform management decisions (Visit West, Bath BID, Heritage at Risk etc)</li> <li>• Covered by Action</li> <li>• Governance amended to reflect GSTE inscription and includes Sec General and Manager</li> <li>• Noted – further work to do to raise</li> </ul>
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295	ICOMOS-UK	<p>The vision is generally strong but there are some areas which could be emphasised to assist in meeting UNESCO obligations and provide ‘hooks’ for addressing threats and challenges. Additions appear below in bold and underlined.</p> <p>Bath will be accessible and enjoyable to all: a site that understands, <u>presents</u> and celebrates its Outstanding Universal Value, beauty and character.</p> <p>(Ensure that)) Development and infrastructure projects <u>will demonstrate understanding of and respond positively to the WHS and its setting and avoid actual or cumulative harm to its Outstanding Universal Value.</u> .</p> <p><u>Public realm and traffic management interventions will be designed to enhance the WHS and avoid actual or cumulative harm to its Outstanding Universal Value.</u></p> <p>Bath will continue to be an exemplar of sustainable management balancing the needs of an inventive and entrepreneurial 21st century city, <u>its residents</u> and its many visitors and the conservation and enhancement of the unique heritage and its natural setting, which is of world-wide significance.</p> <p>World Heritage status will continue to be used to support and enhance the vitality and wellbeing of the local community, underpin sustainable development and <u>promote excellence in heritage management and research</u></p>	Partly accepted
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296	ICOMOS-UK	There appears to be some overlap between aims and priorities which needs to be reviewed. There should be a section in the plan explaining the rationale for how the vision, aims and key and other priorities relate to each other. How the priorities have been graded would also need to be set out	To be reviewed and amended where required
297	ICOMOS-UK	It remains problematic to distinguish key priorities and other priorities. Many of the areas in priorities are surely very important such as managing tourism or influencing strategies and policies to avoid harm to the WHS and its OUV. With a holistic approach, it would be more rational not to differentiate key priorities from other priorities. Prioritising the actions in each area would be more effective. Adding a priority column to the action plan would allow this to be done easily. The basis would be the importance of the action and its urgency. It also makes agreeing annual action plans easier as you have clear priority actions. The key and other priorities could then simply be termed objectives.	Identifying key or headline priorities is considered important, but does not relegate other priorities as being of lesser importance
298	ICOMOS-UK	The addition of a research and education aim would be appropriate particularly with potential for working with the universities to deepen understanding of the WHS and develop best management practice.	To be reviewed to ensure covered in actions

299	ICOMOS-UK	<p>I. Ensure that the Outstanding Universal Value of the Site and its setting is understood, protected and interpreted</p> <p>II. Ensure World Heritage Site status is managed sensitively in a way that contributes positively to addressing the climate and ecological emergencies whilst safeguarding <u>its</u> Outstanding Universal Value</p> <p>III. Ensure that all development within the World Heritage Site and its setting is consistent with the protection, enhancement and safeguarding of its Outstanding Universal Value</p> <p>IV. Promote the sustainable management of the Site. <u>This needs to be more specific. Is it referring to tourism and traffic?</u></p> <p>V. Maintain and promote Bath as a living and working city that benefits from World Heritage Site status</p> <p>VI. Improve physical access to, interpretation of and inclusion in Bath's heritage, achieving widespread local, national and international ownership of the Site's Outstanding Universal Value</p> <p>VII. Fully embed the Great Spa Towns of Europe (GTSE) inscription within the management <u>and governance</u> of Bath as a World Heritage Site</p>	Partially accepted, but ref to sustainable management is regarded as adequate to cover all aspects
300	ICOMOS-UK	The key priorities could benefit from some tying back to the overall purpose of the WHSMP; the protection and enhancement of the WHS and its OUV.	Noted, but already regarded as appropriate to deliver necessary actions

301	ICOMOS-UK	<p><b>Key Priority 5 should provide ‘hooks’ for priorities/actions related to increasing understanding particularly of the GSTE and production of an interpretation strategy. Research related to the OUV could also follow from Key Priority 5. This could provide actions that would engage the universities and museums. Promotion could lead to preparation of a sustainable tourism strategy and presentation and coordination; an interpretation strategy however these are included later under priorities.</b></p>	<p><b>Existing wording regarded as appropriate and adequate to deliver actions</b></p>
302	ICOMOS-UK	<p><b>Key Priority 6 needed some editing to address possible confusion between green spaces within the WHS and its landscape setting. It also risks getting mixed up with setting of the WHS outside the boundary. This remains difficult to resolve as the word setting is included in the Statement of OUV. The amendment refers to the integration of the natural and built environment which is fundamental to the OUV of the WHS.</b></p>	<p><b>To be reviewed and amended as required</b></p>

303	ICOMOS-UK	<p>Suggested changes to the wording of the key priorities underlined</p> <p><b>Key Priority 1</b>  <b>Addressing Climate Change <u>while safeguarding OUV</u></b>  Support measures to adapt to and mitigate the impacts of climate change, decrease harmful environmental impact, and ensure safeguarding and protection of OUV</p> <p><b>Key Priority 2</b>  <b>Development <u>management</u></b>  Seek to Ensure that new buildings and other development in <u>the WHS</u> and <u>its setting</u> does not result in <u>direct or cumulative harm to the WHS and its OUV</u> and <u>should be sustainable but contribute to its harmony, beauty and character.</u></p> <p><b>Key Priority 3</b>  <b>Public Realm</b>  Continue to support and promote a high quality and consistent public realm approach across the city <u>allowing and in the provision</u> of good accessibility <u>for to</u> all in order <u>to</u> enhance the WHS and its OUV</p> <p><b>Key Priority 4</b>  <b>Traffic, Transport and Mobility</b>  Support, encourage and promote less car use, and an increase in active travel, use of public transport, and <u>the ambition to establish Bath as one of Europe's most walkable cities while ensuring that all interventions are sensitive to the WHS and its setting avoiding clutter and other direct or cumulative harm to its OUV.</u></p>	Partially accepted
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304	ICOMOS-UK	<p><b>Key Priority 5</b>  <b>Promotion, Interpretation, Inclusion and Presentation</b>          Work to increase <u>understanding</u> and interpretation of the OUV of the City of Bath and the Great Spa Towns of Europe, including <u>their</u> intangible values. and c Continue to encourage co-ordination amongst providers, promotion <u>of</u> citizen involvement and <del>WHS as being for everyone</del> inclusion.</p>	Accepted
305		<p><b>Key Priority 6</b>  <b>Natural Setting and Nature Recovery</b>          Promote the natural <u>green</u> setting of Bath, both within the city and <u>the surrounding natural</u> landscape, as a key attribute of OUV that is afforded equal importance to the built element and is protected, conserved and interpreted, and that associated nature recovery initiatives are fully supported. <u>Safeguard the integration of the , natural and built environment.</u></p>	Accepted
306	ICOMOS-UK	<p>Amended wording to the key priorities is proposed above. Proposed amendments to issues and actions are listed below. The numbers refer to the existing actions but with any additional actions these will of course need to be updated.</p> <p>Sustainable development is mentioned in the vision and aims but there are no specific aims around livelihoods. Maybe research on community benefit could be undertaken and opportunities identified. It would also be helpful to have figures on this to encourage support for the WHS.</p>	<p>Noted, but no firm proposals at present due to no identified resource. We can make ref to UKNC's work on benefits of WH</p>

307	ICOMOS-UK	<p><b>Addressing Climate Change <u>while safeguarding OUV</u></b></p> <p><b>Action 1 – add to this action: Work with partners to implement relevant recommendations for the protection of WHS and its OUV</b></p> <p><b>Action 3 – add to this action: Where appropriate, work with the GSTE and other WHSs.</b></p>	<b>Accepted</b>
308	ICOMOS-UK	<p><b>Development <u>Management</u></b></p> <p><b>Inappropriate development remains a major threat to the WHS and its OUV both from cumulative damage from smaller scale inappropriate development and from major schemes such as the Gasworks or redevelopment of the Rugby Stadium. Both were the subject of Paragraph 172 referral to UNESCO and Technical Review by ICOMOS and mentioned in a 2023 World Heritage Committee decision on the GSTE.</b></p>	<b>Partly accepted – revert back to use of term development management</b>



309	ICOMOS-UK	<p>An additional action should be included to develop an SPD/guidance providing parameters for development within the WHS based on an increased understanding of the spatial implications of OUV. Its development could include mapping of the attributes and the development of principles drawn from the Statements of OUV. Guidelines on location, design, form and material would assist in safeguarding OUV and benefitting the city by encouraging sympathetic development. This project could involve planners, the architect in residence, the university and members of the SMG and AB. It need not preclude innovative design but it should provide parameters to ensure that new development provides a harmonious addition to city and safeguards its OUV. It should set out the minimum standards of evidence/assessment required to accompany an application in the WHS such as AVR at an early stage and the need to provide an HIA in line with ICOMOS guidelines (2021). This guidance could form the basis of master planning for the city.</p>	<p>Regarded as a duplication of the existing framework provided by the Local Plan</p>
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310	ICOMOS-UK	<p><b>Public Realm</b>  Some security or other street closure interventions are insensitive in design. It should be possible to choose the design, as far as is practicable, to minimise intrusion. This is referenced below in relation to traffic.  <b>Action 11 add - Ensure that physical interventions are sensitively located and designed to avoid cumulative harm to OUV</b></p> <p>Another public realm issue is insensitive shop front signage and LED screens in shop windows which is affecting character. Is this included in the public realm? Are these issues addressed by Conservation Area regulations? Are there insufficient funds for enforcement or is there no guidance? Would an action be helpful?</p>	<p><b>Security measures need to be robust to meet with the practicalities of keeping members of the public safe. Conservation Team was consulted and influenced the measures to result in the best scheme possible for the historic environment. Ref to LED screens beyond scope of the Plan</b></p>
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311	ICOMOS-UK	<p><b>Traffic, Transport and Mobility</b></p> <p>There has been a proliferation of highways clutter which is often insensitively positioned. The current approach to the closure of Gay Street with a large stop sign in the centre of the street is harmful to the legibility of urban design. The placement of bicycle stores is in some cases intrusive to the setting of Listed Buildings and the character. The profusion of tall traffic lights at all corners of Queens Square are more examples of harmful impacts. Overall, there is increasing cumulative harm.</p> <p>Action 12 and 13 should refer to the avoidance of clutter and careful location of infrastructure and sensitive design.</p> <p>An additional action to undertake an audit and provide guidance and training to Highways and relevant contractors. Guidance for appropriate signage in the WHS would be helpful. There is always some level of flexibility. A process needs to be designed including consultation with Conservation Officers/Bath Preservation Trust.</p>	To be reviewed and amend as required
312	ICOMOS-UK	<p>Promotion, interpretation, inclusion, presentation</p> <p>Action 14 – this should be an interpretation strategy for the WHS. The vision mentions better coordination. It should include work with/on the GSTE rather than separating them out completely. Understanding in Bath of the GSTE needs to be increased and joint projects for partners could be included.</p>	See above – acknowledged further work required to promote GSTE inscription

<p>313</p>	<p>ICOMOS-UK</p>	<p><b>Natural Setting and Nature Recovery</b>  It is helpful to include that the interaction of the natural and the built that contribute to OUV. It may be late in the day but quotes from the Statement of OUV as heading perhaps or boxes in the publication would help to tie the plan together. An action to map and provide principles is proposed under the development management priority but is relevant here. Mapping the conservation needs could be helpful if this has not been done.  An action should be included to survey and manage tree in the WHS and its setting. There are large areas of trees holding up banks that need careful management to ensure stability as well as retain the aesthetic of the merging of nature and built environment.  Do you think these are the correct priorities to have and the right actions to address them? What do you think we should change in or add to the other priorities and associated actions?</p>	<p>This topic area considered adequately covered and has been subject to expert review by GI&amp;NC team in the Council</p>
<p>314</p>	<p>ICOMOS-UK</p>	<p><b>Tourism and Visitors</b>  It is surprising that a WHS Sustainable Tourism Strategy is not a key priority as this would feed into climate change and traffic matters as well as life of the community. This supports the argument for removing the distinction of key and other priorities.    You may wish to mention other international guidance on Sustainable Tourism and Tourism and Climate Change produced by UNESCO and ICOMOS if you are including a bibliography or resource section</p>	<p>See ref above re weighting of priorities    Re international guidance – to be reviewed and amended as required</p>

315	ICOMOS-UK	<b>Policies and the WHS</b> <b>Action 36 – Add - to safeguard the WHS from increased pressures</b>	<b>Accepted</b>
316	ICOMOS-UK	<b>Leadership, Liaison and Communication</b> <b>Action 39 the training should be regular – once a year</b> <b>Action 40 Bath needs a procedure for alerting GSTE to those developments here</b> <b>Action 41 Bath would benefit from a newsletter and partners could share responsibility</b>	<b>Training dependent on demand/need and resource</b> <b>GSTE procedure in place and working well</b> <b>Newsletter noted, but dependent on resources – although GSTE already has a newsletter</b>
317	ICOMOS-UK	<b>Research</b> <b>Earlier in the plan research on the Slave Trade is mentioned. Also, research on intangible values is mentioned. Research to inform the Development in the WHS SPD on architecture, landscape and planning could encourage collaboration with universities. The opportunity should not be missed and an action to explore this should be included.</b> <b>An action to produce a research strategy could be explored as an action to encourage work with universities and schools as well as vocational and skills providers.</b> <b>Action – set up a working group on the spatial implications of OUV to inform an SPD</b> <b>The action for the records office could be kept as aspirational. They may need it to support a funding bid should they decide to proceed.</b> <b>Actions can be aspirational.</b>	<b>Further research is encouraged and supported within the Plan and actions. However, exact nature of the research will be developed further within the Plan period</b>

318	ICOMOS-UK	<p><b>Governance</b>  The AB had become too big to be effective and this should be included as a catalyst for the review which produced the strategic management group (SMG). Action A review of how this is working needs to be undertaken after two years. The period is included in the ToR.  The description of the Strategic Management Group on p 21 is entirely inaccurate. Details can be found in the ToR.  Action 45 Short summary reports on implementation should be given annually to the SMG and AB.  39. Organigrammes and ToR plus membership organisations need to be included as appendices</p>	<ul style="list-style-type: none"> <li>• AB membership to be reviewed</li> <li>• Text inaccuracy to be reviewed</li> <li>• Mid-term review regarded as appropriate</li> <li>• ToR can be accessed via link in Plan</li> </ul>
319	ICOMOS-UK	<p><b>Monitoring</b>  Monitoring is best practice to assess success of management approach to allow for adjustments. It also identifies new threats. Monitoring reports should be presented to the SMG/AB on biannual basis.   The 2023 World Heritage Committee Decision on the GSTE implies that component properties should have monitoring programmes to be able to feed in to property-wide monitoring.   Action to develop monitoring indicators for impacts on OUV</p>	<ul style="list-style-type: none"> <li>• Monitoring of actions on mid-term basis</li> <li>• GSTE draft monitoring is underway</li> <li>• Numerous monitoring indicators already in place, although not WHS specific</li> </ul>

320	ICOMOS-UK	<b>Action Plan</b> A lead partner column is important to help initiate actions and drive them forward. As discussed above a priority column with a level from 1 to 3 would be valuable. Timescales for completing actions could be clearer as many are simply on-going	Current approach to actions regarded as appropriate
321	ICOMOS-UK	<b>Chapter 3: <del>Significance of the site</del></b> <b><u>Outstanding Universal Value of the Site</u></b>	Significance regarded as appropriate in this instance
322	ICOMOS-UK	3.3 Info re SMG is inaccurate	To be checked
323	ICOMOS-UK	4.5 and throughout typo re use of hyphen ICOMOS-UK	Accepted
324	ICOMOS-UK	4.9 Needs to reflect here or in the priorities and action section the 2024 Integration of Impact Assessment Procedures in the SoC report 2024	To be reviewed
325	ICOMOS-UK	4.9 2 <sup>nd</sup> para additional text after potential... <u>on the attributes of OUV, authenticity and integrity</u>	Accepted
326	ICOMOS-UK	4.9 2 <sup>nd</sup> para additional text, last sentence: <u>All relevant stakeholders should be involved in this iterative process designed to assist arriving at appropriate and sustainable development</u>	Accepted
327	ICOMOS-UK	4.19 Needs to be monitoring of accumulative impacts over time for both inscriptions, and regularly reported to SMG and AB	See comments above re monitoring
328	ICOMOS-UK	5.3 Questioning wording re aims and objectives	To be reviewed against emerging HE MP guidance

329	ICOMOS-UK	5.4 Is there a separate action plan	Action Plan programme of delivery and partnership working to be developed
330	ICOMOS-UK	5.4 1 <sup>st</sup> para, last sentence: Approaches need to be identified that deliver <u>these</u> imperatives	Accepted
331	ICOMOS-UK	5.4 2 <sup>nd</sup> para, last sentence, additional text: <u>All of which, if not done sensitively, have the potential to result in harm to Attributes of OUV.</u>	Accepted
332	ICOMOS-UK	Capitalisation typo re Plan, and should be consistent throughout	Accepted
333	ICOMOS-UK	5.4 Questioning priority action or priority aim? Needs to be consistent	Accepted
334	ICOMOS-UK	5.4 para 5 – might be helpful to add an example tree currently helping to hold together the city's hillsides	Noted. Bathscape can provide this specialist advice
335	ICOMOS-UK	5.4 para 5 – replace 2 <sup>nd</sup> use of communities with 'they'	Accepted
336	ICOMOS-UK	Action 1 – additional text: <u>Work with partners to implement relevant recommendations for the protection of WHS and its OUV</u>	Accepted
337	ICOMOS-UK	Action 3 – additional text: <u>Where appropriate work with the GSTE and other WHS.</u>	Accepted
338	ICOMOS-UK	5.5 Development <u>Management</u>	Accepted
339	ICOMOS-UK	5.5 1 <sup>st</sup> para/sentence after WHS management, replace with <u>both within the city and its setting</u>	Accepted



340	ICOMOS-UK	5.5 2 <sup>nd</sup> para remove ref to Liverpool: 'this is rather misleading as the delisting of Liverpool was not based on a straightforward disagreement over balance. It would be better to remove the reference to Liverpool'	Current wording regarded as appropriate
341	ICOMOS-UK	5.5 3 <sup>rd</sup> para: This is a bit of a non sequitur. I would advise adding here ref to the aspects of OUV that are outlined in the SoS criteria ii. Revised/additional text: <u>The urban design integrates public and private buildings and spaces in between to form part of a city landscape in harmony with the natural environment within and natural landscape around it. Details of this character and the homogeneity of materials is set out for the single large conservation area</u>	Current wording regarded as appropriate
342	ICOMOS-UK	5.5 4 <sup>th</sup> para, additional text: <u>Protection of the individual conservation areas contributes to the protection of the WHS of which they are a part and helps to minimise the potential for cumulative damage.</u>	Partly accepted
343	ICOMOS-UK	Action 4: needs a date for completion to drive this forward	Not currently possible due to uncertainty of resources required
344	ICOMOS-UK	Action 5: addition text after 'from the setting... <u>disrupting the harmony, beauty and character of the WHS and resulting in harm to the OUV</u>	Current wording adequate and appropriate
345	ICOMOS-UK	Action 7: needs to be ambition for Bath design guidance to become SPD	Currently no identified project related to producing design guidance

346	ICOMOS-UK	Action 7: additional text after 'invitation to excel... <u>whilst protecting OUV</u>	Accepted
347	ICOMOS-UK	5.6 comment regarding requirement to use appropriate materials in repair of buildings and especially public realm in ref to Pattern Book	Noted
348	ICOMOS-UK	Action 11: additional text: <u>Ensure that physical interventions are sensitively located and designed to avoid cumulative harm to OUV</u>	Accepted
349	ICOMOS-UK	Action 26: needs to be more robust – 'stronger'	To be reviewed
350	ICOMOS-UK	Other Priorities: questioning terminology – not clear – might be clearer to have priority objective and just objective	Current wording regarded as appropriate
351	ICOMOS-UK	Priority 8 Conservation: 'Isn't this a priority Conservation of attributes of OUV - I'll read the description but this reads like the main purpose of the WHSMP?'	Current wording regarded as appropriate
352	ICOMOS-UK	Priority 9 Tourism and Visitors: 'Isn't this a priority objective	Current wording regarded as appropriate
353	HE	Reference published UNESCO guidance where appropriate. Of particular interest will be the guidance in Enhancing Our Heritage <a href="https://whc.unesco.org/en/eoh20/">https://whc.unesco.org/en/eoh20/</a>	Accepted
354	HE	The MP needs to act as a resource to support understanding of e.g. a. What is important about Bath's two WHS and why b. (in particular) What needs to be maintained (in order to retain WHS status) c. How they are maintained and can be protected	Plan regarded as already addressing these issues, but remit regarded as wider than this – WHS status is much broader than a protection tool

355	HE	<p>We consider that the structure of the plan, the distinction and flow between sections could be improved as follows. Additional subheadings and numbered sub-sections would also help to make the MP more easily referenceable:</p> <p><b>Section 1: Clear focus for all introductory sections, including separation of scope and status.</b></p> <p><b>Section 2: Review of content and focus of various subsections to ensure this is pertinent to the function of the MP, merge content to provide a more focused understanding of the importance of the properties' settings.</b></p> <p><b>Section 3: Include more structured explanation of key terminology and concepts.</b></p> <p><b>Section 4: Structure to provide clear explanation of how the properties are protected - set out clear explanations of roles and responsibilities in governance structures, explain context of legislative and policy framework in more detail, describe how the Combined MP relates to and works with other documents which individually help provide protection for aspects of the two properties' OUVs, explain the role of heritage impact assessment as a tool and process in support of the achievement of sustainable development.</b></p> <p><b>Section 5: Discuss the key issues, opportunities across the site in relation to the aims and vision for the site. If implemented this could add significantly to the length of the plan text.</b></p> <p><b>Section 6: Set out the key priorities and Action Plan designed to address the key issues with measurable outcomes</b></p>	<p><b>Separate scope and status</b></p> <p>The current structure will be retained (see ICOMOS comments) – terminology for headings accepted and to be changed/amended accordingly</p> <p>Re comment on Section 4 – further work to be done during Plan period</p> <p>Any suggested headings from the draft MP guidance can be used</p>
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356	HE	We consider that the effective use of the MP as a material consideration in the planning process would be significantly enhanced by incorporating more detailed and precise reference to legislation, policy and guidance (including within the PPG) under the planning system. This is only one of the areas in which the MP will be important, but if it is to work alongside and influence the development of B&NES Local Plan, we would recommend that it takes a more structured approach to outlining the framework within which it will be operating	This will be the same for all English WHS's. It would be better to have a single resource (a page on the HE website) to link to. This would avoid mass repetition and be easier to update
357	HE	We would recommend that the Plan explains the additional sensitivity that comes with a transnational inscription, the impact that the management of change within Bath has for all 11 of the component parts of the property.	Accepted - ensure that this sensitivity is highlighted if not already

358	HE	<p>We would recommend that opportunities for the draft Plan to draw additional support from available UNESCO standard setting instruments, and policy documents, is explored for example:</p> <ul style="list-style-type: none"> <li>• The Historic Urban Landscape Recommendation is only mentioned twice, under Action 3 and Priority 8. We would recommend considering how HUL can inform the approach to management and sustainable development within the city. The challenge that HUL engages with is referenced in Section 1.1 of the Plan.</li> <li>• The Policy Document on Climate Action for World Heritage (2023) is of particular relevance to the priority of addressing climate change within the draft Plan. There is scope to make more use of this document in relation to the actions it wishes to bring forward within the Plan period.</li> <li>• Policy on the integration of a sustainable development perspective into the processes of the World Heritage Convention</li> </ul>	Accepted - add references and links to the above UNESCO guidance
359	HE	<p>The City of Bath and Great Spa Towns of Europe are two separate inscriptions; one a property in its own right the second a component part of an international designation which brings with it additional sensitivities. This is a point often forgotten still by consultants when producing heritage impact assessments. Notwithstanding and acknowledging the overarching objective for holistic management between the two properties, we would recommend that the Plan amends its current approach.</p>	See comments above re better articulating the differences between the two inscriptions and promote equal significance

360		UNESCO's 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context is not designed just for the assessment of impact on projects that have the potential to cause harm to the WHS. The guidance includes a set of principles and a methodology for assessment that can be utilised in World Heritage contexts to identify when a proposal might have an effect on an attribute or other aspect of OUV, to understand whether that effect might be positive or negative, and to use the assessment process as a tool to identify how the proposal might be altered to avoid and minimise harmful effects and maximise positive benefits. When used correctly, HIA can be a key tool in the achievement of sustainable development.	Accepted - Include greater reference to the 2022 guidance and toolkit
361	HE	Historic England recommends viewing heritage impact assessment (HIA) as a process and a tool. In this way it can be easier to incorporate it in the development of proposals at the earliest possible stage and to ensure that the level of assessment is proportionate to the scale and impact of the proposal.	Accepted - advocate the importance of HIA more
362	HE	The guidance sets out a methodology for a screening/scoping stage of assessment which also ensures that detailed heritage impact assessment, and the production of detailed HIA reports setting out the conclusions of that assessment, are only undertaken when the initial assessment has identified that this is necessary.	Accepted – as above

363	HE	<b>Preface: Minor typographic error: Both inscriptions recognise that the City of Bath is a dynamic, modern urban area and a living site subject to constant change. Advisory</b>	<b>Accepted</b>
364	HE	<b>Vision: These are two separate inscriptions, one a property in its own right the second a component part of an international designation. We therefore strongly recommend that they are referred to as 'Sites' notwithstanding and acknowledging the overarching objective for holistic management between the two. Necessary</b>	<b>Accepted</b>
365	HE	<b>1.1 "The City of Bath WHS inscription is exceptional." The text that follows relates to both inscriptions and therefore this may benefit from slight amendment. Advisory</b>	<b>Review and amend if necessary</b>
366	HE	<b>1.1 The text reads as though the management challenge is created by the dual designation but the balance of conservation against the needs of a vibrant and thriving 21st century city are not unique either to dual designations or to Bath. We might recommend reviewing this section prior to finalisation. We would also refer you to our general comment above regarding reference to and active use of the Historic Urban Landscape Recommendation (HUL 2011). Advisory</b>	<b>Review. The text relates to the fact that the entire urban area of Bath is inscribed, which is exceptional. Reference to HUL is not considered appropriate in this section</b>

367	HE	<p><b>1.3 We would recommend that the draft MP could be improved by reverting to the approach in the previous WHS MP here (title and content), setting out why a MP is required. This would help define its status and importance. It might be helpful to make specific reference to the recommendation of the World Heritage Committee at inscription Decision 44 COM 8B.16 5. e) Reviewing the management plan of the City of Bath so that its fourth iteration takes into account both its inscription on the World Heritage List in its own right and its inscription as one of the component parts of The Great Spas of Europe. Advisory</b></p>	<p><b>Add former section about why an MP is required and note suggested wording inclusions (see wording of previous Plan)</b></p>
368	HE	<p><b>1.3 Footnote 6: The hyperlink is to a local source; the correct link is <a href="https://whc.unesco.org/en/conventiontext/">https://whc.unesco.org/en/conventiontext/</a> Necessary</b></p>	<p><b>Accepted – amend hyperlink</b></p>
369	HE	<p><b>1.3 It would be useful to include some further explanation of how management is participatory later in the plan. Advisory</b></p>	<p><b>Review and change if necessary</b></p>
370	HE	<p><b>1.3 The references to ‘priorities, objectives and actions’ are a little misleading as the MP seems to use priorities/objectives interchangeably for the same list in Section 5. Commentary</b></p>	<p><b>Review this along with SS related comments</b></p>
371	HE	<p><b>1.4 We would suggest that the draft MP could be enhanced by separating scope and status into two sections so that there is a clear focus on status and relationships with other plans. A more comprehensive explanation of other related plans and how they relate to the MP would also be a useful additional resource here. Advisory</b></p>	<p><b>Accepted - separate sections as suggested</b></p>



372	HE	1.4 We support the approach taken in relation to the scope of the MP, focusing on OUV but recognising that the city's cultural significance is broader than that, and that holistic sustainable management needs to also take account of natural significance, particularly due to the nature of both properties' settings and their contribution to OUV. It may be helpful to make clear that the definition of 'significance' is as set out in the NPPF. See also below re Natural Setting. Commentary / Advisory	Accepted - add reference/link to the NPPF definition
373	HE	1.4 It is positive to see that the Plan is intended for adoption by the local authority which will enhance its status. Commentary	Review and check whether a comment is needed on status
374	HE	1.5 The same point is mentioned above but given the importance of the Aims of the Plan, we repeat it here – there are two World Heritage inscriptions with separate Statements of OUV. We recommend that the Plan is at all times clear that this is the case e.g. the Sites and their settings. Necessary	Both inscriptions and their OUV and attributes are made clear. GSTE PMP to be reviewed 2026 and may have separate and different vision, aims etc
375	HE	1.5 How do the aims of the plan relate to the vision presented on p.9 - are they meant to be steps towards the vision? While appreciating there is crossover in content between the two, too many different visions/aims may confuse the direction of management unless the relationships between them are clear. Advisory	Accepted - explain as suggested

376	HE	<p>1.5 How do the aims of the plan relate to the vision presented on p.9 - are they meant to be steps towards the vision? While appreciating there is crossover in content between the two, too many different visions/aims may confuse the direction of management unless the relationships between them are clear. Advisory</p>	Accepted - explain as suggested
377	HE	<p>1.5 Aim VII: Fully embed the Great Spa Towns of Europe (GTSE) inscription within the management of Bath as a World Heritage Site</p> <p>Given earlier comments regarding the importance of clarifying the separate OUV etc. of the two inscriptions, might it be helpful for the focus of this aim to be about holistic management between the two inscriptions and ensure that management of World Heritage within the city is equally focused both? Advisory</p>	Review and make changes as relevant, although this point has largely already been covered
378	HE	<p>Section 1 We would suggest an explanation of the expected lifespan of the MP, as well as the MP review schedule in this introductory section. Also it would be helpful to consider reviews of individuals elements of the MP, progress monitoring, evaluating the efficacy of the whole plan, and the process that will occur if a reactive review is required in relation to a specific issue.</p> <p>We would refer you to the guidance in Enhancing Our Heritage 2.0 to which will assist in enhancing these aspects of the draft Plan.  <a href="https://whc.unesco.org/en/eoh20/">https://whc.unesco.org/en/eoh20/</a> Advisory</p>	Review and add timespan (if missing) to section 1

379	HE	<b>2.4 Recent changes to the parliamentary constituency boundaries will require an update to this section. Advisory</b>	<b>Review and amend if required</b>
380	HE	<p><b>2.7 QUERY: Is the content of this section directly relevant to the use of this document as a MP?</b></p> <p><b>Some of the content (second paragraph) could add value and understanding to the preceding section on the properties' settings?</b></p> <p><b>Some of the content could also separately provide an indication of the various different characters areas across the city as an introduction with appropriate cross references to the relevant Conservation Area Appraisal/Management Plan etc?</b></p> <p><b>It would be helpful generally for the Combined MP to identify how other resources can also support management of the properties. Advisory</b></p>	<b>Review and amend text if necessary</b>

381	HE	<p><b>2.7 ‘Bath is a thriving 21st century community’ – perhaps pedantic but aren’t all communities 21st century?</b></p> <p><b>‘There is very little sign of former heavy industry’ – does the Lower Bristol Road have such activity?</b></p> <p><b>‘However, the compact historic city is difficult for modern vehicular traffic, resulting in some congestion and resultant air-pollution.’ – perhaps this could be rephrased as it is traffic and the way in which it is managed that is responsible for congestion and air-pollution, not the nature of the city.</b></p> <p><b>Commentary/ Advisory</b></p>	<p><b>Review and amend wording, but note that some WHS (Stonehenge) are archaeological monuments</b></p> <p><b>No heavy industry remains in Lwr Bristol Rd</b></p> <p><b>The nature of the city is one of tight/close grained street/townscape designed for non-motorised traffic. Amend text for clarity</b></p>
382	HE	<p><b>2.8 We would recommend that consideration is given to referring to and summarising the assessment of the state of conservation for both properties under the 2023 Periodic Reporting exercise. This would provide a background against which the then more selective narrative about highlighted projects could be set. We would also recommend analysing the submitted results across the two properties as a means to identify the important trends (positive and negative), concerns and positives. This understanding could then feed into the Action Plan. Advisory</b></p>	<p><b>This is to be too time-demanding to action at this late stage of the MP review. It will be noted for the future that the PR might be tied into the MP</b></p>

383	HE	2.8 'The public realm is regarded as being in a variable state of deterioration' – perhaps this suggests significantly more detail on this could be useful and justified? Advisory	Noted. The public realm also featured in public comments. Actions are highly desirable but resource to implement them cannot necessarily be identified
384	HE	2.8 QUERY: Are there any specific actions (included in the Action Plan) related to any of the sites on the Historic England Heritage at Risk register in Bath ? Is a local register retained for non-designated assets at risk that contribute to the properties' OUV so that heritage at risk surveys for both designated and non-designated heritage assets can be used as monitoring indicators? Advisory	Check the actions to see if bringing historic properties back into use was carried forward to this plan. Actions are likely to be generic rather than property specific, although the former King Eds School is currently under active investigation

385	HE	<p><b>2.9 We would recommend reviewing the usefulness of this section as a support to use of the MP as a document for management. There is a mix in the content between e.g. other national designations located throughout the city and facts and figures that relate more closely to understanding the challenges and opportunities that the city is faced with.</b></p> <p><b>Other national designations are important as they will provide additional protection for attributes of the two properties' OUV and may deserve more attention in the revised Plan. Aspects of the settings of the 2 properties may contribute to OUV or help to maintain it.</b></p> <p><b>We would recommend considering how these key facts might be organised and incorporated under other section headings so that they provide more of a resource to support management of the two properties with information that can be easily located and avoid repetition in other sections.</b></p> <p><b>Advisory</b></p>	<p><b>Considered to be useful for the end-user/reader as an easy to read and accessible approach</b></p>
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386	HE	<p>3.1, 3.4, 3.5 For a broad readership it would enhance the draft MP to provide a little more context and understanding of the key terminology used.</p> <p>It is important that the Combined MP provides a robust resource under the planning system but is also accessible for a wider audience. We would recommend considering the benefits of explaining some of the key concepts e.g. an explanation of what attributes are and why they are important, including within the context of the assessment of planning applications.</p> <p>Historic England has recently updated its website and this may now form a useful resource to explain the context that is necessary including such concepts as e.g. tangible and intangible attributes etc.</p> <p><a href="https://historicengland.org.uk/advice/planning/world-heritage/">https://historicengland.org.uk/advice/planning/world-heritage/</a> (including a World Heritage glossary)</p> <p>Advisory</p>	<p>A glossary is already provided.</p> <p>Further explanation of attributes etc, is possible, but must be balanced against further lengthening of the plan and consequent reduction of legibility</p> <p>Add links to HE website</p>
387	HE	<p>3.3 A small edit to the formatting of the adopted and published Statement of OUV is included. We would recommend reverting to the formatting as published by UNESCO to avoid confusion for readers. Advisory</p>	<p>Check and revert to UNESCO format and reviewed once desktop published copy available</p>

388	HE	<p><b>3.3 Statement of OUV ‘...in transposing Palladio’s ideas to the scale of a complete city, situated in a hollow in the hills and built to a picturesque landscape aestheticism creating a strong garden city feel, more akin to the 19th century garden cities than the 17th century Renaissance cities.’</b></p> <p><b>This statement would be better as ‘... in interpreting Palladio’s ideas on the scale of a complete city...’.</b></p> <p><b>Advisory</b></p>	<p><b>Unclear on this. It appears to suggest changing the wording of the SOUV, which we are not able to do without UNESCO approval</b></p>
389	HE	<p><b>3.3 John Wood the Elder and John Wood the Younger should be used consistently – rather than John Wood Senior and John Wood Younger.</b></p> <p><b>P19 Criterion (iv) – it may be appropriate to perhaps revisit or rephrase a description of the Roman and Georgian periods as ‘great eras in human history’ as perhaps they weren’t for all concerned?</b></p> <p><b>P23 Georgian town planning. Point 14 mentions the Somerset Coal Canal’ Is this beyond the WHS?</b></p> <p><b>P24 Georgian architecture. Point 21 would read better as ‘Interpretation of Palladio’s ideas on the scale of a complete city...’</b></p> <p><b>Advisory</b></p>	<p><b>As above. The SOUV as adopted has been published</b></p> <p><b>Review and check. Same for both comments</b></p>



390	HE	3.3 Footnote 20 Circular 07/09 was also withdrawn in March 2014: <a href="https://www.gov.uk/government/publications/protection-of-world-heritage-sites-circular-07-2009">https://www.gov.uk/government/publications/protection-of-world-heritage-sites-circular-07-2009</a> Necessary	Delete as advised
391	HE	3.4 The number of attributes varies but will depend on the complexity of the OUV described in the Statement of OUV. We would recommend deleting the indication that “Normally five or six such key attributes are identified”. Commentary	Delete as advised
392	HE	3.9 Whilst we agree there is similarity and commonality between some of the attributes of OUV, we would recommend considering a more detailed explanation of the relationships between attributes of OUV between the two properties and a clear indication of where their OUV diverges. This could be one of the areas where a combined MP will significantly enhance consideration of holistic but parallel management of the two properties, ensuring that all attributes of OUV are dealt with equally. Advisory	Noted, but this is likely to form the basis of future work rather than immediate Plan action
393	HE	3.10, 3.11 We support reference to the wider cultural value of the two properties (see earlier comments re significance and OUV) and in addition to its natural values. We consider that the draft MP would be enhanced by considering both the structure and content of these sections in relation to that covered by other parts of the Combined MP e.g. sections on setting, holistic management of cultural and natural environment to enhance the contribution to understanding. Advisory	Review as suggested, but if this requires substantial enlargement of these sections then consider whether this is essential

394	HE	3.10 Some of the cultural value referred to in this section is a contributor to attributes of OUV and therefore has international value as well as national/local – e.g. intangible associations and traditions – and may therefore be best dealt with elsewhere. Advisory	Review and amend as required
395	HE	Section 4 Overarching. We would suggest it might be effective to separate explanations of ownership and governance from discussion of protection measures for the property and daily operations. Advisory	Current wording appropriate
396	HE	Section 4 The text in this section would be enhanced by focusing on providing clear explanations of the roles and responsibilities of the various partners and authorities involved in managing the two properties, making clear which parties/bodies are responsible for decision making, which for providing technical advice to support decision making (at international, national and local level), and which for implementing the management plan and delivering against its actions. Advisory	Check that this is not already done in the appendices

397	HE	<p><b>4.2 This section is focused more on the achievements of the previous MP than on explaining the management of the site. Could this perhaps be moved to a section prior to the actions/objectives under the title ‘Achievements of the previous plan’? Alternatively, this could inform the discussion around the condition of the site, presenting examples of how investment, policy interventions and asset portfolio management have all contributed to supporting protection and conservation of the properties’ OUVs.</b></p> <p><b>Notwithstanding the movement to Appendix of the previous iteration of the City of Bath’s history as a World Heritage Site, we would highlight the benefit of identifying key principles that can continue to inform management of the property, from e.g. the Reactive Monitoring Mission. It would be useful to consider how these might be highlighted and made use of.</b></p> <p><b>Advisory</b></p>	<p><b>Review this but balance against other consultation feedback suggesting that achievements should be given greater prominence</b></p>
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398	HE	<p>4.3 Condition of both properties may be good overall, particularly when focused on the key buildings which are most associated with the City. However, a number of individual buildings within the City are vacant and have been for extended periods, and overall general maintenance can be quite poor. Some vacant buildings are primarily commercial, some residential. Linked to our earlier comment regarding how the Action Plan might target such buildings whether designated or not, there is an opportunity for the Combined MP to act as a guide to where additional support and guidance might be available to help find solutions for challenging sites, but also support owners and tenants to make sensible decisions regarding ongoing management and help improve condition more generally across both properties. How can property owners generally (not just the large landowners) be supported through the Combined MP so that they view WHS status as a benefit?</p> <p>Advisory</p>	<p>Noted, but the number of historic buildings at risk within the city remains remarkably low and should be highlighted. Programmes to address the individual properties are likely to be included within generic actions rather than individually</p>
399	HE	<p>4.4 This section offers an opportunity to address the general comments made earlier regarding the additional sensitivities for management of a transnational inscription. Advisory</p>	<p>Review and amend as necessary</p>

400	HE	<p>4.5 The draft Plan could be enhanced by including more detail about the workings of the Committee and the Centre so that the importance of Committee Decisions is understood for maintaining WHS, and of advice (sought by the State Party to support the planning process) from the Advisory Bodies.</p> <p>The recent updates to Historic England's website may assist in outlining additional detail. ICOMOS International is mentioned as being of principal relevance to Bath, it would be helpful to explain why since ICCROM is also a cultural heritage adviser.</p> <p>Advisory</p>	Provide a link to HE website to avoid repetition
401	HE	<p>4.5, Diagram 2, Appendix 6 Minor correction required: DCMS is now the Department for Culture, Media and Sport since the last general election. Necessary</p>	Accepted and amend
402	HE	<p>4.5 As there is a separate monitoring section, we would suggest explaining paragraph 172 notifications (part of the Reactive Monitoring processes under the Operational Guidelines) there for ease of reference to all monitoring processes in one place. Advisory</p>	Amend as suggested
403	HE	<p>4.6/4.7, Appendix 6 The references to Historic England (London Office) should be altered to Historic England (International Team) in these sections. Advisory</p>	Accepted and amend

404	HE	4.16 As the enhancement fund of £25k per year can have a relatively limited impact on a WHS that encompasses an entire city that gets five million tourists a year, perhaps the MP could aim to secure a more sizeable amount? Commentary	Identifying funding from various sources internally and externally ongoing
405	HE	<p>Action 7 ‘The UNESCO Vienna Memorandum welcomes high quality modern interventions rather than pastiche replicas. B&amp;NES Council planning policy confirms this design approach and states that World Heritage status should not be seen as a constraint, but as an invitation to excel.’</p> <p>Perhaps we mean that the context of World Heritage status is both a constraint (the need to provide a positive contextual respond that safeguards OUV) and an invitation to excel? Commentary</p>	Noted, but there is a reluctance to state that the WHS is a constraint. This is highly likely to be taken out of context in political and other discussions
406	HE	<p>5.7 Key Priority 4: Traffic, Transport and Mobility</p> <p>Large parts of the city centre still have high levels of traffic and congestion at peak periods, and significant areas of land on the edge of the city centre – Avon Street (628 spaces) and Charlotte Street (1056 spaces) devoted to surface car parking, encouraging people to drive into the city centre. The MP clearly needs to address this important matter. Advisory</p>	Traffic and transport has also been raised through public consultation and inclusion of WH priorities within transport plans needs to be improved
407	HE	Priority 12 Monitoring the sources of Bath stone would be useful mindful of its importance in sustaining OUV. (Note: This used to be commonplace when public funds existed for grant assisted repairs). Advisory	Noted and agreed, although the resource requirements of this would need to be considered

408	HE	<p><b>Section 6 Natural Setting and Nature Recovery</b>  Promote the natural setting of Bath, both within the city and surrounding landscape, as a key attribute of OUV that is afforded equal importance to the built element and is protected, conserved and interpreted, and that associated nature recovery initiatives are fully supported.</p> <p>Whilst the association of the green bowl and natural setting of the WHS are germane, are nature recovery initiatives, however important in themselves, relevant to sustaining OUV? Advisory</p>	<p>Noted, but there would be a reluctance to change this in light of the political and public interest in this subject.  Aligning with this agenda not only represents holistic management (as advocated by the HUL initiative) but also aids delivery of other objectives</p>
409	ICOMOS International	<p>This Combined World Heritage Management Plan, whose aim is to “fully embed the Great Spa Towns of Europe (GSTE) inscription within the management of Bath as a World Heritage Site” (p. 12)</p>	<p>This is just one of 7 aims, not the sole aim of the Plan.</p>
410	ICOMOS International	<p>The draft Management Plan produced so far has a very clear structure...</p>	<p>Noted with thanks</p>
411	ICOMOS International	<p>It appears from this statement that the overriding intention is to accommodate the dynamics of change, which are considered essential, in a way that is as compatible as possible with the objectives of heritage conservation</p>	<p>Noted and one of the key purposes of the Plan to sensitively manage change</p>
412	ICOMOS International	<p>It is remarkable that there is no aim to enhance the conservation of the two World Heritage properties or to position them as essential components of the modern city rather only to ensure that they are somehow protected within a “modern” city</p>	<p>Wording of Aims to be amended to emphasise enhancement of the Site</p>

Page 216	413	ICOMOS International	This will require very detailed assessments of the attributes of both properties.... not closely defined in relation to the mapping of the attributes of the proposed Outstanding Universal Value, as in the case of the other components of the nominated property”. This need does not appear yet to have been fully addressed	Most attributes of OUV which can be spatially defined are protected by legislation and are already mapped, including listed buildings, registered parks and gardens, scheduled ancient monuments, etc. Developers and consultants will be aware of mapping. Link can be included to NHLE
	414	ICOMOS International	According to the draft received, the most appropriate legal context for this search for the best possible balance is neither the Combined Management Plan	Advice unclear
	415	ICOMOS International	As the Management Plan does not offer a defined context within which development is to take place, the real context in which World Heritage property protection is exercised has to be the management system, made up of legal frameworks, governance structures, stakeholder roles, etc. Actors of the management system include authorities and stakeholders located at different institutional levels: international (e.g. ICOMOS), national, regional and local. This heterogeneity of management levels within the management system has in some cases led to inconsistent assessments of whether or not certain projects affect the Outstanding Universal Value of the World Heritage property.	Greater clarification within the Plan on the wider management systems not easily achieved, but for future action  Tension between national approach to development management and UNESCO cannot be resolved by this Plan
	416	ICOMOS International	the objective of conservation is paramount	It may be useful to state this in the Plan



417	ICOMOS International	the Combined Management Plan shifts the emphasis from conservation, a priority according to the UNESCO World Heritage Convention, to the ability of managing change in the City of Bath so as to minimise harm to the Outstanding Universal Value	This is a reflection of the statutory planning framework that the Plan must operate under
418	ICOMOS International	Six key priorities related not to conservation but to climate change. It remains unclear what status these priorities have, as well as who will act upon them, and how they will relate to other plans	Give greater emphasis to conservation if required, and amend wording from 'key' to 'headline'
419	ICOMOS International	On numerous occasions, ICOMOS has expressed its strong perplexity at the extreme difficulty both in fixing an objective distinction between what constitutes "substantial" and "not substantial harm",	This comment relates to national guidance and as such is a matter for HE/Central Govt
420	ICOMOS International	ICOMOS notes that these dilemmas are far from being resolved in the Combined Management Plan 2024-2030, and that the areas of decision-making in which the logic of public benefit can dangerously undermine the principle of inviolability of Outstanding Universal Value (which is a priority for UNESCO) remain as wide as ever	ICOMOS 'notes', but no action suggested here
421	ICOMOS International	it is expected that further pressure will be put "on the city to contribute towards meeting increased levels of housing, as well as other related land uses such as employment and other infrastructure" (p. 37). So far from accepting that harm cannot be mitigated by public benefits, the range of public benefits appears to be being widened	This would appear to be an accurate reflection on potential risks

422	ICOMOS International	the document under review points out that the sustained development pressure over several decades has limited the availability of building land within the World Heritage property and caused an increase in development costs. In turn, this “has led applicants to seek permission for taller buildings which potentially have a detrimental impact upon views across the historic city and to and from the setting” (p. 49)	Factual and accurate
423	ICOMOS International	it would be useful for the State Party to further investigate whether the Bath Buildings Heights Strategy (2010) is indeed an adequate tool to address the potential risks of landscape harm associated with the construction of new taller buildings	The Plan does have an action related to this
424	ICOMOS International	...what remains unclear is how the New Spatial Plan, which is absorbing all these changes, relates to the Management system and the Combined Management Plan	Better explain relation between Plan and Local Plan where required, providing better links between the two
425	ICOMOS International	It is advisable for the attributes and constraints to be clearly set out in ways that will allow developers to understand the parameters within which development that supports Outstanding Universal Value might take place	This remains ongoing work involving many and various internal teams and external stakeholders, esp in relation to the GSTE

426	ICOMOS International	the State Party might consider proposing, through the Combined Management Plan (which, although not a statutory document, can provide guidance and suggestions for improving the management system), new and more rigorous criteria in order to reduce and circumscribe the previously considered areas of decision-making that currently appear to heavily depend on case-by-case interpretation and assessment. The aim would be to extend as much as possible the scope of regulatory provisions that apply to a wide range of cases, and to accept that public benefits	Overlap here with the Local Plan
427	ICOMOS International	In general, the attributes carrying the Outstanding Universal Value of a World Heritage property should be individually and collectively identified and mapped. UNESCO acknowledges that in the case of complex properties, such as historic towns, such a procedure is not easy to put into practice, but it is essential in order to allow a clear understanding of what needs to be protected. Currently, the attributes for both properties are only listed	See 406 above

428	ICOMOS International	the attributes for both properties are only listed at a high level and, rather confusingly, it is stated that “most of the attributes of the two inscriptions are similar” (p. 28). How these attributes relate to different Outstanding Universal Value and to specific detailed aspects of the City are not defined. Rather, “key examples of the type are given to enable informed judgement to be made in individual cases” (Bath Combined Management Plan 2024 to 2030, p. 22). It would therefore appear that the distinction between Outstanding Universal Value attributes and non-Outstanding Universal Value elements is only made when planning applications, new projects or other interventions are to be approved	Work was undertaken for inscription of the Great Spas, with for example representative examples of attributes identified. There may be more work to be undertaken here. This could not be carried out immediately, but we may wish to commit to this in the plan actions?
429	ICOMOS International	ICOMOS advises to adopt an approach that identifies and spatially maps in advance, regardless of any future development plans, the attributes of Outstanding Universal Value whose conservation is non-negotiable. This would allow a clear understanding not just of where the built fabric attributes are situated but also the green landscape attributes that support the idea of a “garden city”, key views in, out and across the city...as it is these that are to be conserved, managed and monitored.	See 406 and 421 above

430	ICOMOS International	ICOMOS notes the commitment (although by whom is unclear) “to strive for a target of zero carbon emissions by 2030” (p. 47). However, ICOMOS considers that the centuries-long adaptation, through which Georgian buildings have proved to be “inherently sustainable” and suitable to “accommodate services” (p. 47) are to be extrapolated in the near future with extreme caution. ICOMOS therefore fully agrees that forthcoming alterations to address climate change must be sensitively and carefully managed so as not to be harmful to the Outstanding Universal Value of the property (p. 47)	Noted with thanks
431	ICOMOS International	In this respect, ICOMOS advises that the highest vigilance is placed towards adaptations aimed at: • improving the insulation of the historic buildings, because often this improvement, implemented by replacing traditional materials with higher performance materials, is detrimental to the authenticity of the elements; • installing renewable energy systems	Noted. UK heritage protection legislation and planning processes (i.e. LBC) ensure adequate scrutiny, management of change and best practice
432	ICOMOS International	With regard to this final point, it would be interesting to consider the case of the solar panels that were successfully installed on the roofs in the Old and New Towns of Edinburgh World Heritage property. This experience could possibly be replicated in Bath but only after careful verification, since in other cases, unlike in Edinburgh, this experience has had questionable results	Noted and advice received with thanks. Heritage management in Bath always seeks to learn from examples and experiences from other sites

433	Christopher Pound	<b>A Unique Management Plan – This Management Plan is like no other. It is likely to be unique. It presents a timely opportunity to bring forward change to how the two Bath World Heritage Sites are managed</b>	<b>Noted with thanks</b>
434	Christopher Pound	<b>When agreeing the inscription of the Great Spa Towns of Europe WHS in 2021, the World Heritage Committee took the advice of ICOMOS and the Committee agreed then to require a Combined Management Plan be prepared for Bath. I have not found a combined Management Plan for another World Heritage Site (WHS) with two inscriptions. ICOMOS International did not reply to my request for examples of similar combined plans</b>	<b>Noted with thanks</b>
435	Christopher Pound	<b>Genesis – For the benefit of new readers and members of the Advisory Board the introduction should acknowledge and understand the genesis of this draft of the Combined Management Plan. [See also Item 3 of the Terms of Reference] At the time of the inscription in 2021, the existing City of Bath World Heritage Site Management Plan 2016 - 2022 was ready for review and refreshment. A draft Management Plan for ‘Bath as a Spa’ (2019) had been submitted as part of the nomination for The Great Spa Towns of Europe (2019). This document accepted that will be elision at some time in the future between the existing Management Plan for the City of Bath WHS and the management plan for the Great Spa Towns of Europe WHS after its inscription. This would have allowed other options for a management plan for the two properties be explored</b>	<b>Can be reflected in the 'story so far'</b>

436	Christopher Pound	The Draft Management Plan for Bath as a Spa (2019) was modelled directly from the existing Management Plan for The City of Bath WHS after taking on board relevant matters from the overall draft Property Management Plan (2019). 2 This was then submitted with the Nomination for The Great Spa Towns of Europe (GSTE)	Noted with thanks
437	Christopher Pound	Some actions in the Property Management Plan are taken on board by each of the constituent spa towns in their own management plans. In the future there is likely to be more such actions devolved down from the GSTE and its General Assembly and Executive Board to the constituent spa towns. Accordingly, a mechanism must be in place in the Combined Management Plan to take on board quickly future actions agreed by the Great Spa Towns Executive Board. This cannot wait for a review of the Combined Management Plan at a biannual meeting of the Advisory Board or a review of the plan in six years' time	Valid question - how will the current Bath plan respond to updates from the GSTE? This is yet to be determined.
438	Christopher Pound	The Revised Terms of Reference (September 2024) of Strategic Management Group of the Advisory Board show that taking or advising on management action lies outside the remit of the group. [This has been down-loaded separately and is not presented in the consultation draft Combined Management Plan.] (see Para 14 below)	Noted and can be reviewed

439	Christopher Pound	<p>My brief when embarking on drafting the Combined Management Plan (up to Draft H of 2023) was to ensure that the emerging Combined Management Plan was recognisable as a successor of the then existing City of Bath Management Plan of 2016-2022. This determines the structure and content of the Combined Management Plan. However this Consultation Draft of the Plan omits to discuss, particularly several important subjects. These include:-</p> <ul style="list-style-type: none"> <li>i) an outline of the role and content of the Development Plan, and</li> <li>ii) the role and terms of Reference of The Advisory Board' and</li> <li>iii) a monitoring regime correlated with changes in the other Spa</li> </ul>	This remains a work in progress
440	Christopher Pound	<p>Explain what the Management Plan is for. On a management plan, James Semple Kerr said 'the plan is to identify what is important and what you are going to do about it. At the same time, it is important that the document is concise and accessible. Nevertheless, there will be new readers who cannot know the background to some matters and so that the annexes and appendices setting out background and other references remains essential. There is likely to be an advantage in identifying action, timetable and responsible stakeholders in a slim freestanding document or file</p>	A summary of the action plan is highly desirable, but given the electronic publishing it can be a standalone section capable of being updated



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441	Christopher Pound	<p>Some visitors to my office believe the Combined Management Plan can or will be used as a means of controlling development proposals. The Development Plan is prepared within a strict regulatory framework and is a statutory document. This is the basis for the management of development in the district. The Combined Management Plan is not a statutory document and it addresses only the City of Bath and its setting. Nevertheless, parts of it may be adopted as a Supplementary Planning Document, but only those parts that are Town and Country Planning matters. This makes the relevant parts of the Combined plan a material consideration when determining a development proposal. This is likely to exclude a programme and priorities for action, the role of stakeholders and budgets because these are not Town and Country Planning matters and are likely to change over a six year period</p>	Noted
442	Christopher Pound	<p>Local Plan In my opinion the Combined Management Plan must set out a clear outline of the role and likely content of the Local Plan. By any measure, its three constituent parts are confusing. That Plan will have to be rationalised if it to be effective and able to respond to a changing world. At the same time, other related initiatives are coming forward from both the Council and from UNESCO. These address, inter-alia, Climate Change, sustainable tourism and the United Nation Sustainable Development Goals. The Development Plan and the Combined Management Plan must embrace these with clarity and commitment</p>	<p>See previous comment on this. It is regarded as better to direct readers to the Local Plan itself rather than summarise it in the Plan</p>

443	Christopher Pound	<p>Both the Local Plan and the Combined Management Plan must discuss and embrace the implications of the High Court judgement on the Stonehenge Development Consent Order that was handed down in 2021. This is a material consideration when determining an application for development. The judgement departs markedly from the current advice from ICOMOS to the World Heritage Committee with respect to how harm to an attribute or asset in a World Heritage Site is dealt with. ICOMOS's present policy treats harm to an asset or attribute as harm to the whole property. This interpretation can lead to unwelcome decisions from the World Heritage Committee that may lead to putting a World Heritage Site on The List of Sites in Danger or worse, being struck off the List. The judgement for Stonehenge did not accept that harm to an asset was 'discounted' by no harm or lesser harm to the many other assets over its wide area. 4 This will be an important judgement when considering possible or perceived harm on heritage assets in the City or the relationship of Bath with development in other Spa Towns in the GSTE</p>	<p>If this judgement becomes of universal relevance, it will no doubt be picked up in national or UNESCO guidance. This has not happened to date, despite the judgement having been made in 2021</p>
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444	Christopher Pound	The Council has adopted a number of wide ranging strategies including a response to Climate Change, the Ecological Emergency in July 2020 which was followed by an Ecological Emergency Action Plan. In addition to this, the Bathscape Landscape Partnership and the Bath and North East Somerset Council Green Infrastructure Strategy have been progressed. (See pages 42 and 45) These contribute significantly to the management of the World Heritage Sites. However, there is no explanation of how work on these is coordinated, and by whom, to meet action identified in the plan or to contribute to new actions and determine necessary priorities and funding (p.33)	Action is to support colleagues with various initiatives in Council teams that coordinate with one another, and this is becoming increasingly the case. Coordination is also taking place with external initiatives also, but a work in progress
445	Christopher Pound	On Page 45 one of the key priorities includes 'promotion'. This is not an obligation from the World Heritage Convention. Presentation and passing the values of the site to future generations are obligations. In the years leading to agreeing the wording of 1972 Convention, a translation of an earlier French text was adjusted to embrace 'presentation' rather than 'development' because the latter conflicted with other obligations of the Convention including that to protect the property. The same is with 'promotion' in my view this is inconsistent with the obligation to protect the site and inconsistent with other initiatives to reduce carbon travel and bring forward sustainable tourism	Current wording regarded as appropriate

446	Christopher Pound	I have down-loaded a revised Terms of Reference for The Advisory Board and this was published in September. The copy that I have been able to download, misses all its the appendices. It is not included in this consultation draft Combined Management Plan. Accordingly, there is no opportunity to comment on the detail of how the Terms of Reference will work and these will determine the effectiveness of the Advisory Board	ToR review process has been completed and signed off by the Board
447	Christopher Pound	In my professional opinion, the Advisory Board in its present form has very limited capacity or ability to manage very complicated actions affecting the management of a city. It is too large a group to make quick and effective decisions. Its present terms of reference are to advise and this is abdicating from the responsibility to manage or to steer management of the two World Heritage Sites. Nevertheless, the large group does meet a necessity to take on-board views and opinions from a wide group of stakeholders and interested groups. But what does it do with them?	Advisory Board membership to be reviewed

448	Christopher Pound	<p>The revised Terms of Reference introduces an opportunity for the Advisory Board to discuss those planning applications that may harm the OUV of either of the two World Heritage Sites. This is a significant departure from the purpose of the Advisory Board whose task is to steer the actions identified in the plan. All the members of the Advisory Borad may be informed of a planning application and each constituent part should deal with it in its own way. Discussion of the merits of a planning application will be dealt with independently and more speedily by the Council's planning officers and the Planning Committee. To empower the advisory with the task of discussing the merits of a planning application is an unnecessary distraction from the work of the Advisory Board to implement the actions identified in the plan.</p>	<p>ToR review process has been completed and signed off by the Board</p>
449	Christopher Pound	<p>This draft Combined Management Plan is the best opportunity for the next six years to adjust the Terms of Reference of the Advisory Board so as to take on matters arising from the inscription of the GSTE, to reset the dial and bring into place an effective working group to manage action. The role of the Advisory Board and its Terms of Reference should be included and reviewed in the Combined Management Plan</p>	<p>ToR review process has been completed and signed off by the Board. Link to all ToR included in the MP</p>

450	Christopher Pound	<p>The revised Terms of Reference of the Advisory Board refers to a Strategic Management Group and charges it largely with choosing a Chairman of the Advisory Board. A smaller group of experienced people is necessary if it is to take the responsibility for management of the two World Heritage Sites. In my opinion, this should be an action group of seven or nine people that includes representatives from the Council and professional people. Its Terms of Reference should centre on discharging matters set out in the Action Plan</p>	<p>ToR review process has been completed and signed off by the Board.</p>
451	Christopher Pound	<p>The two World Heritage properties have different statements of Outstanding Universal Value (OUV). This in itself does not present a problem. There is no conflict here, but more can be made of the similarities between the two statements. This will be important when explaining at appeal or in the Courts the nature and role of the two Statements of OUV. The work of the Council's Committees and the Advisory Board may benefit from a free standing paper or leaflet explaining the role of the two OUVs and the similarities between the two statements</p>	<p>More work to do on this re lack of understanding of OUV and picked up in the Actions</p>

452	Christopher Pound	<p>However, the Statement of OUV for the City of Bath WHS is well out of date. In its present form, it opens an opportunity for potential challenges to the Planning Authority or the State Party on its obligation and ability to protect the OUV of the City of Bath WHS. The Statement of OUV refers to the Circular 07/09. This has been 'archived' and has been overtaken by current</p> <p>Government advice offered in the NPPF. 5 At the same time, Bath Tourism Plus and the Destination Marketing Strategy are no more. The Combined Management Plan is an opportunity to set out a clear text to the effect that the OUV approved in 2008 (or 2009) has been overtaken by events and to set out an authoritative statement on present the status the present OUV for The City of Bath WHS.</p>	We are not able to change the OUV
453	Christopher Pound	At the same time, the Advisory Board and the Council can work with other Steering Groups or World Heritage Sites in the United Kingdom to address matters in their OUVs that are well out of date and bring forward a mechanism for the State Party to work with the UNESCO World Heritage Centre to bring forward a more flexible approach to keeping Statements of OUV up to date	This is a matter which has been discussed with DCMS
454	Christopher Pound	The text: The text of the Combined Management Plan must be corrected to show the final draft of the plan will be (has been) approved by the Council (Cabinet?) after taking on board relevant comments from the consultation exercise and making appropriate changes to the text	Noted. The MP will be presented to Cabinet for endorsement

455	Christopher Pound	<b>Executive Summary:</b> This section should outline the role of The Advisory Board and its relationship of the Board with the management regimes of the other spa towns, the General Assembly and the Executive Board. In my view there is no place for the personal pronoun in the chairman's statement. This must outline the role and corporate work of a rather large Advisory Board. To avoid repetition of the Executive Summary, the statement must be a great deal more concise	<b>Noted</b>
456	Christopher Pound	The list of six headline priority areas in the preface (page 6) is different from the six headline priority areas in the Executive Summary (page 8)	<b>To be checked and amended if required</b>
457 Page 232	Christopher Pound	<b>New Legislation</b> The Levelling-up Bill was translated into the Levelling-up Act 2023 too quickly to be addressed in draft H of the Combined Plan. Now other and new legislation, Government announcements 7 and changes to the NPPF are coming forward a great deal more rapidly than in the past. Taking the implications of these on board through a six or three year review of this Combined Management Plan is not an option. Bringing forward a regular or annual bulletin on changes in legislation may be a helpful way of bringing the management plan up to date	<b>Noted. However, need not be in the Plan - a link to a relevant website would cover this</b>



458	Christopher Pound	<p>I am not able to find in the section on Key Priorities a statement of how monitoring of the two WHSs is being undertaken. Monitoring should be undertaken against indicators in the key priorities. More importantly demonstrate how this is being undertaken to comply with or fulfil the requirement of the UNESCO World Heritage Committee. Monitoring of the key priorities should be correlated alongside the monitoring regimes of the other spa towns after giving consideration to the UNESCO World Heritage Committee's decision and now obligation to:</p> <p>g) Extending and further detailing the monitoring programme for the property as a whole, and i) Considering how the role of the Great Spas Management Board might be refined to allow full understanding by all States Parties of major development proposals in all component parts, in relation to their potential cumulative impacts on the property as a whole;</p>	See previous comment. Work in progress. Note also a distinction between monitoring the state of OUV and performance against plan actions
459	Christopher Pound	Diagram in Fig 02 has not been titled in the consultation draft. This must be revised to match the diagram in the first annual report for The Great Spa Towns of Europe. Change the name of the box to indicate The Executive Board and General Assembly	To be checked – does the diagram shown have the correct titles on it?

460	Christopher Pound	Check the status of The Property Management Plan. This was drafted for the Nomination in 2019 and is likely to require updating to reflect the inscription and events that have followed setting up the Executive Board and the Article of Association of the spa towns. The Long Term Vision of the association should be set out in an appendix / annex of this management plan. (p.36)	Noted
461	Christopher Pound	The Long Term Vision presents the first of two challenges for Bath. One is how best to inform the people of Bath, stakeholders and the Advisory Board of these matters generated by the Great Spas of Europe WHS and how these in turn will in turn inform direction and priorities in the actions of this plan	Noted
462	Christopher Pound	The second is the paradox of how best to take on board decisions from GSE Executive Board in this Management Plan. This board may take a decision of say commissioning a coffee-table guide book of all the Spa Towns or commission an operetta about European Spas, then how will all the spa towns take on board that decision and do they all have to agree. Discuss subsidiarity and its boundaries and obligations on Bath as a Spa Town and possible conflicts with the City of Bath WHS	This is GSTE project management and does not necessarily need to be in the Plan

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463	Christopher Pound	Missing from the suggested maps is the map I prepared showing the area to protect the hot water in the springs and defined and designated by The Avon Act 1982. This was based on information from the officer who was the responsible for monitoring the Hot-springs. I recommend you negotiate with her to provide high resolution images of the zones designated in the Avon Act.	<p>Link to that officer instead? If anyone wants information on this, that is the place to go</p> <p><a href="https://www.bathnes.gov.uk/complete-county-avon-act-application-form#:~:text=The%20County%20of%20Avon%20Act%201982%20gives%20us%20the%20power,for%20consent%20to%20conduct%20works">https://www.bathnes.gov.uk/complete-county-avon-act-application-form#:~:text=The%20County%20of%20Avon%20Act%201982%20gives%20us%20the%20power,for%20consent%20to%20conduct%20works</a></p>
464	Christopher Pound	Not all the maps referred to in the list of Appendices in your consultation draft of the plan have been made available and especially the boundary of the World Heritage Sites. This limits the opportunity for readers to comment on the content and nature of the maps that should be in the final draft of the plan	Review to ensure all the maps are there – discuss with Eden
465	Christopher Pound	In Appendix 2 in ‘UNESCO World Heritage in Bath: the Story so Far’. DELETE the entry on ‘1999 The Great Western Railway’. This is non sequitur and may harm the interests of other parties	Noted but current wording regarded as appropriate
466	Christopher Pound	The entry for 24 July 2021 ADJUST text to read ‘Draft management plans were submitted as part of the nomination	Review

467	Christopher Pound	The entry for August 2023 WHAT are the 'Chair's role descriptions'?	See ToR
468	Cllr Ruth Malloy	Three points are missing from the tables: <ul style="list-style-type: none"> <li>- at the bottom of page 31 [GSTE WHS Attributes of OUV] - element 31;</li> <li>- at the bottom of page 64 [Action Delivery Plan] - action 4; and</li> <li>- at the bottom of page 69, action 23</li> </ul>	Amend as advised
469	Cllr Ruth Malloy	Chapter 2 (Description of the Site), paragraph 4 (Boundary of the World Heritage Site): the municipal city boundary which defines the WHS and the mayoral area is no longer the same as the Parliamentary constituency. After the Parliamentary boundary review in June 2023, the changed boundaries came into force in time for the General Election in July 2024, meaning locally that the North East Somerset ward of Bathavon North was added to the former Parliamentary constituency of Bath.	Amend as advised