



City of Bath World Heritage Site Draft Replacement Management Plan

Summary of Consultation responses

Public Consultation ran from 26 August to 7 October 2010.

250 comments were submitted in writing from 21 different non-Council parties:

- **Individuals**

- Mr N Quine
- Mr R Davies
- Mr I Barclay

- **Bath & North East Somerset Council** ('first round' internal consultation had already taken place)

- Historic Environment Champion
- Development & Major projects (meeting held)
- Corporate Sustainability Manager (meeting held)
- Head of Heritage Services (meeting held)
- Corporate Policy Manager – Equalities (meeting held)
- Archaeologist (meeting held)
- Group Manager Highways, Strategic Transport Project Manager – (meeting held)
- Principal Building Control Surveyor (Hot Springs) – (meeting held)

- **National Consultees:**

- English Heritage (meeting(s) held)

- **Special/Local Interest groups:**

- Bath Independent Guest Houses Association (BIGHA)
- Vineyards Residents Association

- Valley Parishes Alliance (Parishes of Bathampton, Batheaston, Bathford, Claverton, Freshford, Limpley Stoke, Monkton Combe, Westwood, Winsley)
 - Federation of Bath Residents Association (FoBRA)
 - London Road Area Residents Association (LoRARA)
 - Beckford's Tower Trust
 - Bath Preservation Trust
 - Bath Society
 - Cotswold Conservation Board
 - Bath Heritage Watchdog
 - Norfolk Crescent Green Residents Association
- o **Developers/Landowners/Consultancies:**
 - Lear Associates on behalf of Duchy of Cornwall

Brief summary of key issues raised (as identified by the sub – group of the WH Steering Group 18 Oct 2010)

1. Management/funding of WH. There are calls to investigate management structures which place WH closer to the heart of Council decision making, & to fund appropriately to ensure actions are delivered.
2. Transport. The perception is that, despite the Bath Package, Joint Local Transport Plan & PRMP, that there is no comprehensive traffic plan for the city. This is a key issue as such a plan was a specific request of the UNESCO Mission.
3. Buffer Zone/Setting. This attracts multiple comment, with arguments for & against. Again this is an issue raised in the UNESCO Mission report. This issue has been addressed recently through the emerging Core Strategy, & the position need to be more clearly stated in the Plan. It is likely that lobbying for a buffer zone will continue.
4. Planning Policy. There are multiple calls for better policy protection through supplementary planning documents on tall buildings, a summary of the WHS plan, the setting study & generic Core Strategy issues. Current Council policy production is not resourced to meet this demand
5. Public Realm. There is strong support for the Public Realm & Movement Programme, & requests that the programme be implemented more widely.
6. Interpretation. A further UNESCO report issue. Interpretation of the site needs to be improved.

Summary of key issues raised

PLEASE NOTE: Comments have been summarised & do not necessarily incorporate exact wording submitted.

With regard to comments highlighting 'typos' or grammatical suggestions, where these are not shown on the table it should be assumed that changes have been made accordingly. Full responses can be made available upon request.

Broad issue	Organisations	Summary of comments made
Funding, river, traffic, industrial heritage, litter.	Historic Environment Champion	1. Lack of funding will be a major stumbling block. Not enough is done to promote the rivers history or future as a working entity to take freight & provide leisure. More needs to be done to address industrial past, particularly water mills. Litter remains a problem.
Visitor management, accommodation, traffic.	Bath Independent Guest Houses Association (BIGHA)	1. Bath Destination Management Plan calls for quality, not quantity of visitors. Flooding Bath with an over capacity of rooms will not bring high quality visitors in- this will just create an abundance of cheap rooms, leading to lower quality visitors.
Visitor Management (Hotels)	BIGHA	2. BANES Visitor Accommodation Study calls for a max. of 370 rooms by 2016. We already have 114 extra rooms at The Gainsborough, possibly another 190 beds at Green Park & a further proposal for an additional 240 at Kingsmead Hse. This exceeds 2016 total, & can only have a detrimental effect on the city's accommodation offer.
Visitor Management (Hotels)	BIGHA	3. Visitor experience will be worsened by a large overcapacity, as the large rise in volume of visitors will increase congestion & pollution problems.
Car Parking	BIGHA	4. Removal of the minimum amount of parking facilities from any new hotel will have an extremely detrimental effect on visitor experience, as Bath is predominantly a tourist destination, & many tourists choose to bring cars here, as they are on a driving holiday. Not having anywhere to park in the city can only make their visitor experience worse.
Planning	BIGHA	5. There is a need for a co-ordinated, proactive, council led response to these planning applications for new hotels, as the current planning process is not working to protect the accommodation offer for the city. The city is in danger of being severely damaged beyond repair if new hotel developments are not correctly managed. This will in turn affect the WHS status of the city
	BIGHA	6. Visitor Accommodation Study states need to preserve the unique mix of Bath's accommodation offer, from small B+B's to the high quality guest houses, & independent hotels. This is part of Bath's unique

		make up, & support should be given to the sector. Flooding the city with hundreds of extra hotel rooms will not do this.
Coach Parking	BIGHA	7. There needs to be consideration of coach parking in & around the city within this process.
Traffic, pollution.	Vineyards Residents' Association	1. Nearly all houses have been cleaned over the past 20 years, but are already blackening again due to air pollution. Some have had to be cleaned a second time after only 15 years. It cannot be good for the houses to be cleaned regularly, but if they are not cleaned they will revert to their blackened state. The houses also suffer from vibration from high volumes of passing traffic. Much is HGV traffic which should not be here, but the HGV weight restrictions are not enforced. Thus these Georgian houses, part of the townscape which makes Bath so exceptional, are likely to suffer progressive deterioration. The same is true of much of the city centre.
Air Pollution	Vineyards Residents' Association	2. Residents suffer high levels of air pollution. The average nitrogen dioxide level at Vineyards in 2009 was 57 micrograms per cubic metre, compared with the safe health limit of 40 set by the World Health Organisation & enshrined in UK Environment Act. This street, & the whole main road network through Bath, has been declared an Air Quality Management Area (AQMA). Some 5000 people live in the current AQMA, where air pollution is by definition above the safe health level. However, far from improving, the pollution is spreading & the 2009 draft Air Quality Action Plan) has had to propose enlarging the AQMA to the Circus & surrounding streets.
Air Pollution	Vineyards Residents' Association	3. Pleased that Plan recognises that vehicular pollution & vibration is affecting historic building fabric. The Plan correctly diagnoses (Issue 41, p40) the need to manage the volume of traffic passing through & around the city, & sets out (Issues 42-47) other 'needs' that should be addressed to improve the city's physical environment & amenity. We agree with the needs identified in this section of the Plan. However, the analysis is not carried through in the remainder of the Plan into actions to tackle the traffic problem. We have the following specific comments.
Traffic	Vineyards Residents' Association	4. Para 5.5.3 Traffic. The issue is not so much that there are physical limits to the city's ability to accommodate growing traffic requirements without detriment to the historic environment, as that the city is already overrun with traffic. There are very high levels of traffic congestion here & throughout the city's main road network, extending even to Queen Square & the Circus. Q. Square "is a prime example of Wood the Elder's high ambitions for remodelling Bath" (p93), The Circus "is the pinnacle of John Wood the Elder's work" (p94). However, Q.Square is also a busy gyratory on the A4, while The Circus has up to 700 vehicle movements an hour.

Traffic (Eastern by-pass)	Vineyards Residents' Association	5. Para 5.5.3 last sentence. A by-pass to the east is technically feasible, & in our view needed to remove N-S through traffic & cut pollution & congestion on London Rd, Cleveland Bridge & Bathwick St. The present wording appears to reflect a preference for protecting the 'setting' rather than the WHS itself. More balanced wording is required.
Traffic Management	Vineyards Residents' Association	<p>6. Like a frank statement in the Plan of the traffic problem. Following Issue 41, p40, the Plan should propose the creation of a comprehensive plan to manage & reduce traffic volumes in the city. We note UNESCO has itself called for an integrated Traffic Control Plan for the city (Annex A7.3, para 5.2, p 108). Therefore propose rewording paragraph 5.5.3 as follows:</p> <p>"5.5.3 Bath suffers from high levels of traffic congestion throughout the city's main road network, & this extends even to the Georgian architectural icons of Queen Square & the Circus. A comprehensive traffic management plan is required in order to deal with the volumes of traffic coming into & through the city. UNESCO has called for an integrated Traffic Control Plan for the city.</p> <p>"5.5.3a The landscape & countryside surrounding the city is of outstanding natural beauty & integral to the values of the Site, & the hot waters below the site are vulnerable to major excavations. Because of these factors an underground by-pass is likely to be problematical; an above-ground road to by-pass the city would be technically feasible but protection of the World Heritage Site by this means could conflict with the preservation of its surroundings. Difficult choices may have to be made".</p>
Air Pollution	Vineyards Residents' Association	<p>7. Para 5.5.4. Plan should acknowledge the impact of pollution on residents. Add before penultimate sentence:</p> <p>"Air pollution also presents a serious threat to the health & well-being of the city's residents, some 5,000 of whom live within the current Air Quality Management Area (AQMA)."</p>
Physical access – traffic management	Vineyards Residents' Association	8. Para 5.5.20, p54. We fully support Obj.s 19 to 26 (physical access). The issue is how to translate them into effective action.
Public Realm	Vineyards Residents' Association	9. Action 4c, p62 & Obj. 16, p67. The PRMP is excellent, but covers only a small part of the mainly commercial centre S of Queen Sq. & George St. It does not cover most of Georgian Bath, not even Royal Crescent & Circus. At present Queen Sq. & George St. represent a barrier to pedestrian movement between the commercial centre & the Georgian area to the N. The PRMP should be accelerated & extended to include the area north of Queen Sq. & George St. Add new Action 4d:

		"4d. Extend PRMP to include the area of Georgian Bath to the north of Queen Square & George Street."
Traffic Management	Vineyards Residents' Association	10. Obj. 21, p69. While we strongly support Obj. of reducing traffic volumes, actions listed will go nowhere near achieving it. Closure of Pulteney Bridge will displace traffic, not reduce it. The freight trans-shipment depot, while welcome, will be voluntary & affect only a v. small percentage of total freight; & funding exists only for a trial. What is required is a commitment to a master plan for traffic in Bath, such as UNESCO has demanded. We would like to see through traffic removed from the Georgian heart of Bath by access restrictions in the area of Queen Square. Add new Action 21c: "21c. Develop a comprehensive plan to manage & reduce traffic volumes in the city."
Traffic Management	Vineyards Residents' Association	11. Para 4.2.1., p35. In view of the vital importance to the city of managing traffic, we believe that there should be an additional Aim in the Plan, on the lines: "Improve the amenity of the city for residents & visitors, & preserve it for future generations, by reducing the volumes of traffic coming into & through the city".
Setting, Buffer Zone,	Valley Parishes Alliance (VPA) (Parishes of Bathampton, Batheaston, Bathford, Claverton, Freshford, Limpley Stoke, Monkton Combe, Westwood, Winsley)	1. Vision. Strongly recommend para 4 of Vision statement should read: "Bath will conserve & safeguard the cultural assets & landscape setting of the World Heritage Site for this & future generations".
UNESCO Report 'Green Belt'	VPA	2. Strongly recommend the Management Plan set the record straight (with regard to references to 'green belt') by the State Party which have grossly misrepresented fundamental considerations relating to the landscape setting of the WHS.
Buffer Zone	VPA	3. Concerned by the lack of reference to buffer zone options presented in Core Strategy Spatial Options document.
Buffer Zone	VPA	4. Strongly recommend that a hard buffer zone, defined by the ridge line of the surrounding hills to the east of Bath, be established. We also recommend that; (a) Content of Circ. 07/2009 regarding protecting the setting of WHS's & buffer zones be set out

		<p>within the Mgt Plan</p> <p>(b). Appropriate sections of the Plan be amended to reflect buffer zone discussion & issues, & obj.s & actions relating to establishment of a buffer zone & an associated protection policy be included.</p>
Aims objectives	VPA	5. Support the aims, & are in broad agreement with majority of issues, narratives, obj.s & actions.
Geology	VPA	6. P 39 Issue 27 (Geology): Geology of area is well documented, It is not clear what the underlying issue is.
River & Canal	VPA	<p>7. Issue 29 (River & Canal). Welcome identification of this issue. Canal, with associated River stretches, is a unique & important asset to Bath & its WHS landscape setting, is enjoyed by the B&NES & Wilts communities as a recreational amenity & generates revenue, not least by virtue of being a tourist attraction for both UK & overseas visitors.</p> <p>However, it also brings with it social, housing, planning & environmental issues.</p> <p>...dramatic increase in the number of boats using the canal & a step change in the recreational use of the waterside path & environs & hence it is considered essential that Mgt Plan addresses all the above issues, in order to:-</p> <ul style="list-style-type: none"> • preserve the attractive green environment & historical features & • ensure that the canal & waterside is available to all users (walking, cycling, commuters, fishing & boating community) but does not degrade into a linear boat park. <p>Recommend that the Mgt Plan include a specific obj. & actions setting out how B&NES envisages (a) promoting understanding that the River Avon & K&A Canal are integral to the Site's landscape setting & (b) effective management of them & the associated waterside environment.</p>
Traffic	VPA	8. Issue 41 & 47 (traffic). There is an associated need to ensure that any initiatives to manage traffic passing through & around city do not have an adverse impact on the WHS landscape setting, particularly Green Belt & Cotswolds AONB areas. Consider that this should be reflected in issue statement.
Steering Group	VPA	9. Recommend that Membership of the Steering Group be reviewed, with a view to increasing the Avon Local Councils Association representation.
Landscape & Natural Setting	VPA	10. Obj. 14 (landscape/natural elements) following from Issue 26: we are concerned that the word 'protected' is missing from Obj. 14 & recommend strongly that it be amended to read -

		“Ensure that landscape and natural elements of the Site & its setting, including heritage sites & their associated remains, are acknowledged, understood, protected & managed as integral parts of the Site”.
A36/A46 Link Road	VPA	11. B&NES, as a member of the W of Eng. Partnership, should abandon any aspirations for an A36/A46 link road through the WHS landscape setting & Cotswolds AONB.
Traffic – HGVs	VPA	<p>12. Obj. 21: Damaging impact of HGVs (noise, vibration, air pollution, fabric of urban infrastructure) on Bath can be tackled by other measures &, therefore, strongly urge their implementation. These measures are identified in the B&NES draft Air Quality Action Plan: e.g. introduction of a Low Emission Zone & Demand Management Strategies (physical & legal restrictions, e.g. HGV ban on Cleveland Bridge or A36 Warminster Road). Elements of the Bath Transportation Package, if implemented, would also result in a reduction of vehicular traffic through the Site.</p> <p>In particular, strongly recommend B&NES impose an HGV ban on Cleveland Bridge or A36 Warminster Road, as originally proposed by the Council in '05; this being the only acceptable option to protect both the WHS & landscape setting/Cotswolds AONB to the E of the City. The VPA feels confident that an effective & enforceable ban can be formulated.</p> <p>The two listed actions are insufficient to achieve the obj.. Furthermore, it is incorrect to state that closure of Pulteney Br. would reduce volumes of vehicular traffic through the Site - it would simply re-route them to the Pulteney Rd, North Parade/bridge & Pierrepont St.areas.</p> <p>Recommend that comment be made on the new Deep Sea Container Terminal at Avonmouth. This highly significant development, which was approved by the DfT in Mar '10, should result in a significant reduction in volumes of HGV traffic (to & from south coast ports) on the A36/A46 corridor through the City.</p>
Management – Staffing levels	VPA	13. Obj. 1 (management & admin arrangements): recommend that the actions include a review of B&NES WH full-time staff levels - We suggest that there may be scope to increase the full-time staff
Setting, Buffer Zone	VPA	14. Obj. 6. We do not consider that the listed actions provide effective planning protection against inappropriate development in the WHS landscape setting/environs & we are also concerned about the potential implications of the govt’s plan to pave the way for the creation of a Community Right to Build in the Localism Bill. We recommend the actions include definition of a buffer zone & associated protection policy.
Setting Study	VPA	15. Action 14a (bring forward setting study as SPD): must ensure that there is public consultation prior to the S. Study being finalised as an SPD.

Sustainable Transport	VPA	16. Obj. 25 (sustainable transport network): Suggest that provision of new hybrid vehicles should be an action not Monitoring Indicator. However, this & the City Car Club initiative would not achieve the stated obj. - additional actions should be identified. There should be no mention of the A36/A46 link road.
Appendices	VPA	<p>17. Given the increased focus on <i>both</i> the WHS & its landscape setting we recommend strongly, in the interests of clarity & education, that the four maps (14a, b, c & d) which are included in the Bath WHS Setting Study also be included in the Management Plan as -</p> <p>App. 2: WHS & Planning Designations - Cotswolds Area of Outstanding Natural Beauty. App. 3: WHS & Planning Designations - Green Belt. App. 4: WHS & Planning Designations - Conservation Areas. App. 5: WHS & Planning Designations - Scheduled Ancient Monuments & Historic Parks & Gardens.</p> <p>& that they are referenced, together with additional narrative, at paragraphs 1.2.8, 2.2.2, & 3.4.16 & in other relevant sections of Chapters 5/6.</p> <p>...also recommend that the maps depict the full extension into Wiltshire of the designations on these maps, particularly the Green Belt & Cotswolds AONB.</p> <p>...recommend that the words "<i>but rather should be considered as a taster of what is available</i>" be removed & the DCLG Circular 07/2009 be included in the bibliography.</p>
Importance of plan	Federation of Bath Residents Association (FOBRA)	1. Welcome the plan. Charm & status of Bath is all about its history & its built environment. Thus designation of Bath as a WHS is undeniably both important & an honour. It has an incalculable economic value. There are just 28 Sites in UK, & Bath is the only one which constitutes an entire city. We therefore have a responsibility to manage it efficiently, fund it properly & ensure that all who visit it understand what it is, & enjoy the experience. If they do, more visitors will be encouraged & the district's economy will benefit.
Adoption of the plan	FoBRA	2. Para 1.2.4, p9: "Plan will be adopted by B&NES Council" but this is mentioned only once, & not expanded upon. What does it mean? Record from the previous (2003) Plan does not inspire confidence: its implementation was not allocated to any Council Director, nor was any associated funding awarded. Thus, although 36% of the 129 actions were assessed as having been achieved (& a further 38% partially done), it seems very likely that these would have happened anyway. However, the WHS-only actions were not implemented, & there is a serious risk that this will happen again unless funding is secured. This is the key to an effective Plan.
Management	FoBRA	3. Management of the WHS is the responsibility of the Council. However, this is handled in such a low-key way that one would hardly know that Bath is a WHS. Disappointed that B&NES has not

		<p>been more energetic in using this coveted international accolade as a draw for tourists & justification for proactive investment in conservation & all aspects of city management. It would then be better placed to achieve recognition as a global centre of excellence in urban heritage management &, with its universities, establish a potentially lucrative leading role in heritage education. Both universities already involved in this area. Other management models exist (Edinburgh WH for example) which might give Bath & its WHS greater prominence & power, draw in additional funding, & involve in a greater way the many stakeholders, including those universities. FoBRA recommends & urges that alternatives be examined.</p>
Employment	FoBRA	<p>4. One opportunity to benefit from WH status that does not feature is recognition that much contemporary business investment focuses on areas offering a high quality, well educated workforce, proximity to centres of learning & research, & an environment that internationally mobile senior staff will enjoy living in. WHS status could be exploited as a tool to encourage inward investment.</p>
Heritage	FoBRA	<p>5. No heritage site can rest on its laurels: in an international visitor economy competition is fierce. The Plan should therefore have ambitious targets for bringing the WHS up to standard & for developing it further. For example:</p> <ul style="list-style-type: none"> a. Discovery of the Temple Precinct beside the Roman Baths in the 1980s took place because of inspired archaeology & funding. Is there still more to be found? (para 2.4.28, p24) b. Why is there no permanent stone mine site for tourists to see? (para 2.3.18, p17) c. Despite much pressure for improvement, the city centre presents a depressing picture of dirty & ill maintained roads & pavements. This is central & fundamental to residents' & visitors' first impressions. The PRMP has to be implemented now.
Traffic	FoBRA	<p>6. Plan correctly diagnoses (Issue 41, p40) the need to manage the volume of traffic passing through & around the city, & sets out (Issues 42-47) other 'needs' that should be addressed in order to improve the physical environment & amenity of the city. FoBRA wholeheartedly agrees with the needs identified in this section of the Plan. However, the analysis is not carried through in the remainder of the Plan into actions to tackle the traffic problem. We have the following observations:</p> <ul style="list-style-type: none"> a. Para 4.2.1., p35. In view of the vital importance to the city of managing its traffic, we believe that there should be an additional Aim in the Plan. b. para 5.2.28, p44. There is insufficient recognition that many of the Georgian houses are family

		<p>homes, whose owner-occupiers care for them & contribute to the character of the city. It is vital that Bath remains an attractive place for families to live. If owner-occupiers find that the downsides of living in Bath - traffic & pollution, difficulties over parking, antisocial behaviour - outweigh the undoubted pleasures of the city they will decline in number & the present character of the city centre will deteriorate.</p> <p>c. Para 5.5.3, p52. Traffic. The issue is not so much that there are physical limits to the city's ability to accommodate growing traffic requirements without detriment to the historic environment, as that the city is already overrun with traffic. There are very high levels of traffic congestion throughout the city's main road network, extending particularly to Queen Sq. & the Circus (which are specifically mentioned as Key Elements of the site). Queen Sq. 'is a prime example of John Wood the Elder's high ambitions for remodelling Bath' (p93), The Circus 'is the pinnacle of John Wood the Elder's work' (p94). However, Queen Sq. is also a busy gyratory on the A4, while The Circus is a rat-run with up to 500 vehicle movements an hour. These high volumes of traffic have a major impact on the overall appearance & amenity of the city. As the draft Plan recognises, pollution & vibration from vehicles is taking its toll on the fabric of the historic buildings. The city's heritage is being slowly but inexorably degraded.</p> <p>d. Para 5.5.3 last sentence, p52. A by-pass road to the east of Bath is perfectly feasible in technical terms, & in our view one is needed to remove north-south through traffic & cut out the pollution & congestion on London Road, Cleveland Bridge & Bathwick Street. The present wording appears to reflect a preference for protecting the 'setting' of the WHS rather than the Site itself. A more balanced form of words is required. FOBRA would like to see a frank statement in this section of the Plan about the traffic problem in Bath. Following on from Issue 41, p40, we believe that the Plan should propose the creation of a comprehensive plan to manage & reduce traffic volumes in the city. We note that UNESCO has itself called for an integrated Traffic Control Plan for the city (Annex A7.3, para 5.2, p 108).</p> <p>e. Para 5.5.4, p52. An aspect that is not mentioned in the draft Plan is that the air pollution associated with this traffic presents a serious threat to the health & well-being of the city's residents, 5,000 of whom live within the current Air Quality Management Area (AQMA). Far from matters improving, the 2009 draft Bath Air Quality Action Plan has had to propose enlarging the AQMA to the Circus & surrounding streets. By definition, air pollution in the AQMA is above the safe health level</p>
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		<p>set by the World Health Organisation & the UK Environment Act.</p> <p>f. Para 5.5.20, p54. We fully support the Physical Access Obj.s 20 to 26. The issue is how to translate them into effective action.</p> <p>g. Action 4c, p62 & Obj. 16, p67. FOBRA has been a strong supporter of the PRMP, but it must be recognised that the PRMP covers only a small part of the mainly commercial centre south of Queen Square & George Street. It does not cover most of Georgian Bath, not even Royal Crescent & The Circus. FOBRA believes that the PRMP should be accelerated & extended to include the wider area between the Holburne Museum, Bath Spa Station, Queen Square & Royal Crescent. It is significant that this is the precisely the area being considered for a Business Improvement District.</p> <p>h. Obj. 21, p69. While we entirely agree with the Obj. of reducing traffic volumes, the actions listed will go nowhere near achieving it. The closure of Pulteney Bridge will displace traffic elsewhere in the city, not reduce it. The freight trans-shipment depot, while a welcome development, will be voluntary & affect only a very small percentage of total freight; & funding exists only for a trial. What is required is a commitment to a master plan for traffic in Bath, such as UNESCO has demanded.</p> <p>i. Traffic Plan: The detailed elements of a comprehensive plan, some of which are already mentioned in the draft WHS Management Plan, should include:</p> <ul style="list-style-type: none"> I. Attractive public transport in all areas, & measures to encourage its use. There need to be more routes, especially in the south west part of Bath & other areas which are currently poorly served, & buses need to run later in the evening. Fares need to be attractive. II. Improved school bus services, to eliminate school run congestion. III. Better facilities for pedestrians & cyclists. IV. Encouragement of alternatives to the private car, including car-sharing & car clubs. V. Extension of the PRMProgramme to the wider area between the Holburne Museum, Bath Spa Station, Queen Square & Royal Crescent.
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		<p>VI. Reducing the volume of traffic by means of parking policy & traffic management. The use of congestion charging should be considered.</p> <p>VII. Proper enforcement to keep HGVs on permitted routes in Bath.</p> <p>VIII. HGV restrictions or a toll on Cleveland Bridge to encourage HGVs to take other routes such as the A350.</p> <p>IX. Improved signposting to discourage traffic from using the centre of the city as a through route; action with satnav providers to ensure that route restrictions are taken into account.</p> <p>X. Greater use of the A420 as a bypass for east-west through traffic.</p> <p>XI. A bypass/link road to the E of Bath to remove N-S through traffic, on a less damaging route than the previous proposal, to cut out the pollution & congestion on London Rd, Cleveland Br. & Bathwick St.</p> <p>XII. A ban on tour coaches which drive around the city without stopping [relates to Obj. 22, p70].</p> <p>XIII. A comprehensive rather than piecemeal approach to traffic issues, & integration of transport & planning policies. Planning decisions should take full account of the traffic implication of new developments – particularly those generating high traffic volumes such as supermarkets. No new development should be permitted without the necessary infrastructure [relates to Obj. 24, p71].</p>
<p>Parks & Open Spaces</p>	<p>FOBRA</p>	<p>7. Page 39, Issue 28 states that "There is a need to ensure that Bath's parks & open spaces are seen to be integral to the Site's landscape setting & managed appropriately". Seven parks & gardens are listed by English Heritage as being of historic importance in A5.14, on page 99. The corresponding obj. is 14, on page 66, which spells out a number of actions. However, both the Issue & the actions ignore the fact that, as pointed out, these listed parks & gardens should not be treated merely as integral to the site's landscape setting but should be managed as part of Bath's heritage. Three of them, Abbey Cemetery, Sydney Gardens & Royal Victoria Park & in the ownership of, or are managed by, the Council. The first is maintained on a basis that does not reflect its historic importance; for the second there is now an opportunity to re-unite it with the Holburne Museum</p>

		garden; & the third incorporates Bath's Botanic gardens. In each of these cases there is a need for an action plan to be published for its restoration & maintenance.
Night time Economy	FOBRA	8. Bath has many bars & clubs, & a large population of students & other young people. Anti-social behaviour, due to excessive alcohol consumption, is a major problem at night. Not only does this have an adverse effect on local residents, but it is also upsetting for visitors & can spoil their experience of the City.
Consultation Period	FOBRA	9. This is a lengthy & very important paper. Many of the organisations expected & desiring to respond have no paid employees, & answers must therefore be developed by members in their spare time. Adequate warning & a time scale of at least 8 weeks is needed for proper consideration of such plans & development of responses, allowing also time for periods away from Bath which may already have been arranged.
Terminology	FOBRA	10. Pg 21, para 2.4.9 (5) Attributes of the WHS: Replace "hollow in the hills" by "river cutting through a limestone plateau".
Statement of OUV	FOBRA	11. Pg 27, para 2.4.34 Man. & Protection. Line 25. Amend "..network, outlined..." to read "..network & widespread pedestrianisation, outlined..."
Physical access	FOBRA	12. Issue 44. Line 1. Insert "& reduce" after "control".
Transport	FOBRA	13. Add new Aim (para 4.2.1 (vi) to read: "Improve the amenity of the city for residents & visitors, & preserve it for future generations, by reducing the volumes of traffic coming into & through the city".
Community action	FOBRA	14. Pg 44 para 5.2.28 Add "It is also vital that Bath remains an attractive place to live for private individual owners & their families, taking into account all aspects of everyday life experienced in the city. Too much pressure on those in the city centre could result in the houses there reverting to multiple occupation, with consequential effects on the quality & amount of money invested in their conservation. Residents' Associations should be encouraged, as a source of strength, advice & civic pride."
Wayfinding	FOBRA	15. Pg 48 para 5.3.18 It is important that any new way-finding system extends beyond the city centre to give directions to all sites of importance. At present it is particularly poor, south of the river.
Traffic	FOBRA	16. Pg 52 para 5.5.3. Reword to read: "Bath suffers from high levels of traffic congestion throughout the city's main road network, & this extends even to the Georgian architectural icons of Queen Square & the Circus. A comprehensive traffic management plan is required in order to deal with the volumes of traffic coming into & through the city. UNESCO has itself called for an integrated Traffic Control Plan for the city."
	FOBRA	17. Pg 52 para 5.5.3 Redraft to read : "There are physical limits to the city's ability to accommodate growing traffic requirements without detriment to the historic environment. The landscape &

		countryside surrounding the city is of outstanding natural beauty & integral to the values of the Site. In addition, the hot waters below the site are vulnerable to major excavations. Because of these factors an underground by-pass is likely to be problematical; an above-ground road to by-pass the city would be technically feasible but protection of the WHSite by this means could conflict with the preservation of its surroundings. Difficult choices may have to be made".
Air Pollution	FOBRA	18. Pg 52 para 5.5.4 Add: "Air pollution also presents a serious threat to the health & well-being of the city's residents, 5,000 of whom live within the current Air Quality Management Area (AQMA).
	FOBRA	19 Pg 56 para 5.6.12 Add new obj. 33: Work to minimise anti-social behaviour at night in order that long-stay visitors are not deterred.
	FOBRA	20. Pg 62 Obj 4 Add new Action 4d: "Consider extension of PRMP to include the wider area of Georgian Bath between the Holburne Museum, Bath Spa Station, Queen Square & Royal Crescent." Cross ref to existing action 16b
	FOBRA	21. Pg 66 Obj 14 Add new Action 14f: "Draft & implement a plan to manage the seven historic parks & gardens within the WHS listed in A5.14 as being of importance."
	FOBRA	22. Obj 21 Add new Action 21c: "Develop a comprehensive plan to manage & reduce traffic volumes in the city."
	London Road Area Residents Association (LoRARA)	1. We support the responses by the Valley Parishes Alliance & Bath Society, & would like our views to be recorded accordingly.
Setting	(LoRARA)	2. Ask B&NES (& the State Party) to act upon UNESCO's Recommendation of " RE-INFORCED PROTECTION OF THE LANDSCAPE SURROUNDING THE PROPERTY " & not just relying on Green Belt designation.
Flooding	(LoRARA)	3. Worried that section on Flood risk is inadequate. Fear the cumulative impact of developments within the Flood Plain plus danger of hard non porous surfacing & (by definition) non porous buildings. Concerned at fanciful aspirations to "pretty" the riverside, at the expense of undermining Frank Greenhalph's masterly Flood Defence design. We await publication of Flood Risk Mgt Strategy.
Transport, Pollution		4. i) No mention is made of using Rail – (existing or enhanced) to reduce vehicle miles & congestion & attendant pollution damaging not only to health but to Ashlar stone. ii) The closure of one of Bath's five bridges is naïve & merely re-distributes traffic to cause congestion & pollution elsewhere.
Statement of OUV/Significance	Beckford's Tower Trust	1. '...situated in a hollow in the hills & 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'

		<p>It is perhaps misleading to put a reference to the garden city concept in this section so closely associated to the reference to the Picturesque aesthetic. The Garden city movement (the ideas of which were being developed in 1880s but as a movement was founded in 1898) is, while significant to the early 20th century developments, in particular those to the west of the city, perhaps not however the correct term to use when referring to the Picturesque of Bath. Bath's Picturesque & the use of the natural landscape to develop it emerged in the late 1820s through to the 1860s & is a very different theoretical ideal from the Garden City movement, & feel that that distinction should be very clear.</p> <p>It is also perhaps misleading to refer to this in the same sentence as having established the development of the city & referred to a series of primarily C18th architects who transpose Palladio, when the Palladian development of Bath is also not part of the Picturesque movement. I would suggest that the first sentence in this paragraph end after '...a complete city.' & the new sentence then cover the Landscape 19th century Picturesque & later developments that can be seen as being in the Garden City idea.</p> <p>Criterion ii is phrased better as the reference to the Picturesque is not included.</p> <p>There is such a distinct difference between the Palladian, the Picturesque & the Garden City movement that we should really try not to confuse them. Placing such an emphasis on the garden city feel, when really that is quite late in Bath's development & not the most significant phase is misleading.</p> <p>The reference to John Wood in criterion i as John Wood Senior, when he is always referred to as John Wood the Elder.</p>
Architectural approach	Mr N Quine	<p>1. Fully agree that Bath is a living city & not a museum, & the management plan needs to reflect that. Why is there is not a default assumption that any development within the WHS should a) reflect historic st. plan or reinstate it where lost, & b) recreate the façade of C18 (or older) buildings lost either to enemy action or insensitive development in the C20. This assumption needn't be rigid, but deviation from it ought to be strongly justified before being approved. This policy could particularly benefit areas such as Green Pk Rd/Charles Str, Avon St & Trim St/Barton St, & can be seen to have worked marvellously in Bathwick St & Claverton St. It might even have improved the new Southgate still further.</p>
	English Heritage (EH)	<p>1. Couple of useful meetings already held to assist in shaping the document. This response incorporates comments from International team as well as the region. More detailed points will be sent to you via track changes on the electronic version of the document.</p>

Responding to the Mission Report	EH	2. Due to the Mission visit the plan will be scrutinised by UNESCO, in particular issues raised in their report. Issues included: protecting views, setting, presentation & flooding, key development sites such as Bath W.Riverside. Whilst there is a response to some of these points in the appendix, there needs to be a discussion & actions associated with these within the plan. E.g setting study, building heights study, & flooding strategy are all mentioned but, in addition, the key messages & how these will be taken forward needs to be summarised in this section. Fundamental Issues such as buffer zone need to be discussed.
Wider Council involvement	EH	3. The first part of the plan has been improved & majority of text for first 4 chapters is largely acceptable. However in terms of site governance we have concerns regarding overall engagement of all Council depts with the development of the plan & associated actions. E.g Council owns a significant no. of buildings within the Site & its direct management of these properties is critical. Other depts are responsible for the spaces between buildings such as the public realm & parks/gardens. Heritage Services look after some key sites & no doubt have proposals for their future management/ presentation/ interpretation, - these aren't contained within actions. The key to the success of the plan is that it is fully integrated into working practices of all the relevant depts & isn't just considered the remit of the planning dept. This engagement would provide a mechanism for delivery of actions plus means for funding bids.
Implementation by stakeholders	EH	4. Noted that a number of obj.s & actions are going to be met by other stakeholders such as the Bath P. Trust, which is welcomed. Desirable to have wider stakeholder engagement in plan delivery.
Structure	EH	5. Structure of the second half of plan remains unresolved; - suggest further rationalisation of sections is undertaken. In particular, it could benefit if the issues & obj.s were combined. In addition, the actions need to be placed against the relevant obj. & not repeated. We recommend that the document is proof read to check the cross referencing.
Monitoring Indicators	EH	6. In association with monitoring, plan needs to include key indicators of state of conservation of WH property as well as of the effectiveness of the plan itself. We suggest a starting point would be those established by ICOMOS UK & the WHS Coordinators. Others could include Heritage at Risk, visitor survey information, traffic data, to name but a few.
Archaeology	EH	7. There is very little on archaeology, which is one of the key components of the OUV of the site. This needs to be enhanced & we suggest you liaise with your archaeology colleagues & those in Heritage Services who directly input into the conservation & management of the Roman Baths. We presume that they will have some key obj.s & actions to deliver within the lifespan of this plan.
Executive Summary	EH	8. As you have suggested it would be useful to have an exec. summary containing Statement of Significance & key plan obj.s. Stonehenge provides a useful model.

Commercialisation of the historical district. Advertising	Mr R Davies (RD)	<p>1. Gradual Commercialisation of the historical district at the heart of the city. Steady & constant degrading of listed buildings & public realm in the city & it should be a Council obj. to stop any additional advertising & to reverse blight from our finest buildings & streets. Clear Govt guidelines on window advertising is ignored & advertising outside many listed offices/shops/pubs, etc is totally inappropriate with often large painted names on many windows & indeed quite inappropriate advertising blinds on others. Steady growth of A boards is a constant unsightly feature throughout Bath, most in contravention of the law in terms of placing & overall size. There is a new "commercial" development starting outside restaurants & cafes that offer pavement service where barriers are being deployed to demarcate their area which in itself isn't a problem but these normally carry further advertising. Recommendation. That the whole issue of the gradual despoiling of Bath with inappropriate advertising is treated as an important WHS issue & that a code of practice is set out which all businesses will be expected to observe with fines applicable if they fail to meet the requirements.</p>
Plaque Scheme	RD	<p>2. Current building plaques are virtually illegible, inadequate & unrepresentative of the many interesting people who have lived here. A new Bath plaque should be designed similar to the excellent ones in London & a detailed city tour guide developed. The guide should include detailed notes on each occupant & their influence on our society. The BPT is a fund of information on the occupants of our listed buildings.</p>
Landscape/Park	RD	<p>3. Probably the 2 most important Georgian open spaces in Bath are Queen Sq & Circus green. Queen Sq is used for many totally inappropriate activities causing considerable damage to the grass/path edges etc & often looks little better than a 3rd world soccer pitch. The wonderful streetscape envisaged by J. Wood for the Circus is completely hidden by the excessively large Victorian trees. Both open spaces should be reviewed & a policy adopted in the WH document to bring them back to their original planned design.</p>
Cobbled Streets	RD	<p>4. Apparently many Bath streets still have the original cobblestones under their current modern asphalt surfaces. A programme to identify these streets & bring them back to their original cobblestone finish should be one of the goals of the WH plan.</p>
Coaches	RD	<p>5. In no other European historical city are large coaches allowed to freely circulate without stopping. Coaches fuel congestion & add to air pollution. Passengers should be forced to get off the coaches to spend money in the city's shops, pubs, museums, restaurants, galleries etc & coaches banned from the city centre.</p>
The River	RD	<p>6. Both the proposed E. Park & Ride & the current W. P&R sites are very close to the River & these corridors into the city should be considered for moving people into/out of the city rather than just</p>

		relying on buses. The argument is that river transport would be too slow but it is doubtful that any river bus would take any longer than a road bus to get into & out of the city during busy periods. A plan to open up the river for transportation should be a goal of the WHS document.
Listed Building Consent	RD	7. Issue causes considerable anger. Decisions taken by the listed building (LB) staff are often arbitrary & frequently contradictory. There needs to be clear guidelines set as to what can & cannot be done to LB's with clear information. LB officers tell residents they can't tank vaults, then that they can tank 1 & then again others get granted approval if they use the right architectural practice. Some officers say council wants LBs to revert from offices to residential & others that the city is desperate for office accommodation & any permission to convert back to original use is unlikely. The situation for the officers & the applicants is unsatisfactory & clear unequivocal written guidance on all listed building issues should be a WHS priority & would make the LB officers life far more tolerable & avoid potential conflict.
Traffic & HGV Enforcement	RD	8. Traffic regulations are seldom enforced. HGVs drive through the heart of this WHS along the A4 in contravention of the law with virtual impunity. Double Yellow line violations are seldom enforced. Traffic lights are rarely synchronised. Parking is often allowed in totally inappropriate places. Deliveries are permitted at the busiest times of the day causing further congestion & adding considerably to air pollution not to mention lost productive time for everyone stuck in the traffic. All in all the whole traffic management issue in Bath is haphazard & piece-meal without any overriding master plan for the future. The resultant damage to the WHS infrastructure is incalculable but undoubtedly severe.
Buildings at Risk	RD	9. A number of LBs throughout the City are urgently in need of repair/ maintenance but remain neglected. There should be some City bye-law that requires fabric of any LB to be protected & the Council should be required to move in to maintain the fabric if the owner fails to fulfil his LB. The Council is one of the worst culprits in neglecting many listed properties. The Georgian Terraces under Empire/Guildhall facing Pulteney Br. & Weir are falling into disrepair. These magnificent columned terraces could be restored/ developed & generate substantial income. Cafes/ restaurants etc could be set up in them & become a major attraction (Bath's equivalent to St Marks Square) but instead they lie derelict & virtually forgotten. It is a disgrace & again the WHS plan should have clear goals as to what needs to be achieved.
Governance, plan actions	RD	10. The plan covers general aspirations for WH status but is short on policy & actions needed to move Bath towards being a really worthy holder of this International honour. Bath's WH status is largely taken for granted by B&NES Cllrs especially many of those who live outside the historical heart. They fail to understand that this unique WHS is the life blood of the local economy & that it urgently needs nurturing & protecting with a clear unequivocal plan of action for the future.

	Bath Society	1. B.Society welcomes the plan in summarising a range of issues connected with WH. It is also a valuable exercise in raising awareness. It strongly supports measures concerning statutory backing of the plan, provisions made in Circ. 07/2009, & proposals to adopt a summary as an SPD. It urges that they be further strengthened by means of the designations, documents & strategies listed in paragraphs 3.4.16 & 3.4.17.
Planning Policy	Bath Society	2. All possible links should be made between plan, Core Strategy & other relevant Development Plan Documents. CS Obj. 4 should make specific reference to Bath. Suggest that, in view of importance of WHS, protection should be provided for in a range of development, design & townscape/landscape protection CS policies, rather than within just one.
Obj.s	Bath Society	3. Agree that managing change is the most pressing issue. Unclear how issues have been converted into obj.s. Can obj.s be prioritised?
Setting Study, Building Heights Study	Bath Society	4. Very much support the intention to produce a 'Setting Study' (5.2.11) & 'Tall Buildings Study' (5.2.14) as SPD.
Action Plan	Bath Society	5. Addition of 'responsibility' & 'funding source' columns in the tabulation is welcome. Consider the action list too long & would benefit from prioritisation.
Delivery of Actions	Bath Society	6. Are all the Planning Service actions achievable in the face of budget constraints? Can a bigger role be played by voluntary societies?
UNESCO Mission Report	Bath Society	7. Rec. III of the UNESCO rpt (rvd plans for social facilities in BW Riverside) has not been undertaken. The Society applauds recs. IV & V. Do not feel the State Party is meeting Recommendation VI (interpretation).
Landscape, Buffer Zone	Bath Society	8. Recent planning decisions testify that neither Green belt or AONB status are sufficiently robust to protect the WHS surrounding landscape. We ask that the final version of the Plan responds to the UNESCO recommendations as written, & that B&NES writes to the new SoS for DCMS pointing out the mistaken response of his predecessor. Furthermore, B&NES could note WHS Circ 07/2009 regarding settings & buffer zones & undertake measures to define the latter.

Flooding	Bath Society	9. 5.2.16 para 2 not wholly accurate as it omits Oct 2000 when Bath came within two inches of flooding. Recent calls to remove the 1974 sluice gate on aesthetic grounds display an ignorance of the gate's function – to operate at low to medium river flows to raise the velocity of flow under Pulteney Br. (The arches were underpinned & the riverbed widened during the construction of the weir). Society has consistently expressed concern about cumulative impacts of recent riverside proposals - Bathampton Meadows P&R, Lambridge P&Ri, Bath Rugby on the Rec., Dyson at Newark Works, BW.Riverside & 'Blue Sky thinking' proposals expressed in the semi-secret Royal Haskoning report to B&NES. What happened to the River Corridor Study ?
Flooding	Bath Society	10. 5.2.17 Last sentence should add "& also the impact of the water table either side of the Avon". Gardens in Kensington PI flooded in 2000 & 2008 despite 1960s landfill elevation of Kensington Meadows between the Avon & the Grade II listed properties – water is affected by geological strata
Flooding	Bath Society	11. When will the Flood Risk Management Strategy become public ?
Flooding	Bath Society	12. 5.2.19 i) impossible to create compensatory storage downstream as it is already flood plain (ref PPS 25 Practice Guide) – cannot add to where it already floods. ii) Regarding upstream measures a) the 1m Cumec reservoir. Told that at projected peak flow this will fill in 38 mins – assuming it was empty to begin with b) Tree planting will take years & just as ground can only absorb so much water, so trees cannot be expected to absorb more water when there is a sudden excess.
Flooding	Bath Society	13. 5.2.20, 5.2.21 PARNASSUS - how will Bath's WHS benefit rather than individual Nat.I Trust properties ? We can minimize the danger of run-off by opposing new hard surfacing eg tarmaced car parks & other non- porous developments Buildings are as impervious as tarmac & also may form an obstruction to water flow. Society believes dangerous proposals within flood plain should not be allowed. No mention is made of maintenance of interlocking metal piling which has a finite life. The pilings 'backstay' construction is a further problem that should not be ignored.
Traffic	Bath Society	14. Public Realm 5.3 17 – 19 & Public Transport 5.5.7 – 5.5.12 do not mention using Rail Infrastructure to relieve road congestion. B&NES should display 'Localism' & approach Network Rail & the Department for Transport for help & advice
Traffic	Bath Society	15. Obj. 21 B (page 69 – Pulteney Bridge) is naïve, misleading & displays flawed thinking. How will closure of one of Bath's five bridges reduce vehicular volumes & develop alternative modes of transport ? Redistributes traffic & adds to congestion elsewhere. Vehicular emissions from standing & slow moving traffic increase. As always, the pollution is exacerbated by the so called 'canyon effect' of Bath buildings & surrounding topography. Traffic emissions harm Bath stone.
Traffic	Bath Society	16. Re 23B & 26B The Society has repeatedly opposed elements of the B. Trans.Package. Cancellation of the Regional Spatial Strategy house building removes the pressure to enlarge the

		Newbridge P&R & further weakens case for the dedicated Rapid Transit Bus route & associated Com. Purchase Orders.
	Bath Preservation Trust	<p>1. Plan provides a comprehensive description of the WHS & the progress (or otherwise) in implementing previous plan actions. Fails to provide a convincing picture of how the responsible authorities (principally B&NES) will ensure delivery of long-term vision. BPT believes plan needs significant reshaping to address some issues around delivery, & that it should provide the vehicle for debate within Cabinet & Council as to how the Council intends to deliver WHS responsibilities. The plan should be adopted as an SPD within the LDF with appropriate officer responsibility & budget. Our comments concentrate on the key areas of authenticity & integrity, governance & resourcing & prioritisation.</p> <p>There needs to be a strong WHS voice at the table when the key decisions are taken, & in every policy document. The current WHS management arrangements have failed to deliver this.</p>
Authenticity & Integrity	Bath Preservation Trust	<p>2. Spirit of Place - BPT welcomes the work done to develop understanding of the OUV, including the concepts of authenticity & integrity. Consider that the draft statement of OUV set out at paragraph 2.4.34 (p25 to 27 of the consultation draft) provides a satisfactory description of the physical elements of the WHS (the hot springs, the historic buildings & streetscapes, & their relationship with the surrounding landscape). However the authenticity & integrity of the WHS depends not only on its physical structures but also on its intangible culture & character – the spirit of the place. Challenge for Bath, like other urban WHSs, is to conserve physical heritage while also nurturing/ preserving spirit of place as a living entity across generations. Stat. framework for protecting WHSs described on p. 27 does not fully address the complexities of preserving either the physical structures or the spirit of place. It is essential that we protect/ preserve our historic buildings, spaces & views & also ensure new development is of appropriate quality & sits harmoniously alongside heritage assets. But there need to be clear means to achieve these goals, & in any case this represents only part of the challenge.</p>
Planning	Bath Preservation Trust	<p>3. physical assets of the place need to be preserved, developed & looked after consistently & in such a way as to assist multiple owners/ leaseholders to understand the framework in which they operate. The planning system in a City as complex as Bath needs to be much more responsive to customer needs by providing clear, unambiguous planning guidance where possible, & dedicated case-by-case advice where needed. Bath has considerably less generic but place-specific policy guidance than comparable historic cities, & result of this is a confrontational & labyrinthine planning system which imposes unnecessary costs on both property owners & Council's Planning Dept. This mgt plan should be much more prescriptive in demanding this policy framework as a high priority</p>

		<p>within the action plan. As resources become constrained within the Planning Dept, the fear is that individual owners will increasingly 'do their own thing' without sufficient pre-planning advice or post-development enforcement to ensure that authenticity & integrity are maintained. The Council is ideally placed to take the lead in this with its substantial ownership of City Centre properties, whose leases should ensure the highest standards in property maintenance & repair.</p>
Role of Local Planning Authority	Bath Preservation Trust	<p>4. Chap. 3: acknowledges that B&NES is the 'predominant steward' of the site but barely mentions its role as the Local Planning Authority (LPA) in ensuring best possible management of individual physical assets & potential for this role to be an active servant of the site OUVs. There have been a number of areas where B&NES has fallen short in this duty. EG:</p> <p>i) There is no Conservation Area Character Appraisal for Bath, which results in the paradox of a number of villages in B&NES being better served in terms of planning policy than the WHS.</p> <p>ii) Changes achieved in PPS 5 (mentioned paragraph 3.4.4) in relation to WHS should be made much more prominent in order to enter into the consciousness of the Council at the highest level.</p> <p>iii) Physical accommodation of the City's Record Office is a disgrace, & there is clear evidence that there are inadequate resources available to maintain the Historic Environment Record. Despite outstanding efforts of the City Archivist & his colleagues to deliver a first-class service, this presents a real threat to maintaining the integrity & authenticity of the WHS.</p> <p>iv) Draft Plan gives no firm commitment that WHS mgt is to be incorporated into the LDF. In our view, the Plan will not be worth the paper it is written on unless the LD. Scheme is amended to include adoption of SPDs covering the key Plan priorities from the Plan, the Building Heights Study & Bath WHS Setting Study & including creation of a buffer zone.</p>
Distinctiveness	Bath Preservation Trust	<p>5. B&NES has done useful work defining spirit of place: Future for Bath Vision 2007 & Public Realm & Movement Strategy (2009). This work has not been fully carried through into later documents such as Sustainable Community Strategy 2009 to 2026 & Core Strategy Options Document 2009. These documents fail to recognise paramount importance of nurturing/ preserving the very special tangible & intangible qualities which set Bath apart from other historic cities. Careful consideration needs to be given to promotion (the 'Bath brand'). BPT recognises that in order to sustain its economy, Bath needs to remain an attractive destination for shoppers & tourists. Positive recent developments include creation of Future Bath Plus & the appointment of City Centre Manager, & opening of new small independent shops opening in N end of city centre. New Southgate has attracted several new retailers. Current advertising strategy 'a golden city paved with shops' misses the opportunity to tell visitors Bath has much more than shopping to offer. Bath's heritage must not be overridden by powerful commercial initiatives aimed at one particular client group (the shopper</p>

		market). Concerned that the Business Improvement District proposal seems to take little account of the tangible/ intangible qualities which set the city apart from its competitors.
Public Art	Bath Preservation Trust	6. City has not yet thought through how best to capitalise on its distinctiveness in the approach to public art displays. BPT are concerned that recent initiatives (& Christmas Market) do not enhance the exceptional quality of the buildings & public spaces at the heart of the city, & that the sheer number of people in the historic core frequently results in a poor quality experience for the visitor. BPT would like to see a more strategic approach to developing a public art programme of sufficient artistic distinction for a WHS, potentially using guest curators & developing educational links, for example through the Holburne Museum. More effort should be made to use public art displays to enhance areas of the city in need of temporary improvement instead of concentrating them in the historic core.
Governance & Resourcing	Bath Preservation Trust	7. BPT welcomed creation of the World Heritage Manager post & reconstitution of the WH Steering Group in 2008. The new Steering Group has undertaken useful initiatives, most notably the WH Enhancement Fund & a volunteer network for delivering small projects. However current arrangements cannot deliver the management infrastructure to take control of & implement this Plan. This is not the fault of any individuals involved: the unhelpful institutional framework, lack of any political or snr management accountability for delivery of the WHS Plan & absence of significant dedicated financial resources mean that it has been impossible to bring about any high level WHS management. First priority: develop a shared understanding of the OUV in their widest sense, including intangible/ tangible elements. This understanding needs to be shared by, & fully embedded in thinking & actions of political decision makers; officers, all three parts of Future Bath Plus; & by stakeholder organisations representing residents, the business community & heritage sector. We are concerned that we still hear influential individuals expressing the view that WH status is a drag on the city rather than an accolade which underpins its current economic & cultural prosperity & needs to be cherished. The shared understanding should be reflected in all daily management decisions & longer-term development. A WHS Steering Group meeting on a bi-annual basis (as proposed p60), supported by a single officer (the WH Manager) will never achieve this. Financial pressures will make med./short term budget increases very difficult for the Council. BPT believe that the time has come to radically rethink the way the WHS is managed. The aim should be to develop an alternative model which would better integrate WHS management with city management & which could unlock alternative sources of funding.
Prioritisation	Bath Preservation Trust	8. Lengthy analysis of issues & obj.s provides a useful evidence base for the Plan, & the equally lengthy list of actions are desirable. For the Plan to be a credible management tool, there needs to

		<p>be a clear commitment from the Council (& others where appropriate) that the most important obj.s will be delivered. Pages 60 to 73 are a wish list, not an action plan. The sheer length of the list will require a great deal of reporting & monitoring. It would be much more effective to identify a small number of really critical obj.s & concentrate the available resources on achieving these.</p> <p>BPT would identify the following critical obj.s:</p> <ol style="list-style-type: none">1. Review WHS management arrangements & move to an alternative model which (a) ensures that OUV of the WHS are at the centre of decision-making & (b) unlocks new sources of funding;2. Develop a fit-for-purpose planning policy framework for managing the WHS which meets Govt requirements, by;<ol style="list-style-type: none">a. amending Local Develpt Scheme to show early adoption of SPDs covering WH Management, Building Heights & View Management;b. Prioritise adoption of Bath WHS Setting Study as SPD & use its research to identify & install a buffer zone;c. undertake a Conservation Area Character Appraisal for Bath Conservation Area;d. Produce SPD on adaptation of traditional buildings in the WHS to reduce carbon emissions (using the model of partnership working with third parties currently underway);e. Produce SPD on adaptation of traditional buildings in the WHS to reduce carbon emissions (using the model of partnership working with third parties currently underway);3. Provide adequate resources for the Bath Record Office4. Implement the PRMP5. Develop & implement transport policies to reduce the pressure of vehicle traffic within the WHS & its setting while facilitating appropriate means of access for increasing numbers of visitors; &6. Produce & implement an interpretation strategy for the WHS.
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Action Plan	Bath Preservation Trust	9. Most individual Actions in Section 6 would support high-level obj.s. Many are however unfunded & no specific timetable can therefore be identified. The formal Action Plan should not be a wish list; rather, it should set out those items which the responsible authority commits to delivering. The wish list needs to be recorded separately, with items from it being brought forward for action as & when resources allow. BPT would welcome the opportunity to work with the WHS Manager to produce an alternative version of Section 6 of the draft Plan on these lines, for consideration at the next Steering Group meeting.
Research	Duchy of Cornwall	1. Welcome the Plan & excellent work done by the Council in preparing document for consultation. The Duchy is committed to advancing the understanding of Bath & already committed resources to further independent & <i>bona fide</i> archival & topographical research within the City. The findings this work will be made fully available to B&NES & other interested parties in due course.
Vision	Duchy of Cornwall	2. Page 6 Long Term Vision: 'Bath will maintain & enhance...(1st para) ...& Bath will conserve(4th para). This doesn't make sense - Bath is a place & not an agent of action in & of itself. See also P 35 4.1 .
Introduction to Plan	Duchy of Cornwall	3. Chapter 1 Intro: Should contain a statement of authorship & purpose of document & how this document relates to existing/ previous versions of the WHS Plan & assoc. documents.
Clarification of text	Duchy of Cornwall	4. Page 8 1.1.3 4th bullet. the 18th century 'Georgian' city & associated villages with their dwellings... Does this refer to earlier villages absorbed within the Georgian core; or villages created in the Georgian period – ie what is Georgian about these villages?
Clarification of text	Duchy of Cornwall	5. Page 8 1.1.3 8th bullet: 19th, 20th & 21st century developments, including presentation & interpretation of the historic environment through museums & other services... If this is referring to significant areas of 19th & 20th century housing development it should say so. It is not clear to link the first part of the bullet with the second (about museums) which would link better with the 9th bullet.
Clarification of text	Duchy of Cornwall	6. Page 9 1.1.7 : 'Bath Travel to Work Area' should be defined & main work destinations/commuter flows identified.
Clarification of text	Duchy of Cornwall	7. Page 9 1.1.9: Hotels & Restaurants are part of the service sector but the comment implies these are not part of the 79%.
Clarification of text	Duchy of Cornwall	8. Page 10 1.2.9: Bath is not a prospective Site.

Supporting documents	Duchy of Cornwall	9. Page 11 1.2.16: We have not been able to locate a detailed review of actions on the Council website.
Setting, Buffer Zone	Duchy of Cornwall	<p>10. Page 12 1.2.19: Document is a tool for management of the WHS & should respect the boundaries of the Site as legally defined. Whilst the issue of views & the interconnection between countryside & city is of undoubted importance, the WHS boundary was established in 1987 & reconfirmed in 2005. The fact that there is as yet no agreed buffer zone or boundary defining the 'setting' make the findings of the 2009 Setting Study difficult for interested parties to understand & interpret. If the claim that is now put forward is that the OUV resides outside of the WHS, then the boundaries should be withdrawn & be renominated as indicated in 2.4.6 (this doc.) If however, the area immediately adjacent to the present WHS boundary is a contributory factor in the protection of OUV qualities & authenticity, but not in & of itself an element of OUV, then control of planning issues arising beyond the WHS boundary should be dealt with under existing or purpose drafted planning legislation. It is also noted (1.2.16 this doc.) that 'care needs to be taken not to include in the Plan any aspect of the City's management which are not directly related to its WH status'. With such a large & complex Site such as Bath, it is clear that most aspects of city planning will impact on the WHS, & changes beyond the boundary are no less likely to be influential. What is essential is that there is a robust interdepartmental consultative procedure within the Council, but it is our view that the inclusion of the setting is not warranted within the present document as a target of Management Actions. It is our understanding that much of the 19th & 20th century development (not included in the OUV Statement of Significance) extends from areas close to the City's historic Roman & Georgian core up to (& in some cases, beyond) the WHS boundary. That is to say, throughout much of Bath, it is 19th & 20th century development, & not the identified OUV that abuts the WHS boundary & which is brought directly into tension with the setting. Areas of 19th & 20th century development critically impinge on the view quality & experience of the countryside in some areas such as Little Solsbury Hill; but at the same time not all parts of the landscape surrounding the WHS are of equivalent sensitivity. For this reason, we advocate the development of more focused planning mechanisms such as view cone or view corridor policies which are successfully employed elsewhere in the UK including Greater London & Oxford. Development of a view cone strategy for Bath, need not compromise the concept of setting, or the excellent work compiled within the 2009 Setting Study; however in contrast to a reliance on setting, a view cone or view corridor policy (dealing with inward & outward views) & 3D modelling would provide a more practical tool in directing limited Council resources to maximum effect in the protection of the most important views; whilst also accepting the importance of growth & change in sustaining a vibrant city.</p>
Plan	Duchy of Cornwall	11. Page 13 1.3.3: The responses to these recommendations can be read in full at App 7. The

structure, wording		accompanying Appendix is particularly unclear. App 7 contains UNESCO/ICOMOS mission terms of reference July 2009 & it is presumed that the following text is of the same date. However App 7 also contains 'Response from the State Party' dated March 2009. It cannot then be the case that the 'State Party' comments are made in response to the July 2009 mission, & indeed the text itself suggests that these comments are made in response to an earlier document, which is not presented here.
Wording descriptions	Duchy of Cornwall	12. Page 16 2.3.10 We suggest text addition/alteration as below: In the 18th century the City was re-invented as a fashionable health resort. It expanded beyond its walls through the release of pockets of agricultural land from the various estates which surrounded the medieval city as a consequence of speculative development by their owners in response to the changing social & economic environment of the City. As a result, very few early buildings & urban arrangements remained unaltered. Cramped, jumbled medieval streets were transformed into a spacious & beautiful classical city ...
Wording descriptions	Duchy of Cornwall	13. Page 16 2.3.11. Is reference to town planning appropriate? Paragraph 2.3.16 states, & we would support, that "Bath evolved through speculative development... there was no city-wide plan" that is to say, Bath was not subject to any masterplan or town planning scheme, other than that put forward by individual architects & developers, whose work in time came to coalesce with considerable visual & practical cohesion.
Setting	Duchy of Cornwall	14. P. 17 2.3.19: This extends what is considered to be "the Site". It also challenges the concept of "setting" which has up to now largely been predicated on views. Presumably the 18th century buildings in surrounding villages are protected under normal planning restrictions & are not currently identified as OUV elements.
Railway	Duchy of Cornwall	15. P.17 2.3.21. ..was undertaken in a largely sympathetic manner, contributing some new, & high quality architecture. The high embankment of railway line to the W within the Avon valley significantly altered the relationship to the river of Corston, Newton St. Loe & Kelston Park.
Assets carrying OUV	Duchy of Cornwall	16. P 17 2.3.24. Greater clarity is required as to those assets listed which are considered to be OUV those that are not.
Royal Crescent	Duchy of Cornwall	17. P 18 2.3.30. Archival evidence shows that the design of the Royal Crescent also reflected adaptation & constraints placed upon it by the necessity to sustain the agricultural infrastructure, which was only gradually being absorbed into the urban infrastructure.

River	Duchy of Cornwall	18. P 19 2.3.35 Much could be achieved in extending access & improving the rural & natural qualities of the river flood plain. Such opportunities should be taken into account in determining policy for the river corridor area.
Trees	Duchy of Cornwall	19. P 19 2.3.36 There is evidence that much of the 18th & 19th century treescape to the south of the river contained substantial belts of conifers. Today, extensive conifer plantations are unlikely to engender public support, but it is an issue of authenticity which needs to be addressed if the management strategy is to be extended to include 'the setting'. A detailed appraisal should be made of trees within the City. Trees contribute greatly to the perception of Bath as a green city, nonetheless they must be respected as dynamic & changing elements with the capacity to grow or die; alter or block views; affect biodiversity & people's perception of place. The type of species, age of tree & its potential longevity with concern about the long-term viability of Horse Chestnut due to disease & pest issues. These are important factors to be taken into account in any city-wide tree appraisal. This should form the basis of a tree management strategy & form an integral part of the WHS Management Plan provision.
OUV	Duchy of Cornwall	20. P 20 2.4.6: The summary of the Committee's determination of OUV value must be based on their decision at the time, since any change to it would require a re-nomination of the property. Surely this means OUV refers to those attributes within or at the very most, visible (in terms of establishing curtilage or context) from the WHS itself.
OUV – Garden Cities	Duchy of Cornwall	21. P 20 2.4.8 : The agreed Statement of Significance says: <i>...creating a strong garden city feel, more akin to the 19th century garden cities than the 17th century Renaissance cities.</i> The term Garden City is misapplied. It normally is used in British contexts to the establishment of New Towns towards the very end 19th century & early 20th century. These were based on a city-wide plan which determined layout as part of a master planning process. Such towns were typically on much flatter sites, without diverse topography & with the provision of green open space driven by functional rather than aesthetic considerations. They are not generally considered in Picturesque terms. As such, the term does not reflect Bath well in terms of the processes of its development, nor the low density housing & the lack of central coherence which is a common feature of the so called garden cities.
OUV	Duchy of Cornwall	22. P 23 2.4.21 The drafting of a full statement of Outstanding Universal Value should be distinct from the WHS management plan.
Setting	Duchy of Cornwall	23. P 24 2.4.27 This is somewhat misleading. Much of the landscape surrounding the Georgian city (OUV) has been developed in successive centuries & in places, such as Batheaston, Bathampton & Bathford there has been extensive development mainly in the 20th century outside the city boundary.

Buffer Zone	Duchy of Cornwall	24. P 24 2.4.31 Agree that the boundary is generous & for this reason find it difficult to appreciate why a buffer zone further extending the effective catchment within the boundary should be necessary. Also we would like to see greater consideration & clarity given to definitions which identify elements as OUV & those regarded as 'connected with the OUV'. Those elements not regarded as being of significance to the OUV , or contributing less positively to the OUV but are nonetheless contained within the WHS boundary should also be more clearly identified.
Wording descriptions	Duchy of Cornwall	25. P 25 2.4.34 4th bullet We find reference to 'hollow in the hills' & 'garden city' inappropriate. Suggest text alteration as: "Bath is situated within the valley of the River Avon & its tributaries which cut deeply through the limestone plateau, opening an attractive topography of steeply sloping hillsides majestically occupied by buildings of extraordinary architectural merit & visual coherence through the use of local stone as a building material."
Wording descriptions	Duchy of Cornwall	26. Bath's grandiose neo-classical Palladian crescents, terraces & squares spread out over the surrounding hills & set in its green valley This suggests that Bath is not contained within its valley & extends out over the plateau. We suggest text addition/alteration as underlined below: Bath's grandiose neo-classical Palladian crescents, terraces & squares spread out 'along the sides of the valley & its slopes'
Integrity	Duchy of Cornwall	27. P 26 Integrity (2010): Suggest text addition/alteration as below: 'Remains of the known Roman baths, the Temple of Sulis Minerva & the below grounds Roman remains are well preserved & within the property boundary. Despite some loss of Georgian buildings prior to inscription, the Georgian City remains largely intact both in terms of buildings & plan form. An extensive range of interlinked spaces formed by crescents, terraces & squares set in a harmonious relationship with the green landscape survive,' ... both within & surrounding the WHS site boundary, though the existence of this greenspace does not in all accounts represent a designed process but one determined by historical & present day patterns of ownership, development opportunities past & present, in addition to development control measures established during the 20th century. In all, ... 'the relationship of the Georgian city to its setting of the surrounding hills remains clearly visible. As a modern city, Bath remains vulnerable to large scale development & to transport pressures, both within the site & in its setting that could impact adversely on its garden city feel, & on views across the property & to its green setting. 'Garden city feel' is less problematic in this context but nonetheless might be replaced with 'green city' or similar for reasons given above.
Trees	Duchy of Cornwall	28. P 26 Authenticity (2010) suggest text addition/alteration as: 'Careful appraisal & management of the urban treescape is also essential to ensure the continuity of the green character of the city.'
Trees	Duchy of Cornwall	29. P 27 Management & Protection (2010) Suggest that there should be reference to tree

		management issues here. We consider that a tree management programme which addresses the issues of senescent & diseased trees will be essential in maintaining the green character of the City. Advocacy for planting of large sized tree species appropriate to the Georgian setting & recognition of the dynamic & long-term contribution that trees make to the townscape also requires careful appraisal.
	Duchy of Cornwall	30. Issue 29: Improvements in the visibility & accessibility of the river are highly desirable & should be an important principle in consideration of any development or redevelopment within the river corridor. Issue 31: A comprehensive appraisal of the contribution that trees make in defining the character of Bath & authenticity in relation to the OUV is required, along with a plan to manage the treescape into the future. Issue 33: We suggest text addition/alteration as underlined below: There is a need to secure the necessary capital investment to realise opportunities to improve the quality, heritage significance & maintenance of the Site's public realm & open spaces. Issue 40: There is a need to ensure that historic buildings are understood in the context of their surroundings... Reference to Georgian building design as an architectural response to topography would be helpful here.
Setting, OUV, Planning Policy	Duchy of Cornwall	31. P 41 5.2.10 'Local Plan policy BH1 addresses World Heritage, & currently refers to protection of the 'special qualities' that lead to inscription, & to the Site's 'setting'. This policy needs to be both taken forward into the emerging Core Strategy & amended to refer to the OUV instead of special qualities' If there are elements of the OUV not contained within the present WHS boundary, then the Site should be withdrawn & re-nominated by due process. If elements within the setting are contingent only in so far as they establish a general character then they should not be conflated with the term OUV. See also comments for P 12 (1.2.19).
Summary Plan SPD	Duchy of Cornwall	32. P 41 5.2.11 Welcome the approach of producing a summary SPD. We consider that not all parts of the setting are of equal sensitivity in relation to the WHS/OUV. We would suggest that clear understanding of issues such as proximity to OUV; visibility to & from OUV; scales of sensitivity & risk to OUV should be established according to a purpose developed systematic assessment methodology.
Tall Buildings	Duchy of Cornwall	33. P 42 5.2.14 Consider that the policy for tall buildings should take account of the underlying topography & the potential for impact in relation to views across the city. It is noted that the WH committee mission July 2009 response found the proposal for an 8 storey building within the Western Riverside Development to be acceptable on the basis that buildings of similar height can be found in historic quarters of Bath. Whilst acknowledged that the committee took into account other factors relating to the removal of the existing gasometer, this should not obscure recognition that the tall buildings within the OUV

		area are typically developed as a means of mitigating & articulating their relationship to steep slopes. In areas such as river corridor, building design does not perform the same function - the landform has little or no gradient.
Flooding	Duchy of Cornwall	34. P 43 5.2.20 Desirability of new development/redevelopment on the river floodplain should be addressed. This area offers significant potential for ecological & public access improvements which would contribute positively in reconnecting Bath with its River. Redevelopment of brownfield sites within the river corridor do not offer a no risk option on the straight forward basis that development of brownfield sites should in all cases be preferred. There are significant issues concerning protection of the OUV from both flood & visual intrusion in this zone. As an important arterial route, the qualities of the river corridor also conveys impressions of the city to visitors. Obj 2: Propose additional action point 2c as underlined below: Critically readdress development/redevelopment strategies in light of flood management issues identified within the river corridor.
New buildings	Duchy of Cornwall	35. P 46 5.2.41 We suggest text addition/alteration as below: Obj. 10: Promote multifunctional & adaptable new build configurations which will make an important contribution to long term sustainability by ensuring that built infrastructure can adapt to suit cultural & social needs in the future without demolition & wastage of valuable material resources. Multifunctional provisions should include opportunities for home working & employment within neighbourhood centres to promote social cohesion & reduce travel to work dem&.
River, Conservation Area	Duchy of Cornwall	36. P 46 5.3.6 There should be a closer relationship between the OUV & CA in order to guide sensitivities & conservation priorities through the planning system. We regard the River corridor as particularly sensitive with regard to potential impact upon the OUV.
Craft Skills	Duchy of Cornwall	37. P 47 5.3.9 Opportunities for appropriate skills training & qualification should be identified & promoted through active engagement in appropriately specified development schemes & restoration projects. P 39 5.1.9 Issue: 24: Duchy, in association with the Prince's Foundation for the Built Environment, has high regard for traditional craftsmanship of all types & has experience in ensuring the survival of living craft skills which so easily die out if not propagated through practical training & application.
Public Realm	Duchy of Cornwall	38. P 47 5.3.11 A robust inter-departmental consultative procedure <i>within</i> the Council is of crucial importance to ensure the effective conservation of public realm infrastructure.
Setting, Views	Duchy of Cornwall	39. P 47 5.3.12 We suggest text addition/alteration as below: ...important views need to be identified & given planning protection with consideration given to view cone/view corridor policies as means of delivery. This recommendation is made since not all parts of the setting are of equivalent sensitivity in relation to OUV & that a more practical approach with more sharply defined targets & policies should carry forward findings & further development in the understanding of issues relating to 'the setting'.

		<p>Obj 14: We suggest text addition/alteration as underlined below: Action 14a: Bring forward the information paper Bath WHS Setting Study (Oct 2009) as a SPD, & ensure SPD identifies & prioritises key views as a means of targeting effective controls.</p>
Trees	Duchy of Cornwall	<p>40. P 47 5.3.13 A detailed evaluation of the City's treescape is required. Trees in Bath exist in a dynamic & intimate relationship with built form. Not only do they present important issues in terms of historical authenticity of the OUV; but they also critically determine, constrain & augment views; & make a vital contribution to the perception of Bath as a green city; in addition to impacting on biodiversity & influencing multi sensory experiences of the city. A comprehensive tree management plan is required which respects & responds to WHS Management issues & ensures that an appropriate treescape survives into the future. This needs to be dovetailed with a landscape management plan, which ideally can link together public, NGO & private landholdings partly by the planning process & partly by education & incentives</p> <p>P 47 5.3.14. Much of the treescape to the South of the City was dominated by 18th century plantings of conifers & firs now out of fashion. In this respect the <i>type</i> of treescape to be maintained or re-established needs careful assessment if authenticity is to be taken seriously. See also comments under Page 19, paragraph 2.3.36.</p> <p>P 48 5.3.19 Suggest text addition/alteration for Obj. 16 as below: Undertake critical analysis of trees within the WHS to better understand their contribution to authenticity; impact on views; anticipated growth & longevity; & implications of diseases affecting trees such as h. chestnut.</p>
Public Realm	Duchy of Cornwall	<p>41. P 48 5.3.17 The materials, textures & forms of the public realm are crucial in defining the unique qualities of Bath. Such infrastructure delivers a sense of place, often working in subliminal ways & overlooked until such time that the crucial components are disassembled or replaced.</p> <p>P 48 5.3.18 Respect for the historic evidence base should guide the selection of materials, surfaces & forms to be adopted in new works & restorations.</p> <p>Suggest text addition/alteration as below: Action 14e: PRMS to provide pattern book for landscape features in public realm to manage asset & inform material choices for all future improvement work with regard to historic precedents & contexts.</p>
Research	Duchy of Cornwall	<p>42. P 49 5.4.3 The extensive scope & need for research is beyond that which can be reasonably carried out, commissioned & assimilated by the Council. The Council should build a suitable consultative structure so that valuable research carried out by reputable agencies or individuals can be fed into the WHS Management Planning Process as it is rolled forward.</p> <p>P 51: 5.4.25 Suggest text addition/alteration as below: Obj. 19: Develop strategies by which reputable agencies & individual researchers can interact with &</p>

		<p>contribute to understandings which will contribute to the ongoing process of WHS Management Planning.</p> <p>Ps 60 – 73 Obj 1: Propose additional action point 1g as below: Develop strategies & procedures for the assimilation of relevant WHS research from suitably qualified outside bodies & individuals.</p> <p>Obj. 19: Propose additional action point 19b as underlined below: Develop strategies for the assimilation of new research & analysis from bona fide & suitably qualified sources into forthcoming WH management planning.</p>
River Transport	Duchy of Cornwall	<p>43. P 53 5.5.12 Suggest addition to follow paragraph 5.5.12 as below: Opportunity exists to critically address the development potential within the river corridor. The potential for riverboat services should be investigated as part of the sustainable Transport Strategy. Obj 25: We propose additional action point 25b 'Explore potential for river taxi services.'</p>
Visitor Dispersal	Duchy of Cornwall	<p>44. P 55 5.6.8 Focus on Bath's literary & artistic heritage through leaflet guides would help to disperse visitors by following specific trails & encourage more overnight stays through making more obvious other aspects of City worthy of exploration & enjoyment.</p> <p>Obj 29: Propose additional action point 29c 'Develop special interest trails to disperse visitors & encourage overnight stays.</p>
Cotswold AONB	Cotswolds Conservation Board	<p>1. Board welcomes this revision of the WHS Mgt Plan & is supportive of the document, in particular pleased to note references to the Cotswolds AONB & the Cotswolds AONB Mgt Plan 2008-13. As you are aware that Plan was endorsed by the Council as a material consideration in the consideration of planning applications & for the development of planning policies</p>
Setting	Cotswolds Conservation Board	<p>2. The WHS Plan addresses the issue of the setting of the WHS & its significance. Some discussion is included of whether the setting can be defined as a Buffer Zone. The Board has issued a position statement on development within the setting of the Cotswolds AONB which provides guidance on this issue. It includes the following statement which may be helpful in context of WHS Plan:</p> <p>The setting of the Cotswolds AONB does not have a geographical border The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty & special qualities of the AONB. A v. large development may have an impact even if some considerable distance from AONB boundary.</p> <p>Examples of adverse impacts will include:</p> <ul style="list-style-type: none"> - Blocking or interference of views out of the AONB particularly from public viewpoints - Blocking or interference of views of the AONB from public viewpoints outside the AONB - Loss of tranquillity through the introduction of lighting, noise, or traffic movement

		<ul style="list-style-type: none"> - Introduction of abrupt change of landscape character - Loss of biodiversity, particularly if of species of importance in the AONB - Loss of features of historic interest, particularly if these are contiguous with the AONB - Reduction in public access - Increase in air or water pollution <p>Adverse impacts might not be visual. The special qualities of the Cotswolds AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB.</p>
Vision	Cotswolds Conservation Board	3. Board would suggest that para 4 of the Vision should read "Bath will conserve & safeguard the cultural assets & landscape setting of the World Heritage Site for this & future generations".
Partnership Working	Cotswolds Conservation Board	4. Board will continue to conserve & enhance the AONB through its own actions, & in partnership with others. Examples include offering grant aid for dry stone walling restoration, countryside management by the Cotswolds Voluntary Warden Service, management of the Cotswold Way National Trail, & securing the undergrounding of significantly intrusive electric distribution cables. The Board will also respond to significant planning applications & planning policy proposals which affect the AONB & its setting.
Steering Group	Cotswolds Conservation Board	5. In view of overlap between WHS/ AONB, consideration should be given to inviting Board representation onto WHS Steering Group.
Tranquillity, Dark Skies	Cotswolds Conservation Board	6. The Board has issued a position statement on Tranquillity & Dark Skies in the AONB.
	Bath Heritage Watchdog	1. The revised plan is both shorter than the 2003 edition & easier to read & understand. Authors are to be congratulated.
Management	Bath Heritage Watchdog	2. Cabinet Member for Devlpt & Major Projects has responsibility for WH matters. This is a union with a permanent conflict of interests. Major Projects are aimed at achieving particular aims, whether they be housing targets, employment opportunities, etc. WH matters have a conservation slant, attempting to preserve the OUV & its tourism significance without completely stifling development. Having one Cabinet Member as sole arbiter between the two has generally resulted in undesirable outcomes. We propose that responsibility for WH matters should transfer to the Leader of the Council as part of the Culture Development responsibilities. Conflicts of interest would then have to be resolved by discussion rather than being one person's decision. This would put the OUV

		on an equal footing to development aspirations. The outcome might end up the same, but it might not; & having the issues properly debated beforehand must make both parties aware of what is at stake when a decision is made.
Management	Bath Heritage Watchdog	3. Council's Heritage Champion obviously has a role to play outside Bath because heritage exists throughout B&NES. But if his title was amended to Heritage & World Heritage Champion it would serve to identify an alternative point of contact (other than the World Heritage Manager) for public concerns about World Heritage.
Conservation Area	Bath Heritage Watchdog	4. WH boundary embraces the entire city, but the current Cons Area covers only part of that. The introduction of an umbrella term "Heritage Asset" in PPS5, puts listed buildings, conservation areas, sites of special scientific (or natural) interest, archaeological remains & visually important open spaces etc on an equal footing. Part of Bath's OUV recognises sight lines & landscape, but outside the CA no protection is offered to parts of the landscape that might be visually important. Outside of the CA, inappropriate felling of trees, an unfortunately placed "permitted development" extension or dormer window, could sever this line or a "permitted development" demolition could remove a landmark feature. We recommend that the entire Site is made a CA, so that developments are subject to planning permissions & Article 4 controls can be introduced where appropriate.
Planning	Bath Heritage Watchdog	<p>5. Development Control Committee often hear opinions as to whether a planning application would affect the WHS. Unfortunately there are many interpretations of the Site, ranging from the correct one of everything within the city boundary plus views in & out, to an incorrectly restricted view of "central Bath" or "Georgian core". An incorrect description of the WHS during a debate must lead to planning decisions of doubtful accuracy.</p> <p>Currently, developments on land areas in excess of 0.5 hectares are referred to English Heritage, & too often EH either make no assessment of the impact on the WHS, or even worse, make a wrong assessment. In the case of the West. Riverside, UNESCO specifically disagreed with the EH advice.</p> <p>We recommend:</p> <ul style="list-style-type: none"> • A standard procedure of referring all proposed developments with a land area of 0.5 hectares or more to ICOMOS-UK as well as EH, because as agents for UNESCO, ICOMOS-UK are the experts on the OUV. Such planning applications should also require consultation input from the WH Manager. • Training should be given to all DCC Members & reserves on how to properly assess any impact on the WHS, & should emphasise that local benefits should take second place to the expectations of the rest of the world. • Written guidelines for Case Officers to help them assess any impact on the WHS.

		<ul style="list-style-type: none"> Delegated decisions on Listed Building applications should only be made by Cons Officers, as should CA Consent for demolitions.
Tourism	Bath Heritage Watchdog	<p>6. Many Tourists come to absorb the architectural ambiance, & don't care when something was built provided it fits in with their idea of what Bath should look like. Architectural purists can find lots wrong with the detailing of the Southgate, but the general public like it because it meets their expectations of what a shopping centre in Bath should look like, & the only styling criticism from visitors that we have overheard is that it is too tall (which it is). Similarly, nobody cares that the Francis Hotel was built in the 1950s with the wrong number of doors, because it looks as though it belongs to Queen Sq. & very few know that on another side of Queen Square is a Victorian infill. The varieties of style, like the Italianate villas on Bathwick Hill & the Edwardian terraces in Oldfield Pk are regarded as part of the homogeneous experience of Bath. From a WH point of view, the world in general will not support the idea that 'pastiche' is somehow abhorrent, or that uncharacteristic buildings (such as the bus station, where we overheard "What were they thinking of when they built this") are an asset.</p> <p>When Bath City Council controlled planning, there was a style guide that insisted that every new building should be compatible with the homogeneous appearance of Bath, in scale & in palette of materials. Avon Co.Council took over this policy but did not enforce it rigidly. B&NES did not adopt this policy, probably because to do so would have prevented planning permission being given to the Thermae Spa building. But the continued absence of this policy has failed to prevent the bus station which was built, & provided an excuse for the Dyson multi-coloured glass palace, the tower blocks on the West. Riverside which the council is mindful to permit, or the Cullinan Plan for N. & S. Quays which has not yet had proper public exposure.</p> <p>The proof that this mode of thinking is still in vogue can be witnessed by the new proposals for a 'Welcome Building' for the Technical College. A style guide to control this type of extravagance is desperately needed. We recommend that this type of style guide is resurrected & is adopted as an SPD. Tourists do not come to Bath to be impressed by modern architects' egos, they come to enjoy the honey coloured stone & a universal sense of proportion. Bath only needs one landmark building, the Abbey.</p>
Long Term Vision	Bath Heritage Watchdog	<p>7. There seems to be a general attitude that having got WH status nothing else needs to be done. Yet this is far from true. Looking at Bath from popular viewpoints, nearly everything that looks out of place was built in the last 40 years, & it shows itself up by absence (of chimneys, dormers or window proportions etc) or as a presence (shiny roofs, excessive areas of glass, brilliant white rainwater goods etc). The Long Term Vision needs to include a reminder that maintaining the OUV</p>

		takes effort. We suggest an amended paragraph: Bath will be accessible & enjoyable to all; a site that understands, <u>defends</u> & celebrates its Outstanding Universal Values & atmosphere.
Description of the Site	Bath Heritage Watchdog	8. The evolved nature of Bath needs far greater description than “19 th , 20 th & 21 st century developments”. It is right to identify the “Designated” archives, but that section needs to also recognise that other collections are an important window on the site.
Energy Conservation	Bath Heritage Watchdog	9. Para 1.1.5. Ways that historic buildings can be adapted for energy conservation are not necessarily the same methods as those promoted for modern buildings. The last sentence should be amended to: Bath has a high number of historic buildings which may not be <u>suitably</u> adapted for changing energy needs <u>by the most widely used methods</u> .
Students	Bath Heritage Watchdog	10. Between 1.1.6 & 1.1.7, should come a reference to the steadily increasing student population also has to be accommodated. Some purpose built residences have been erected, but a considerable amount of former family housing has been bought & converted into bedsits. This has not only added to the shortage of family housing by taking a considerable proportion of such properties off the market, but in the interests of easy maintenance gravel has replaced many gardens & in some places walls & gateposts have been removed. The character of some areas has changed considerably.
Contemp. Architecture	Bath Heritage Watchdog	11. Para 1.1.10 is over-simplified. There is no single style called “contemporary”. The reference to contemporary buildings should refer to typically styled contemporary buildings . Contemporary buildings have been successfully introduced (Charlton Court, Horstman Close & Seven Dials for example) but Bath should not be entertaining architects who want to introduce “shock value” designs to the city. It is not impossible to surround a modern business space with an exterior that sits comfortably into the street scene, but it is difficult to persuade developers that they should do that.
Legislation	Bath Heritage Watchdog	12. Para 1.2.6 needs additional material: The World Heritage Convention has been ratified by the UK Government, although the designation is not yet recognised in UK law <u>beyond being included as a “Heritage Asset” in PPS 5</u> . The Site is primarily protected by UK planning laws & specific planning guidance. PPS 5 (2010) lays down the principles for protection, & Circular 07/2009 clarifies that World Heritage Site status is a ‘key material consideration’ in planning terms. The Plan <u>has not</u>

		<p><u>previously</u> been adopted as a Supplementary Planning Document, but the Action Plan contains an aspiration to achieve this by adopting a summary version. Locally, protection is currently (2010) via the B&NES Local Plan, adopted in October 2007. Designations including listed buildings & conservation areas, & scheduled monuments also offer statutory protection. <u>The Local Plan makes provision for protecting Locally Important Buildings, but the associated task of identifying the buildings that fall into that category has never been undertaken.</u> Section 3.4 gives more detail on the planning & policy framework, & Appendix 5 contains the relevant Local Plan policy. Non-statutory designations also exist, such as the English Heritage Register of Historic Parks & Gardens, <u>& planning decisions normally treat areas on that register as Grade II listed.</u></p>
Setting	Bath Heritage Watchdog	<p>13. Paragraph 1.2.8 doesn't go quite far enough. It needs some additional words in the second sentence: The Plan recognises that factors beyond the boundary of the Site will influence it <u>or views into or from it.</u></p>
Management & Funding	Bath Heritage Watchdog	<p>14. Para 1.2.15 needs amending. Bearing in mind that it is a plan for a number of years, it should not rule out possibilities for the future even if they seem unlikely today. So the last sentence should begin <u>Delivery of plan actions has not so far been</u> underpinned by a specific budget & <u>currently</u> relies on co-ordinating & influencing other agendas.</p>
Wording	Bath Heritage Watchdog	<p>15. Para 1.2.16. Saying that 26% is not completed implies that they are started. You should say 26% unachieved.</p>
UNESCO Mission	Bath Heritage Watchdog	<p>16. Para 1.2.17 misleads slightly. The Mission Rpt assesses management of <u>the parts of the site which they saw</u> as good. In the conversation that Watchdog had with them they were completely shocked to discover that something as unique as Cleveland Pools could be allowed to get into the state in the photographs we showed. However, because they didn't see it with their own eyes they didn't mention it in their rpt.</p>
Interpret.	Bath Heritage Watchdog	<p>17. Para 1.2.18 should recognise that better dissemination of information is required. Educational establishments should extend beyond schools into the universities. Also, a surprising number of residents are unaware that Bath is a WHS. The WH logo should be on council forms, main buildings & on all local maps & leaflets available from the Tourist Info. office.</p>

<p>Contemp. Architecture</p>	<p>Bath Heritage Watchdog</p>	<p>18. Para 1.2.21 is not true. Look at the claim “Large scale developments of contemporary architecture have come forward, & provided important lessons on how to handle such applications.” Now consider that the original proposals for the Dyson Academy involved demolishing the Newark Works & resulted in the Canadian Government writing to the Secretary of State insisting that the building was preserved, & it was spot listed within days. Then the plans were amended to retain just a butchered façade, & the council voted to grant permission. This demonstrates that the lesson that what the world (in this case represented by the Canadian Government) wants should be more important than a mere local desire, was definitely not learned. Similarly, the WH Committee, made up of delegates from a number of countries, voted decisively that the West. Riverside as currently proposed would seriously damage the Site, yet the DCC decided to persist with that design. Whether these examples reflect greed, stubbornness or stupidity is irrelevant, there is clearly no evidence that anybody has learned anything.</p> <p>As for the Thermae Spa proving that it is compatible with Bath’s status, the appearance on the street scene might not cause visual problems, but the method of construction rules out the “entirely compatible” description used in this paragraph. Firstly, the Beau Street Baths which was demolished to build the Thermae building was of traditional stone & mortar construction, & would have lasted another couple of centuries, whereas the Thermae building is concrete poured over ungalvanised steel reinforcements, so has a life of at best 60 years, & probably less than this. Then the Beau Street Baths had its water at the lowest level, so that the weight of water in the pool was supported by the water table in the surrounding soil, & the building above could be relatively light. The Thermae building has a large pool on the roof, so all the underlying structure has to be strong enough to support the weight, making it a very heavy building bearing down on a relatively small footprint. Its weight appears to be already moving the water table beneath it, & the colonnade & buildings in Bath Street are showing the first signs of structural damage from movement of their foundations. So this adventure into modern architecture has resulted in a short-lived building replacing one that would have outlasted it, which will have caused considerable expense to rescue the Grade I listed buildings in Bath Street in its short lifetime.</p> <p>Consequently, the only part of Paragraph 1.2.21 worth keeping is the first sentence & parts of the last two, hence: “Balancing conservation against growth has been a significant challenge. Decision makers within the development process need to appreciate, understand & properly interpret Bath’s status & characteristics. This requires continual support & reinforcement”.</p>
<p>Access</p>	<p>Bath Heritage Watchdog</p>	<p>19. Para 1.2.25 could be extended with the news: “Plans for providing disabled access to Number 1 Royal Crescent are in the early stages but should be brought to completion within the lifetime of this Management Plan.”</p>

WH Day	Bath Heritage Watchdog	20. Para 1.2.26 should not be so narrow as to set a single day for World Heritage Day, when “World Heritage Events” would give elbow room. See also our comments on Para 5.4.7.
Wording	Bath Heritage Watchdog	21. Para 1.3.3 needs an additional sentence: By the autumn of 2010, none of the recommendations iii to vii have been actioned.
Landscape Setting	Bath Heritage Watchdog	22. Paragraph 2.3.2 has a last sentence that is too narrow. It should say: The countryside stretches into the city in several places, & there are views of the surrounding hills from <u>many parts of the city, along with views into the city from the surrounding hills.</u>
Wording	Bath Heritage Watchdog	23. Paragraph 2.3.3 should begin: The stone of the surrounding hills can & has been mined & quarried ...
Wording	Bath Heritage Watchdog	24. Paragraph 2.3.5 reads clumsily. For accuracy the first sentence should read: The hot springs have played a central role in <u>nearly</u> every stage of the city’s development, creating a unique social history & continuing culture. It would be better for the second sentence to say: The city has regularly used the springs as a regeneration tool, rebuilding the structures & promoting the culture of drinking the waters for health, & bathing in the waters for health & recreation.
Wording	Bath Heritage Watchdog	25. Paragraph 2.3.9 for accuracy should begin: Medieval Bath was an important regional trading centre based on the wool & cloth trades, & during that time the Roman complex remained undiscovered & the hot springs ran to the river unused.
Wording	Bath Heritage Watchdog	26. Para 2.3.13 needs an additional sentence at the end: The Mineral Water Hospital, the first hospital in the country to offer treatment to patients from outside the local area, attracted scientists & doctors of renown because of the opportunities the hospital offered for research.
Wording	Bath Heritage Watchdog	27. Para 2.3.19 needs to be completely rewritten: Unlike the Georgian builders who either remodelled existing buildings or demolished & replaced them, Victorian developments mostly infilled

		<p>the gaps left by the Georgians or extended the size of the city. Many of the buildings the Victorians built in the city centre continued the Palladian style, & a number of buildings that are assumed to be Georgian (including parts of the Roman Baths complex) are of a later date. The Victorians also extended buildings in the original style, including the Guildhall, the Abbey & the Pump Room & the Mineral Water Hospital. Bath also had the majority of its churches (with exceptions such as St Mary's Bathwick, St Saviours, Larkhall & Christ Church, Julian Road which were of the late Georgian period but not in that style) built by the Victorians. The contribution to the skyline of Bath made by these buildings is significant. At the time, Bath had the greatest number of places of worship per head of population than anywhere else in Britain, & John Wesley came to preach. The use of Palladian style continued after 1825, indeed the now demolished Beau Street Baths was built in Palladian style in the 1930s, but new Victorian styles increasingly influenced the city's architecture, & in particular extended the city beyond its Georgian boundaries. The 19th & 20th century suburbs largely filled in the landscape between the city & its satellite villages, but stayed within the river valley. A distinctive contribution was made to the site by industrial & railway architecture mostly along the river valley. Many surrounding villages, although separate centres of population until the suburbs reached them, were closely associated with the city & their 18th century buildings reflect the activity in Bath at that time, & now they form an important element of the Site.</p>
Bomb Damage	Bath Heritage Watchdog	<p>28. Para 2.3.22 Very few Georgian artisan dwellings were lost to World War II bombs. The City Engineer's records from 1942 identify 115 Georgian buildings destroyed by bombs (we have a list of the addresses if you want it), everything else (the records show that about 19,000 buildings sustained some degree of bomb damage) was either repairable damage or in the Victorian & Edwardian suburbs. It was Bath City Council's post war policies that erased acres of Georgian artisan dwellings from the landscape, not the war.</p>
	Bath Heritage Watchdog	<p>29. Para 2.3.25 needs revising. The built heritage of Bath is extensive & spread across the Site. The city centre is largely Georgian in character <u>despite retaining the medieval street layout</u>, though some buildings were refaced & contain earlier fabric, <u>& others are later, mostly Victorian additions, built in the Georgian style</u>. A few notable buildings from the 16th & 17th centuries remain, <u>& the original Roman drain from the bathing complex still exists & functions today</u>. In addition to the structural fabric of buildings, many historic interiors survive from different periods. Surviving Georgian elements comprise not only buildings, but also infrastructure elements such as parks & gardens, streets & footways, bridges, subsurface vaults, & cemeteries.</p>
	Bath Heritage Watchdog	<p>30. Para 2.3.29 needs additional sentence: Some of the inter-war buildings are sufficiently</p>

		important to the character of Bath that they have been listed.
Wording	Bath Heritage Watchdog	31. Para 2.3.30 needs additional information. In some locations, the gaps between buildings are architecturally significant.
	Bath Heritage Watchdog	32. Paragraph 2.3.34 needs to be divided & enhanced as follows: 2.3.34 Bath also has rich associations with prominent people from all periods, particularly the 18th & 19th centuries: royalty, politicians, aristocracy, artists, writers, musicians, doctors, scientists & engineers. It has played a long-term role as a national & international place for large-scale social interaction. In the 18th century Bath was central to the development of society, particularly the upper classes. In the 19th century, engineering advances improved Bath's textile mills, local residents James Dredge invented a new type of bridge, Gustav Horstmann invented the micrometer allowing accurate measurements to a thousandth of an inch for the first time & his son Sidney Horstmann designed & built a very early motor car, while Stothert & Pitt manufactured with such skill & accuracy that they became Isambard Kingdom Brunel's favourite subcontractor & were trusted with building the very first steam locomotives to run on the Great Western Railway. Medical science was advanced by the diagnosis of diabetes & the discovery that vaccination could prevent smallpox, & Dr Oliver's biscuit improved digestive problems. Isaac Pitman invented Shorthand & designed a method of printing it, & Jonathan Bowler automated the processes of producing Soda Water.
Bridges	Bath Heritage Watchdog	33. Para 2.3.35 needs addition: The natural crossing points of the R.Avon in Bath were used by the Romans, & as ferries were replaced by bridges, have continually influenced the city's development.
	Bath Heritage Watchdog	34. Para 2.4.8 Criterion (ii) provides too much scope for those who regard everything except the masterpieces as disposable. It is important to avoid any excuse for another 'Sack of Bath', & so the second sentence should be extended: This unifying of nature & city, seen throughout Bath, is perhaps best demonstrated in the Royal Crescent (John Wood Younger) & Lansdown Crescent (John Palmer), but the unsung Georgian artisan dwellings, & the 19th & 20th Century expansions of Bath in similar proportions & in the same limited palette of materials all contribute to a homogeneous character.
	Bath Heritage	35. Para 2.4.9 needs to be amended slightly to be compatible with amended Criterion (ii).

	Watchdog	Changing Item 4 to Georgian <u>styled</u> architecture would suffice.
	Bath Heritage Watchdog	36. Para 2.4.18 should include Ironbridge, which is within radius of the other WHS locations listed.
	Bath Heritage Watchdog	37. Para 2.4.19 needs to match the revised Criterion (ii), so the third sentence should read: Architecture & engineering from periods not <u>specifically mentioned</u> in the OUV are important ...
	Bath Heritage Watchdog	38. Para 2.4.21 needs revision: Text for parts a) & b) of this Statement is already agreed & should not require <u>more than minor</u> revisions.
	Bath Heritage Watchdog	39. Para 2.4.24 ends with wishful thinking. "Management measures in place through planning system continue to ensure changes are faithful to original designs & are recorded". ...the back of the Grade I listed Holburne is completely contrary to all national guidelines, & equally unjustifiable decision to demolish Grade II* listed access ramp to Bath Spa station, ...planning system fails dismally to protect what it is supposed to. Property Services have not been consulted about the ability of ancient vaults to support weight of the BRT buses. ... reports submitted by the public of damage done to listed buildings without planning permission, noting how many have been declared "not expedient to enforce" by Planning Enforcement, will show the other side of the coin. If it is important to rescue this paragraph, then: Management measures in place through the planning system <u>are intended to</u> ensure that changes are faithful to original designs & are recorded is at least honest without highlighting the failures.
	Bath Heritage Watchdog	40. Para 2.4.32 needs to be more accurate: With regards to development &/or neglect, this matter was fully considered by the 2008 joint UNESCO / ICOMOS Mission which found <u>those parts of the site examined</u> to have a 'good overall state of conservation' (see 1.3), <u>though they expressed concerns about future development plans</u> . Management measures are outlined in this plan to ensure that <u>conservation remains important</u> , & the integrity of the site remains <u>council policy</u> . Until Major Projects agree to take WH seriously, nothing more positive than that can be said.
	Bath Heritage Watchdog	41. Para 2.4.34 needs to align with the suggested amendment to Para 2.4.8. <ul style="list-style-type: none"> • Criterion (i) second para becomes: Bath's quality of architecture & urban design, its visual homogeneity & its beauty are largely

testament to the skill & creativity of the architects & visionaries of the 18th & 19th & to a lesser extent 20th centuries who applied & developed Palladianism in response to the specific opportunities offered by the spa town & its physical environment & natural resources (in particular the hot springs & the local Bath Oolitic limestone). Three men – architect John Wood Senior, entrepreneur & quarry owner Ralph Allen & celebrated social shaper & Master of Ceremonies Richard “Beau” Nash – together provided the impetus to start this social, economic & physical rebirth, resulting in a city that played host to the social, political & cultural leaders of the day. That the architects who followed were working over the course of more than a century, with no master plan or single patron, did not prevent them from contriving to relate each individual development to those around it & to the wider landscape, creating a city that is harmonious & logical, in concord with its natural environment & extremely beautiful.

- Criterion (ii) becomes:
Bath exemplifies the 18th century move away from the inward-looking uniform street layouts of Renaissance cities that dominated through the 15th-17th centuries, towards the idea of planting buildings & cities in the landscape to achieve picturesque views & forms, which could be seen echoed around Europe particularly in the 19th century. This unifying of nature & city, seen throughout Bath, is perhaps best demonstrated in the Royal Crescent (John Wood Younger) & Lansdown Crescent (John Palmer), but the unsung Georgian artisan dwellings, & the 19th & 20th Century expansions of Bath in similar proportions & in the same limited palette of materials all contribute to a homogeneous character. Bath’s urban & landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically, & that visually (& at times physically) draw in the green surrounding countryside to create a distinctive garden city feel, looking forward to the principles of garden cities developed by the 19th century town planners.
- Criterion (iv) becomes:
Bath mainly reflects two great eras in human history: Roman & Georgian. The Roman Baths & temple complex, together with the remains of the city of Aquae Sulis that grew up around them, make a significant contribution to the understanding & appreciation of Roman social & religious society. The 18th century re-development is a unique combination of outstanding urban architecture, spatial arrangement & social history. Bath exemplifies the main themes of the 18th century neoclassical city; the monumentalisation of ordinary houses, the integration of landscape & town, & the creation & interlinking of urban spaces, designed & developed as a response to the growing popularity of Bath as a society & spa destination & to provide an appropriate picturesque setting & facilities for the cure takers & social visitors. Although Bath gained greatest importance in Roman & Georgian times, the city nevertheless reflects its medieval street pattern within the area that was bounded by the city walls, significant

		<u>Victorian additions, many imitating the Georgian style, & continuous development over two millennia with the spectacular mediaeval Abbey Church sat beside the Roman temple & baths, in the heart of the 18th century & modern day city.</u>
	Bath Heritage Watchdog	42. The last sentence of the "Authenticity (2010)" section needs to read: There is a need for new developments to respect the planning of the Georgian terraces, to respect the scale & rhythm of its structures, <u>to adhere to the local palette of materials</u> , & to contribute to picturesque views.
	Bath Heritage Watchdog	43. The "Management & Protection (2010)" section should perhaps mention the National Heritage Act 1983 as amended by the National Heritage Act 2002. Also, the sentence in the last paragraph "Transport improvements are based principally around a bus based network, outlined in the Management Plan" should be omitted. Our perception is that much of the congestion in central Bath is caused by ill conceived traffic lights & buses getting in the way of other buses as a consequence, & a long term plan should not commit to a single solution that might have to give way to other ideas within its lifetime.
Urban Regeneration Panel	Bath Heritage Watchdog	44. Para 3.2.6, isn't accurate. The Urban Regeneration Panel was set up to advise on the Western Riverside, but they took it upon themselves to examine other proposals. Given the discrepancy between their aspirations for the WR & UNESCO's abhorrence of the plans, they should be deleted from the "Governance" section. Rely instead on the WH Steering Group.
Parks & Gardens	Bath Heritage Watchdog	45. Add new Paragraph 3.3.16: Four of Bath's Parks are on the English Heritage Register of Historic Parks & Gardens, listed at Grade II, & the Local Plan identifies some Visually Important Open Spaces which are not recognised as parks but are an essential component to landscape views.
	Bath Heritage Watchdog	46. Paragraph 4.1 should contain the same amendment as the Vision at the beginning of the Management Plan: Bath will be accessible & enjoyable to all; a site that understands, <u>defends</u> & celebrates its Outstanding Universal Values & atmosphere. Something that ought to be in the Long Term Vision but isn't is the idea that the WHS should be actively advertised, perhaps in conjunction with an interpretation centre. (A visit to Ironbridge could be an inspiration for this).
	Bath Heritage Watchdog	47. The Built Heritage Team is undermanned for the number of listed buildings that are visually

		important in the WHS. Potential developments can be lodged in the form of a LB Application at no charge, but pre-application consultation is charged for so most applicants choose not to take it. This significantly increases the workload of the Built Heritage Team who have to write a formal response to an application & later deal with resubmissions, when an informal chat could have set an applicant on the right lines. only Conservation Officers should be case officers for Listed Building Applications, & this is not the current policy. The current policy has led to some serious errors of judgement.
Planning Decisions	Bath Heritage Watchdog	48. Planning legislation allows some leeway for judgement, balancing harm against benefits, but decision makers sometimes take liberties. One DCC Member about to vote on a development was heard to say he was fed up with being reminded about WH & would ignore it, despite the requirement to treat this as a matter of special significance & the national guidance that harm should be wholly exceptional. Decision makers should properly understand their obligations to protect the Site & the quality of their decisions should be audited.
Planning Enforcement	Bath Heritage Watchdog	49. Enforcement is not mandatory. legislation says that Local Planning Authorities “may” (rather than “must”) take enforcement action. Unfortunately, far too many cases are ruled “not expedient to pursue”. This has led to an attitude by building owners that they either won’t bother to apply for LB Consent, or if they apply & get refused, they can go ahead & do it anyway. Every case not pursued encourages others. The situation is made worse by non-specialist Enforcement Officers who cannot accurately judge the harm to heritage assets (one case of reporting UPVC windows installed in a Grade II listed building without permission – which would not have been granted – was not pursued because “they look OK to me”). What is needed is a specialist Conservation Enforcement Officer who is actively supported in pursuing planning infringements within the WHS.
Interpret.	Bath Heritage Watchdog	50. More information needs to be provided about the chronology of the site. The attitude that if it is not Roman & is not Georgian it is not important must be stopped. There is also a need to educate about the industrial history & heritage of the Site.
Transport	Bath Heritage Watchdog	51. No thought seems to be given to the fact that most of central Bath has roadways supported on vaults, yet these vaults are an important component of the built heritage. There is an urgent need to place weight limits on vulnerable roads.
Physical	Bath Heritage	52. As worded, Issue 44 (“There is a need to encourage walking & cycling in order to control car

access	Watchdog	journeys”) could be misunderstood. Controlling car journeys is what the bus gate set out to do, but all it achieved was the same cars taking a longer route from A to B, congesting different roads. This Issue should encourage walking & cycling in order to reduce the number of car journeys undertaken.
Tourism	Bath Heritage Watchdog	53. Issue 49 is unachievable, in that visitors will go where they will see what they want to see. The trick is to let them know what they are missing so that they do roam further afield. The “Pigs” trail last year & the “Lions” trail this year proved popular. Other trails could be promoted: Victorian engineering, Religious or Worship buildings (who, for instance, if visiting would know that a recreation of a 6th century Roman Basilica lies in Oldfield Park), carved stone on buildings, interesting sight lines, building plaques for famous past residents, rare trees, & many others could be devised. Guided tours sold as MP3 downloads or iPhone apps could generate an income too.
	Bath Heritage Watchdog	54. Para 5.2.3 should include the lack of durability. It doesn’t seem to be part of current thinking, because the obelisk in the Abbey Churchyard to advertise the Cotswold Way & the sundial alongside the canal to celebrate the bicentenary were both designed with a 20 year life despite the function they were designed for stretching ahead indefinitely. The previous Southgate was demolished after 35 years & the current one will not last much longer than that because of the construction methods employed. The proposed Western Riverside would last a maximum of 60 years. Buildings that would last for centuries (Beau Street Baths, Green Park House) are being replaced by buildings that in the timescales of Bath’s heritage can only be considered short term. There is a real risk that in the future, Bath will become a permanent building site, with a continuous cycle of “disposable” buildings being replaced. There is a real need for all new buildings to be designed with a life of over a century, & a policy of not granting permission for demolishing any existing building unless a durable building replaces it.
Tall Buildings	Bath Heritage Watchdog	55. This should be extended to be Tall &/or Inappropriate Buildings. It could then protect against inappropriate materials, & buildings that are not tall in an absolute sense, but tower inappropriately above their neighbours. Supplementary Planning Documents currently offer very little protection. The Renrod application by Windsor Bridge was granted planning permission despite a number of constraints in the Western Riverside SPD declaring it unsuitable for that location. The Western Riverside Outline Application also doesn’t comply with the Western Riverside SPD. There are a number of instances of other inappropriate developments permitted around Bath despite conflicting with the City Wide Character Appraisal SPD. What is actually needed is SPDs that protect the Outstanding Universal Value (the Western Riverside SPD currently doesn’t!) & a mechanism for ensuring that the SPDs are adhered to. Ideally we would like to see the World Heritage Manager

		given a veto over planning decisions that ignore SPDs or national Heritage Guidelines.
Flooding	Bath Heritage Watchdog	56. Para 5.2.16 is not quite accurate when it claims that since 1972 flooding has been into designated flood plain. We have photographs from 2000 which show a flooded basement in Grove Street & around the Pavilion. Whilst the building structures subject to flooding might be resilient, there is a risk of loss of historic fabric if internal timbers & plasterwork are damaged. Para 5.2.19 misses the point. Bathampton Meadows already provides upstream flood storage, but the council wants to build roads & a Park & Ride on it. The Newbridge flood plain already provides downstream flood storage, but the council wants to extend a Park & Ride across it. The Recreation Ground provides city centre flood storage, but the council is promoting a land swap so that it can be built on. Raising the banks won't solve flooding problems: the experience of the Mississippi is that it saves some flood events, but if the water ever gets over the levee the impact of the flood is far more serious than if the river had overspilled earlier & at a lower water level. Bath, unlike the Mississippi valley, is hilly, & so Bath also has to consider that raised banks function as a dam if the water to be dealt with is running off the hills rather than along the river. The only practical solution is to deepen the river (by regular dredging) so that its capacity for carrying water is greater, & by banning any further construction on the flood plain.
Flooding	Bath Heritage Watchdog	57. Paragraph 5.2.21 is interesting, but doesn't really have a place in a Management Plan. It should be deleted.
Locally Important Buildings	Bath Heritage Watchdog	58. Para 5.2.24 needs to be expanded to introduce a commitment to implement the council's Locally Important Building policy. There is already the situation where several popular guide books invite tourists to see the Magna Carta which no longer exists, & there are council documents featuring as locally important the Bath Press building which is under threat. The last remaining Tin Church within the Site boundary was demolished this year, & nobody could stop it because it wasn't in a Conservation Area, so demolition was "Permitted Development"; yet English Heritage had described it as a Locally Important Building though not important enough nationally to list. Not every building that is important to Bath will be listed, & there needs to be a commitment in the Management Plan to protecting the ones that currently fall through the cracks.
Information	Bath Heritage Watchdog	59. Para 5.2.25 needs to include commitment to have database online for enquiries from the public, along the lines of the Eng. Heritage Listed Buildings system. Similarly, public has no ready access to info. about trees protected by Tree Protection Orders, but for protection of the character of the Site,

		it is important that this information is readily available so that pruning or felling such trees can be stopped if it is seen to be taking place. Extending the Cons. Area to match Site boundary will make all trees protected from felling without specific consent.
Planning Decisions	Bath Heritage Watchdog	60. Para 5.2.29 is partly addressed in our "Policy" section above, in that training will go some way towards getting WH properly considered. However, there is a tendency for some on the DCC to deliberately ignore the impact on the site & the advice of Conservation Officers, so it is not just ignorance but wilfulness that needs to be addressed. The consequence of this can be seen in Hayesfield Sch., where new extension was approved despite strong opposition by the Cons. Officer, English Heritage & Conservation Groups, & the folly of ignoring this informed advice is visible for all to see. We recommend that the World Heritage Manager should have an automatic right to attend & address the DCC when controversial issues are being discussed.
Park & Ride Site	Bath Heritage Watchdog	61. Para 5.2.30 ought to say that the Park & Ride, will have an impact on the eastern views in & out of the Site, the pressure to make best use of land will encourage unacceptably tall buildings & any development on the Rec will increase flood risks for listed buildings. Separation of WH from Major Projects is essential if such risks are to be controlled.
Contemp. Architecture	Bath Heritage Watchdog	62. The second sentence with reference to Thermae Spa & the Bus Station should be deleted. See our "Policy" comment on Tourism & our comments on Para 1.2.21 for reasons. Unless contemporary architecture takes account of the needs for durability, then there is a long term risk that Bath will become a permanent building site. That is not to say that high quality contemporary buildings cannot be designed & built. Seven Dials isn't pastiche, - there is nothing else like it in Bath, & yet it fits in. This shows benefit of contemporary architecture being designed by local architects who understand the character of Bath, compared to the Bus Station, designed by a French architect working for a London company.
Re-use of buildings	Bath Heritage Watchdog	63. Para 5.2.34 needs an additional sentence to say that reuse of an existing building is always preferable to demolition & a new construction in sustainability terms, & planning permission for demolition should only be granted as a last resort.
	Bath Heritage Watchdog	64. Para 5.2.35 should recommend that to preserve natural capital (because Bath stone is becoming an increasingly scarce resource, anything built of natural Bath stone that is permitted to

		be demolished must be dismantled rather than knocked down so that the ashlar is available for reuse.
	Bath Heritage Watchdog	65. Para 5.2.36 could usefully point out that solar panels were originally very visible, & in quantity would have adversely affected the views into & across the Site. Current research is aimed at making these products much more discrete, (for instance photovoltaic cells that have the size & appearance of natural slates are being tested on a listed building in Wiltshire), & although dealing with climate change is important, in the interests of the appearance of the Site, permitted installations should always use the least visible types available.
	Bath Heritage Watchdog	66. Para 5.3.4 needs to recognise that some property, mostly commercial premises, are owned by non-residents, & they often do not understand the special character of Bath. Some owners have probably never even visited their property to understand its surroundings. So we suggest that there is scope for an information leaflet outlining what needs to be borne in mind should be sent to planning applicants giving out-of-city addresses.
	Bath Heritage Watchdog	67. Para 5.3.6 should have our recommendation in our "Policy" section above as an objective. There are a number of benefits from matching the Conservation Area with the World Heritage Site boundary
	Bath Heritage Watchdog	68. Para 5.3.7 could be enhanced. We recommend that the 1993 shopfronts guide is reformatted to form a Supplementary Planning Document, along with a colour chart of colours compatible with listed buildings (the Shopfronts Guide states: No other single aspect of design has so much effect on the character of a shopfront than its colour. A good design can be completely spoilt by poor colour, or a nondescript design uplifted by the right choice of colour which explains the necessity). The possibility of sending out WHS guidance with Council Tax documents should be considered.
	Bath Heritage Watchdog	69. Para 5.3.10 needs to recognise the risks associated with unauthorised changes. The current level of enforcement, even when infringements are reported is poor, & increasingly we are seeing unauthorised changes being used as justification for inappropriate change elsewhere. We have even seen a planning refusal overturned on appeal because an unchallenged unauthorised change further along the street was considered to be a precedent. We recommend that a specialist Heritage Enforcement Officer should be appointed & given the authority to pursue infringements to

		rectification, &/or fines. Once the news spreads that unauthorised changes won't be overlooked, the attempts to get away with it will reduce.
'Phone Masts	Bath Heritage Watchdog	70. Para 5.3.12 should include the intention to have the cumulative effects of mobile phone masts on the landscape covered by the planned SPD.
Public Realm	Bath Heritage Watchdog	71. Para 5.3.18 needs more teeth. We have been taking part in the Public Realm & Movement Strategy Project, so we know that the WHS has not been actively considered during their discussions. Also no real attention has been paid to the importance of local knowledge, to the extent that the person researching & drafting designs for street furniture is from Sheffield & is basing his recommendations & designs on what is in use there. The project is also overlooking the street furniture that the council doesn't install, such as 'A' boards, tables & chairs. The Management Plan should be the basis for reviewing the PRMS membership & Terms of Reference. What they produce should be proposals ideal for Bath, not a clone of somewhere else.
	Bath Heritage Watchdog	72. Para 5.3.19 needs two additional objectives: <ul style="list-style-type: none"> • Objective: Instil pride in the World Heritage Site. • Objective: Encourage developments to have variations within a set of design parameters to avoid monotony. <p>The second one perhaps needs some explanation. Major developments tend to go to one developer with one architect, which leads to a risk of a large area of monotonous repetition. The Western Riverside is a prime example. Yet look around Kingsmead Square for example & you will see that although everything goes well together there are variations to give interest. Southgate shops have also avoided monotony by having each block show its own style variations within an overall design concept. It is just a pity that the planning process has allowed monotonous "High Street, Anywhere" shopfronts to be installed to spoil the quality of what the architects designed.</p>
	Bath Heritage Watchdog	73. Para 5.4.7 will be difficult to address. The PRMS has set its face against increased signage. Our suggestions that signs should be on key parks & buildings (Sydney Gardens, Parade Gardens, Railway Station, Bus Station, the Guildhall, on the tour buses on the street signage & on the council website, for instance) fell on stony ground. Our suggestion that the World Heritage symbol should appear on street markers was dismissed as adding too much clutter! It seems from the lack of progress on the issues listed in paragraph 1.3.2 that the council as an organisation doesn't take the

		opinions of UNESCO seriously enough. Remember how the comments of ICOMOS for the Western Riverside were treated. There needs to be an objective to change this mindset.
	Bath Heritage Watchdog	74. Para 5.4.13 needs to move away from the concept of a single day. One of the criticisms of the past events is that Bath is so extensive that it is impossible to see everything of interest because the times overlap. Another criticism is that there were no evening events so that those who could not take time off work were excluded. Consideration should be given to a festival of events over a number of days so that those who want to take full advantage are not limited to a subset.
	Bath Heritage Watchdog	75. Para 5.4.15 needs to be updated along the lines of our comment on paragraph 1.2.18. It is also important that such educational material is put online.
	Bath Heritage Watchdog	76. Para 5.4.21 also needs to recognise the educational opportunities. Many planning consents are on condition that an architectural survey is conducted, & these results need to be made publicly available to inform future research. Similarly, the Historical Environment Team has what they refer to as their Monuments Records that should be more widely available, as should the Property Services records of the vaults & other structures that exist beneath the surface public realm. A link to Appendix 4 from this paragraph would be useful.
	Bath Heritage Watchdog	77. Para 5.5.13 usefully encourages walking. But it needs somebody putting himself (or herself) in the position of a tourist, walking around with a camera to identify photo opportunity viewpoints which should then be advertised as such. The same exercise will show where street clutter, advertising & signage spoils what would otherwise be a photograph to treasure. This section gives a feeling of déjà vu because there is some overlap with the Visitor Management objectives in Section 5.1. Do the two need to be separate, or could they be amalgamated?
	Bath Heritage Watchdog	78. Para 5.6.3 is true. Has anybody considered placing screens showing short promotional films in public free spaces (Roman Baths foyer, Guildhall reception etc) & copying them to youtube?
Map	Bath Heritage Watchdog	79. The fact that a better map will be provided is noted. Would it be possible to use a whole page A3 print, fan folded to fit into an A4 document? Anything smaller than that would not show sufficient detail.

<p>Victorian Development</p>	<p>Bath Heritage Watchdog</p>	<p>80. Appendix 2. The Victorian Changes section (currently Paragraphs A2.38 & A2.39) should include another paragraph on the Kennet & Avon Canal, opened in 1810. This allowed Bath Stone to be transported to other parts of the country, though mainly London, at reasonable cost, bringing employment opportunities to the quarries & profits for the quarry owners, much of which was spent locally.</p> <p>The other thing the Victorians built was buildings for industry,. The Newark Works for Stothert & Pitt is perhaps the most notable, but there were also extensions to the gas works & Carr’s Mill among others.</p> <p>But the greatest unsung Victorian building boom was places of worship, see our comment above on Paragraph 2.3.19.</p> <p>20th Century</p> <p>Paragraph A2.40 needs to have a second paragraph:</p> <p>Also in the 1930s, Bath recognised that it had heritage that was worthy of special protection but did not conveniently fit into the criteria specified in the Ancient Monuments Protection Act 1882. So Bath produced a local Historic Buildings Register, which later served to identify to the War Damage Commission those buildings which should be rebuilt if they were damaged by bombing. When the Town & Country Planning Act 1947 led to the compilation of the first list of buildings of special historical or architectural importance, Bath’s Historic Buildings Register seeded the national list, & was then discontinued.</p>
<p>Bomb Damage</p>	<p>Bath Heritage Watchdog</p>	<p>81. Bomb Damage. note that the rebuilding of the suburbs did take place, on a like-for-like basis. The Bath at Work Museum has chapter & verse on exactly what happened rebuilding King Edward Road, which would have been typical of almost all the ordinary bomb damage reconstruction, but in a nutshell, the Government would pay for the repair & rebuilding costs provided that for any unlisted building it didn’t exceed the estimated sale price of the building after repair. Almost all of the 2-storey residences were repaired under this yardstick, & all listed buildings, but 3-storey economics were marginal & many did not get rebuilt.</p> <p>For a more succinct summary, see www.bathblitz.org/events08.htm & we have secured permission from that website author for you to reproduce anything useful to you from that page, provided you add the website to your bibliography.</p>

App.3	Bath Heritage Watchdog	82. App 3 needs additional material to reflect the corrections & additions we have provided. See or comments on Section 2.4 above
App.4	Bath Heritage Watchdog	83. App 4 should include the Mineral Water Hospital (John Wood) & the Cleveland Pools.
Typo	Bath Heritage Watchdog	84. Paragraph A4.221 contains a typo. 165 should be 1865.
Parks & Gardens	Bath Heritage Watchdog	85. Paragraph A5.14. This list looks incomplete. Hedgemoad Park is listed Grade 2.
UNESCO Mission	Bath Heritage Watchdog	86. App A7. We believe that the response from the State Party was inaccurate, & wrote to both DCMS & UNESCO to say so, with details (for instance the Newark Works is listed as a group with its ancillary buildings so it is much more than an Italianate façade). We don't suggest that the Management Plan should express any opinion on the State Party's comments, but for completeness you should give the Mission Report in full & let the readers make up their own mind.
Core Strategy	Bath Heritage Watchdog	87. Final recommendation we would make is that entire Management Plan should be part of the Core Strategy. It would have more force in the planning processes if that were the case.
Consultation	Norfolk Crescent Green Residents Association (NCGRA)	1. Welcome opportunity to comment, but concerned that the plan says it has been developed in consultation with the local community. To date consultation appears to have only been with selected stakeholders, whose views are not always representative of the wider community. We trust therefore all views resulting from this public consultation will be given full consideration & incorporated as appropriate into the Management Plan before it is adopted by BANES Council & approved by WHS Steering Group etc. It's appreciated this is not a Planning Document & hence does not have to comply with SCI procedures, but if it is to be put forward to DCMS & UNESCO as a plan developed in consultation with the local community, making a summary of consultation responses available on request only does not seem appropriate & will give rise to doubts among contributors as to whether their views have been taken into account. So please can we be assured a summary of consultation responses will be placed on the website prior to BANES adopting the plan?
	NCGRA	2. We note it is intended to adopt a summary Plan as an SPD at a later date; objective Ic & 6a suggest 2011/12. It is assumed public consultation will then be undertaken again in accordance with SCI procedures & a schedule of comments & how they are addressed will be reported to Committee. However another consultation on the same topic is likely to confuse & many may not

		respond assuming there is no need as they've already commented on the Plan this time round. We would be grateful to hear how this will be addressed.
Core Strategy	NCGRA	3. In the meantime we understand the Core Strategy is now scheduled for public consultation commencing in January 2011& assume this will not take account of responses from the current consultation, but merely include some references to WHS policies, which is disappointing, but please confirm this is correct.
Planning Policy/ Tall Buildings	NCGRA	4. Proposals to adopt further SPDs to supplement Policy BH1 in the local Plan & in the forthcoming Core Strategy, inc. Bath WHS Setting Study, Building Heights Strategy/Tall Buildings SPD. No doubt, like us, many respondents will welcome the above proposals to guide regeneration without compromising OUV of the site. In view of the potential for 'aggressive development' in very close proximity to our neighbourhood, for us a Building Heights Strategy/Tall Buildings SPD to guide regeneration is a pressing concern. Although work has been undertaken on a Tall Buildings Study, we note in objective 6f, completion & taking forward as an SPD is dependent on resources & no timescale is given. We would be most grateful if this SPD could be given earliest priority as our Georgian Architecture is extremely threatened by the impact of major development & tall buildings, (far more than in any other part of Bath WHS) because of our location opposite the proposed Western Riverside development. Although Crest Nicholson kindly averted the threat to the western part of our locale by reducing their buildings to 4 storeys, the adopted BWR SPD proposes buildings to the City Extension eastern part (only 30 metres across the river from the southern end of Grade I Norfolk Crescent) in excess of those granted outline planning permission further west in Crest's development i.e. 9 storeys +. From UNESCO's comments regarding Phases 2 & 3 of Crest's development, it is to be assumed they will not accept this scale of development in such close proximity to a group of 18 th C architecture.
Flood Risk	NCGRA	5. Mission comments that Council should be encouraged to provide clear guidelines with respect to flooding & development – state party reply refers to SFRA & land allocation for development management & sequential approach in PPS25 plus Flood Risk Management Strategy entitled Strategic Food Mitigation Management Strategy! Unfortunately their reply & the text in WHS Management Plan fails to explain that neither PPS 25 nor FRMS will reduce flood risk to existing properties & only guarantees this risk will not increase, although it protects new development. Should it not be made clear to UNESCO precisely the number of historic properties, or at least the groups of buildings, located in FZ 3a & hence already at some considerable flood risk? The whole text in WHS Management Plan is very muddled. 5.2.15 & 5.2.16 at best are irrelevant,

		<p>but at worst imply damage to 18thC architecture is acceptable because “major historic buildings appear to be resilient”; maybe they are, but costs of repair could be prohibitive & lead to blight. The second part of 5.2.16 is incorrect in that the river has not remained in its banks since 1972 as many of us have personally witnessed.</p> <p>It is assumed in 5.2.19 “feasible, comprehensive, strategic solution” means one that protects all property in Bath from flooding, even that currently at flood risk, but this needs clarifying. Reference is made to “industry guidelines” but it is surmised instead Defra methodology applies & that Bath is low on their priority list for complete protection.</p> <p>There might be some opportunity for non UK grants towards total protection but it is not clear if this has been investigated. If not, maybe once UNESCO is aware of the number of historic properties at risk they will assist with enquiries re possible sources of funding.</p> <p>Regret to say, overall it is considered the whole section needs re-writing by a professional & hope that EA or Atkins might be asked & prepared to assist.</p> <p>5.2.20 & 5.2.21 – An interesting but lengthy project & isn’t relevant to subject. Please see http://www.bath.ac.uk/news/2010/07/08/parnassus/ for details.</p>
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