

Bath & North East Somerset Council		
MEETING:	Council	
MEETING DATE:	14 March 2019	:
TITLE:	The City of Bath World Heritage Site Management Plan mid-term review	
WARD:	All wards within The City of Bath and surrounding parishes	
AN OPEN PUBLIC ITEM		
List of attachments to this report: None		

1 THE ISSUE

- 1.1 The City of Bath World Heritage Site Management Plan 2016-2022 (hereafter ‘the Plan’) was endorsed by Council in 2016 and is mid-way through its 6 year life. In line with best practice, the document has been monitored and reviewed. Minor changes to the Action Plan have been made by the World Heritage Advisory Board, the body which oversees its production and implementation.
- 1.2 The Plan is a material consideration in the planning system. In order to avoid any confusion or challenge to it, Full Council (as the body which endorsed the Plan) is asked to subsequently endorse mid-term alterations to it.

2 RECOMMENDATION

- 2.1 To endorse the mid-term changes to the City of Bath World Heritage Site Management Plan and recommend to the Cabinet Member for Economic and Community Regeneration that the revised document is approved for submission to the United Nations Educational, Scientific and Cultural Organisation (UNESCO).

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 The Plan is being delivered within allocated budgets.
- 3.2 The Plan contains 48 actions, some of which are funded, and others for which funding must be sought (from external sources such as the National Lottery Heritage Fund). Some are aspirational and the Plan clarifies that inclusion of such items carries no guarantee that funding will be found and cannot be a promise of delivery. The Plan must strike a balance between being visionary and deliverable, and inclusion of aspirations proves useful when bidding for funds from external sources.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 UNESCO World Heritage Site (WHS) status remains the highest accolade relating to heritage and is a globally recognised, respected and coveted brand. Inscription is first and foremost a responsibility, confirming that we are the guardians of heritage acknowledged to be of importance to all humankind and which should be conserved for this and future generations. The status also brings economic benefit, principally in terms of generating increased tourism, civic pride and the general perception of Bath as a place of quality.
- 4.2 The UK Government is a signatory to the World Heritage Convention (1972). Responsibility for the management of sites is then devolved to an appropriate local body, which in the case of Bath is Bath and North East Somerset Council. World Heritage status is therefore a national obligation resulting from being a convention signatory rather than a statutory matter. World Heritage is however enshrined within UK Government Policy including the National Planning Policy Framework (2018). UNESCO membership is not connected to membership of the European Union and is not directly affected by current Brexit deliberations.
- 4.3 UNESCO Operating Guidelines require all sites to have a management plan. The current City of Bath WHS Management Plan is the third such plan, replacing previous versions of 2003 and 2010. Given the six-year time span of the document, review at the mid-way period is considered best practice and to represent and demonstrate a responsible management approach.
- 4.4 Production and delivery of the Plan is overseen by the WHS Advisory Board. This is a well-established (2001) forum of 16 local and national organisations with an independent chairperson (Prof. Barry Gilbertson) and multiple Council representation including the Cabinet member for Economic and Community Regeneration. The Council takes the role of 'principal steward' of the WHS, providing a secretariat and employing the WH Manager who (amongst other duties) writes the Plan. The Plan is therefore not wholly a Council document, although the Council plays a lead role in production and implementation.

5 THE REPORT

- 5.1 The 2016-2022 Management Plan was endorsed by Full Council on 15 September 2016 and subsequently sent to UNESCO. It contained 47 actions in an Action Plan chapter within the main document. This section is designed as a 'stand-alone' element of the Plan which can be updated and amended as necessary. The actions are delivered by a range of partners and monitoring of performance is conducted every two years. At this mid-term point, some minor alterations have been made to adjust actions to reflect changing circumstances.
- 5.2 The changing circumstances prompting review of the actions range from changes to major projects (such as rail electrification), changes to actions successfully delivered or refinement to actions which monitoring has shown would benefit from re-focussing to achieve the desired impact.
- 5.3 The primary purpose of this report is not to review performance to date of the Plan or to conduct a detailed review of the changes to the wording of actions, both of which have been carried out in detail by the World Heritage Advisory Board. (The report to the Board is included in background papers). As noted in 1.2, the Plan can be a material consideration in major planning applications. To have the Plan endorsed by Full Council but subsequently altered by another decision making

body may give rise to confusion and/or challenge, so endorsement by Full Council of the changes is sought in order to ensure maximum clarity. It also perpetuates the message that this Council attaches the utmost importance to its responsibility with regard to the good management of Bath as a World Heritage Site.

- 5.4 The alterations to the Action Plan are set out in Table 1 at the foot of this report. This table shows the existing action wording, the recommendation of the World Heritage Manager to the Advisory Board of 27 November 2018, the Advisory Board's response (as taken from the minutes of that meeting) and the new wording.

6 RATIONALE

- 6.1 The rationale for seeking endorsement of these minor changes is largely set out in 5.3 above, in that to avoid confusion or legal challenge in planning (or other) deliberations the Council body which endorsed the Management Plan should be the same body to endorse these changes.

7 OTHER OPTIONS CONSIDERED

- 7.1 Do not make changes to the Plan. A six year time period will inevitably see changes in circumstance which if not reflected in changes to the actions will result in a diminished ability to meet objectives. It also risks the plan becoming increasingly obsolete as time passes.
- 7.2 Review and change the whole Management Plan. The production of a new plan is a lengthy exercise taking around 18 months and involving multiple rounds of public consultation. It is not considered necessary or prudent to undertake such an exercise in order to make minor amendments.
- 7.3 Endorse changes through a Single Member Decision. Legal opinion suggests that this may cause confusion or present the opportunity for challenge.

8 CONSULTATION

- 8.1 The Plan itself was subject to full public consultation over an 8 week period (May/July 2016). The current minor amendments were made by the World Heritage Advisory Board, the minutes of which are posted to the internet. The minor wording alterations undertaken are not considered to constitute significant changes warranting bespoke public consultation.

9 RISK MANAGEMENT

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

Contact person	Tony Crouch, World Heritage Manager, 01225 477584
Background papers	<ol style="list-style-type: none">1. City of Bath World Heritage Site management Plan (2016-2022). https://www.bathworldheritage.org.uk/management-plan2. World Heritage Site Management Plan Mid-term

	<p>Monitoring Table.</p> <p>3. World Heritage Site Management Plan Monitoring Covering Report 27 November 2018</p> <p>All of the above documents can be viewed at: https://www.bathworldheritage.org.uk/management-plan</p>
<p>Please contact the report author if you need to access this report in an alternative format</p>	

Table 1. Changes to the wording of the Action Plan of the City of Bath World Heritage Site Management Plan 2016-2022

Act. No.	Original wording from World Heritage Site Management Plan	World Heritage Manager's recommendations to the World Heritage Advisory Board	Advisory Board Comments (taken from minutes of meeting 27 Nov. 2018)	New Action Wording
1	Re-establish a design advisory panel for major development applications.	This action seeks to re-establish a design review panel, which has been achieved. The use of the panel is however not automatic or mandatory and applicants may choose not to use it, not least because of the expense involved. It is suggested that the wording should be changed to <u>encourage</u> the use of the design panel, where appropriate.	The Board agreed that the wording change should be changed to encourage the use of the design panel, where appropriate, plus other guidance. The Bath Preservation Trust's 'Making Changes' document was cited as an example of such guidance.	Strongly encourage the use of a design review panel, plus the use of other relevant guidance, in the preparation of major development applications.
2	Ensure that the issue of building height is effectively managed through the application of the Placemaking Plan & by the adoption of a Building Heights Strategy as a SPD.	The Placemaking Plan has been adopted so it is recommended to remove references to this adoption from the action. The Building Heights Strategy relies on evidence that is now several years out of date and the document is in need of refreshing. Adopting it as a SPD is still a valid aspiration, but this is unlikely to happen without it being updated. The recommendation is to change the wording to 'Seek to ensure that the Building Heights Strategy is refreshed and subsequently adopted as a SPD'.	The Board accepted that the Building Heights Strategy would benefit from updating before potentially being adopted as Supplementary Planning Guidance. LB agreed that inclusion of this as an action would help ensure this this work was programmed.	Ensure that the issue of building height continues to be effectively managed by updating the Building Heights Strategy & adopting it as a Supplementary Planning Document.

4	<p>Engage with proposals for major development which may impact upon the OUV of the site, including the following:</p> <ul style="list-style-type: none"> a. The development of a sporting, cultural & leisure stadium at the Recreation Ground b. Cleveland Pools project as a listed building at risk & an attribute conveying OUV c. Conservation & enhancement works as part of the Bath Abbey Footprint Project d. Replacement of the radial gate at Pulteney Weir e. The rail electrification project 	<p>Specific reference is made to the rail electrification project and the Pulteney Weir Radial Gate. There is no indication that either project will come forward within the lifetime of this plan and it is suggested that these references are removed. A general reference to 'any other major project which impacts upon the OUV' should be added.</p>	<p>The Board agreed that a caveat along the lines of 'any other projects that impact upon the OUV' should be added, but did not think it was worth removing the references to the Radial Gate and rail electrification. Bath Rugby proposals may impact upon the Radial Gate.</p>	<p>Engage with the following known project proposals for major development, plus any other proposals which may impact upon the OUV of the site:</p> <ul style="list-style-type: none"> a. The development of a sporting, cultural & leisure stadium at the Recreation Ground b. Cleveland Pools project as a listed building at risk & an attribute conveying OUV c. Conservation & enhancement works as part of the Bath Abbey Footprint Project d. Replacement of the radial gate at Pulteney Weir e. The rail electrification project
7	<p>Engage with & support the current programme of cycling improvements & ensure that they deliver sustainable travel options whilst protecting the OUV.</p>	<p>The actions referred to here have now been completed. B&NES Senior Engineer (Accessibility and Cycling) considers that inclusion of this action within the Plan has been useful but suggests it is widened to walking, as most schemes cover walking and cycling. The question is whether to retain this action, as</p>	<p>The Board considered that it was worth retaining this action, reworded to include walking as well as cycling. This was considered important as the Clean Air Zone proposal may introduce more opportunity for cycling/walking improvements.</p>	<p>Engage with & support proposed walking and cycling infrastructure improvements where they deliver sustainable travel options whilst protecting the OUV.</p>

		without specific proposals it becomes more of an objective.		
20	Support the on-going co-ordination of the Bath cultural offer & the identification of funding to facilitate this.	This action was widened to refer to the 'Bath cultural offer' during consultation on the draft plan. It is now ambiguous and potentially covers museum or arts activities which may not have a direct connection to the OUV of the site. There is also no clear monitoring indicator for this. It is suggested this action needs either re-wording or removing.	TC thought this action was too broad and not linked closely enough to the OUV of the Site. The Board would rather see it retained and re-worded than removed. AB said that she supported the co-ordination of Bath museums and that this should be encouraged. KD said issues such as the social setting and the natural interest could be covered here.	Support the Bath cultural offer, through museums, attractions, events and other offers, in so far as these relate to the OUV of the Site.
22	Work toward increasing the current Bath WHS education content in primary & secondary school curriculum & in associated local projects.	The wording of this action specifically refers to inclusion of material within the educational curriculum. This is largely beyond the control of the Advisory Board and it does not recognise the educational offer made by, for example, the proposed new Education Centre at the Roman Baths. It is suggested that this is re-worded to remove reference to the curriculum.	It was agreed that this action needed to be more generic and the reference to 'curriculum' removed.	Promote, facilitate and support opportunities for primary & secondary school pupils to engage with & learn about Bath as a WHS.
27	Act to remove properties (& other attributes carrying OUV) from the national & local Buildings at Risk registers.	The local 'Buildings at Risk' register is a key monitoring indicator for the WHS. However the updating and review of the register happens in a piecemeal fashion as and when resources	TC advocated encouraging regular periodic review of the local register. The Board supported this and CK commented that in other areas outside bodies supported the Council in delivering this.	Act to remove properties (& other attributes carrying OUV) from the national & local Buildings at Risk registers & work to ensure a published local

		allow. This reduces its effectiveness as a reliable monitoring indicator and is vulnerable to reduction in resource provision. An action to encourage regular review should be considered.		register which is periodically monitored.
29	Bring forward Conservation Area appraisals for areas within Bath Conservation Area plus a list of locally important buildings	Conservation Area appraisals and the list of Locally Important Buildings are clearly separate projects and should be split into individual actions.	The Board agreed that Conservation Area appraisals and Locally Important Buildings were separate projects and should be split.	<p>29a Support the production, implementation & periodic review of Conservation Area appraisals for areas within Bath Conservation Area.</p> <p>29b Support & engage with the production & associated actions of a register of Locally Listed Heritage Assets within the WHS.</p>
32	Engage with regional/national/local government to ensure that sub-regional growth & new housing numbers allocated to the city respects the special characteristics of the WHS	This action seeks to engage with national/regional government to prevent excessive new housing numbers being allocated within the Site. However, this is primarily the role of the local plan and engagement with this is already covered in Action 3. Given this overlap, and that the Advisory Board has little influence over the housing allocation figures, it is recommended that this action is removed.	It was considered by the Board that more progress had been made here than is currently recorded. LB said that working within the West of England Combined Authority B&NES had been able to influence housing allocations for the district and had limited this to far more realistic levels than in the past (300 houses in the city over the next 20 years). The action should be marked amber rather than red. Furthermore, Bath is no longer	Continue to work with the West of England Combined Authority and other relevant organisations to deliver sub-regional growth & new housing for Bath which at the same time respects the OUV of the WHS

			taking housing allocations not fulfilled by Bristol, thanks to a Memorandum of Understanding.	
38	Pursue the establishment of a research group & an index of current research	This action was focussed on producing an index of research because of the potential of a funding opportunity which now no longer looks achievable. It is suggested that this action is re-worded to encourage research activities, in a similar way to Action 30 does for craft skills.	Following the inability to attract funding to support a research index, TC advocated that the action be widened to support on-going research. This was approved by the Board.	Encourage & support research actions pertaining to the understanding, interpretation, promotion & conservation of the OUV of the WHS.
42	Engage with proposals to address coach parking within the WHS & seek to ensure that sustainable solutions are delivered which maximise the benefit & minimise any harm to the WHS.	This action refers only to coach parking and thus does not cover the wider harm potentially caused by coaches. It is suggested that the action be re-worded.	TC advocated widening this action beyond just parking. The Board agreed. BG said that access in historic areas such as The Circus remained an issue. Residents had been counting coaches and had recorded 392 different companies in an 18 month period. Moves were underway to ban coaches from The Circus, with a Traffic Order ready and Dept. of Transport approval of signage awaited. AH said that the Destination Management Plan (Plan Action 41) should cross-reference with this action.	Engage with proposals to ensure that coach travel within the WHS, in terms of parking, vehicle movements & their emissions, delivers benefits whilst minimising any harm to the Site.
47	Provide training as required to elected members, officers, visitor ambassadors & others on WH issues	This action refers only to training and thus does not fully capture the considerable amount of awareness raising achieved by the range of talks to community groups undertaken by the	TC advocated that this action be widened to capture the range of promotional talks being undertaken by the Chairman. AA noted that the Mayor's Guides significant contribution might also be	Provide, support & promote training, educational & awareness raising talks, walks & events to a wide range of stakeholders, especially

		Chairman. It is suggested that a separate action is introduced which says 'provide talks and presentations, as opportunities arise, to ensure awareness of WH remains at a high level'.	recognised here. The Board agreed.	key decision makers, on WH matters.
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