

**Locally listed Heritage Assets.
Supplementary Planning Document**

Consultation Report

May 2021

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1. Statement of Compliance of overall consultation with the Neighbourhood Planning Protocol

- 1.1 In line with the SCI, a formal public consultation on the draft Locally Listed Heritage Assets supplementary planning document took place between 23 April and 4 June 2018 whereby the draft supplementary planning document was advertised locally and sent out to target groups.
- 1.2 A full schedule of comments together with a consultation report.
- 1.3 The key target groups focused on in this consultation were the Town and Parish Councils, Historic England, local amenity societies, local planning agents and architects and the local communities. The relevant services within Bath and North East Somerset Council were also consulted. A copy of the draft supplementary planning document was made available on the council's website together with hard copies deposited for viewing at local libraries and council offices.

2. Summary of responses to the consultation and Council response to key issues raised

- 2.1 A total of 24 responses were received during the consultation period, respondents had the option of submitting representations either online questionnaires via the Council website, e-mail or post.
- 2.2 The responses received are summarised below:
 - Questionnaire respondents – 9 respondents completed on-line questionnaires. These were 2 parish councils, 5 members of the public, 2 councillors.
 - Other respondents – 15 further responses were received. These included Bath Preservation Trust, Bath Heritage Watchdog, Bath Chamber of Commerce and Business West Initiative in Bath and North East Somerset, Historic England, Saltford Parish Council, Priston Action Group for the Environment.
 - 9 of these responses were to do with nominating specific assets rather than commenting on supplementary planning document content and the proposed methodology and are not therefore analysed below.
- 2.3 The key issues raised in the consultation comments and the Council's response to these issues are summarised below. Section 1 analyses the questionnaire responses. Section 2 analyses the four additional responses.
- 2.4 Full consultation responses are retained on electronic file.

Section 1 - Questionnaire responses analysis

Do you agree with the Council’s intention to offer further guidance in relation to non-designated heritage assets (referred to as Locally Listed Heritage Assets)?

Please circle either YES or NO.

Further guidance in relation to non-designated heritage assets.	
Yes – Number of respondents	No – Number of respondents
9	0

Comments	Bath and North East Somerset Council comments
I hope that this will be enforceable to ensure assets really are protected.	Current Government legislation prohibits direct control for internal works. However, any external works may be controlled where planning permission is required through the development management process, ensuring for example appropriate design & materials. In future an Article 4 Direction may also be considered.
In view of the expected level of development across Bath and North East Somerset set out in the Joint Spatial Plan and related local	The Supplementary Planning Document is intended to form part of this strategy within the context of the existing and future Council’s

Comments	Bath and North East Somerset Council comments
strategies and plans, a framework to support the active management and preservation of local heritage assets is essential.	spatial policy framework.

Question 2:

Do you consider the document provides an adequate planning tool for identification, recording and development management of Locally Listed Heritage Assets?

Please circle either YES or NO.

Adequate planning tool for identification, recording and development management of Locally Listed Heritage Assets	
Yes – Number of respondents	No – Number of respondents
8	0
1 respondent did not answer yes or no.	

Comments	Bath and North East Somerset Council comments
It needs to be made public knowledge so that any applications for planning are aware of the restrictions regarding the building, monument, structure etc.	The Local List of Heritage Assets will be publicised and accessible on the Bath and North East Somerset website.
The document is clear and accessible and implies that the illustrations are of heritage assets worthy of local listing. However, the document could be helpfully supported with more explicit examples of assets which reflect the various selection criteria in Chapter 4.	More examples will be included in website documentation if considered necessary when the Supplementary Planning Document is launched.

Question 3:

Do you agree with the methodology for identification of Locally Listed Heritage Assets and selection criteria (set out in Chapter 4)?

Please circle either YES or NO.

Adequate planning tool for identification, recording and development management of Locally Listed Heritage Assets.	
Yes – Number of respondents	No – Number of respondents
7	1
1 respondent did not answer yes or no.	

Comments	Bath and North East Somerset Council comments
<p>1- Regarding assets identified as part of a Neighbourhood development plan:</p> <p>If assets have been identified in a made Neighbourhood development plan, then they ought to be automatically added to the Bath and North East Somerset Councils locally listed heritage assets. In order to be noted within a Neighbourhood development plan it will have been necessary to inform (where possible) owners and an examiner will also have agreed that the asset was indeed locally important.</p>	<p>It is intended that assets identified through neighbourhood plans and conservation area character appraisals will be added to the list of locally listed heritage assets as they will already have been through an assessment process. It will be the responsibility of a nominator to notify the owner of an asset when they make a nomination.</p> <p>Ward councillors, town and parish councils in the rural area and Bath Preservation Trust and the Chair of the World Heritage Advisory Committee in Bath will be notified of nominations, allowing</p>

Comments	Bath and North East Somerset Council comments
<p>2- I feel the process would be more accountable if the Cllrs who are called upon were an appropriate cabinet member (either with the portfolio for heritage or for planning) plus the chair of Development Management Committee, all else as proposed (i.e. if no agreement then decided at Development Management Committee).</p>	<p>them an opportunity to comment as part of the decision making process and the decision will be delegated to professional officers. (Rather than the decision taking place in consultation with the Heritage Champion and Chairman of Development Management Committee). This will give opportunity for wider involvement of interested bodies.</p>
<p>Age criterion - you need to give more detail about how recent an asset might be, to be considered. I am interested in assets of the 1950s, 1960s and 1970s, and would like assurance that 20th century assets will be considered equally with older ones.</p>	<p>Further detail added to clarify that 20th century assets will be considered.</p>
<p>Yes, but with more effort made to make the public aware of the changes.</p>	<p>The Locally Listed Heritage Assets initiative and Supplementary Planning Document will be publicised and available on the Council's website</p>
<p>Using the guidance issued by Historic England would seem a sensible way to avoid reinventing the wheel and to ensure consistency of listing decisions with other areas. It also maintains consistency where other national guidance has been adopted by Bath and North East Somerset for related processes, e.g. for conservation area character appraisals. By using a recognised basis for listing, any applications by communities for funding or other support to investigate / manage / restore local heritage assets are likely to be strengthened.</p>	<p>Historic England guidance has been used as a basis for the Supplementary Planning Document.</p>

Question 4:

Do you agree that Council's Historic Environment Record and electronic maps are appropriate tools for recording of the Locally Listed Heritage Assets?

Please circle either YES or NO.

Historic Environment Record and electronic maps are appropriate tools for recording of the Locally Listed Heritage Assets?	
Yes – Number of respondents	No – Number of respondents
7	0
2 respondents did not answer yes or no.	

Comments	Bath and North East Somerset Council comments
You should also consider appropriate use of the excellent Parish Online software package	As the Council's web pages for the Locally Listed Heritage Assets Supplementary Planning Document are developed linkages to this will be considered. The checklist will include a link to this website.
I would urge Bath and North East Somerset Council to consider how far they can actively promote and support the development of community layers on the Know Your Place website as a means of stimulating local engagement in identifying potential heritage assets and then maintaining visibility and	The Bath and North East Somerset Historic Environment Record data is uploaded to Know Your Place and the Locally Listed Heritage Assets data will be part of this.

understanding of them.	
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Question 5:

Do you support the approach in relation to works to and demolition of Locally Listed Heritage Assets?

Please circle either YES or NO.

Approach in relation to works to and demolition of Locally Listed Heritage Assets.	
Yes – Number of respondents	No – Number of respondents
8	0
1 respondent did not answer yes or no.	

Comments	Bath and North East Somerset Council comments
It is vital that historic buildings etc. are retained preserved and protected for future generations	This is the aim of the Locally Listed Heritage Assets initiative.
But Bath Press development is a lost opportunity to use the building in a more appropriate way that reflects its past, so in practice this doesn't seem to work.	View noted; the circumstances in relation to the specific case are too extensive to be reviewed here.
Since the approach is not supported by a general statutory protection outside conservation areas, does consideration need to be given to reviewing existing conservation areas to extend	The Council will continue to review conservation area designations when resources permit with a view to producing up to date conservation area character appraisals for each one. As part of this process the boundaries

that level of protection in some cases? The local listing process could be used as part of an iterative review cycle whereby nominations are used to inform conservation area boundary reviews.	of existing conservation areas will be reviewed, and local heritage assets identified.
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Question 6:

Do you think the Nomination Form adequately covers all the key areas of interest/significance of a non-designated heritage asset?

Please circle either YES or NO.

Nomination Form adequate	
Yes – Number of respondents	No – Number of respondents
6	2
1 respondent did not answer yes or no.	

Comments	Bath and North East Somerset Council comments
Stone walls in villages, boundaries and in the countryside and urban setting should be added. Wherever possible retaining dry stone walls, as drystone walls, as they are good for wildlife too.	Boundary walls which are considered to be local heritage assets could be nominated.
Bath's medical heritage should be preserved and enhanced; this	Buildings which represent Bath's medical heritage and meet the various

Comments	Bath and North East Somerset Council comments
is why Bath is here.	criteria could be nominated.
<p>The Nomination Form is simple and clear and presents no issues until one gets to Question 10. Following Q10, there is a "Please Explain..." box. We strongly urge that the completion of that free text box should clearly be made optional and not mandatory. We believe the preceding questions adequately and succinctly capture all the relevant data and issues at this early stage of the Locally Listed Heritage Assets assignment process. Consequently, asking the Form's originator to explain in words - i.e. repeat, and for every asset nominated - what the previous pages have neatly captured in a few good tick-boxes seems to us to add very little value. Additional words may, in a few cases, be appropriate or necessary but mandatory completion of that (visually large and hence administratively intimidating) box for would effectively double the workload in the portfolio of Forms' submission. However much you would wish otherwise, that administrative load certainly would discourage time-poor Parish Councils like us from submitting some potentially important heritage assets for consideration. So, encourage us to submit - keep it as short and simple as possible!!</p>	<p>It will be helpful in assessing nominations if as much information as possible is provided about the asset and the form is therefore intended to encourage this. Equally if this is unnecessary in the context of the rest of the information provided this section can be brief.</p>
<p>Can the Supplementary Planning Document and nomination form be supported with a document setting out some local examples for each of the ten criteria to help generate interest in the process and the completion of the nomination process, and</p>	<p>A sample completed example nomination form is a good idea and will be included on the website. The Supplementary Planning Document is intended to provide images and generate interest.</p>

Comments	Bath and North East Somerset Council comments
a worked example of a "best practice" nomination form?	

Question 7:

Would you like to make any further comments on the Draft Supplementary Planning Document?

Please circle either YES or NO.

Further comments	
Yes – Number of respondents	No – Number of respondents
4	5

Comments	Bath and North East Somerset Council comments
I would like to see cottages protected better in villages and urban settings, but particularly in villages to retain homes that are small enough to be afforded by the next generation and to protect the	The Locally Listed Heritage Assets initiative is intended to identify assets of value and ensure they are given appropriate consideration

<p>character of villages which were by and large made up of cottage. Too often special circumstances are given for extensions which remove a cottage for ever or cottages are joined to make one house, and there again lost. Extensions should never be permitted building rights, and special circumstances dismissed in favour of protection of historic importance.</p> <p>I hope this designation and recording is done without delay so as to protect assets.</p>	<p>as part of the planning process.</p>
<p>I really support this. Please be as generous and flexible as possible in allowing assets to be accepted, especially assets with more recent social/community history (see comment above). For example, the Women's Refuge Charity Shop in Walcot Street was where Bath Arts Workshop (later the Natural Theatre Company) started out in the 1970s - this is a really important part of the story of Bath in the 1960s and 1970s. There is also a fascinating 'hidden history' of buildings and places associated with LGBTQ history - we should be celebrating and recording all this.</p>	<p>Support noted.</p>
<p>Once adopted, how will awareness of the Supplementary Planning Document be raised across communities in Bath and North East Somerset Council in order to maximise nomination of heritage assets; how can town & parish councils and local societies best support active local engagement with the Supplementary Planning Document?</p>	<p>The Locally Listed Heritage Assets initiative and Supplementary Planning Document will be publicised</p>
<p>Please safeguard the small drinking trough, which is now used occasionally for greenery, located on the front of the erstwhile toilet block, now gift shop, in Larkhall Square at the junction of Salisbury Road and Brookleaze Buildings. This is a heritage object that adds character to Larkhall Square and should be preserved; as should</p>	<p>Nominations will be invited when the Supplementary Planning Document is adopted</p>

the toilet block itself.	
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Section 4 – Analysis of other respondents - letters/e-mail/ telephone

From	Comments	Bath and North East Somerset Council comments
Historic England	The only comment we have is that perhaps it may worth including a paragraph regarding the Heritage List (National Heritage List for England) as there may be situations where the higher level of protection (rather than local listing) may be more appropriate?	A paragraph has been added about the National Heritage List for England and statutory designation.

From	Comments	Bath and North East Somerset Council comments
<p>Bath Heritage Watchdog</p>	<p>The basic approach of the draft Supplementary Planning Document was acceptable, but there are a few details which should be brought to your attention. Also, there are some safeguards which the document mentions which we believe are essential.</p> <p>The Bath Press building; the text accompanying it states that it is a prominent feature along Lower Bristol Road. We agree that it deserved the description of a locally important heritage asset, but unfortunately the planners didn't; and it is now a prominent pile of minced-up bricks. This leaves you with two problems:</p> <ul style="list-style-type: none"> • What to replace those pictures with, because you can't leave them in the final Supplementary Planning Document. • How to convince planners, and the Development Management Committee members especially, that they need to put local importance above other advantages that a planning application might offer. 	<p>This comprehensive response is welcomed and has been addressed, as summarised below:</p> <ul style="list-style-type: none"> ▪ Comments noted regarding the Bath Press building. As noted above the circumstances in relation to the specific case are too extensive to be reviewed here. The picture has been replaced but it is still recognised that the surviving façade could be considered a local heritage asset. ▪ The suggested process for decision making has been reviewed. Ward councillors, town and parish councils in the rural area and Bath Preservation Trust and the Chair of the World Heritage Advisory Committee in Bath will be notified of nominations, allowing them an opportunity to comment as part of the decision making process and the decision will be delegated to professional officers. (Rather than the decision taking place in consultation with the Heritage Champion and Chairman of Development Management Committee). This will give opportunity for wider involvement of interested bodies. ▪ This simplified process will also assist in managing an influx of nominations. ▪ Nominations which are already the subject of a current planning application will need to be assessed as part of the determination of that application and within the appropriate statutory timescales. (The same criteria for assessment will of course apply).

From	Comments	Bath and North East Somerset Council comments
	<p>We are unhappy with such an approach that puts the entire control in the hands of elected councillors who may have party allegiances. Nevertheless, if the Development Management Committee is to take Local Listing seriously they can't be left entirely out of the decision making process. We recommend something along the lines of planning applications, where the decisions are made by the full Development Management Committee and minuted accordingly, with the brief for the committee prepared by the Senior Conservation Officer. That way the initial Yes or No recommendation is made on the judgement of staff with the appropriate heritage skills, but the Development Management Committee members have the final say on whether or not that recommendation is endorsed.</p> <p>Once the Supplementary Planning Document is endorsed and becomes active there is likely to be a peak of applications which will gradually reduce over time to a trickle. It would make sense to limit the Local List agenda items to five per meeting</p>	<ul style="list-style-type: none"> ▪ The possible use of Article 4 Directions will need to be reviewed in the future.

From	Comments	Bath and North East Somerset Council comments
	<p>to protect both Conservation Officers and Development Management Committee Members.</p> <p>The only potential drawback to this queue with a limited feed is the outside possibility that an application for local listing might be pending when a planning application for the same site or building is submitted. The ideal would be for the Validation stage to know what is queued so that the queued Local List item could be given express treatment and get a Development Management Committee “Aye” or “Nay” within the public consultation window for the planning application so that the Case Officer can take it into account. The alternative would be for Case Officers to be able to access the queue of local listing proposals and ask for a Conservation Officer opinion on the application. The Placemaking Plan recognises the need to cater for “non-designated heritage assets”, so the Development Management Committee endorsement for Local List items is not essential for planning decisions made under delegated authority provided the Case Officers are properly advised. There</p>	

From	Comments	Bath and North East Somerset Council comments
	<p>does need to be a workable policy to cater for the overlap of normal planning and Local List applications.</p> <p>The draft Supplementary Planning Document indicates that Article 4 Directions might be necessary to control demolition or modification of Locally Listed assets or their settings from what would otherwise be Permitted Development.</p> <p>We think that such actions are essential. It is probably not necessary to control works to a locally listed asset that cannot be seen from the publicly accessible surroundings, but it will be necessary to require planning permission for any alterations that affect the external appearance or the setting of the asset. That won't prevent permission being given if appropriate, but it will protect against permitted developments that would have an adverse impact on a locally important asset.</p>	

From	Comments	Bath and North East Somerset Council comments
	<p>We believe the issue of the Supplementary Planning Document and the preliminary consultation of the Article 4 restrictions should go together.</p>	
<p>Bath Preservation Trust</p>	<p>The Trust welcomes this proposal to formalise the publication and subsequent planning policy considerations of a Local List. In particular we are very pleased to see explicit references to the protection of locally listed assets by naming them as a material consideration in a planning application.</p> <p>Summary of recommended changes;</p> <ul style="list-style-type: none"> • While this document needs to serve the whole of B&NES, we would suggest that there are slightly different considerations in the city of Bath and in conservation areas than 	<p>This comprehensive response is welcomed and has been addressed, as summarised below:</p> <ul style="list-style-type: none"> ▪ Further detail has been added about the National Heritage Register and statutory designation. ▪ The Supplementary Planning Document has been updated to reflect most recent designation and guidance at the time of adoption. ▪ It has been made clear that the criteria for designation are irrespective of state of repair.

From	Comments	Bath and North East Somerset Council comments
	<p>in other non-identified areas. The introduction needs to explain 'statutory listed' i.e. formally designated and protected 'listed buildings' on the national register.</p> <ul style="list-style-type: none"> • Section three will need to be revised to tie into the new National Planning Policy Framework Reference to the 2012 document will become outdated. <p>In the Criterion section:</p> <ul style="list-style-type: none"> • This section should make clear that selection is irrespective of the state of repair. • The reference to age does not really make sense, certainly in the City of Bath context. We would suggest that age is less of a consideration in locally listed assets, as often it is 'younger' heritage assets that are locally important for reasons besides age. The older a building the more significance it has historically, and therefore the more likely it is to be on the national list. It is fair to say that in Bath, most older housing stock is listed and most non-designated assets tend to be 19th or 20th century. Therefore, perhaps this criterion should be re- 	<ul style="list-style-type: none"> ▪ A locally listed heritage asset can be any age as long as it meets other criteria. This is in line with the advice from Historic England and not intended to omit more recent assets. In addition, some older assets may have been identified as being too altered to be nationally designated but could still meet the criteria for the local list. ▪ A note has been added to expand on rarity and integrity; the archaeological interest section has been reduced; a note has been added to local association; 'illustrative' has been added to archival interest; wording around statement of significance has been altered. ▪ The decision making process has been reviewed and simplified, such that Ward councillors, town and parish councils in the rural area and Bath Preservation Trust and the Chair of the World Heritage Advisory Committee in Bath will be notified of nominations, allowing them an opportunity to comment as part of the decision making process and the decision will be delegated to professional officers. (Rather than the decision taking place in consultation with the Heritage Champion and Chairman of Development Management Committee). This will give opportunity for wider involvement of interested bodies.

From	Comments	Bath and North East Somerset Council comments
	<p>written or expanded.</p> <ul style="list-style-type: none"> • Rarity should be expanded to explain e.g. that it is the only, or one of few examples of its type in the local area. Similarly, integrity could also be referenced; if an asset exists in an unaltered state (without unsympathetic alterations) this may make its case for inclusion on the list stronger, though this may be covered under Aesthetic Value. • In the Criterion section, the archaeological interest section is too long (and, with its footnote, repetitive) and should be rationalised. The acknowledgement that most archaeology remains undesignated is a clue as to how much should be written here (i.e. relevance). In Bath, by contrast, there are significant archaeological remains protected by statute. • In the Criterion section, the reference to historic association should be 'beefed up' as this will be, in our view, one of the key reasons why an asset should be locally listed. Also, there are two references to significance close together. We suggest para should 	<ul style="list-style-type: none"> ▪ The section on protection of locally listed heritage assets has been simplified. ▪ The possible use of Article 4 Directions will need to be reviewed in the context of nominations received. It is therefore considered appropriate to leave this reference in the Supplementary Planning Document. ▪ It is not proposed to add to the document by including guidance on alterations. It is preferable for the reader to access links to such on the Historic England website, or indeed Bath Preservation Trust guidance. Additional links to both have therefor been added, ▪ Research sources have been included as part of a checklist supporting nominations, Bath Preservation Trust and Avon Gardens Trust have been added to this as well as referenced in the main document.

From	Comments	Bath and North East Somerset Council comments
	<p>read 'As well as any association to notable national figures, the special interest of a local heritage asset of any kind may be underpinned or enhanced by an historical association to important local figures or organisations such as key business people and architects or to artisan or industrial processes which are not documented by names of people.'</p> <ul style="list-style-type: none"> • Archival interest isn't just written, it is pictorial, photographic and illustrative. • With regard to identifying the asset, we are concerned that the request to include a Statement of Significance within the nomination may be quite onerous/off putting to a lay person. Perhaps this should be re-written to say '<i>Assessment of significance: details of the special interest or significance of the asset based on the criteria contained in the form</i>'. • The reference to Know Your Place is well made but the interactive element is quite buried in the tool so it should perhaps be primarily identified as a mapping regression 	

From	Comments	Bath and North East Somerset Council comments
	<p>and information tool for those researching local assets with a secondary reference to the ability to upload information and images.</p> <ul style="list-style-type: none"> • Whilst we accept that the adoption and amendment of entries in any Supplementary Planning Document requires signoff at Councillor level we do not think that decision-making is sufficiently consultative, independent or transparent, certainly within Bath. Councillors may be under significant political pressure to facilitate certain developments or to resist listing. We would suggest that recommendations to list should have the input of a trained heritage or planning professional. We therefore suggest that the Senior Team Leader of Planning & Conservation (perhaps in conjunction with the Group Manager) should have final recommendation on the nominations, in consultation with the Chair of the World Heritage Site, and the Bath Preservation Trust (in Bath) and the Parish Councils in wider Bath and North East 	

From	Comments	Bath and North East Somerset Council comments
	<p>Somerset, with sign off by the two Councillors suggested but with any lack of consensus between officers and Councillors going to wider committee with third parties able to make the case. We suggest that an organogram of the decision-making process should be included.</p> <ul style="list-style-type: none"> • In Section 7, the reference to Banes at the end of the para should read Bath and North East Somerset. • In Section 8, reading as a lay person, what exactly are you saying? The actual planning position is not as clear as it could be (though we acknowledge that national policy surrounding local assets is itself not definitive). We suggest a rationalisation in bullet points to outline the different planning scenarios (e.g. demolition in the conservation area = permission needed, demolition outside the conservation area = permission not needed unless Article 4 in place, alterations to local assets in the Conservation Area etc.). Using phrases like 'may still require pp' may be true but is confusing; therefore, you may at this stage 	

From	Comments	Bath and North East Somerset Council comments
	<p>want to consider referring to your informal and formal pre-app channels.</p> <p>Can alterations be made to locally listed properties without permission or will there be an Article 4 in place as you suggest in Section 10?</p> <p>Detailing the Article 4 as a possibility is not helpful for the lay person to understand whether they will or will not need to seek planning permission. Perhaps it would be better to leave the Article 4 reference out or incorporate it into Section 8 if they are definitely going to be implemented. We would welcome Article 4 Directions removing Permitted Development rights from locally listed assets at the least in the World Heritage Site.</p> <ul style="list-style-type: none"> • In the draft 2008 Locally Important Buildings, Supplementary Planning Document there is a section of guidance on what constitutes appropriate alterations, use of materials etc. in locally listed buildings; we suggest perhaps that a potted version of this could be 	

From	Comments	Bath and North East Somerset Council comments
	<p>included in this guidance (and that this would not unnecessarily lengthen the document as there are a couple of full pages that are just images).</p> <ul style="list-style-type: none"> • The Bath Preservation Trust conservation team, our library and archives should be mentioned as a specific local resource for advice and research in Section 12. We also suggest that the Gardens Trust (and/or Avon Gardens Trust) is included in this section. • Resources; have/can adequate resources be secured to fully implement this Supplementary Planning Document and the associated Article 4 Directions? In particular there would be time pressure placed on conservation planning officers to assess applications for local listing as well as their normal workload. We sincerely hope that the appropriate amount of support can be found to ensure this beneficial proposal can be properly implemented. 	
Business West-Initiative in	We have reviewed the draft Supplementary	The National Planning Policy Framework together with

From	Comments	Bath and North East Somerset Council comments
<p>Bath and North East Somerset- Bath Chamber of Commerce.</p>	<p>Planning Document on Locally Listed Heritage Assets and would argue against its adoption.</p> <p>First, we believe the Supplementary Planning Document is unnecessary and would create a further hurdle for developers, which could result in delays and increase costs. Most buildings which could potentially be listed will already sit in conservation areas or common sense will dictate they should be preserved, if they have real merit.</p> <p>In practice, we feel this will be yet another constraint to be considered, another expert to be consulted, another report to be written, and yet another ground for those who oppose change to latch onto.</p> <p>We are particularly concerned about the suggestion that alterations to a building should not harm its setting. This seems to be beyond the limits of existing policy and has the potential for creating a wide</p>	<p>Historic England - the Governments advisors for managing the historic environment -advocate that the identification of assets of local interest is best practice for all local authorities to undertake. This advice has recently been strengthened in the latest version of the National Planning Policy Guidance.</p> <p>The purpose of the Supplementary Planning Document is to ensure that the initiative has a clear and expedient process.</p> <p>Identification of local heritage assets early in the planning process will be of positive benefit to those planning development.</p>

From	Comments	Bath and North East Somerset Council comments
	<p>area of confusion about what “setting” actually means.</p> <p>In short, we feel the Supplementary Planning Document would not achieve its stated aims and the law of unintended consequences could be the result.</p>	
Saltford Parish Council	The assessment procedure at item 6 in the document as proposed does not include a consultation role for Parish and Town Councils and we would suggest that B&NES Council’s Specialist Team in making its assessments should provide an opportunity for Parish and Town Councils to provide a view before reaching a decision	Parish Councils will be notified of applications being assessed and able to comment.
Priston Action Group for the Environment	<p>Pleased to see that the planning department is compiling a list of buildings, structures and landscape features that make up the local character and distinctiveness of our area. I would like to nominate the fingerposts in and around Priston. I recognise that they are only some of the many in the BANES area, perhaps they should all be listed.</p> <p>I note that the draft consultation document</p>	Support noted.

From	Comments	Bath and North East Somerset Council comments
	<p>for BANES Locally Listed Heritage Assets recognises the importance of such street furniture to the landscape and to the population generally. They are, of course, still used by many motorists and cyclists for navigation!</p>	

