





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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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