





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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



105	Bath resident	More emphasis needs to be given ti managing over tourism downwards. It was chronic this year. Endless promotion of Bath will kill the goose that laid the golden egg. A significant tourist tax needs to be introduced. Other cities in France charge as much as 5 euro per night	Concerns noted
106	Bath resident	See above re overtourism	Concerns noted
107	Bath resident	The bird poo is not dealt with. There are no public toilets. Other historic places are better organised for the visitor economy. There is an obsession with getting people out of cars but no measures to help them get to the city if they live more than5 miles away.	Concerns noted
108	Bath resident	It feels as though the climate and ecological emergencies have been arbitrarily added to the plan, with no explanation of what that might actually mean. Will double glazing be allowed? Will solar panels become acceptable? Will public transport suddenly improve? Will trees be allowed in Milsom Street ?	Plan supports appropriate, informed, and sensitive responses to climate change that safeguard OUV
109	Bath resident	I think that carbon reduction is important but it's not the first job of this plan which is about heritage. And the first priority ought to be presentation which is currently lacking.	Concerns noted
110	Bath resident	Slowly loosing its appeal	Concerns noted
111	Bath resident	Congestion, cleanliness, the lengths to which Lib Dem councillors go to ignore the requests of the locals, empty shops, constant scaffolding and road works etc that are never done in a timely manner. A neglected city - ruined by those running it.	Concerns noted

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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