23rd June 2014

**The Rt Hon Eric Pickles MP  
Secretary of State for Communities and Local Government  
Department for Communities and Local Government,  
 Eland House, Bressenden Place  
 London, SW1E 5DU**

I am writing on behalf of Bath Preservation Trust concerning the **Bath and North East Somerset Core Strategy/Local Plan,** which is due to be finalised by your Inspector at PINS, Mr Simon Emerson, in the next week or so. We understand that a final draft will be with the Council shortly.

You will be aware that Bath is the UK’s only City which is a UNESCO World Heritage Site in its entirety, and that therefore the immediate countryside around the City represents part of the setting of this internationally important heritage asset.

Bath is surrounded by Green Belt and most of the land around is also in the Cotswold Area of Outstanding Natural Beauty.

We were reassured when the NPPF was finally published that these three designations would be sufficient to protect the land around Bath from inappropriate development. However the Council have, in their Core Strategy amendments, brought forward two parcels of land which are in all three of Green Belt, AONB and World Heritage Site setting. One of the parcels is, in addition, immediately adjacent to a Scheduled Ancient Monument at risk of further degradation. …/…

P 2 of 3

It is not as if this is the only land being brought forward for development in Bath. Indeed a major City Centre site of up to 2000 dwellings, together with three former MOD sites with again many hundreds of houses, are being brought forward now, and in all these two protected site represent only 450 of the 7000-odd houses proposed for the district as a whole. So they cannot be regarded as strategically essential to deliver new homes. Indeed they are being brought forward beyond the market projections of need in order to deliver the appropriate percentage of affordable housing. We think there are other solutions to this problem.

Your Inspector gave Bath Preservation Trust a fair hearing at the Examination of the Core Strategy, but protecting the uniquely special nature of this land sits uncomfortably with ‘rules’ on 5 year land supply, and his task is therefore a difficult balancing act between competing objectives. Your statutory consultees seemed to think that harm could be mitigated if development were highly restricted, but the reality is that if the argument is lost at this stage, the pressure for further development on this land will continue and the cumulative harm in Bath’s setting will grow. In any case the mitigation of harm falls somewhat short of the duty to ‘protect and conserve’.

We would ask you to consider intervention in recognition that ministerial judgement may be required as to whether the weight given to protecting this uniquely designated land should be outweighed by the desire to build housing in excess of calculated market need in order to meet affordable provision.

…/…

P 3 of 3

Of course we have not yet seen your Inspector’s report and he may yet see it as we do. But in the interim we thought it appropriate to give you the opportunity to ensure that the UK’s only whole-city World Heritage Site continues to be set in green countryside rather than suburban sprawl.

Yours sincerely

**Caroline Kay  
Chief Executive**