## BATH PRESERVATION TRUST

## RESPONSE TO B&NES LOCAL PLAN LAUNCH DOCUMENT CONSULTATION

## NOVEMBER 2022

## Primary ambitions

Our primary ambitions for the new Local Plan are:

* Responding to the challenge of the Climate and Ecological Emergencies and facilitating the goal of Net Zero carbon by 2030
* Establishing a transformational approach to protecting and enhancing nature
* Maximising delivery of affordable housing to respond to the district’s demographic, social, and economic needs
* Creating opportunities for the following:
  + Sustainable economic development
  + The types of jobs that are needed in our communities
  + Availability of the right type of space for businesses to grow

Please [read about our ambitions for the Local Plan](https://beta.bathnes.gov.uk/bath-and-north-east-somerset-local-plan-2022-2042-launch-document/scope-and-content-local-plan) before responding to the next few questions.

### Do you agree with our primary ambitions?

Yes

No – please specify why

I don't know

#### Please tell us why you disagree with our primary ambitions

The second ambition should be amended or a further ambition included to prioritise the protection and enhancement of the World Heritage Site and historic environment.

For example:

Either:

Establishing a transformational approach to protecting **the Outstanding Universal Value of the World Heritage Site** and enhancing ~~nature~~ **the natural and historic environment**

Or:

Establishing a transformational approach to protecting and enhancing **the natural environment.**

Establishing a transformational approach to protecting and enhancing the **historic environment** and sustaining the **Outstanding Universal Value of the World Heritage Site.**

### Are there any other topics that you feel should be within our primary ambitions?

Yes – please specify

No

#### Please tell us what other topics should be within our primary ambitions

Ambition should be for **high quality** affordable housing.

It is assumed that sustainable transport solutions would be covered under the first item.

A primary ambition should be to protect, enhance and sustain the **Outstanding Universal Value of the World Heritage Site**. Although the other ‘ambitions’ are clearly essential, you could apply them to any city in the UK, whereas what makes Bath different is the fragility of the WHS status.

## Other issues

Other issues in the scope of the Local Plan include the following:

* Maintaining a 5-year housing land supply and facilitating delivery of the necessary type and scale of new homes to respond to the District’s social and economic needs. This would include the following groups of people and types of homes:
  + Older people
  + Students
  + Key workers
  + Gypsies, travellers, and boat dwellers
  + Supported accommodation for residents with health and social care needs
  + Self-build dwellings
* Delivering high quality development that supports healthy, vibrant, successful communities, and addresses inequalities
* Ensuring new development is aligned with the necessary infrastructure, including community facilities and green infrastructure
* Protecting and enhancing the beauty of our environment
* Setting an approach to sustainable transport and movement which facilitates behavioural change and the [15-minute neighbourhood concept](https://tcpa.org.uk/collection/the-20-minute-neighbourhood/)
* Increasing renewable energy generation
* Setting a positive strategy for the conservation and enjoyment of the historic environment
* Creating vibrant town and city centres

### Do you agree with these?

Yes

No – please specify

I don't know

#### Please tell us what other issues should be covered

The five-year housing land supply target groups are good. However, we observe that one group is missing: people, usually young people but not always, who are starting out or on a middle income, who are not Key Workers and are not yet ready to buy a property, who need a rental property on an **affordable,** **controlled rent.**

At present such people are at the mercy of private landlords who are about to be hit by rising interest rates and likely to put up rents.

Headline statements setting out the scope if the plan must be amended to include:

“Delivering high quality ***new*** development ***and support for the historic and existing built environment*** that supports healthy, vibrant, successful communities, and addresses inequalities”

“Setting a positive strategy for the conservation, ***appropriate sustainable development*** and enjoyment of the historic environment”

**Engagement strategy**

Details of our approach to engagement are set out in our Engagement Strategy, which we have published alongside the Launch Document.

Please read our [Engagement and comunication strategy](https://beta.bathnes.gov.uk/sites/default/files/engagement_and_communication_strategy.pdf) before responding to the next two questions.

### Are there any particular stakeholders or groups that you feel we should engage with throughout the preparation of the Local Plan?

Yes – please specify

No

#### Please tell us what other groups and stakeholders we should engage with

Bath Preservation Trust

Transition Bath

Bath Architecture Is/RIBA SW

Schools groups

B&NES 3G

Local groups ought to be consulted at each stage.

### What would your preferred method of engagement be?

Please select all that apply

Online workshops and meetings

Online questionnaires

Online community mapping (allowing stakeholders to add comments to maps of a local area)

In-person workshops and meetings

In-person drop-in sessions in local centres

Something else – please specify

As well as online questionnaires.

There needs to be a way to engage groups that are not ‘old, white, male, opposers’.

The consultation process needs to include children and young people through a proper engagement programme.

Consultation should be open and non-prescriptive, ideally engaging at concept stage through principles and with future points of engagement rather than only at latter stages, as tends to happen.

Consultation processes and responses should be shared publicly.

**Proposed evidence base**

The proposed evidence base for the Local Plan will cover a wide range of issues including:

* Climate change
* Health and wellbeing
* Housing need
* Economic strategy
* Transport
* Cultural strategy
* Design and placemaking
* Flood risk
* Green belt
* Landscape
* Ecology, habitats, and biodiversity net gain
* Renewable energy
* Air, soil and water quality
* Green infrastructure
* Infrastructure delivery
* Viability

Please [read more about our evidence base](https://beta.bathnes.gov.uk/bath-and-north-east-somerset-local-plan-2022-2042-launch-document/purpose-and-nature-evidence-base)before responding to the next question.

### Do you think there are any important topics missing?

 Yes – please specify

No

#### Please tell us what topics you think are missing

Reference to sustaining **OUV** and the conservation of **Heritage Assets** is missing from the list.

Design **‘quality’** is missing. Evidence to define local design quality needs to support **design quality policies** for design quality considerations and decisions in planning to have weight and status, and to provide the necessary hook for **analysis, vision, design policies** and **guidance**.

**Additional comments**

### Do you have any other comments regarding the launch of the Local Plan?

Yes – please specify

No

#### Please tell us your comments

**Please tell us about you**

### What is the basis of your interest in the Local Plan?

I am a Bath and North East Somerset resident

I am a representative of an organisation

I am an agent working on behalf of an organisation

I am commenting as an individual

### Please tell us about you

Full name

Joanna Robinson

Your organisation (If applicable)

Bath Preservation Trust

Organisation you are representing (If you are an agent or responding on behalf of an organisation)

Contact email address

jrobinson@bptrust.org.uk

### Please tell us your postcode

We will only use this for the purpose of mapping where we receive responses from

BA1 2LR

### Please tell us your whether you own your own home

We will only use this for the purpose of better understanding the demographics of the responses we receive

My home is:

Owned outright

Owned with a mortgage or loan

Shared ownership

Rented from the local authority or another social landlord

Rented privately

Rent free, but tied to the employment of an occupant

Prefer not to say

Something else