

## **Bath Preservation Trust Responds to Consultations on Local Plan Partial Update and Changes to Supplementary Planning Documents**

October 21, 2021

**BPT has responded to 4 local planning consultations, including the Local Plan Partial Update and revised Sustainable Construction and Retrofitting Supplementary Planning Document.**

Whilst we recognise the approach of B&NES Council is amongst the most forward-thinking of local Planning Authorities in the country, and we welcome and support the primacy of the Climate and Ecological Emergencies we also feel the proposed policies fall short of providing the context for Bath to become an international exemplar of integrated sustainable design and city planning.

BPT has called for policies and guidance to be strengthened to ensure that:

- The Green Belt is actively protected. Measures should be taken for existing Park and Ride sites to be sustainably enhanced as nature corridors and locations for renewable energy and recycling, without being removed from the Green Belt.
- Green transport modes are prioritised with end-to-end solutions with carbon emitting transport options disincentivised.
- Brownfield/new developments are of the highest quality of sustainable net zero carbon architecture which enhance the character of Bath.
- Community and sectoral engagement and consultation is actively promoted and resourced as a viable method which puts local people at the heart of decision making and positive development.
- Incentives to encourage sustainable modification of existing buildings is prioritised ahead of new-build.
- Fully independent and transparent carbon auditing (including embodied carbon) provides a strong and verifiable means of evaluating development or modification proposals. This should be included as an evaluation criterion which will influence decision making.
- Overheating is addressed as significant risk for the future and obligations to respond to this should apply to all developments, irrespective of size.
- End use of sites are considered in consultation with local communities with the objective of limiting any adverse impact to those communities.
- The cost of pre-application planning advice services for listed building energy efficiency retrofits is removed as a barrier.
- Detailed guidance is provided for the approach to secondary glazing in listed buildings without the need for listed building consent or planning permission, where existing fabric won't be irreversibly harmed or damaged.

Detailed responses to the following local consultations are available here:



**Local Plan Partial Update**

**Sustainable Construction and Retrofitting SPD**

**HMO SPD**

**Transport & Development SPD**