

## FoBRA response to consultation: Approach to B&NES Local Plan 2023

### Key issues FoBRA would like to be considered as part of the Local Plan approach

#### 1. Be consistent with and “in line with” adopted Council policies

- This is particularly relevant to ensure that new schemes consider impacts on both the development site and the wider neighbourhood context they sit within to ensure that such developments enhance rather than detract from existing neighbouring areas within Bath.
- Ensure that individual developments comply with current policy but not just within a site silo. This can be to the detriment of the immediate neighbourhood and create a situation for the pre-existing neighbourhood which is inconsistent with the Council’s own adopted policies. While the site allocation themselves may be in line with certain policies the adverse effects of that site on the wider locale should require scrutiny, and mitigation if required via an impact assessment of the site allocation on the existing neighbourhood.
- Ensure that planning and transport impacts are more closely considered and consistent with adopted policies, within the municipal boundary not only the small city centre core.

#### 2. Be consistent with and “in line” with Bath’s World Heritage Management Plan

- The Local Plan should protect the World Heritage site of Bath as a whole as advised in NPPF which states World Heritage status should be a key material consideration for planning applications.
- The city is recognised as a place of Outstanding Universal Value for architecture, town planning, landscape and archaeological remains
- The inscription covers the whole city, the boundary is the municipal boundary
- The wider landscape setting lies beyond the site boundary “(2.4) it offers effective protection as a “buffer zone”
- Ensure outstanding universal value of the World heritage site of Bath (architecture/town planning/landscape/archaeological remains is understood, protected and sustained (1.6 aims) should be one of the key objectives of the new Local Plan . Bath’s trees and landscapes are an integral part of the OUV and protection and replanting are critical for both bio diversity but also world heritage.
- Key sight lines are established as part of the OUV of Bath city these should be detailed
- These key site lines should be reinforced and protected in any emerging tall building strategy
- To ensure the OUV of emerging architecture and development a design code should be established for schemes within the municipal boundary
- Extend the city centre boundary to encompass and protect major conglomerations of heritage assets, many of which are cited in the UNESCO inscription

#### 3. Address the statutory consultee deficit that Bath city residents experience.

- Consider that the City of Bath has no Neighbourhood plan which sits below the Local plan whereas the areas surrounding Bath have Parish Councils to ensure full impacts on their area are understood, conveyed and dealt with in the formation of the plan.
- Ensuring that a forum of democratically elected councillors from the city of Bath have the ability to scrutinise the plan on the basis of Bath city interests could be a way to address this.
- Engagement with a multitude of special interest groups , (some may even be self-appointed rather than elected) is not the best way to represent the residents who live in Bath.
- Parish Councils, (as the process is currently set out) will have a disproportionate quality and quantity of consultation vs. residents of Bath. Bath City needs to have equal quality and quantity of consultation.

FoBRA November 14<sup>th</sup> 2022