

WHS Management Plan –

Consultation draft, August 2010

FoBRA Comments

1. FoBRA welcomes this most comprehensive Management Plan. The charm and status of Bath is all about its history and its built environment. Thus the designation of Bath as a World Heritage Site is undeniably both important and an honour. It has an incalculable economic value. There are just 28 Sites in UK, and Bath is the only one which constitutes an entire city. We therefore have a responsibility to manage it efficiently, fund it properly and ensure that all who visit it understand what it is, and enjoy the experience. If they do, more visitors will be encouraged and the district's economy will benefit.
2. **Adoption:** FoBRA is gratified that (para 1.2.4, p9) "The Plan will be adopted by Bath and North East Somerset Council" but this is mentioned only once, and not expanded upon. What does it mean? The record from the previous (2003) Plan does not inspire confidence: its implementation was not allocated to any Director in the Council, nor was any associated funding awarded. Thus, although 36% of the 129 actions were assessed as having been achieved (and a further 38% partially done), it seems very likely that these would have happened anyway. However, the WHS-only actions were not implemented, and there is a serious risk that this will happen again unless funding is secured. This is the key to an effective Plan.
3. **Management:** At present, management of Bath's WHS is the responsibility of the Council. However, this is handled in such a low-key way that one would hardly know that Bath is a World Heritage Site. We are disappointed that B&NES has not been more energetic in using this coveted international accolade as a draw for Bath's tourists and as justification for proactive investment in conservation and all aspects of city management. It would then be better placed to achieve recognition as a global centre of excellence in urban heritage management and, with its universities (see Specific Comments below), establish a potentially lucrative leading role in heritage education. Both universities are already somewhat involved in this area. So, what could be done? Other management models exist (Edinburgh World Heritage, for example) which might give Bath and its WHS greater prominence and power, draw in additional funding, and involve in a greater way the many stakeholders, including those universities. FoBRA recommends and urges that alternatives be examined.

4. **Employment:** One opportunity to benefit from World Heritage status that does not feature is recognition that much contemporary business investment focuses on areas which offer a high quality, well educated workforce, proximity to centres of learning and research, and an environment that internationally mobile senior staff will enjoy living in. WHS status could be exploited as a tool to encourage inward investment.

5. **Heritage:** No heritage site can rest on its laurels: in an international visitor economy competition is fierce. The Plan should therefore have ambitious targets for bringing the WHS up to standard and for developing it further. For example:
 - a. Discovery of the Temple Precinct beside the Roman Baths in the 1980s took place because of inspired archaeology and funding. Is there still more to be found? (para 2.4.28, p24)
 - b. Why is there no permanent stone mine site for tourists to see? (para 2.3.18, p17)
 - c. Despite much pressure for improvement, the city centre presents a depressing picture of dirty and ill maintained roads and pavements. This is central and fundamental to residents' and visitors' first impressions. The PRMP has to be implemented now.

6. **Traffic:** The Plan correctly diagnoses (Issue 41, p40) the need to manage the volume of traffic passing through and around the city, and sets out (Issues 42-47) other 'needs' that should be addressed in order to improve the physical environment and amenity of the city. FoBRA wholeheartedly agrees with the needs identified in this section of the Plan. However, the analysis is not carried through in the remainder of the Plan into actions to tackle the traffic problem. We have the following observations:
 - a. Para 4.2.1., p35. In view of the vital importance to the city of managing its traffic, we believe that there should be an additional Aim in the Plan. A wording is proposed below.
 - b. para 5.2.28, p44. There is insufficient recognition that many of the Georgian houses are family homes, whose owner-occupiers care for them and contribute to the character of the city. It is vital that Bath remains an attractive place for families to live. If owner-occupiers find that the downsides of living in Bath - traffic and pollution, difficulties over parking, antisocial behaviour - outweigh the undoubted pleasures of the city they will decline in number and the present character of the city centre will deteriorate. A wording is proposed below.
 - c. Para 5.5.3, p52. Traffic. The issue is not so much that there are physical limits to the city's ability to accommodate growing traffic requirements without

detriment to the historic environment, as that the city is already overrun with traffic. There are very high levels of traffic congestion throughout the city's main road network, extending particularly to Queen Square and the Circus (which are specifically mentioned as Key Elements of the site). Queen Square 'is a prime example of John Wood the Elder's high ambitions for remodelling Bath' (p93), The Circus 'is the pinnacle of John Wood the Elder's work' (p94). However, Queen Square is also a busy gyratory on the A4, while The Circus is a rat-run with up to 500 vehicle movements an hour. These high volumes of traffic have a major impact on the overall appearance and amenity of the city. As the draft Plan recognises, pollution and vibration from vehicles is taking its toll on the fabric of the historic buildings. The city's heritage is being slowly but inexorably degraded.

- d. Para 5.5.3 last sentence, p52. A by-pass road to the east of Bath is perfectly feasible in technical terms, and in our view one is needed to remove north-south through traffic and cut out the pollution and congestion on London Road, Cleveland Bridge and Bathwick Street. The present wording appears to reflect a preference for protecting the 'setting' of the WHS rather than the Site itself. A more balanced form of words is required. FOBRA would like to see a frank statement in this section of the Plan about the traffic problem in Bath. Following on from Issue 41, p40, we believe that the Plan should propose the creation of a comprehensive plan to manage and reduce traffic volumes in the city. We note that UNESCO has itself called for an integrated Traffic Control Plan for the city (Annex A7.3, para 5.2, p 108). A wording is proposed below.
- e. Para 5.5.4, p52. An aspect that is not mentioned in the draft Plan is that the air pollution associated with this traffic presents a serious threat to the health and well-being of the city's residents, 5,000 of whom live within the current Air Quality Management Area (AQMA). Far from matters improving, the 2009 draft Bath Air Quality Action Plan has had to propose enlarging the AQMA to the Circus and surrounding streets. By definition, air pollution in the AQMA is above the safe health level set by the World Health Organisation and the UK Environment Act. A wording is proposed below.
- f. Para 5.5.20, p54. We fully support the Physical Access Objectives 20 to 26. The issue is how to translate them into effective action.
- g. Action 4c, p62 and Objective 16, p67. FOBRA has been a strong supporter of the PRMP, but it must be recognised that the PRMP covers only a small part of the mainly commercial centre south of Queen Square and George Street. It does not cover most of Georgian Bath, not even Royal Crescent and The Circus. FOBRA believes that the PRMP should be accelerated and extended to include the wider area between the Holburne Museum, Bath Spa Station,

Queen Square and Royal Crescent. It is significant that this is the precisely the area being considered for a Business Improvement District. A wording is proposed below.

- h. Objective 21, p69. While we entirely agree with the Objective of reducing traffic volumes, the actions listed will go nowhere near achieving it. The closure of Pulteney Bridge will displace traffic elsewhere in the city, not reduce it. The freight trans-shipment depot, while a welcome development, will be voluntary and affect only a very small percentage of total freight; and funding exists only for a trial. What is required is a commitment to a master plan for traffic in Bath, such as UNESCO has demanded. Wording for a new Action is proposed below
- i. **Traffic Plan:** The detailed elements of a comprehensive plan, some of which are already mentioned in the draft WHS Management Plan, should include:
 - I. Attractive public transport in all areas, and measures to encourage its use. There need to be more routes, especially in the south west part of Bath and other areas which are currently poorly served, and buses need to run later in the evening. Fares need to be attractive.
 - II. Improved school bus services, to eliminate school run congestion.
 - III. Better facilities for pedestrians and cyclists.
 - IV. Encouragement of alternatives to the private car, including car-sharing and car clubs.
 - V. Extension of the Public Realm and Movement Programme to the wider area between the Holburne Museum, Bath Spa Station, Queen Square and Royal Crescent.
 - VI. Reducing the volume of traffic by means of parking policy and traffic management. The use of congestion charging should be considered.
 - VII. Proper enforcement to keep HGVs on permitted routes in Bath.
 - VIII. HGV restrictions or a toll on Cleveland Bridge to encourage HGVs to take other routes such as the A350.
 - IX. Improved signposting to discourage traffic from using the centre of the city as a through route; action with satnav providers to ensure that route restrictions are taken into account.
 - X. Greater use of the A420 as a bypass for east-west through traffic.
 - XI. A bypass/link road to the east of Bath to remove north-south through traffic, on a less damaging route than the previous proposal, to cut out the pollution and congestion on London Road, Cleveland Bridge and Bathwick Street.
 - XII. A ban on tour coaches which drive around the city without stopping [relates to Objective 22, p70].
 - XIII. A comprehensive rather than piecemeal approach to traffic issues, and integration of transport and planning policies. Planning decisions should take full account of the traffic implication of new developments –

particularly those generating high traffic volumes such as supermarkets. No new development should be permitted without the necessary infrastructure [relates to Objective 24, p71].

7. **Parks and Open Spaces:** Page 39, Issue 28 states that "There is a need to ensure that Bath's parks and open spaces are seen to be integral to the Site's landscape setting and managed appropriately". Seven parks and gardens are listed by English Heritage as being of historic importance in A5.14, on page 99. The corresponding objective is 14, on page 66, which spells out a number of actions. However, both the Issue and the actions ignore the fact that, as pointed out, these listed parks and gardens should not be treated merely as integral to the site's landscape setting but should be managed as part of Bath's heritage. Three of them, Abbey Cemetery, Sydney Gardens and Royal Victoria Park are in the ownership of, or are managed by, the Council. The first is maintained on a basis that does not reflect its historic importance; for the second there is now an opportunity to re-unite it with the Holburne Museum garden; and the third incorporates Bath's Botanic gardens. In each of these cases there is a need for an action plan to be published for its restoration and maintenance (suggested wording below).
8. **The Night time Economy:** Bath has many bars and clubs, and a large population of students and other young people. Anti-social behaviour, due to excessive alcohol consumption, is a major problem at night. Not only does this have an adverse effect on local residents, but it is also upsetting for visitors and can spoil their experience of the City (suggested wording below).
9. **Consultation Period:** This is a lengthy and very important paper. Many of the organisations expected and desiring to respond have no paid employees, and answers must therefore be developed by members in their spare time. Adequate warning and a time scale of at least 8 weeks is needed for proper consideration of such plans and development of responses, allowing also time for periods away from Bath which may already have been arranged.

R.G.Kerr,

Secretary

Final

4th Oct 10

Annex – specific comments:

| Page | Para | Line | Comment |
|------|----------------------------|------|--|
| 8 | 1.1.2 | 3 | Insert “and” before “inspired” |
| 9 | 1.1.9 | 4 | Insert after “...health;” “two universities;” |
| 12 | 1.2.21 | 7 | Replace “continual” by “continuous” and insert “regular” before “reinforcement”. |
| 12 | 1.2.23 | 3 | Replace “from” by “by”. |
| 12 | 1,2,24 | 2&4 | Amend “PRMS” to read “PRM Programme” |
| 17 | 2.3.24 | 1 | “The City <i>of</i> Bath” |
| 18 | 2.3.27 | 1 | Insert “century” after “20 th ”. |
| 18 | 2.3.30 | 1 | “...are key features of...” |
| 21 | 2.4.8 criterion iv | 12 | Amend “sat” to read “placed”. |
| 21 | 2.4.9 (5) | | Replace "hollow in the hills" by "river cutting through a limestone plateau". |
| 26 | 2.4.34 criterion iv | 14 | Amend “sat” to read “placed”. |
| 27 | 2.4.34 Man & Protection | 25 | Amend “..network, outlined...” to read “..network and widespread pedestrianisation, outlined...” |
| 32 | 3.4.11 | 2 | Amend “policies” to read “policies”. |
| 35 | 4.2.1 | | Add new para 4.2.1 (vi): "Improve the amenity of the city for residents and visitors, and preserve it for future generations, by reducing the volumes of traffic coming into and through the city". |
| 38 | Issue 7 | 2 | Insert “at” before “local”. |
| 38 | Issue 12 | 3 | Insert “to” before “make”. |
| 40 | Issue 41 | 1 | Delete “and” after “city”. |
| 40 | Issue 44 | 1 | Insert “and reduce” after “control”. |
| 44 | 5.2.28 | 5 | Add "It is also vital that Bath remains an attractive place to live for private individual owners and their families, taking into account all aspects of everyday life experienced in the city. Too much pressure on those in the city centre could result in the houses there reverting to multiple occupation, with consequential effects on the quality and amount of money invested in their conservation. Residents' Associations should be encouraged, as a source of strength, advice and civic pride." |
| 45 | 5.2.36 | 2 | Delete “to” after “capacity”. |
| 48 | 5.3.18 | 8 | It is important that any new way-finding system extends beyond the city centre to give directions to all sites of importance. At present it is particularly poor, south of the river. |
| 48 | 5.3.18/19 | | Amend “PRMS” to “PRMP” (several times). |
| 48 | 5.3.19 | | Insert reference to funding. |

| Page | Para | Line | Comment |
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| 52 | 5.5.3 | | Reword to read: "Bath suffers from high levels of traffic congestion throughout the city's main road network, and this extends even to the Georgian architectural icons of Queen Square and the Circus. A comprehensive traffic management plan is required in order to deal with the volumes of traffic coming into and through the city. UNESCO has itself called for an integrated Traffic Control Plan for the city." |
| 52 | 5.5.3 | | Redraft to read : "There are physical limits to the city's ability to accommodate growing traffic requirements without detriment to the historic environment. The landscape and countryside surrounding the city is of outstanding natural beauty and integral to the values of the Site. In addition, the hot waters below the site are vulnerable to major excavations. Because of these factors an underground by-pass is likely to be problematical; an above-ground road to by-pass the city would be technically feasible but protection of the World Heritage Site by this means could conflict with the preservation of its surroundings. Difficult choices may have to be made". |
| 52 | 5.5.4 | 3 | Before "historic" insert "...those who live in Bath and visit it, and to the..." |
| 52 | 5.5.4 | | Add: "Air pollution also presents a serious threat to the health and well-being of the city's residents, 5,000 of whom live within the current Air Quality Management Area (AQMA)." |
| 54 | 5.5.20 Obj 20 | 1 | After "traffic" insert "...and associated pollution..." |
| 55 | 5.6.7 | | Add "See para 5.5.6: the Civitas funding has also allowed new interpretation signage to be designed and trialled." |
| 56 | 5.6.12 | | Add new objective 33: "Work to minimise anti-social behaviour at night in order that long-stay visitors are not deterred." |
| 58 | 6.1.1 | 4 | Amend "The programme of action..." to read "This programme..." |
| 59 | 6.2.9 | 4 | Insert "€" before "3.975 million" |
| 62 | Obj 4 | | Add new Action 4d: "Consider extension of PRMP to include the wider area of Georgian Bath between the Holburne Museum, Bath Spa Station, Queen Square and Royal Crescent." |
| 66 | Obj 14 | Action 14e | Amend "PRMS" to read "PRMP". |

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| 66 | Obj 14 | | Add new Action 14f: "Draft and implement a plan to manage the seven historic parks and gardens within the WHS listed in A5.14 as being of importance." |
| 67 | Obj 16 | Action 16b | Add "(see also Action 4d)". |
| 69 | Obj 21 | | Add new Action 21c: "Develop a comprehensive plan to manage and reduce traffic volumes in the city." |
| 98 | 5 | | "Planning and Policy Framework". |
| 107 | 5.1 sub-para 2 | 2 | Amend "...British law. To read "...English law." |
| 109 | 5.3 sub-para 4 | 2 | Amend "...Strategy..." to read "...Programme..." |
| 109 | 5.3 sub-para 4 | 3 | Add after "...system." "with Civitas funding. See para 5.5.6" |
| 109 | 5.4 | | FoBRA made comments on the latest Planning Application for BWR, specifically criticising the unsuitable height of the "landmark buildings" and the inappropriate campus layout. |
| 112 | A8.1 | Bullet 5 | Amend "The green setting of the City in a hollow in the hills" to read "The green setting of the City made by the river cutting through a limestone plateau." |
| 112 | A8.1 | Bullet 6 | Delete " its role as a destination for pilgrimage ". Bath has not been a destination for pilgrimage since Roman times. |