

Date: 15th January 2010
Our ref:
Your ref:

Planning Policy Team
Bath and North East Somerset Council

By email



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Dear Sir/Madam

Bath and North East Somerset Core Strategy Spatial Options Consultation

Thank you for consulting Natural England on this document.

Natural England is a non-departmental public body, established under the Natural Environment and Rural Communities Act 2006. Natural England has been charged with the responsibility of ensuring England's unique natural environment, including its flora and fauna, land and seascapes, geology and soils are protected and improved.

Our purpose, as outlined in the Act, is to ensure the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our response follows each question in turn, as set out in the consultation document, where we have chosen to make a response.

Spatial Vision and Objectives

Q DW1

The proposed district wide vision appears to reflect the Council's ambitions with respect to a creating a sustainable low carbon future, with sufficient homes and jobs both within the city of Bath, market towns and rural settlements. However it would benefit by the inclusion of a specific reference to Bath's high quality natural assets, including its urban parks and landscape. We also suggest that references to ease of movement should specify that this will be by means other than the private car wherever possible.

Q DW2

We are broadly satisfied that the proposed spatial objectives are right for the district, and are pleased to note that actions and decisions will be coordinated across the council.

In particular we welcome the Council's recognition of the importance of tackling the causes and effects of climate change, and its commitment to reducing consumption of oil and other natural/non renewable resources, including efficient use of land.

We consider the remaining strategic objectives to be comprehensive and capable of addressing the range of needs and issues across the district.

Q DW3

We suggest that the Cotswolds and Mendip Hills AONB Management Plans are included in the list of policy tools under objective 4.

Q DW4

We welcome references to master-planning, production of SPDs and commitment to provide integrated green infrastructure as a key part of sustainable development.

More specifically we are broadly supportive of the Council's preferred option (2).on the basis that this option places less pressure on Bath and SE Bristol, including landscape impacts, and we share your view that this option should help to revitalise the district's market and key towns, making them more self contained and creating opportunities for improved public transport.

Q DW5

We are content that the Council have identified the issues and opportunities facing the district and that proposed strategic objectives are the right ones. However given the range of uncertainties with respect to regional planning context, land availability, progression of south Bristol regeneration and the like, the policy framework would benefit from some flexibility, albeit within a robust set of consistent principles.

Q DW6

We would urge the Council to aim for higher targets if the latest government research suggests a more ambitious approach is realistic, however careful consideration of the type and location of renewable energy technologies will be needed, not least with respect to larger wind turbines, which can impact on landscape and vulnerable species.

Q DW7

Renewable energy can be successfully integrated with green infrastructure planning and provision, such as the production of biomass, community/micro scale water and wind technology. We therefore suggest the emerging Green Infrastructure Strategy will be relevant.

Q DW8

The majority of housing and other development in the district over the next 20 years is already in place, therefore the importance of 'retro-fitting' improved energy efficiency and contributing to renewable energy cannot be overstated. However this will be a huge challenge, so a clear, robust policy framework that supports retro-fitting will be particularly important.

Q DW9

We are pleased to note a Sustainable Energy Strategy will be required to support larger scale planning applications, which should make a valuable contribution to meeting the more ambitious targets suggested by the Renewable Energy Sustainability Research

Q DW10

While we accept that it would not always be practical or reasonable to expect smaller development proposals (10 dwellings or less) to provide 20% on-site renewable energy, it should be possible to establish a sliding scale to set an appropriate level of contribution to the generation of renewable energy off-site.

Q DW11

We agree that major development should be expected to meet higher targets than the national standard, particularly as national targets represent current thinking and it is not unreasonable to expect improvements in available technology during the plan period. Such an approach would also be consistent with the Council's Headline Objective.

Q DW12

We think the thresholds should be lower. The current levels represent major developments, but it is likely that a greater number of smaller, but still significant, proposals will be brought forward that could make an important contribution to renewable energy targets and a reduced carbon footprint.

Q DW13

We would support a requirement that planning applications include a sustainability checklist; this would ensure sustainability becomes a key consideration for all new development and that this is approached consistently.

Q DW14

Use of such checklists should only be discretionary if it proves impractical to make it a requirement.

Q DW15

Given the clear policy direction available in existing Government guidance we do not consider it necessary for the Council to develop a local policy, subject to different advice from the Environment Agency.

Q DW16

Yes, and we are pleased to note the Council are preparing an Infrastructure Delivery Plan, which will help to integrate the elements of the proposed policy.

Q DW17

The proposed policy appears to be comprehensive and based on existing evidence. We are pleased to note the Council will be developing a local GI definition for Bath & NE Somerset. We agree with the Council's interpretation of green infrastructure esp. in terms of the multiple benefits it can provide. Furthermore we welcome the references to addressing cross boundary issues, and the strategic opportunities this provides in terms of collaborative working.

Having said this, successful green infrastructure is a physical framework with land take implications, and its success will depend on the standards that are set. For example, Natural England has developed Access to Natural Green space Standards (ANGsT) ¹ which set out minimum standards for access to green space, and broadly mirrors those set out CLG's Ecotowns guidance. This is particularly relevant for proposed urban extensions where there should little justification for failing to meet the highest standards, equal to the level of provision of a similar size ecotown.

Q DW28

We suggest adding support for a cohesive PROW and streets network to encourage walking and, to a lesser extent, cycling.

Q DW18

We suggest a reference is made to the potential contribution restored quarries can make to the green infrastructure network.

Q DW21

Yes, appears comprehensive and we are pleased to note the links to standard set out in recognised guidance.

Q DW22

We welcome the references to partnership working and to seeking to contribute to meeting the objectives of relevant plans and strategies. We suggest a reference to the contributing to meeting NI targets within the LAA, which goes beyond NI 197. Elements of the Avon BAP could usefully be considered as part of partnership approach.

Q DW24

Yes.

Q DW24

Yes, we particularly welcome the commitment to help "ensure the district's architecture and heritage interest is preserved and enhanced as a non-renewable resource for its own sake".

¹ An accessible natural greenspace of at least 2 hectares in size, no more than 300 meters (5 minutes walk) from home; at least one accessible 20 hectare site within two kilometers of home; one accessible 100 hectare site within five kilometers of home; one accessible 500 hectare site within ten kilometers of home and statutory Local Nature Reserves at a minimum level of one hectare per thousand population

Q DW25

Yes, subject to the assessment criteria (ref 2.114) and clarity of use.

Q DW29

We recommend impacts on ecology are also given consideration for example habitat loss, disturbance, changes in hydrology, and pollution.

Spatial option for Bath and a new neighbourhood to S/SW Bath

Q B1 & B2, B3, B4, B5

Yes, we are happy with the description of Bath and its environment, issues and vision.

Q B7

Yes, in so far as it will be important to establish principles and standards appropriate for the key areas of growth.

Q B8

We are broadly supportive of the proposed coordinated approach to the River Corridor Concept, which should help to maintain distinctiveness within a framework of principles and standards. Good planning will be particularly important with respect to protecting ecological interests and the commuting corridor for bats. These interests will need to be balanced against the social and economic potential of the river corridor.

Q B9

We suggest that Bath's parks and green spaces, including accessible riverside are included if relevant to the central area.

New neighbourhood in an urban extension in Bath

Q B15

The vision includes a reference to complementing the redevelopment of the river corridor – this appears to have greater relevance for the site at Twerton.

Q B16

Yes, we support and welcome the objectives for the new neighbourhood.

Q B17

We are concerned about the high landscape impact of the preferred location. Although the site lies outside of the Cotswolds AONB it will have a significant impact on its setting within the Avon Valley character area.

While we recognise the preferred site benefits from being adjacent to the A4, rail links, and a possible rapid bus route in terms of transport connections and, being larger, has potential to accommodate a greater number of houses and/or commercial use, we remain concerned that the adverse impacts on the setting of the Cotswolds AONB, Bath and the WHS would undermine their intrinsic value.

Q B18

Further investigation of the implications of this option on the Bath & Bradford on Avon Bat SAC and Cotswolds AONB are needed, and we would welcome the opportunity to discuss this further with the Council.

Spatial Options for Keynsham

Q K1

Yes, as long as development conforms to the emerging District wide spatial policies.

Q K3

The spatial vision and objectives appear to reflect the issues and opportunities well.

Q K4

Both options appear reasonable, although option 2 will present extra challenges in terms of greater requirement for land, it offers benefits in terms of sustainable transport options and could contribute to the vitality and self containment of Keynsham.

Spatial options for a new neighbourhood at South East Bristol

Q SEB1

Yes, largely, but the vision might benefit from a reference to the historic landscape, to help ensure this is at the forefront of planning the area.

Q SEB2

Yes, we particularly welcome the reference to creating a place that responds appropriately to its setting.

Q SEB4

We recognise this location would support Bristol City Council's objectives for regeneration in south Bristol, and that this could result in a number of mutual benefits, including improved public transport.

Q SEB5

The Council appear to have identified the issues and constraints of the location, and the suggested timetable for the proposal to come forward should help to ensure necessary transport and other improvements are in place prior to starting development.

Spatial Options for Midsomer Norton and Radstock

Q MNR1

Yes, we agree there would be benefits from sensitive regeneration.

Q MNR3

Yes and we welcome the references to the distinctive heritage and natural environmental assets.

Spatial Options for rural Areas

Q RA1

Yes, the vision and objectives appear to reflect the issues and opportunities for rural areas. We particularly welcome the objectives for increasing local produce and materials.

Q RA2

We recognise the need for limited development of some smaller settlements to improve their vitality, achieve a greater level of self containment and deliver more viable public transport. We are happy with the Council's approach to identifying appropriate villages.

Q RA3

Development in smaller villages within the green belt should be kept to a minimum to protect their setting, however we acknowledge the need to address issues such as isolation, but suggest there may be opportunities to promote sustainable transport opportunities before considering further development.

Q RA4

We expect there is a need for a rural exceptions policy to address localised affordable housing needs.

Q RA5

Ideally yes, such a policy would also provide greater clarity for potential developers and would help to avoid inappropriate locations coming forward.

Q RA6

All the suggested policy elements appear relevant considerations and should be included.

Q RA7

We suggest the policy should include a reference to safeguarding local distinctiveness and the natural environment.

Interim Sustainability Appraisal

We are satisfied the interim Report has adopted a clear and reasonable methodology and broadly concur with the issues, gaps and recommendations that have been identified. We would expect these to be addressed in the emerging Core Strategy.

Habitats Regulations Assessment

We welcome the Council's precautionary approach to assessing the potential impact of the emerging Core Strategy policies on European protected sites.

As noted in the introduction, the report represents the first stages of the assessment process and is not a full blown Appropriate Assessment.

We are satisfied that the assessment has identified relevant sites, their qualifying features and the potential issues and effects on these. However further work is needed, in particular mitigation opportunities need to be better understood.

To this end, Natural England would welcome the opportunity to input to this process as the plan progresses.

I hope this letter is clear and helpful, however we would be very happy to discuss any of the points raised further.

Yours faithfully

Amanda Grundy
Adviser, West of England Team