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Your ref: LDF/ML/281



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Dear Mr Trigwell

### **Invitation to comment on Core Strategy amendments**

Thank you for your consultation on the above dated 08 November 2013 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **Legal compliance and soundness**

Natural England is satisfied that the concerns we raised regarding potential landscape and ecological impacts of development at Odd Down and Weston Slopes have been adequately addressed in the revised Core Strategy.

In so far as it relates to those areas upon which Natural England is qualified to comment, we consider the revised Core Strategy to be generally legally compliant, sound and in conformity with the National Planning Policy Framework (NPPF).

### **Previous concerns**

In our response to the Proposed Changes to the Bath and North East Somerset Submitted Core Strategy – Part 1 of the Local Plan, dated 8<sup>th</sup> May 2013, we raised concerns regarding potential effects of the proposed development on the edge of Bath on the special qualities of the Cotswolds Area of Outstanding Natural Beauty (AONB) and on the Bath & Bradford on Avon Bat Special Area of Conservation (SAC).

The Council has since commissioned a number of further studies and undertaken a detailed and evidence based assessment of the land adjoining Odd Down and at Weston, including with respect to the AONB and the Bat SAC. The assessments identified a range of site specific constraints and have helped to determine the developable area and the requirements from new development in these locations.

Policy B3A *Land adjoining Odd down, Bath Strategic Site Allocation* and Policy B3B *Land adjoining Weston, Strategic Site allocation* set out the place-making principles and detailed development requirements, which include the preparation of a comprehensive masterplan and a Landscape and Ecological Mitigation Strategy and Management Plan. The site allocation policies are further supported by concept diagrams.

## **Cotswold AONB**

The assessment of the landscape impacts of development at Odd Down and Weston followed up to date guidance produced by the Landscape Institute and provided a field by field assessment of the broad search areas. The assessment of the landscape and visual impact of development on the Cotswold AONB included consideration of the AONB “Special Qualities of Significance” as identified in the AONB Management Plan 2013-2018. Special qualities identified for these areas comprised ‘escarpment views, tranquillity and accessible landscape for quiet recreation’.

The detailed landscape assessment findings and conclusions appear reasonable and to have informed the revised allocation boundaries and shaped the site allocation policies and should help to significantly moderate the potential impacts on the AONB, as far as is reasonably possible given the land in question lies within the AONB.

Based on an understanding that the need for development on the edge of Bath has been identified by the Council and alternatives investigated via the Sustainability Appraisal process, Natural England is satisfied that development at Odd Down and Weston, if undertaken in accordance with the revised Plan, would not undermine the designation purposes of the AONB. The masterplan process, as identified in the evidence findings, will be fundamental to ensuring harm can be reduced as much as possible by incorporating appropriate mitigation measures into the design and layout of development.

## **Bath & Bradford on Avon Bat SAC**

Natural England welcomes the further bat surveys and detailed analysis of these that have been undertaken by the Council’s ecologist and consultant bat expert. We are satisfied that the detailed policy requirements set out in Policy B3A and Policy B3B have been underpinned by sound evidence and should help to ensure development at Odd Down and Weston Slopes does not result in an adverse impact on the integrity of the European Site.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Amanda Grundy on 0300 060 1454. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy  
Lead Adviser, Sustainable Development Network