

**Local Plan 2016-2036
Issues & Options Consultation
Winter 2017**

Background Paper

Whitchurch Strategic Development Location



**Bath & North East
Somerset Council**

B&NES Local Plan Options Consultation

Background Paper: Whitchurch Strategic Development Location

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2.0 Introduction

2.1 This background paper sets out the key issues identified by the Council in considering how to take forward the Strategic Development Location at Whitchurch as identified in the West of England Joint Spatial Plan. It explains the policy context for the Local Plan and the range of evidence that was commissioned and which was used to inform the Local Plan Options document.

2.2 It is essential that the evidence documents referred to are read as a whole, rather than relying on some of the selected summaries or highlights that follow.

3.0 Policy Context

National Planning Policy Framework (NPPF)

3.1 The NPPF provides the Government's policy context for planning. It shapes the parameters of the content of Local Plans, and explains the Government's position on issues of acknowledged importance. Local Plans need to conform with the NPPF. It therefore provides the context for much of the evidence that has been commissioned to inform the preparation of the Local Plan. This is elaborated in more detail under the relevant sections below.

West of England Joint Spatial Plan (JSP)

3.2 This provides the overarching planning framework for the West of England, and sets out the spatial strategy for meeting the growth aspirations and requirements of the area. This includes the identification of Whitchurch as a Strategic Development Location (SDL), capable of delivering 1,600 homes in the plan period (with a potential capacity of 2,500 new homes) and a policy outlining overarching development principles. The JSP is programmed to undergo a public examination in 2018 which might result in changes.

The [Strategic Development Location Templates](#) set out the story so far for each SDL and the reason for the site requirements.

[Topic Paper 2](#) explains why the location were selected

Core Strategy/Placemaking Plan – (current B&NES Local Plan)

3.3 This provides the current planning policy context for development within Bath and North East Somerset up to 2029. Its policy framework as it applies to Whitchurch will be superseded with the adoption of the new Local Plan.

Whitchurch Village Neighbourhood Plan

3.4 The Whitchurch Village Neighbourhood Plan has recently passed its community referendum and the making and bringing into force of the Plan was agreed by the Council's Cabinet at its meeting on 6th December 2017. It now has full weight in the determination of planning applications. It will inform some of the detailed policies that are to emerge in the Local Plan, and assist in identifying opportunities for enhancement. As is acknowledged in the Neighbourhood Plan, the Joint Spatial Plan and the Local Plan, once these have been adopted, will take precedence over the Neighbourhood Plan. This may also necessitate a review of the Neighbourhood Plan.

The new B&NES Local Plan (NLP)

3.5 The Local Plan is now under preparation. It will set out the more detailed policy framework for the SDL in the context of the JSP. It will formally allocate the site and set out

the more detailed planning requirements and will remove the land from the Green Belt. The plan period is 2016-2036.

Key Evidence Base

4.0 Landscape and Visual Assessments

4.1 This body of work comprises a series of landscape and visual impact assessments, and was commissioned to inform the consideration of the development potential of land in the Whitchurch area. Earlier phases were used to inform the B&NES Core Strategy, and subsequent phases form part of the evidence base to inform both the Joint Spatial Plan produced by the West of England, and the more detailed Local Plan (2016-2036) being produced by Bath and North East Somerset Council.

4.2 This series of studies that were commissioned have now been combined into one document for ease of reference, they comprise:

- Whitchurch Strategic Development Location 2017: Landscape and Visual Impact Assessment
- Whitchurch Landscape and Visual Assessment 2016 (Appendix 1)
- The Core Strategy Green Belt Review 2013/14 - Whitchurch Landscape and Visual Assessment Summary (Appendix 2)

4.3 The approach common to all of the studies has been to assess and understand the landscape and visual character of the area proposed for development.

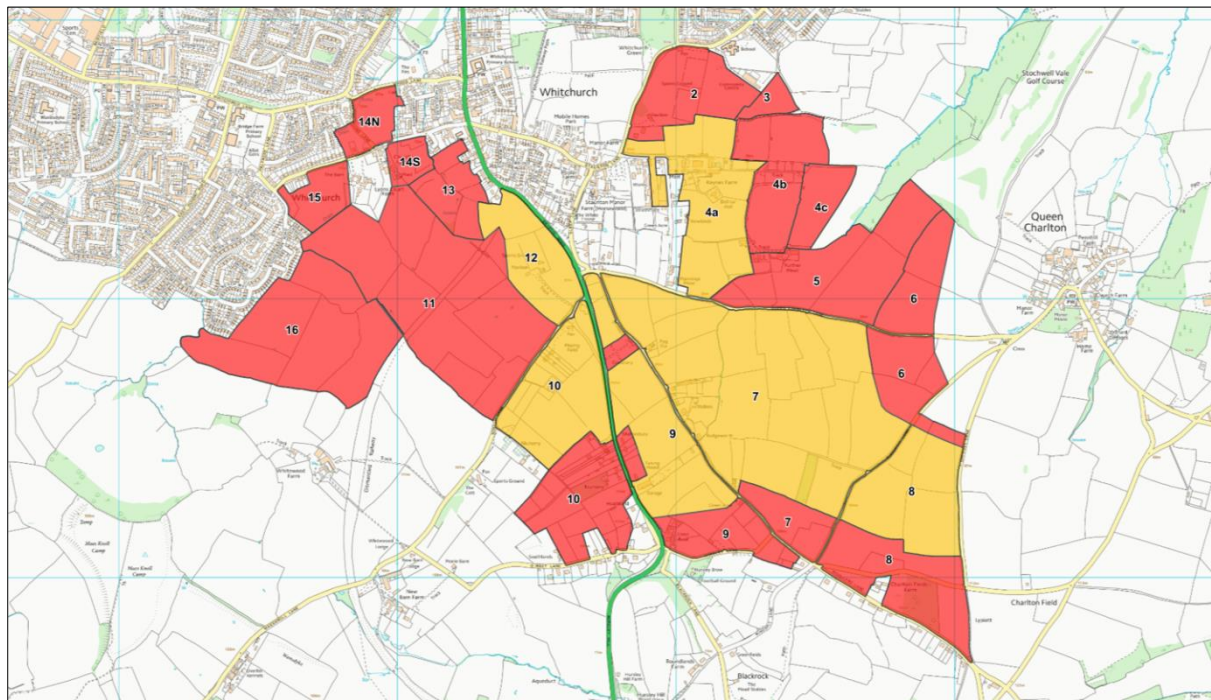
Methodology

4.4 The methodology of the most recent study is the same as for the previous assessment work and has been carried out in accordance with the Guide to Landscape and Visual Impact Assessment, 3rd Edition (Landscape Institute and Institute of Environmental Management and Assessment). The assessment is necessarily general given the hypothetical nature of any development. Scoring for sensitivity, magnitude and significance of effects is based on a scale of low, low to medium, medium, medium to high and high; and negative, neutral and positive (Appendix 4 gives definitions). The landscape assessment is primarily against landscape character with reference made within that to key landscape elements such as important tree groupings and landform features and including landscape setting to settlements where appropriate as well as Green Infrastructure. The visual assessment is against individual viewpoints and also receptor groupings such as local residents and road users.

Conclusions and Implications:

4.5 The work assessed the significance of effects on the landscape character and visual impacts of development potential in different land parcels. These areas and their level of impact is set out in plan below. This, combined with other evidence such as that related to Heritage Assets and Green Belt, has informed the suggested extent of the area that is potentially available for development that is set out in the Local Plan Options document. This area will be further refined through the next stage of Local Plan production.

**Figure 1 - Landscape and Visual Impact Assessment
Combined Significance of Development Effects for Whitchurch SDL**



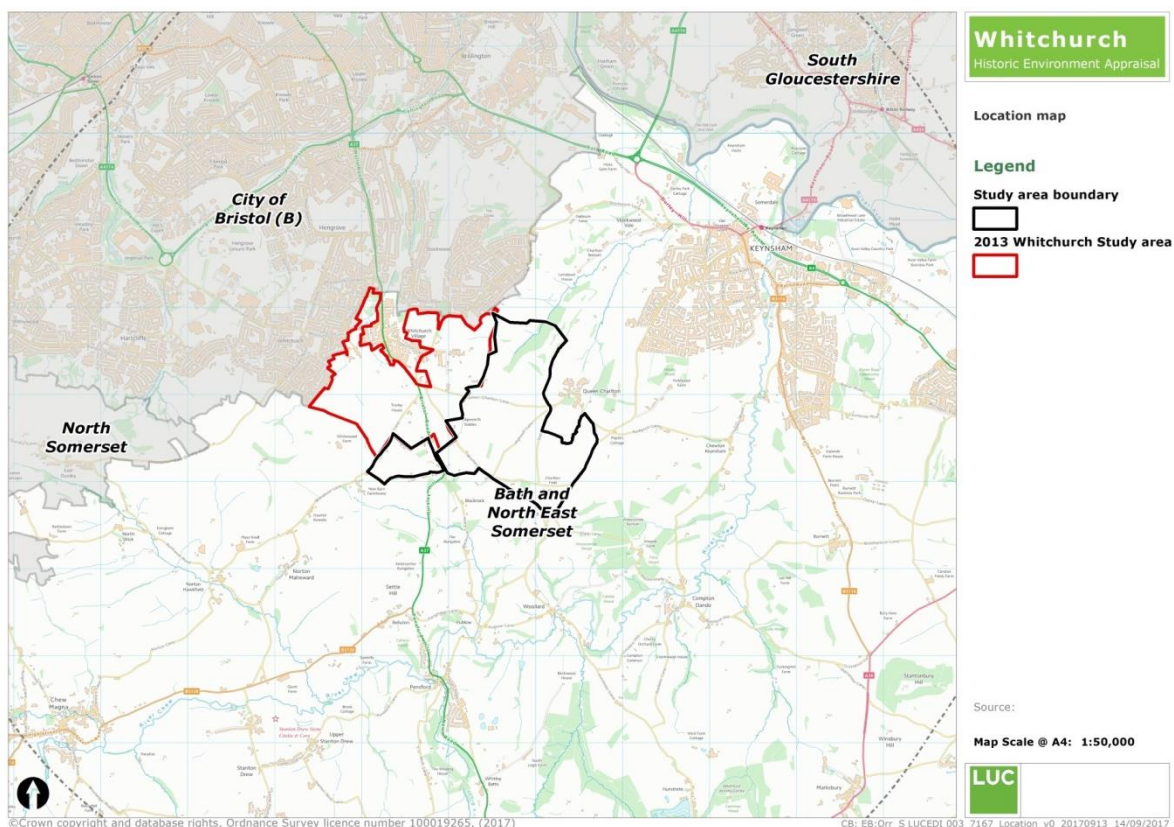
Legend	
Red	High negative significance of effects
Orange	Medium-high negative significance of effects
Yellow	Medium negative significance of effects
Light Green	Low-medium negative significance of effects
Dark Green	Low negative significance of effects

5.0 Heritage Asset Study (2013) & Historic Environment Appraisal (2017)

5.1 National planning policy as set out in the NPPF, provides guidance for local authorities on the conservation and investigation of heritage assets, and on the significance of impacts. It sets out that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the the asset’s conservation. The more important the asset, the greater the weight should be.’

5.2 To understand the significance of the heritage impacts of the proposed development at Whitchurch, and to inform Bath and North East Somerset Council’s planning for the future growth of the area, a consultant team, led by Land Use Consultants (LUC) were commissioned to undertake two Heritage Asset Studies. The first study was commissioned in 2013 to inform work on the Core Strategy. A second study was commissioned in 2017 to cover an extended geographic area which represented the broader area of search that was considered through the Joint Spatial Plan work.

Figure 2 - the different geographic areas that were considered by the studies



5.3 There is a difference in the methodology between the 2013 study and the 2017 study. Cumulative effects have been considered in the most recent document in a more systematic and transparent manner, meaning that – on occasion – land parcels register higher levels of risk of impact due to cumulative effects, for example development of:

- one land parcel on multiple heritage assets; or

- multiple sites on multiple assets.

5.4 In addition and in recognition of the complexity that this can bring, the assessment scales have been afforded more subtlety, using a five-point scale rather than the 2013 study's threepoint scale.

Heritage Asset Study (2013)

5.5 The 2013 Study provided this summary from its assessment:

Combined Sensitivity and Risk Summary

5.6 Development of the Whitchurch location presents an **overall high risk of harm to the significance of** the setting of Maes Knoll and the Wansdyke within the south western areas of the land assessed. In the centre of the site the Medieval concentric field pattern is an area of potentially at least **moderate sensitivity** but an archaeological evaluation would be necessary to establish its full nature. The northern areas of the site, which are already developed would present a **lower risk** in relation to the significance of heritage assets, due to the existing built form. The east and southeast of the site would pose a **medium risk** to the setting of the Queen Charlton Conservation Area.

5.7 A **medium risk** remains in relation to undiscovered archaeology and it is recommended that suitable survey work is carried out prior to any development works. In this overall assessment of the risk to the significance of heritage assets, the risk to the concentric field pattern is identified as Medium although further investigation is required to assess its full significance. This may raise the risk to **High**.

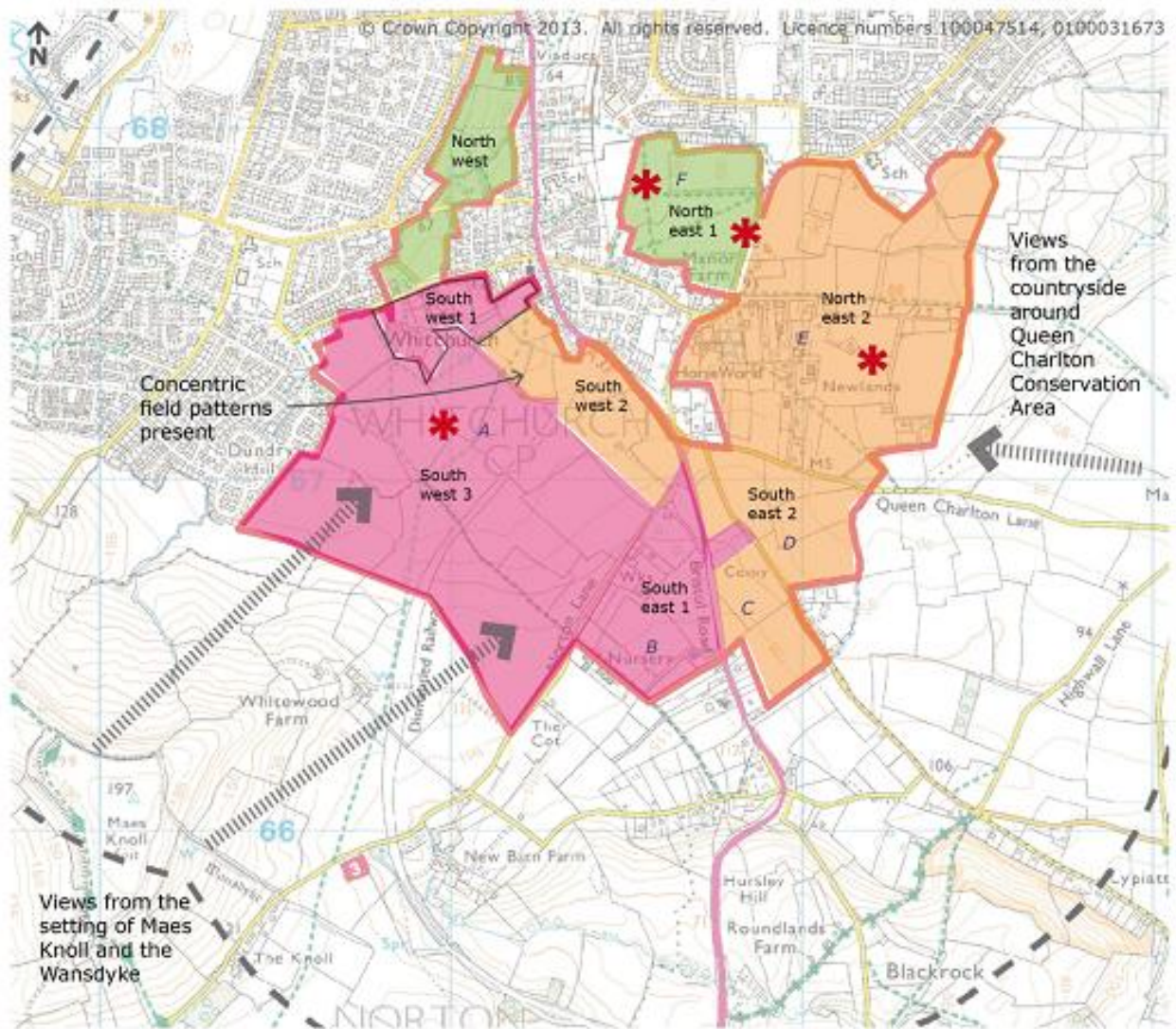
5.8 In addition ... there is **high risk** to the significance of heritage assets in a number of **spot locations**.

5.9 In summary, development at the Whitchurch site will be:

- **low risk** within North West and North East 1.
- **medium risk** within North East 2, South East 2 and South West 2 (although in this latter case it may rise to **high** depending on the full significance of the concentric field pattern).
- **high risk** within South West 1, South West 3, and South East 1.

5.10 Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required.

Figure 3 – Whitchurch Summary Map



Whitchurch Summary Map

- High risk to significance of heritage assets
- Medium risk to significance of heritage assets
- Low risk to significance of heritage assets

* High risk to known archaeological heritage assets, indicative location

Labels A - F refer to other B&NES studies, in this case the Greenbelt Review, and do not accord with the site boundaries of this report. They are included on the map figure to allow cross reference.

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

Historic Environment Appraisal (2017)

5.11 The objectives of the 2017 study were to:

- Undertake a desk-based assessment, to accepted industry standards, to:
 - Identify heritage assets with the potential to be affected by the proposed land allocation;
 - Understand their significance, including any contribution made by setting;
 - Assess the likely effect on heritage significance arising from development in the study area – including those arising from setting change and cumulative/in-combination effects;
- Provide commentary on the wider relationships between heritage assets and the historic landscapes of the area, including potential for effects as a consequence of development; and
- Provide advice on options for sustainable development, where appropriate.

5.12 In addition, Historic England guidance *Historic Environment Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets* ('GPA3') has been followed in understanding the contribution of setting to the significance of assets and impacts thereon.

5.13 The study provides a strategic assessment of the risk of harm to heritage assets arising from development within the study area. As detailed proposals for the sites are not available, the study cannot draw conclusive statements regarding the significance of the potential impacts or definitive levels of harm. Detailed assessments would need to be undertaken as part of any subsequent planning applications and, if necessary, accompanying Environmental Impact Assessments.

5.14 The assessment of potential effects was based upon a series of assumptions to provide a 'maximum case' scenario, in line with the required precautionary approach adopted by the study.

5.15 The study entailed undertaking the following discrete tasks:

1. Data Collection.
2. Desk-based Assessment (DBA).
3. Spatial Analysis.
4. Asset Significance.
5. Initial Effect Appraisal.
6. Initial Cumulative Effect Appraisal.
7. Site Visits and Appraisal Moderation.
8. Reporting.

5.16 These tasks are explained in more detail in the full report. Table 1 sets out how the findings should be interpreted in the context of the NPPF .

Table 1: Policy Framework and Recommendations

Level of Potential Effect	Policy Framework and Recommendations
High	Development is likely to cause substantial harm to the significance of one or more designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance. Therefore development of these areas should be exceptional or wholly exceptional depending on the nature of the asset (NPPF 132 and 139).
Medium-high	Development is likely to cause harm to the significance of one or more designated or non-designated heritage assets of demonstrably equivalent significance.
Medium	Development is likely to cause substantial harm to non-designated assets of medium significance.
Low-medium	Development is unlikely to cause harm to designated or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.
Low	Development is likely to cause some harm to non-designated assets of medium significance.
	Development is likely to cause substantial harm to non-designated assets of low significance.

Overview of sensitivity to change arising from development

Process

5.17 The outcomes of the assessment process has been drawn together to provide a strategic appraisal of the likely risk of harm from development within the study area.

5.18 The study area has been divided into land parcels, based on existing defensible boundaries and responding to the historic environment resource therein. This is depicted in Figure 4 below.

Outcome

5.19 As Figure 4 illustrates, the study area as a whole is generally very sensitive to change arising from residential development. This is derived from the following key factors:

- Nationally important archaeological assets – Maes Knoll and the Wansdyke – to which a coherent, intact rural landscape setting is a critical aspect of their heritage significance.
- Contribution of the adjacent open historic fieldscapes to the character and significance of the Queen Charlton Conservation Area.

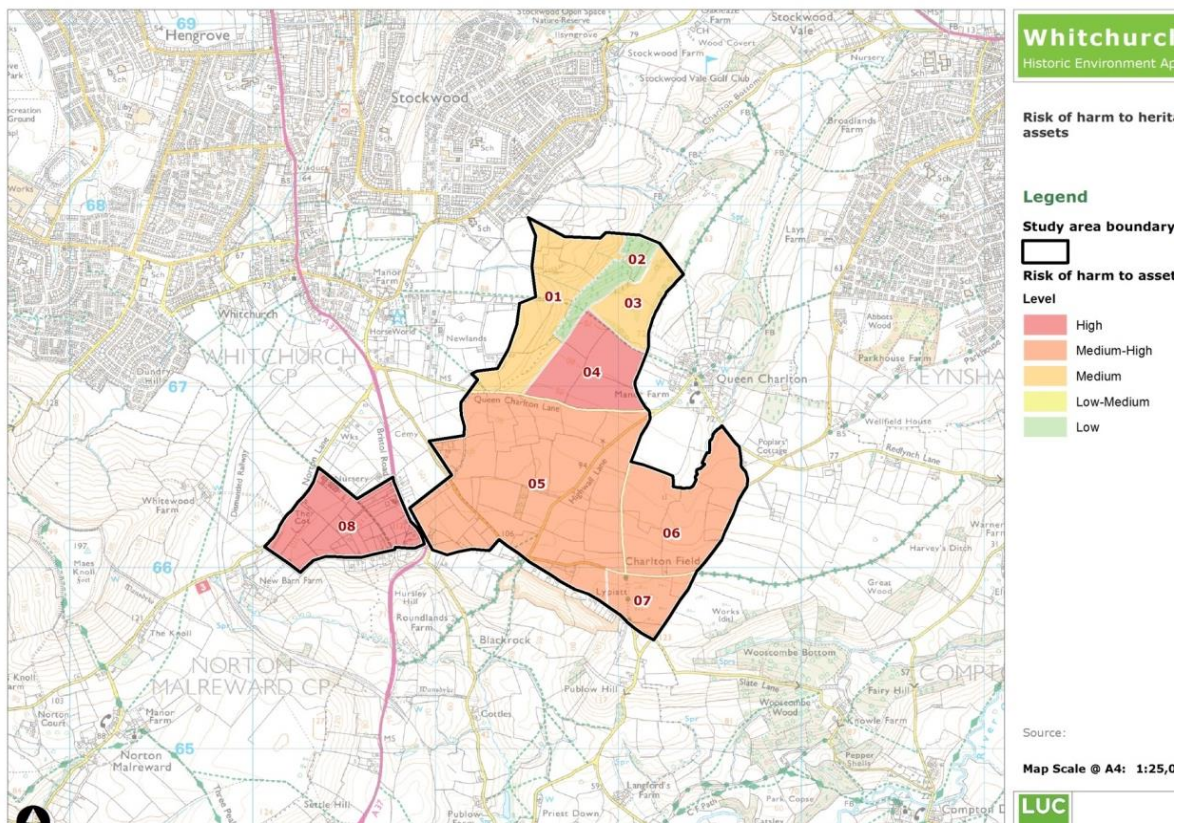
- Contribution of open, rural landscape setting to the character and significance of comparatively uncommon 17th century isolated farmsteadings.
- High levels of archaeological potential, confirmed through aerial photographic and LiDAR data interpretation.
- Relatively few viable options for mitigating the impact of setting change on the significance of designated assets.
- Potential for development to have simultaneous impacts on a number of heritage assets.

Table 2 – Provides a summary of the historic environment issues by indicative land parcel:

Parcel number	Summary of resource and potential for harm NB. Other constraints may affect deliverability and/or acceptability in planning terms	Risk of Harm rating
01	Area of high archaeological potential; adjacent to putative Roman occupation site. Potential for physical effects on archaeological assets. Medium risk of harm to heritage assets.	
02	Area of recently-established woodland; likely to have reduced archaeological potential as a consequence of ploughing/mounding for tree establishment. Limited potential for physical effects to buried archaeology; potential for slight setting change to Queen Charlton Conservation Area depending on building heights. Low risk of harm to heritage assets.	
03	Golf course; area of medium archaeological potential – slight upstanding remains of northern extremity of putative coaxial field system; golf course development has truncated some remains. Potential for physical effects / total loss of non-designated archaeological assets, and potential for setting change to Queen Charlton Conservation Area. Medium risk of harm to heritage assets.	
04	Area of high archaeological potential; in-situ non-designated archaeological assets. Potential for total loss/substantial harm to non-designated archaeological assets as a consequence of development. Significant potential for setting change to Queen Charlton Conservation Area, likely approaching substantial harm. High risk of harm to heritage assets.	
05	Area of high archaeological potential and historic landscape value; potential for physical impacts to non-designated assets. Level of harm dependent on extent of development but potential to included localised total loss/substantial harm.	

Parcel number	Summary of resource and potential for harm NB. Other constraints may affect deliverability and/or acceptability in planning terms	Risk of Harm rating
	<p>Potential for setting change to Queen Charlton Conservation area – level of harm dependent on extent and nature of development.</p> <p>Potential for setting change (longer distance views to/from) Maes Knoll and the Wansdyke Scheduled Monuments [visibility greatly affected by vegetation levels]. Level of harm dependent on extent and nature of development.</p> <p>Cumulative effect of development in this land parcel on a number of heritage assets has significant potential to give rise to harm, approaching substantial harm in places – although this would likely be strongly dependent on the nature, location and scale of development.</p> <p>Due to the potential for the developed settlement edge moving significantly closer to the Wansdyke, and filling much of the foreground in views to the north east from Maes Knoll with development, the southern portion of the land parcel is particularly sensitive. Similarly, the north-western portion adjacent to Queen Charlton is particularly sensitive in terms of setting change to the Conservation Area.</p> <p>Medium-high risk of harm to heritage assets.</p>	
06	<p>Area of medium-high archaeological potential and historic landscape value; potential for physical effects to non-designated archaeological assets. Level of harm dependent on extent of development but likely to included localised total loss/substantial harm.</p> <p>Potential for setting change to Queen Charlton Conservation area – level of harm dependent on extent and nature of development.</p> <p>Medium-high risk of harm to heritage assets.</p>	
07	<p>No archaeological potential (former quarry).</p> <p>Potential for setting change to Queen Charlton Conservation Area and the Wansdyke Scheduled Monument – level of harm dependent on extent and nature of development.</p> <p>Medium-high risk of harm to heritage assets.</p>	
08	<p>Potential for significant setting change to Maes Knoll (SM), the Wansdyke (SM), Whitewood Farm (LB) and New Barn Farm (LB).</p> <p>Level of harm likely to be dependent on nature and extent of development, but likely to be significant – multiplier effect of impacts on several nationally significant assets.</p> <p>High risk of harm to heritage assets.</p>	

Figure 4 - Potential risk of harm to heritage assets arising from development in numbered land parcels



Conclusions and Implications

5.20 With the intention of providing transparency with regard to effects to individual assets, and the cumulative effect of development where relevant, the study assessed effects on heritage assets arising from the development of each land parcel. This analysis is contained in the full report.

5.21 The potential area for development as suggested in the Local Plan Options document avoids the area of high risk. However, it is acknowledged that some risks will still remain. The next process of Local Plan preparation will need to consider how a more detailed site allocation could be formulated. It will be informed by the evidence base and the policy framework will seek to minimise the risk of harm to each of the heritage assets identified, by for example moving development further away from the Wansdyke, and respecting the setting of Queen Charlton conservation area.

5.22 It may be the case that some of the localised issues/impacts referred to in the summary table above relating to area 05 means that further assessment could result in a slight reduction in capacity. In this regard it is important to note that whilst it is currently considered that there is capacity for about 2,500 homes in the whole Whitchurch area, the requirement as set out in the Joint Spatial Plan is to deliver 1,600 homes within the plan period.

6.0 Green Belt

6.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.

6.2 Green Belt serves five purposes set out in national policy:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (Paragraphs 79 & 80).

6.3 In addition, there is a further, ‘local Green Belt purpose’ applicable in Bath and North East Somerset which seeks “to preserve the individual character, identity and setting of Keynsham and the villages and hamlets”.

6.4 Within this context a number of Green Belt studies have recently been undertaken to inform planning policy. These are as follows:

- Arup Green Belt Assessments (2013) Stage 1 and 2 – undertaken to inform the B&NES Adopted Core Strategy & available here:
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr_stage1_report.pdf
<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/gbr-stage2.pdf>
- Joint Spatial Plan Green Belt Assessment Stage 1 and 2 – available here:
<https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/view?objectId=295187#295187>
- Local Plan Green Belt Assessment (Part 1): Whitchurch Strategic Development Location (Nov 2017)
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf

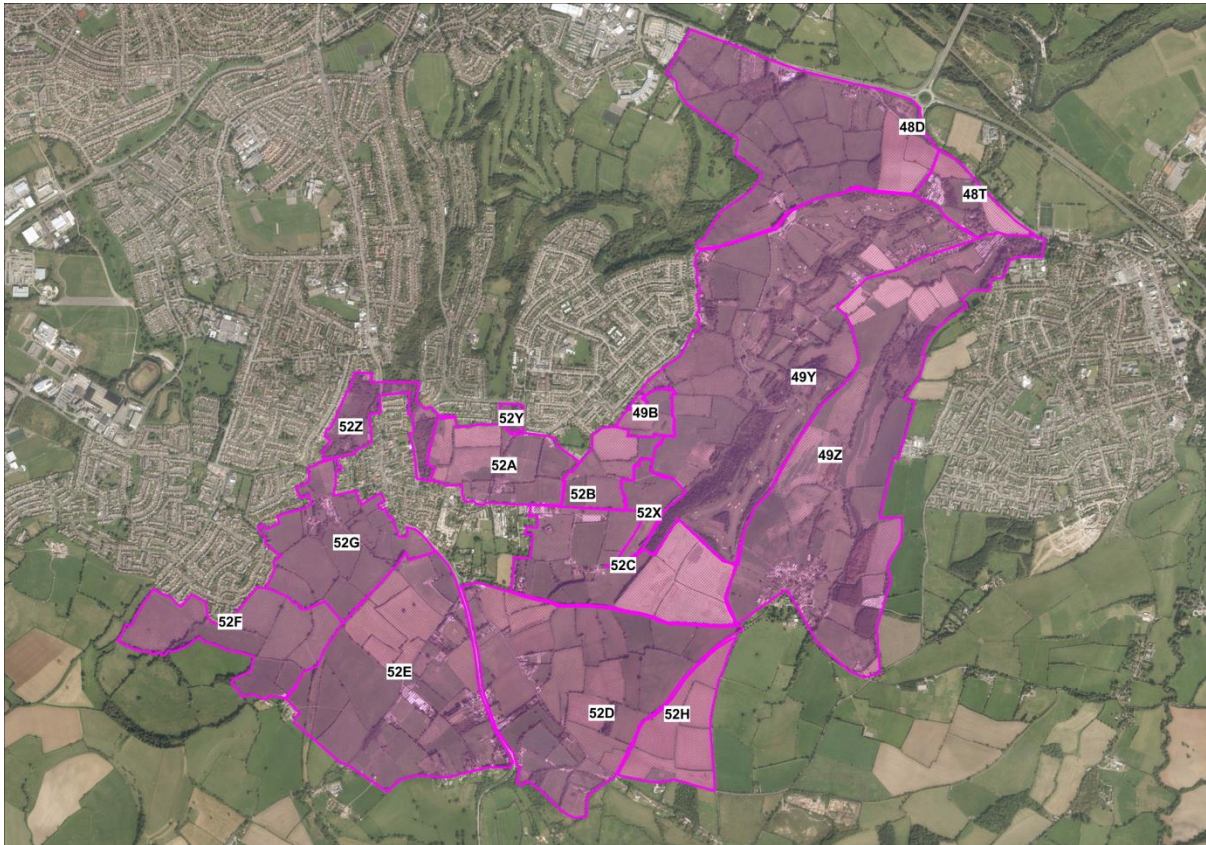
Local Plan Green Belt Assessment (Part 1): Whitchurch Strategic Development Location

6.5 The JSP will establish the 'Exceptional Circumstances' for releasing locations from the Green Belt for development. The new Local Plan will set out the new detailed Green Belt boundary at Whitchurch. The Council has undertaken a Local Plan Green Belt Assessment (Part 1) (see link above) to assist the definition of precise boundaries of the Strategic Development Location. It has been informed by the Joint Spatial Plan Stage 2 Green Belt Assessment, which was used to advise the identification of the Strategic Development Locations. The assessment builds on the work undertaken as part of the Joint Spatial Plan Stage 2 Green Belt Assessment, which considered the performance of cells in respect of the purposes of the Green Belt set out in the NPPF. This assessment considers Green Belt performance in greater detail, including against the local purpose and assesses the impact of potential development on the Green Belt. The Local Plan Green Belt Assessment cells are shown in Figure 5 below.

6.6 The cells assessed reflect those in the Joint Spatial Plan Stage 2 Green Belt Assessment, with some additional cells included for the reasons set out below:

- Cell 52H is included within the assessment because this land is now considered to be potentially suitable as part of the Whitchurch Strategic Development Location which is identified in the Local Plan Options document. The extent of the cell and its contribution to the purposes of the Green Belt has been assessed using the same methodology as was used for the JSP Green Belt Stage 2 Assessment.
- The Local Plan Options document indicates the extent of the area considered to be potentially suitable as part of the Strategic Development Location. Comments are also sought in the Options document on whether some adjoining areas of land might be suitable for development. In order to be comprehensive and to inform any further consideration of Green Belt impact in these areas additional cells are included in this assessment i.e. cells 52Y and 52Z, as well as some of those defined in the Stockwood area e.g. 52X (see below).
- The Joint Transport Study identifies the need for an orbital link from A4-A37-South Bristol Link. Potential route alignment options are subject to a separate assessment study. In order to inform the study and a consideration of the Green Belt impact of route alignment options the Green Belt performance of additional cells 48T, 49Y, 49Z and 52X forms part of the Local Plan assessment.

Figure 5 - Local Plan Green Belt Assessment cells



Appraisal criteria

6.7 The extent of the cell and its contribution to the purposes of the Green Belt has been assessed using the same methodology as was used for the JSP Green Belt Stage 2 Assessment. The aim of the assessment is to determine an overall contribution rating for each cell based on a combination of assessments against each relevant Green Belt purpose. The approach has been tailored to reflect the wording of the Green Belt purposes in the National Planning Policy Framework (paragraph 80):

Green Belt purposes 1, 2 and 4 are directly expressed:

- 1 - to **check** the unrestricted sprawl of large built up areas;
- 2 - to **prevent** neighbouring towns from merging into one another;
- 4 - to **preserve** the setting and special character of historic towns;

Whereas purposes 3 and 5 are expressed as assistance roles:

- 3 - to **assist** in safeguarding the countryside from encroachment;
- 5 - to **assist** in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.8 These five statutory purposes of the Green Belt form the basic appraisal criteria. In addition, the appraisal takes account of a further, 'local Green Belt purpose' which seeks "to preserve the individual character, identity and setting of Keynsham and the villages and hamlets". The local purpose is of continuing relevance having regard to the reasons for the original designation of the Bristol and Bath Green Belt (one of the reasons for the Green Belt given in the 1966 County of Somerset Development Plan Written Statement was to specifically prevent the merging of Bristol, Keynsham, Saltford and Bath and to preserve the identity and character of the surrounding towns, villages and hamlets; this has consequently been included in each subsequent Development Plan including the current adopted B&NES Core Strategy/Placemaking Plan).

6.9 In order to demonstrate variations between the cells in terms of the extent of their contribution, a scale with three rating levels has been devised as set out below:

Table - 3

Major contribution		Cell makes a major contribution to serving Green Belt purposes These cells can be considered to be at the front line of contributing to purposes of Green Belt.
Contribution		Cell makes a contribution to serving Green Belt purposes Noting that the Green Belt is an extensive designation, not all cells are likely to be at the front line of making a contribution. The 'contribution' rating is applicable to those cells which support the purposes of Green Belt, particularly in combination with other cells.
Limited contribution		Cell makes a limited contribution to serving Green Belt purposes These are cells which are considered to have only a limited or negligible contribution to individual purposes. They do not have a significant role in themselves and do not have a significant role in supporting or assisting the purposes of Green Belt in combination with other cells.

Summary Results

6.10 Table 4 is a summary of the contribution to the purposes of the Green Belt each cell makes

Contribution to the NPPF purposes of the Green Belt				
<i>Cell</i>	<i>Purpose 1 (sprawl) contribution</i>	<i>Purpose 2 (merger) contribution</i>	<i>Purpose 3 (encroachment) contribution</i>	<i>Overall contribution</i>
49B	Major Contribution	Major Contribution	Contribution	Major Contribution
52A	Major Contribution	-	Contribution	Major Contribution
52B	Major Contribution		Contribution	Major Contribution
52C	Major Contribution	-	Contribution	Major Contribution

52D	Major Contribution	-	Contribution	Major Contribution
52E	Major Contribution	-	Contribution	Major Contribution
52F	Major Contribution	-	Contribution	Major Contribution
52G	Major Contribution	-	Contribution	Major Contribution
52H	Major Contribution	-	Contribution	Major Contribution
52X	Contribution	Contribution	Contribution	Contribution
52Y	Major Contribution	-	Contribution	Major Contribution
52Z	Major Contribution	-	Contribution	Major Contribution
48D	Major Contribution	Major Contribution	Contribution	Major Contribution
48T	Contribution	Major Contribution	Contribution	Major Contribution
49Y	Major Contribution	Major Contribution	Contribution	Major Contribution
49Z	Contribution	Major Contribution	Contribution	Major Contribution

Commentary on the assessment

6.11 For the purposes of this assessment, development is considered to be housing-led development. It is recognised that the Whitchurch Strategic Development Location is likely to include some other types of development, such as office development, but the majority of land at the Whitchurch Strategic Development Location is expected to be housing development. Characteristics such as density or height are not differentiated in this assessment. The assessment compares the existing land, which is largely undeveloped land, to housing-led development, and the impact this would have on the Green Belt.

Consideration of the impact of such development in the Local Plan (Part 1) Green Belt assessment is focussed on the area considered potentially suitable as part of the Whitchurch Strategic Development Location. Further assessment of the impact of either housing-led development in other areas and/or the orbital link will be undertaken at a later stage.

6.12 The assessment shows that all the cells make a MAJOR CONTRIBUTION to checking the unrestricted sprawl of large built-up areas. The introduction of development into these cells would therefore have a highly negative impact on the Green Belt in relation to this purpose. Where there is little to differentiate the contribution these cells make to checking unrestricted sprawl, the impact on the Green Belt is also similar. It was noted that the cell containing land separating Whitchurch village from Bristol restricts the sprawl of Bristol and prevents the subsuming of Whitchurch village into Bristol. By extension, the impact of development in these gaps is likely to be the most harmful to the Green Belt, in relation to checking unrestricted sprawl.

6.13 Regarding the prevention of the merger of neighbouring towns, the only cell that serves this purpose is 49B. Indeed, this cell was assessed as making a MAJOR CONTRIBUTION in this respect, due to its location in an important gap between Bristol and Keynsham. Development in this cell would therefore have a highly negative impact on the Green Belt. Development of the other cells would have no impact on the Green Belt in respect of preventing neighbouring towns merging into one another.

6.14 The assessment scored all cells equally in respect of their contribution to assist in safeguarding the countryside from encroachment. The detailed analysis showed some minor differences in the cells, largely due to the presence of scattered buildings, but this was not considered to have a significant effect on the overall character of the cells or their Green Belt performance in respect of purpose 3. The impact of development is also likely to be fairly uniform across the cells, in respect of this purpose. However, while the impact of development on the Green Belt in respect is considered to be uniform across the cell, it should be noted that the assessment considered the performance of cells against the Green Belt purposes, but did not consider access to the countryside as part of the assessment. While safeguarding the countryside from encroachment and access to the countryside are not one and the same, access to the countryside is something local planning authorities should plan positively to enhance¹. Therefore, cells could be differentiated between those that currently allow existing communities to access the countryside easily, such as those adjacent to the urban edge of Bristol and Whitchurch, and in particular any that contain public rights of way. By extension, the development of such land, is likely to have a more negative impact on the Green Belt.

Conclusion and Implications

6.15 Development in all cells will have a significant/highly negative impact on Green Belt Purpose 1 (sprawl) and negative impact on Purpose 3 (encroachment). Development in cell 49(B) will have a significantly negative impact on Purpose 2 (merger). As such in those areas considered to be potentially suitable as part of the Whitchurch Strategic Development Location the most significant harm to the Green Belt is likely to be caused by development in cells to the north & west of Whitchurch and adjoining Stockwood (those areas located between Bristol and Whitchurch village and between Bristol and Keynsham).

6.16 Through the preparation of the Local Plan and on-going consideration of the most appropriate land to allocate for development, Green Belt performance and the impact of development on openness and Green Belt purposes will continue to be carefully considered. Within the context of the NPPF and the need to achieve sustainable patterns of development the assessment work will be used to ensure that Green Belt harm is, as far as possible, minimised and where, possible mitigated.

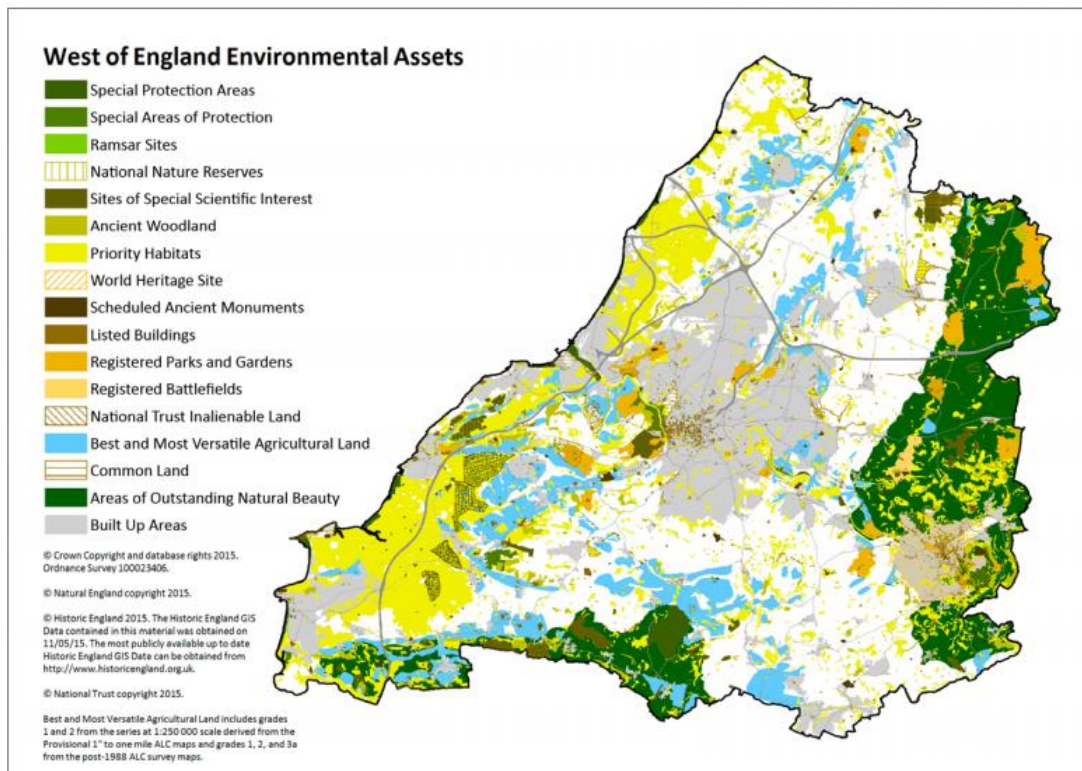
¹ National Planning Policy Framework, 2012, paragraph 81

7.0 Ecology / HRA

7.1 The context for the consideration of ecological issues on the site is provided by the **West of England Joint Spatial Plan Habitat Regulation Assessment Nov 2017**. This identified the impacts in relation to ecology and recommended a number of mitigation measures that were incorporated into the Joint Spatial Plan.

7.2 This report has been produced by the four unitary authorities (UAs) which make up the West of England (WoE) sub-region. Its purpose is to set out the process undertaken pursuant to satisfying the requirements of the Conservation of Habitats and Species Regulations 2010 in relation to the West of England Joint Spatial Plan. It has been published alongside the Joint Spatial Plan, which has reached ‘publication’ stage (in accordance with Regulations 19 and 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012).

Figure 6 – West of England Environmental Assets



1. The HRA process has been iterative. For each consultation stage to date an output report has been produced.
2. The HRA is a requirement of the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the ‘Habitats Directive’) implemented in Britain by the Habitat Regulations 2010.

3. The aim of a HRA is to provide legal protection for a range of habitats and species identified as being of European importance. These are known as Natura 2000 sites (SAC, SPA, Ramsar sites).
4. The HRA process has four potential stages (see appendix A). Depending on the plan or program being assessed a HRA may not need to undertake all stages. The JSP HRA was completed within stage 1: Screening, as officers have ‘screened out’ any Likely Significant Effects (LSE). Evidence shows that through delivery of the mitigation proposed likely significant effects on Natura 2000 sites can be avoided.

Table 5 – HRA Process

Habitat Regulation Assessment – Stage	Purpose
1. Screening	Process for identifying potential impacts of a plan or project on a European site, either individually or in combination, and consideration of whether likely effects will be significant.
2. Appropriate Assessment	Consideration of impacts on integrity of the site, either individually or in combination with other plans and projects, having regard to the site’s structure, function and conservation objectives. Where adverse impacts are identified, assess mitigation options to identify impacts on the integrity of the site. This stage should involve consultation. If mitigation options do not result in avoidance of adverse effects permission can only be granted if the remaining 2 stages are followed.
3. Assessment of alternative solutions	Review and examine alternatives to achieve objectives; would these alternative solutions avoid or have less adverse effects on the European sites?
4. Assessment of any ‘imperative reasons of overriding public interest’ (IROPI)	Where no suitable alternative solution exists and adverse impacts still remain then assess whether the development is necessary for IROPI. If so then identify potential compensatory measures to maintain integrity and coherence of the protected site.

7.3 It is the role of the Local Plan to provide the more detailed planning policy framework to secure these mitigation measures. The Options document is deliberately non-specific at this stage as it is seeking to explore potential options. In doing so, the Local Plan suggests the potential of Stockwood Vale to help meet increased demand for recreation and as an opportunity to enhance habitat. This potential will need to be considered alongside the route options assessment for the A4-A37 orbital link.

8.0 Green Infrastructure

8.1 Green infrastructure can be defined as the networks of natural spaces and corridors that make up the natural environment in a given area. The range of benefits that green infrastructure can deliver can be summarised as;

- Supporting healthy lifestyles and thriving communities
- Providing active access to the outdoors
- Enhancing landscape character and built heritage
- Enhancing biodiversity
- Supporting healthy ecosystems
- Providing climate change solutions
- Invigorating the local economy and natural tourism
- Enhancing sense of place

8.2 The Local Plan will seek to ensure that opportunities for enhancing and extending the existing local and strategic green infrastructure network are explored. This will provide high quality, multifunctional green spaces linked to the wider countryside and neighbouring areas, enabling multiple benefits including active travel, healthy lifestyles and increased biodiversity and sense of place. This would include:

- A Site Development Biodiversity Action Plan that would seek to protect and enhance the ecological interests of this location and include:
 - i. a hedgerow network(comprising retained and new hedgerows);
 - ii. a community woodland linked into the hedgerow network;
 - iii. new flower-rich verges to benefit pollinators;
 - iv. new nesting sites for swifts and swallows; and
 - v. measures to safeguard farmland birds.
- Enhancing and extending the strategic green infrastructure corridors that provide multifunctional benefits including those associated with biodiversity and water quality/management.
- Conserving and enhancing landscape character and historic assets and their setting particularly Queen Charlton Conservation Area, Maes Knoll and the Wansdyke Scheduled Monuments will enhance sense of place.

8.3 Provision of additional cycle routes linked to the National Cycle Network will provide active travel modes as part of healthy lifestyles, reduce environmental impact, and promote more sustainable travel. The opportunity for residents to access Keynsham via new or enhanced routes through Stockwood Vale, the Chew Valley in the Mendip Hills AONB via the cycle network can be enhanced through improved connections. Also the opportunity for visitors to the Mendip Hills AONB to visit Whitchurch.8.3 Work has commenced on a West of England Green Infrastructure Plan and this emerging evidence has informed some of the opportunities that have been presented in the Local Plan Options document. The Green Infrastructure Plan will inform the next phases of the Local Plan, including the detailed site allocation and the planning policy framework.

9.0 Education

9.1 The requirement to provide two primary schools and a secondary school is based on an assessment of existing provision and on the legal requirement to meet the educational needs of the pupils anticipated in the proposed development.

9.2 The requirements for Education infrastructure in Whitchurch based on the 2500 homes proposed in the Joint Spatial Plan would be:

Primary

Whitchurch 2,500 dwellings - 775 primary pupils - 2 no. 420 place primary schools, located on the development site..

Secondary and Sixth Form

Whitchurch - 475 secondary pupils & 100 sixth form - 1 no. 600 place (120 per year group) secondary school with a 160 place (approx.) sixth form located on the Whitchurch development site.

Early Years

Early Years provision may also be required depending on the sufficiency of provision available in Whitchurch in the future.

Whitchurch - 75 early years age 0-1, 50 early years age 2, 200 early years age 3-4 - early years provision may be required, depending on the sufficiency of provision available in Whitchurch in future. This can be provided via a standalone facility/facilities located on the development site or via an Early Years unit as part of the primary school(s).

*In Whitchurch there could be scope to deliver the required school places via a single all through school/education campus – primary, secondary + sixth form or early years, primary, secondary + sixth form, as appropriate.

10.0 Transport

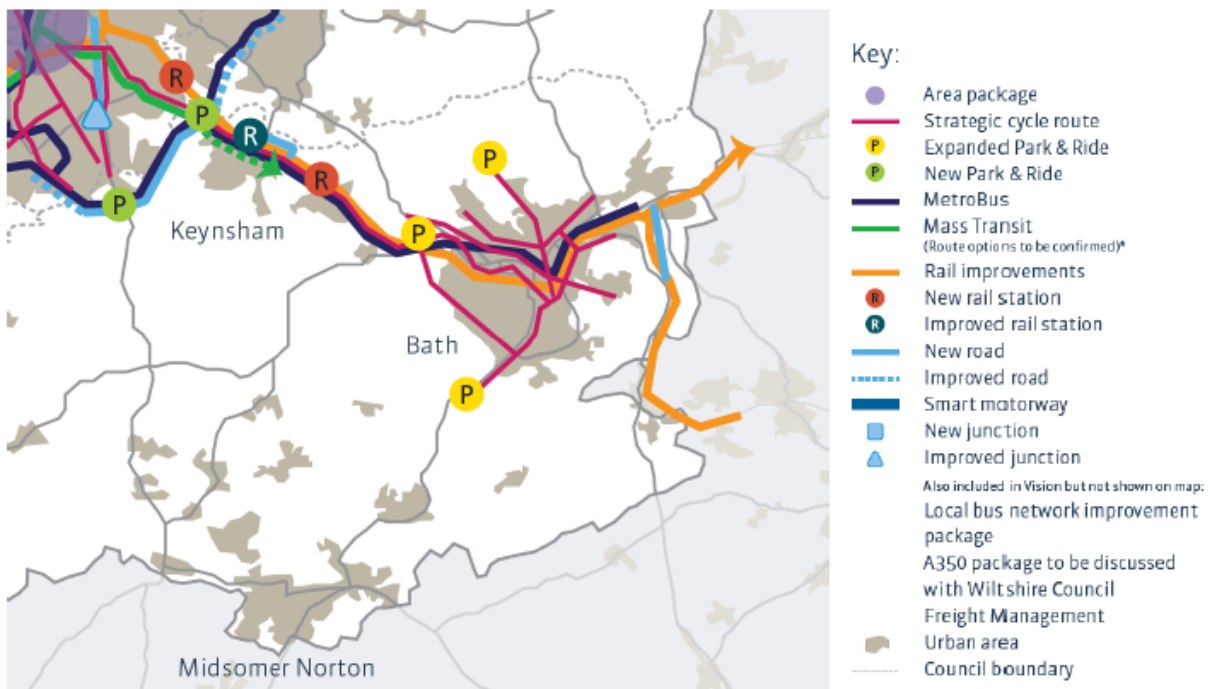
10.1 The Joint Spatial Plan is complemented by the Joint Transport Study. This sets out a Transport Vision to address the scale of existing challenges and future growth within the West of England, and it also identifies those transport schemes and interventions necessary to address the transport impact of the suggested development locations set out in the JSP.

10.2 In relation to Whitchurch, this identified:

... There is therefore a strong case for a new or improved highway connection between the A4 and the A37 at Whitchurch, to accommodate movements to/from the strategic highway network (A4 and A4174) from new housing and South Bristol. Improved transport connections on to the A4174 at Hengrove Roundabout would significantly relieve these pressures and provide new capacity for sustainable forms of travel in this area.

This will be complemented by Park & Ride to the south of Whitchurch and a new Orbital MetroBus route, which would connect with the North Fringe to Hengrove route (at Hengrove Park) and A4 transit corridor (at Hicks Gate). A key risk for orbital services is the potential level of subsidy required and whether there would be sufficient patronage to justify orbital services. There is potential to integrate new transport infrastructure with new development in these areas, which will help to both mitigate the impacts of this development and tackle the underlying transport problems in this area. The combination of Park & Ride and improvements to orbital connectivity will enable a transfer of road trips to public transport and cycling, particularly along the A4 Bath Road.

Figure 7 from the Joint Transport Study



Alignments in this plan are shown for illustrative purposes only and are not intended to indicate specific alignments.

10.3 Bath and North East Somerset’s position is that, based on current evidence, there will be no further housing development at Whitchurch until the multi-modal link connecting the A37 and the A4 has been completed.

10.4 Work is currently underway which will consider the more detailed issues related to this route and consider potential route options. This is due to report back in March 2018, and the outcomes of this will be subject to further public consultation and debate.

11.0 Bringing it all together

11.1 In seeking to take forward the JSP proposals for a Strategic Development Location, the Local Plan Options document summarises the current evidence and the high level issues that need to be considered. This entails responding appropriately to the sensitive environmental context. Whilst Local Plan does not yet provide a definitive proposal nor a site boundary, it does provide an indicative area for development which responds to the evidence currently available. The consultation feedback and additional evidence will help to inform the next stages.

11.2 It should also be noted that in planning for this scale of development with the associated infrastructure that is required, as well as ensuring that it becomes a desirable and sustainable place to live, will not be without impacts. Whilst the approach is to minimise these impacts, some harm will be caused. In order to support the future success of the West of England the objective is to provide homes and communities for people to live in with the necessary supporting infrastructure, as well as delivering a high quality environment with well used and popular green infrastructure that benefits biodiversity.

12.0 Evidence base gaps

12.1 Any evidence base gaps will be identified following the consultation phase, and through the scoping work required to take the plan onto its next and more detailed phase.