

Initial HRA Screening of the Local Plan (Core Strategy and Placemaking Plan) Partial Update Options Document (January 2021)

Introduction

The Bath and North East Somerset area includes and is adjacent to a number of Natura 2000 sites. These sites are of European Importance for nature conservation and are protected by the Habitats Directive (92/43/EEC).

Article 6(3) of the Habitats Directive (92/43/EEC) requires an 'appropriate assessment' to be undertaken when a plan or development project is likely to have a significant effect upon a Natura 2000 site.

The partial update of the Core Strategy and Placemaking Plan must therefore be subject to HRA.

Background

The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029. Together these documents comprise the Local Plan.

The Council is required to review the Local Plan every five years in order to determine whether it remains fit for purpose or whether all or part of it needs to be revised and updated.

The council is therefore undertaking a partial review of the Local Plan and has prepared an Options Document for consultation. This sets out the options for

changes proposed, and the consultation will help guide the preparation of an updated plan which will be subject to the Habitat Regulations.

The options must therefore be reviewed in terms of the Habitat Regulations and an initial screening for potential impacts has been completed to help identify any areas of potential concern or issue in terms of potential impact and detriment to European Sites.

This document sets out the initial findings of the HRA screening undertaken and makes some recommendations for final plan preparation in terms of any policy changes that may be required to ensure compliance with the Habitat Regulations.

Purpose and scope of the Options document

The scope of the changes proposed is confined to those areas that can be addressed without changing the spatial priorities of the Core Strategy & Placemaking Plan; the spatial strategy; and the strategic housing and job growth requirements.

In March 2019 the Council declared a climate emergency and pledged to enable carbon neutrality in the district by 2030. In July 2020 the Council declared an ecological emergency in response to the escalating threat to wildlife and ecosystems. The Council has also reviewed its corporate strategy. The Council's overriding purpose is to improve people's lives. Its core policies are addressing the climate and nature emergency and giving people a bigger say.

The Local Plan has been reviewed in this context. Policy changes have been designed to support progress to carbon neutrality, to help deliver nature recovery and to deliver housing and employment. In terms of the protection of European sites many of the changes will therefore bring some benefits to the sites and species they support. However, there are still some risks to European Sites from new and modified policies. This initial HRA screening is designed to identify any significant risks and to identify solutions that could be adopted to prevent them.

Approach to Habitat Regulations Assessment Screening

There are 4 main stages of the HRA process which are summarised below:

Habitat Regulations 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.

For the options document initial screening is required to guide policy development. This is an iterative process approach, where policy changes or additions, and site allocations will be reviewed to identify potential effects and opportunities for mitigation. The findings will be used to help refine or develop policy or allocation changes in the next iteration of the Plan in order to avoid impacts on the integrity of any European site. If it is concluded that mitigation measures are required to avoid any likelihood of a significant impacts then the final plan will need to be subject to a full Appropriate Assessment.

Screening process – stage 1

The screening process used is based upon that set out in the Habitats Regulations Assessment Handbook (Tyldesley, D and Chapman, C. (2013)).

Screening categories	Code
A general statement of policy	A
Policy listing general criteria for testing proposals	B
Proposals referred to but not proposed by the plan	C
Environmental protection policies	D
Steering change away from positive sites	E
Do not propose change, but control approach (e.g. design)	F
No conceivable effect	G
Actual or theoretical effects cannot undermine conservation objectives	H
Likely Significant Effect (LSE) on a site alone	I
No Likely Significant Effect (LSE) alone but an effect - check in combination	J
No Likely Significant Effect (LSE) even in combination	K
Likely Significant Effect (LSE) in combination	L

Any component of the Partial Update allocated a screening category of I, J or L (highlighted above in yellow) would require an action to be taken or an amendment made to the partial update, and recommendations will be made to the plan authors. Where amendments are suggested, those elements of the plan will be subject to further rounds of screening following redrafting to determine whether the action taken has achieved its intended outcome.

If elements of the plan cannot be screened out at stage 1 without use of mitigation measures, the HRA process would need to move to stage 2 and an appropriate assessment would be undertaken.

There are 5 sections to the Options Documents, and each have been considered for screening:

Chapter	Need for Screening
1. Introduction	none
2. Development Management Policies	Individual policies
3. Addressing Housing Supply	Site Allocations & Policy
4. Other Opportunity Sites	Site Allocations & Policy
5. Minor Policy Amendments	Individual policies

Details and Results of the screening process.

Development Management Policies

Each new policy and policy change was reviewed in terms of potential to result in a likely significant effect, and each policy was allocated a screening category based upon Tyldesley, D and Chapman, C. (2013) methodology. The majority of the main policy options did not raise any significant issues, those that potentially result in a likely significant effect are highlighted in the table below. (Please see Appendix 1 for full screening results.)

New Policy Harnessing wind energy	New criteria based policy is proposed linking with the land sensitivity for wind turbines.	This could potentially impact upon functional SAC Bat habitat, but options include reference to ecological considerations within criteria	I
New Policy Purpose Built Student Accommodation	Introduce a new policy to restrict Purpose Built Student Accommodation (PBSA) to allocated sites, or elsewhere in the District where need is clearly demonstrated. The alternative option would be to extend Policy H2 (on HMOs) to also cover PBSA schemes including application of the HMO threshold test.	This could potentially impact upon functional SAC Bat habitat subject to location, but routine policies would apply.	J/L
PMP:ST2 Sustainable Transport Routes	Amend by broadening the scope to enable land (other than former railway land) to be safeguarded for sustainable transport purposes (e.g. links to North Keynsham options below & provision of multi-modal corridor)	Possible impacts subject to location	I/J/K
PMP:ST6 Park and Ride	Update the policy so that it reflects JLTP4 and is refocussed from providing 'traditional' park and ride sites to multi modal interchanges delivering a range of benefits e.g. e-car and e-bike hire, access to the countryside, solar energy canopies. Ensure that the most suitable/sustainable and available site have been selected and to require wider transport benefits are assessed (not solely traffic	Potential issue subject to location & implementation	I/J/L

	impact).		
PMP:B5 Strategic policy for universities, private colleges and their impacts	The development capacity at the Claverton Campus needs to be reviewed and potentially updated through the partial update.	Potential impacts if dev capacity increased or site requirements change	J

The policy areas of potential concern were limited to those areas where the location and scale of development is currently unknown, or where the policy relates to the Bath area which is largely covered by SAC Bat consultation zones. These zones are set out in draft guidance for the Bath & Bradford on Avon SAC and identify areas which are most likely to support SAC bats. The guidance sets out measures to ensure development does not result in significant impacts to SAC bats and was developed as part of a strategic mitigation approach originally being developed for the Joint Spatial Plan. The guidance has not been published but is supported by Natural England, and the best practise could be used to guide the partial update. This would ensure no supporting habitat is lost, and would prevent loss of un-developed land within key areas. In addition it guides survey requirements and lighting requirements.

Addressing Housing Supply

The Local Plan Partial Update needs to identify and allocate sites to deliver around 1,200 homes. A number of sites are proposed either as amendments to existing allocations or as new sites. The spatial strategy guides allocations to Bath & Keynsham as the most sustainable locations. Both these areas, but Bath in particular, are associated with SAC bat activity. As noted above most of the City of Bath lies within the 4km working consultation zones associated with the SAC, and so will flag potential issues where supporting habitat may be affected and where lighting issues may arise. The results of the initial screening are set out below and many of the Bath sites raise potential issues.

Location	Housing capacity	Screening Category
Bath		
Policy SB7 Green Park West and Sydenham Park	300	J/L? Due to River. New development framework could address issues
Policy SB8 Western Riverside	340	J/L? Due to River. New development framework could address issues
Policy SB14 Twerton Park	90	K
Policy SB18 RUH	100*	J? New development framework will need to secure tree retention & control light spill from buildings and public realm
Roseberry Place	80	J/L? Due to River. New development framework could address issues
Station Road	10	J? New development framework will need to secure tree retention & control light spill from buildings and public realm
Bath sub-total	920	
Keynsham		
Fire Station	15	E/G
Treetops Nursing Home	10-15**	E/G
Safeguarded land (Policy KE3b)	300	J ? Development requirements may be needed to avoid potential impacts e.g. loss of foraging; flight-lines and impacts of

		lighting
Keynsham sub-total	325	

With adequate forward planning and respect for these issues it should be possible to avoid or fully mitigate against these impacts through the use of very clear site development requirements in the pre-submission Draft Plan and early dialogue in the planning process. In addition, some training and review of good lighting case studies for case officers and developers would be beneficial.

4 Other opportunity sites

The other sites being considered and reviewed by the partial update were also screened and the results are set out below. Again many of the Bath sites raise potential issues. Those sites that potentially result in likely significant effects are summarised in the table below.

Site	Screening Category
Policy SB19 University of Bath	J - Potential impacts if development capacity is increased or site requirements change; retention of key flight lines and control of light spill will be required
Park and Ride Sites	J - Possible impacts, may require development requirements to protect flight lines and control lighting
Bath Community Academy	J - Possible impacts, may require development requirements to protect flight lines and control lighting
Weston Island	J- Possible impacts, may require development requirements to protect flight lines and control lighting
Policy SSV9 Somer Valley Enterprise Zone	J - Possible impacts, may require development requirements to protect flight lines and control lighting

5 Minor Amendments

The minor amendments were also screened. No issues of potential concern were identified.

<u>Volume 1 - District-wide Strategy and Policies</u>	Revision / Proposed amendments	
SPATIAL STRATEGY FOR BATH & NORTH EAST SOMERSET		
DW1 District-wide spatial Strategy	No change to the overall spatial strategy but replenishing housing supply via new site allocations may necessitate minor changes to the policy and the associated key diagram. The strategic district-wide dwelling and jobs requirements will remain unchanged although the housing supply will moderately increase.	A
RESPONDING TO CLIMATE CHANGE		
CP4 District Heating	The policy includes a district heating network at Keynsham Town Centre. The majority of land allocated for development in Keynsham Town Centre such as the Civic Centre has been built out. Therefore, it is proposed that Keynsham High Street is included as an opportunity area rather than a district heating priority area.	F
CP5 Flood Risk Management	Minor amendment to cross refer to and ensure Green Infrastructure benefits delivered through flood risk management approach.	D
SU1 Sustainable Drainage	Amendment to require provision of multi-functional SUDS also acting as Green Infrastructure (multiple benefits)	D
ENVIRONMENTAL QUALITY		
CP6 Policy CP6: Environmental Quality	4. Nature Conservation Update to policy to reference measurable biodiversity net gain requirements and nature recovery networks.	D
D4 Street and Space	Development proposals must be well connected, in particular: h Street trees and green spaces should contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. <u>All new streets should be lined with trees wherever possible.</u>	D
D8: Lighting	2 Development will be expected to reduce or at best maintain existing light levels to protect <u>retain or improve</u> the darkness of rivers, watercourse or other ecological corridors in particular to protect or provide a functional dark route for European protected species. New lighting facilities with light spill to these features must be dimmable. <u>Lighting must be designed in relation to protection of wildlife habitats, including B&NES 2018 Waterspace Design</u>	D

	<u>Guidance and Bats and Lighting in the UK (ILP, 2018).</u>	
NE2 Conserving And Enhancing The Landscape And Landscape Character	Add new criteria 4 Great weight will be afforded to conserving and enhancing landscape and scenic beauty within nationally designated Areas of Outstanding Natural Beauty (AONBs) and their setting, and with particular reference to their special qualities.	D
NE6 Trees and woodland conservation	3 Development proposals directly or indirectly affecting ancient woodland or and ancient trees or <u>veteran trees</u> will not be permitted.	D
Green Infrastructure		
CP7 Green Infrastructure	It is proposed to amend Policy NE1: Development and Green Infrastructure to provide clarity on policy implementation to support green infrastructure delivery.	D
Green Belt		
GB3 Extensions and alterations to buildings in the Green Belt	Proposals to extend or alter a building in the Green Belt will only be permitted provided they would not represent a disproportionate addition over and above the size of the original building.	F
A PROSPEROUS ECONOMY		
Economic Development		
ED.1B Change of use & redevelopment of B1 (A) office to residential use	<p>POLICY ED1B: Change of Use & Redevelopment of B1(a) Office to Residential Use</p> <p>1. Change of use (i.e. conversion)</p> <p>The conversion of office space (B1a) to residential C3 is normally permitted development, subject to the exceptions set out in the GDPO (which includes listed buildings). The principle of change of use through conversion of listed buildings in B1a use to C3 residential use is also accepted.</p> <p>2. Change of Use and Redevelopment (i.e. demolition and construction of a new building)</p> <p>The change of use and redevelopment of office space (B1a Class E (g)(i) to non-student C2, C3 or C4 residential will be permitted unless there are strong economic reasons for</p>	A

	<p>refusal, as set out below.</p> <p>3.Strong economic reasons</p> <p>4. In the event that permitted development rules referred to in this policy no longer apply (whether due to the introduction of a direction under Article 4 of the Town and Country Planning Acts or through changes to national legislation or policy):</p> <p>a If the permitted development rules relating to change of use (conversion) from office to residential are removed, all such applications, including for listed buildings, will be assessed using the criteria set out in paragraphs 2-3, above. For the avoidance of doubt, in these circumstances the principle of change of use through the conversion of listed buildings in B1a use to C3 use will no longer be automatically considered acceptable.</p> <p>1. b If the permitted development rules relating to change of use (conversion) from office to residential are widened to include redevelopment, consideration of strong economic reasons, as set out in paragraphs 2-3 above, will no longer be required. This would not apply to listed buildings</p>	
<p>ED.1C Change of use and redevelopment of B1 (A) office use to other town centre uses</p>	<p>POLICY ED1C: Change of Use and Redevelopment of B1(a) Office Use to Other Town Centre Use</p> <p>1 The change of use of office space to A1, A2 and A3 uses will be permitted unless clauses 3a and 3b of Policy ED1B apply</p> <p>The change of use or redevelopment of office space to other town centre uses (<u>not within Class E use</u>) will not normally be permitted, unless the space is of particularly poor quality in relation to the total stock of the city, or, if this is not common ground between the applicant and LPA, the space has been marketed for 12 months, on reasonable terms, at a time when the UK economy is growing and no serious occupier interest has been forthcoming.</p> <p>Even where these criteria are not met the economic and social benefits of the alternative proposed town centre use (in terms of employment, GVA and contribution to the centre and any townscape improvements resulting from change) will be material considerations, that could, in exceptional cases, outweigh ED1C (2)</p>	<p>A</p>
<p>RE1 Employment uses in the countryside</p>	<p>Proposals for employment uses in the countryside outside the scope of Core Strategy Policies RA1 and RA2 will be permitted providing they are consistent with all other</p>	<p>G</p>

	<p>relevant policies, and involves:</p> <ul style="list-style-type: none"> i) replacement of existing buildings or development of previously developed land; ii) the limited expansion, intensification or redevelopment of existing employment premises; and iii) they would not lead to dispersal of activity that prejudices town and village vitality and viability. <p>In the case of development in the Green Belt proposals should be consistent with national Green Belt policy.</p>	
CR1 Sequential Test	<p>POLICY CR1: Sequential Test</p> <p>Retail and other main town centre uses (including commercial leisure) should be located within the centres identified on the Policies Map and in Core Strategy Policy CP12. Where there are no suitable and viable sites available <u>(or expected to become available within a reasonable period)</u> to meet the needs for such uses within centres, edge of centre locations may be appropriate. Sites should be in a location readily accessible on foot, by cycle and by public transport, with preference given to sites that are well connected to the town centre.</p> <p>Out of centre development of main town centre uses will only be acceptable where: i No suitable or viable centre or edge of centre sites are available <u>(or expected to become available within a reasonable period)</u> and the proposal would be in a location readily accessible on foot, by cycle and by public transport, with preference given to sites that are well connected to the town centre; or</p>	G
CR2 Impact Assessment	<p>ii It would have a significant adverse impact on existing, committed or planned investment in a centre or centres in the catchment area of the proposal.</p> <p>Within Bath, an Impact Assessment will be required for Use Class A1-5 <u>E (a-c), together with public houses / drinking establishments and hot food takeaways</u>, and retail proposals over 500sqm (gross) that are located outside of the designated town centres and not in accordance with the Local Plan. For the rest of the District, an Impact Assessment will be required for - Use Class A1-5 <u>E (a-c), together with public houses / drinking establishments and hot food takeaways</u>- retail proposals over 280sqm (gross) that are located outside of the designated town centres and not in accordance with the Local Plan.</p>	G

<p>CR3 Primary Shopping Areas and Primary Shopping Frontages</p>	<p>POLICY CR3: Primary Shopping Areas and Primary Shopping Frontages</p> <p>Development within Primary Shopping Frontages Within Primary Shopping Frontages identified on the Policies Map development will be expected to maintain or provide active ground floor uses. Within Primary Shopping Frontages change of use of shops (Use Class A1) to another use will not be permitted (subject to permitted development rights) unless the proposed use would:</p> <p>i Make a positive contribution to the vitality, viability and diversity of the centre; and ii Not fragment any part of the Primary Shopping Frontage by creating a significant break in the shopping frontage; and iii Not result in a loss of retail floorspace of a scale harmful to the shopping function of the centre; and iv Be compatible with a retail area in that it includes a shopfront with a display function and would be immediately accessible to the public from the street.</p> <p>Development outside Primary Shopping Frontages</p> <p>Outside the Primary Shopping Frontage but within Primary Shopping Areas and Town Centres, the loss of Use Class A1 retail floorspace will be permitted provided that a healthy uses other than Use Class A1 <u>retail use</u> are avoided. The proposed use should still attract pedestrian activity and footfall to the centre and should not significantly harm the amenity of the area. The proposed use should not have an unacceptable impact on the vitality, viability and diversity of the centre.</p>	<p>G</p>
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Conclusions

The changes being considered for the partial update, whilst not substantial in terms of scale or extent, have some potential to cause direct or indirect impacts to SAC bats, and in the absence of specific mitigation measures are considered likely to result in a significant effect to the bat SACs within and adjacent to the District.

Potential impacts to Chew Valley Lake SPA were flagged only in relation to the proposed new wind harnessing policy.

The new Wind Harnessing Policy also raises concerns for SAC bats, and will need specific measures to protect bats and their flight lines. The proposal does reference the need for the policy framework to include measures to protect ecology. This will be essential.

The housing allocations and other opportunity sites, particularly within Bath, flag potential issues. Whilst the majority of housing sites are brownfield sites, with limited existing habitat or habitat quality, the riverside sites can provide key SAC supporting habitat. In addition a main area of concern will be from the impacts of new light emissions from new building and public realm. This can cause issues where increased light levels impact on supporting habitat. The Somer Valley Enterprise Zone is also flagged due to the potential loss of flight-lines and foraging habitat.

Strict measures of control will therefore be required for some sites, which could potentially reduce housing or development capacity and this will require further assessment in preparing the pre-submission Draft Plan. It is possible however to combine the provision of green space and new habitat features to support site drainage, cycling or walking provision which can also provide or protect dark and habitat based corridors for bats, and which could also contribute to any Biodiversity Net Gain requirements if well planned in advance and well coordinated.

An established approach to minimising damaging light spill is set out in the council's lighting guidance : Protecting bats in waterside development (June 2018), the principles of which relate to any supporting habitat; and the Bat Conservation trust's Guidance Note 8 : Bats and artificial lighting.

Recommendations

In developing the policy options for the partial update it is recommended that specific measures will be needed to ensure that the integrity of the Bath & Bradford on Avon Bat SAC, the North Somerset and Mendips Bat SAC, and the Chew Valley Lake SPA are not adversely affected. These include:

- A clear requirement for addressing ecological factors within the policy framework for harnessing wind energy, and for developing the Somer Valley Enterprise Zone, and Weston Island.

- The requirement for light level parameter plans for major developments
- The use of current light guidance documents
- The use of the guidance from the draft SAC technical guide for the Bath & Bradford on Avon SAC

These measures can help shape emerging policy to minimise impacts.

An Appropriate Assessment of the updated plan will be needed, and it is recommended that an iterative approach and liaison with Natural England is undertaken.

Appendix 1 Local Plan Partial Update Options HRA Screening

Screening categories	Code
A general statement of policy	A
Policy listing general criteria for testing proposals	B
Proposals referred to but not proposed by the plan	C
Environmental protection policies	D
Steering change away from positive sites	E
Do not propose change, but control approach (e.g. design)	F
No conceivable effect	G
Actual or theoretical effects cannot undermine conservation objectives	H
Likely Significant Effect (LSE) on a site alone	I
No Likely Significant Effect (LSE) alone but an effect - check in combination	J
No Likely Significant Effect (LSE) even in combination	K
Likely Significant Effect (LSE) in combination	L

Volume 1 - District-wide Strategy and Policies	Revision / Proposed amendments	HRA / ECOLOGY ISSUES	Screening Categories	Subject to this partial update
SPATIAL STRATEGY FOR BATH & NORTH EAST SOMERSET				
CS:DW1 District-wide spatial Strategy	No change to the overall spatial strategy but replenishing housing supply via new site allocations may necessitate minor changes to the policy and the associated key diagram. The strategic district-wide dwelling and jobs requirements will remain unchanged although the housing supply with moderately increase).		A	Minor amendment
PMP:RA1 Development in the villages meeting the listed criteria	No change		-	x
PMP:RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria	No change		-	x
CORE AND DEVELOPMENT MANAGEMENT POLICIES				
CS:SD1 Presumption in favour of Sustainable Development	No change		-	x
RESPONDING TO CLIMATE CHANGE				
CS:CP1 Retrofitting Existing Buildings	In the case of existing buildings the Sustainable Construction Checklist SPD currently requires a 10% reduction in CO2 emissions on proposals for existing buildings of medium scale or higher (5 dwellings or 500m2). It is proposed to amend the policy CP1 to reflect this. There is also an option to increase this requirement to a 20% reduction.	No likely impact/change	F	✓
CS:CP2 Sustainable Construction	Policy to be updated/revised to require zero carbon development – optional approaches to be set out related to the Future Homes Standard but this is partly dependent on the approach taken by national Government.	No Impact	F	✓
New Policy Whole Life Cycle Carbon Assessment	New policy is proposed to require a Whole Life Cycle Carbon Assessment.	No impact	F	✓
New Policy EV charging	New policy is proposed to require EV charging points in new development. Options to be presented as to whether EV infrastructure should comprise a combination of passive and active or solely active charging points solely passive or a combination of passive and active	No impact	G	✓

	charging points including bike storage/e-bike charging (plus Supplementary Planning Document).			
CS:CP3 Renewable Energy	Amend the policy to facilitate new grid balancing plants to follow the hierarchy to consider energy storage plants and avoid increasing the district's carbon emissions.	No Impact	F	✓
New Policy Harnessing wind energy	New criteria based policy is proposed linking with the land sensitivity for wind turbines.	This could potentially impact upon functional SAC Bat habitat, but options include reference to ecological considerations within criteria	I	✓
PMP:SCR1 On-site renewable energy requirement	Options to achieve zero carbon new development are considered.	No impact	D/G	✓
PMP:SCR2 Roof Mounted/Building Integrated Scale Solar PV	No change	No change	-	x
PMP:SCR3 Ground Mounted Solar Arrays	No change	No change	-	x
PMP:SCR4 Community Renewable Energy Schemes	No change	No change	-	x
PMP:SCR5 Water Efficiency	No change	No change	-	x
CS:CP4 District Heating	To be revised to give greater flexibility in delivering and connecting to potential district heating networks outside the priority & opportunity areas. Reference to the specific designation of Keynsham Town Centre to be removed as it is no longer feasible to deliver a network here.	No Impact	F	To reflect the latest evidence
CS:CP5 Flood Risk Management	Minor amendment to cross refer to and ensure Green Infrastructure benefits delivered through flood risk management approach.	Beneficia effects	D	✓
PMP:SU1 Sustainable Drainage	Amendment to require provision of multi-functional SUDS also acting as Green Infrastructure (multiple benefits)	Beneficial effects	D	✓
ENVIRONMENTAL QUALITY				
CS:CP6 Environmental Quality	Overarching policy on Environmental Quality (Policy CP6) and related policies on the natural environment (see below) need to be updated in order to fully reflect the Council's priorities in the context of a climate and nature emergencies. Amendments to be made including reference to biodiversity net gain and nature recovery network (see relevant policies	Beneficial effects	D	✓

	below).			
High Quality Design				
PMP:D.1 General Urban Design Principles	No change	No change	-	x
PMP:D.2 Local Character & Distinctiveness	No change	No change	-	x
PMP:D.3 Urban Fabric	No change	No change	-	x
PMP:D.4 Streets and Spaces	Development proposals must be well connected, in particular: h Street trees and green spaces should contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. All new streets should be lined with trees wherever possible.	Beneficial effects	D	Minor amendment
PMP:D.5 Building Design	No change	No change	-	x
PMP:D.6 Amenity	No change	No change	-	x
PMP:D.7 Infill & Backland Development	No change	No change	-	x
PMP:D.8 Lighting	Minor amendment to ensure light levels meet Habitats Regulation Assessment requirements, through reference to maximum light spill in the Waterspace Design Guidance.	Beneficial effect	D	✓
PMP:D.9 Advertisements & Outdoor Street Furniture	No change	No change	-	x
PMP:D.10 Public Realm	No change	No change	-	x
Historic Environment				
PMP:H1 Historic Environment	No change	No change	-	x
PMP:H2 Somersetshire Coal Canal and the Wansdyke	No change	No change	-	x
Landscape				
PMP:NE2 Conserving And Enhancing The Landscape And	Add new criteria 4 Great weight will be afforded to conserving and enhancing landscape and scenic beauty within nationally designated Areas of Outstanding	Beneficial effects	D	✓

Landscape Character	Natural Beauty (AONBs) and their setting, and with particular reference to their special qualities.			
PMP:NE2A Landscapes setting of settlements	No change	No change	-	x
PMP:NE2B Extension of residential curtilages In the countryside	No change	No change	-	x
Nature Conservation				
New Biodiversity net gain policy	New policy to require biodiversity net gain.	Beneficial	D	✓
PMP:NE3 Sites, species and habitats	It is proposed to amend this policy to reflect the NPPF, legislation, the Environment Bill and Council's ecological emergency declaration.	Beneficial	D	✓
PMP:NE4 Ecosystem Services	No change	No changes	-	x
PMP:NE5 Ecological networks	It is proposed to amend this policy referring to NRN – update policy map	Beneficial	D	✓
PMP:NE6 Trees and woodland conservation	3 Development proposals directly or indirectly affecting ancient woodland or and ancient trees or veteran trees will not be permitted.	Beneficial	D	Minor amendment
Green Infrastructure				
PMP:CP7 Green Infrastructure	It is proposed to amend Policy NE1: Development and Green Infrastructure to provide clarity on policy implementation to support green infrastructure delivery. See the main consultation paper	Beneficial	D	✓
PMP:NE1 Development and Green Infrastructure		Beneficial	D	✓
Green Belt				
PMP:CP8 Green Belt	No change	No change	-	x
PMP:GB1 Visual amenities of the Green Belt	No change	No change	-	x
PMP:GB2 Development in Green Belt villages	Draft paragraphs/options on amendments to the policy to ensure that it conforms with the NPPF and reflects latest legal judgements. Inclusion in the policy of a reference to redevelopment or replacement of dwellings in Green Belt villages and consideration of options relating to the application of 'limited infill' and Housing Development Boundaries.	No issue if other protection policies applied where appropriate	K	✓
PMP:GB3 Extensions and	Minor amendment to conform with the NPPF so that it also relates to	No Impact	F	Minor amendment

alterations to buildings in the Green Belt	proposals to alter a building. Proposals to extend or alter a building in the Green Belt will only be permitted provided they would not represent a disproportionate addition over and above the size of the original building.			
Pollution, contamination and safety				
PMP:PCS1 Pollution and nuisance	It is proposed to amend the policy to avoid potential sources of pollution from new development.	Beneficial effect	D	✓
PMP:PCS2 Noise and vibration	No change	No change	-	x
PMP:PCS3 Air quality	No change	No change	-	x
PMP:PCS4 Hazardous substances	No change	No change	-	x
PMP:PCS5 Contamination	It is proposed to amend the policy to avoid potential contamination of land	No impact/ beneficial	D/F	✓
PMP:PCS6 Unstable land	No change	No change	-	x
PMP:PCS7 Water Source Protection Zones	No change	No change	-	x
PMP:PCS7A Foul sewage infrastructure	No change	No change	-	x
PMP:PCS8 Bath Hot Springs	No change	No change	-	x
BUILDING STRONG AND VIBRANT COMMUNITIES				
Meeting Housing Needs				
CS:CP9 Affordable Housing	It is proposed to set affordable rent contribution build to rent schemes.	No effect	F	✓
CS:RA4 Rural Exceptions Sites	No change	No change	-	x
PMP:H1 Housing and Facilities for the Elderly, people with other Supported Housing or Care Needs	No change	No change	-	x
CP10 Housing Mix	No change	No change	-	x
PMP:H2 Houses in Multiple	Amend the policy so that it also relates to new build HMOs and change	No impact	A	✓

Occupation	of use from a non-residential use, as well as changes of use from small HMOs to large HMOs.			
New Policy Purpose Built Student Accommodation	Introduce a new policy to restrict Purpose Built Student Accommodation (PBSA) to allocated sites, or elsewhere in the District where need is clearly demonstrated. The alternative option would be to extend Policy H2 (on HMOs) to also cover PBSA schemes including application of the HMO threshold test.	This could potentially impact upon functional SAC Bat habitat subject to location, but routine policies would apply.	J/L	✓
PMP:H3 Residential Use in Existing Buildings	No change	no change	-	For clarification
PMP:H4 Self-Build	No change	No Change	-	x
PMP:H5 Retention of Existing Housing Stock	No change	No Change	-	x
PMP:H6 Moorings	No change	No change	-	x
PMP:H7 Housing accessibility	In order to help deliver the housing needs of elderly persons and in light of the Council's priorities, application of the accessibility standards should be considered through the partial update. Internal space standards are currently only applied to affordable housing. For market housing, the standard is usually exceeded, but occasionally it is not. 'Micro housing' is also emerging as a niche market. It is helpful to review this element of the policy through the new Local Plan	No impact	F	✓
PMP:H8 Affordable Housing Regeneration Schemes	No change	No impact	F	x
CS:CP11 Gypsies, Travellers and Travelling Showpeople	No change.	No change	-	x
Meeting local community and recreational needs				
PMP:LCR1 Safeguarding local community facilities	No change.	No change	-	x
PMP:RA3 Community Facilities and Shops	No change.	No change.	-	x
PMP:LCR1A Public houses	No change.	No change.	-	x

PMP:LCR2 New or replacement community facilities	No change.	No change.	-	x
PMP:LCR3 Sites safeguarded for primary school use	No change.	No change.	-	x
PMP:LCR3A Primary school capacity	No change.	No change.	-	x
PMP:LCR4 Allocation of land for cemeteries	No change.	No change.	-	x
PMP:LCR5 Safeguarding existing sport and recreational facilities	Introduce a requirement for applicants to produce a management plan for artificial pitch proposals to address pollution issues.	No impact	F	✓
PMP:LCR6 New and replacement sports and recreational facilities	It is proposed to amend the policy to require a management plan for artificial pitch proposals to address pollution issues.	No impact/ beneficial impacts	D/F	✓
PMP:LCR6A Local Green Spaces	No change.	No change.	-	x
PMP:LCR7 Recreational development proposals affecting waterways	No change.	No change.	-	x
PMP:LCR7A Telecommunications development	No change.	No change.	-	x
PMP:LCR7BBroadband	No change.	No change.	-	x
PMP:LCR7C Commercial riding establishments	No change.	No change.	-	x
PMP:LCR8 Protecting allotments	No change.	No change.	-	x
PMP:LCR9 Increasing the Provision of Local Food Growing	No change.	No change.	-	x
A PROSPEROUS ECONOMY				
Economic Development				
PMP:ED.1A Office Development	No change.	No change.	-	x

PMP:ED.1B Change of use & redevelopment of B1 (A) office to residential use	Minor amendments to ensure it reflects the new Use Classes Order (September 2020) and would relate to a change of use from an office to a non E-use class town centre use and the Council's Town Centre Renewal agenda.	No impact.	A	minor amendment
PMP:ED.1C Change of use and redevelopment of B1 (A) office use to other town centre uses	Minor amendments to ensure it reflects the new Use Classes Order (September 2020) and would relate to a change of use from an office to a non E-use class town centre use and the Council's Town Centre Renewal agenda.	No impact	A	Minor amendment
PMP:ED.2A Strategic (*) and other primary industrial estates	Options to amend the policies in order to strengthen protection of industrial land and premises across B&NES and especially in Bath given evidence on the level of losses that have occurred and resultant shortage of supply. Additional primary industrial estates to be identified for protection under Policy ED2A and Policy ED2B to be strengthened with a presumption in favour of retaining for industrial use unless specified criteria are met.	No impact	A	✓
PMP:ED2B Non-Strategic Industrial Sites		No impact	A	✓
Sustaining a buoyant rural economy				
PMP:RE1 Employment uses in the countryside	Minor amendments to ensure it reflects new classes order (September 2020) and would relate to a change of use from an office to a non E-use class town centre use.	No issue if other protection policies applied where appropriate	B	minor amendment
PMP:RE2 Agricultural development	No change.	No change.	-	x
PMP:RE3 Farm diversification	No change.	No change.	-	x
PMP:RE4 Essential dwellings for rural workers	No change.	No change.	-	x
PMP:RE5 Agricultural land	No change.	No change.	-	x
PMP:RE6 Re-use of rural buildings	No change	no change	-	x
PMP:RE7 Visitor accommodation	No change.	No change	-	x
Centres and Retailing				
PMP:CP12 Centres and Retailing	Change the reference to use class A1-A5 to use class E	No issue	A/F	Minor amendment

	<p>This policy may need to be updated/amended in relation to the approach to the location of additional hotel provision in the District and specifically Bath.</p> <p>In the new Local Plan consideration should also be given to amending/strengthening wording of Policy CP12 to address the potential for mixed use / higher density development; securing a high quality environment; sustainable access; embedding the Healthy Streets approach; local identity and sense of place; barrier free and inclusive environments; maximising footfall; safety and security. The list of local centres may also need to be reviewed in preparing the new Local Plan.</p>			
PMP:CR1 Sequential Test	Minor amendments to ensure it reflects the new Use Classes Order (September 2020)	No impact	A	Minor amendment
PMP:CR2 Impact Assessments	Minor amendments to ensure it reflects the new Use Classes Order (September 2020)	No impact	A	Minor amendment
PMP:CR3 Primary Shopping Areas and Primary Shopping Frontages	Minor amendments to ensure it reflects the new Use Classes Order (September 2020)	No impact	A	Minor amendment
PMP:CR4 Dispersed Local Shops	No change	No change	-	x
PROMOTING SUSTAINABLE TRANSPORT				
PMP:ST1 Promoting sustainable travel and healthy street	<p>Amend the policy so that it focusses even more strongly on ensuring that development facilitates travel by sustainable modes and minimises travel by private car. Proposed changes/additions to include:</p> <ul style="list-style-type: none"> ▪ Requirement for development to be located where there are opportunities to travel by alternatives to private car usage and to reduce travel distance ▪ Require development design to support sustainable travel. ▪ Sustainable transport opportunities to be available early (for first occupiers) <p>Impact mitigation must maximise opportunities for mode shift</p>	No issue	D/G	✓
PMP:ST2 Sustainable Transport Routes	Amend by broadening the scope to enable land (other than former railway land) to be safeguarded for sustainable transport purposes (e.g. links to North Keynsham options below & provision of multi-modal corridor)	Possible impacts subject to location	I/J/K	✓
PMP:ST2A Recreational Routes	Amend policy so that developments are required to enhance recreational routes.	Beneficial changes	D	✓

PMP:ST3 Transport infrastructure	Amend policy to ensure transport infrastructure is planned and designed to promote shift to sustainable transport modes as a priority over traffic capacity, including by demonstrating schemes which increase capacity have assessed/exhausted opportunities to achieve modal shift. Include reference to complying with LTN1/20.		D/F	✓
PMP:ST4 Rail freight facility	No change	No change	-	x
PMP:ST5 Traffic Management Proposals	Amend this policy so that it reflects and helps to deliver Liveable Neighbourhoods Strategy e.g. through re-balancing space towards people & way from cars; discouraging short car journeys; supporting people with restricted mobility; reducing on-street non-residential parking & providing opportunities for EV charging, car clubs etc.	beneficial	D	✓
PMP:ST6 Park and Ride	Update the policy so that it reflects JLTP4 and is refocussed from providing 'traditional' park and ride sites to multi modal interchanges delivering a range of benefits e.g. e-car and e-bike hire, access to the countryside, solar energy canopies. Ensure that the most suitable/sustainable and available site have been selected and to require wider transport benefits are assessed (not solely traffic impact).	Potential issue subject to location & implementation	I/J/L	✓
PMP:ST7 Transport requirements for managing development	Refocus and strengthen the policy in requiring development to offer genuine travel choice through sustainable travel opportunities. Transport improvements and/or mitigation measures must also maximise sustainable travel opportunities. Parking standards to be removed from the policy and to be included in a new Parking Standards Supplementary Planning Document (SPD). (The Parking Standards SPD will review parking standards in light of the climate emergency and will also include cycle storage requirements, EV charging standards & HMO parking. The SPD will be the subject of separate consultation exercise).	No issue	F	✓
PMP:ST8 Airport and Aerodrome Safeguarding Areas	No change		-	x
MINERALS				
CS:CP8a Minerals	No change	No change	-	x
PMP:M1 Mineral Safeguarding Areas		No change	-	x

PMP:M2 Minerals Allocations		No change	-	x
PMP:M3 Aggregate Recycling Facilities		No change	-	x
PMP:M4 Winning and working of minerals		No change	-	x
PMP:M5 Conventional & Unconventional Hydrocarbons		No change	-	x
INFRASTRUCTURE				
CS:CP13 Infrastructure Provision	No change	No change	-	x
Volume 2 - Bath				
PMP:B1: Bath Spatial Strategy	The number of dwellings to be accommodated in Bath (Policy B1 in clause 3) will be revised. Options relate to the REC. (clause 8b).		G	✓
CS:B4 The World Heritage Site and its setting	No change	No change	-	x
PMP:BD1: Bath Design Policy	No change	No change	-	x
PMP:B2 Central Area Strategic Policy	No change	No issue	-	x
PMP:SB1 Development Requirements and Design Principles Walcot Street /Cattlemarket Site	No change (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	No change	-	x
PMP:SB2: Development Requirements and Design Principles Central Riverside & Recreation Ground	Options relate to the Rec (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	stadium already allocated, options to remove the allocation, therefore no likely significant effect	G/?	✓
PMP:SB3: Development Requirements and Design Principles Manvers Street	No change (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	No change	-	x
PMP:SB4 – Bath Quays North &	No change	No change	-	x

Bath College Development Requirements and Design Principles	(BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)			
PMP:SB5 – South Quays & Riverside Court	No change	No change	-	x
PMP:SB6 – South Bank	No change (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	No change	-	x
PMP:SB7 – Green Park Station West & Sydenham Park	No change (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	No change	-	x
PMP:SB8: Western Riverside	Dwelling number in the policy may need to be amended to reflect deliverable supply. Elements of the policy relating to housing type and pedestrian/cycle access also to be amended. (BNG: the river and tow path form part of the River Avon SNCI, and so are part of a protected site)	Potential impacts ?	I/J/L	✓
PMP: B3 : Strategic Policy for Twerton and Newbridge Riversides	Options to strengthening the protection of industrial land.		G?	x
PMP:SB9 – The Bath Press Development Requirements and Design Principles	No change	No change	-	x
PMP:SB10 – Roseberry Place Development Requirements and Design Principles	Option to amend policy to reflect that western part should be allocated for mixed use development, incorporating additional residential and employment uses. This would also increase the overall housing figure for the site identified in the policy.	Potential impact if more riverside lighting & loss of habitat	I/J/L	✓
PMP:SB11 – Former MoD Fox Hill Park Development Requirements and Design Principles	No change	No change	-	x
PMP:SB12 Former MoD Warminster Road	No change	No change	-	x
PMP:SB13 Former MoD Ensleigh and Royal High Playing Field	No change	No change	-	x

(formerly Core Strategy Policy B3c)				
PMP:SB14 Twerton Park	Policy to be amended to set out the mix of uses to be delivered, incorporating residential with a specified number of dwellings.	Existing stadium not contributing to/influencing SAC	K	✓
PMP:SB15 Hartwells Garage	No change	No change	-	x
PMP:SB16 Burlington Street	No change	No change	-	x
PMP:SB17 Englishcombe Lane	No change	No change	-	x
PMP:SB18 Royal United Hospital	The dwelling capacity specified in the policy is to be amended to reflect deliverable capacity and facilitating the provision of a greater amount of key worker accommodation. Review in light of the emerging RUH Estates Strategy.	Potential impacts if loss of mature trees or existing bat flight lines impacted, or increased light spill	J	✓
PMP: B5 Strategic policy for universities, private colleges and their impacts	The development capacity at the Claverton Campus needs to be reviewed and potentially updated through the partial update.	Potential impacts if dev capacity increased or site requirements change	J	✓
PMP:SB19 University of Bath at Claverton Down	The University of Bath has prepared its masterplan for Claverton Down Campus. The policy needs to be reviewed in light of the masterplan and to reflect updated development capacity. Policy SB19 UoB <ul style="list-style-type: none"> • Add a simplified masterplan development diagram • Update development principles with PBSA numbers and academic floorspace (BNG: seem to be part Brownfield and part green field – assume the green field bits would be subject to BNG)	Potential impacts if dev capacity increased or site requirements change	J	✓
PMP:SB20 – Bath Spa University, Newton Park Campus	No change (BNG: seem to be part Brownfield and part green field – assume the green field bits would be subject to BNG)	No Change	-	x
New Policy Bath Spa University	Options for allocating land in Locksbrook area for Bath Spa University teaching/studio/community space and releasing Sion Hill campus for residential led development.	Potential impacts loss of mature trees or existing bat flight lines, or increased light spill?	J	✓
CS:B3a: Land adjoining Odd Down, Bath Strategic Site Allocation	No change	No change	-	x
New Policy	Options for allocating Bath Community Academy (BCA) focussing on	Possible impacts, may require	J/I	✓

Bath Community Academy	protecting for educational uses, also considering whether an element of residential development should potentially be included in order to help facilitate delivery.	development requirements		
New Policy/Allocation Weston Island	Allocation of Weston Island site for industrial & warehousing uses/builders merchants in order to help facilitate delivery of Manvers Street and South Bank sites. Policy should ensure lighting does not harm ecological interest and protect ecology along the river corridor.	No issues if ecology protected as stated	G/J	✓
New Policy/Site Allocation Depot, Station Road, Newbridge	Option for allocating Station Road site, Newbridge for residential development (capacity to reflect trees on site).	Possible impacts	J/I	✓
New Policy Park and Ride	Options for removing Bath Park & Ride sites from the Green Belt (subject to the demonstration of exceptional circumstances) and allocating them for accommodating solar energy infrastructure and household waste recycling facilities alongside their current Park & Ride function.	Possible impacts, may require development requirements	J?	✓
Volume 3 - Keynsham				
PMP:KE1: Keynsham Spatial Strategy	Amend the number of homes directed to Keynsham and identified in the policy	Possible impacts	J?	✓
PMP:KE2: Town Centre/Somerdale Strategic Policy	No change	No change	-	x
PMP:KE2a: Somerdale	No change	No change	-	x
PMP:KE2b: Riverside and Fire Station Site	Option to amend the policy to specify a dwelling capacity for the redevelopment of the Fire Station element of the site for residential uses (allied to amended parking standards relating to this town centre location)	No issue	E?	✓
CS:KE3a: Land adjoining East Keynsham Strategic Site Allocation	No change	No change		x
CS:KE3b: Safeguarded Land at East Keynsham	It is proposed that this safeguarded land to be released for development	Possible impacts, may require development requirements	J?	✓
CS:KE4: Land adjoining South West Keynsham Strategic Site Allocation	No change	No change		x
New Allocation	Three options to allocate land at north east Keynsham site for	Possible impacts	J?	✓

N.Keynsham	development: 1.Allocate only the safeguarded land for development (Policy KE3b) 2.Allocate wider North Keynsham site for development (incorporating the Policy KE3b safeguarded land) 3.Allocate currently safeguarded land (Policy KE3b) and safeguard the wider North Keynsham site for future development, with the exception of land at western and eastern end of wider site which would be allocated in order to facilitate employment development and delivery of transport infrastructure (including protecting multi-modal corridor route)			
Volume 4 - Somer Valley				
PMP: SV1 : Somer Valley Spatial Strategy	Amend the number of homes directed to the Somer Valley and identified in the policy	Possible impacts- subject to location	K?	✓
PMP: SV2 : Midsomer Norton Town Centre Strategic Policy	Amend Policy in light of the review of the South Road Car Park (SSV2) allocation	Not sure of impacts?	K?	✓
PMP:SSV1: Policy SSV1 Central High Street Core Site	No change (BNG: seem to be part Brownfield and part green field – assume the green field bits would be subject to BNG)	No change	-	x
PMP:SSV2: South Road Car Park	Options to amend South Road Car Park allocation - either 1) retain it as an allocation for retail led development and provision of public car parking or 2) allocate/safeguard it primarily for public car parking with the potential for complementary renewable energy generation and/or housing development. Under option 2 reference would need to made to alternative opportunities to enhance the retail offer of the town centre (as referenced in Policies SV1 & SV2) being considered on a sequential basis.	No impacts	K	✓
PMP:SSV4: Former Welton Manufacturing Site	No change (BNG: seem to be part Brownfield and part green field – assume the green field bits would be subject to BNG)	No impacts	-	x
PMP:SSV3: Midsomer Norton Town Park	No change	No impacts	-	x
CS:SV3 : Radstock Town Centre Strategic Policy	No change	No impacts	-	x

PMP:SSV14: Charlton Timber Yard	No change	No change	–	x
PMP:SSV17: Former Radstock County Infants	No change	No impacts	–	x
PMP:SSV20: Former St Nicholas School	No change	No impacts	–	x
PMP:SSV18: Somer Valley Campus	No change (BNG: seem to be part Brownfield and part green field – assume the green field bits would be subject to BNG)	No Change	–	x
PMP:SSV11: St Peter's Factory site	No change	No change	–	x
PMP:SSV9: Old Mills Industrial Estate	Amend Policy to help facilitate delivery and to reflect the emerging Local Development Order– primarily by amending the site boundary and allowing a different mix of uses on part of the site (higher value commercial uses)	Unsure about likelihood of impacts	J?	✓
Volume 5 - Rural Areas				
PMP:SR24 Land adjacent to Temple Inn Lane, Temple Cloud	No change	No change	–	x
PMP:SR17 The Former Orchard, Compton Martin	No change	No change	–	x
PMP:SR5 Pinkers Farm, East Harptree	No change	No change	–	x
PMP:SR6 Water Street, East Harptree	No change	No change	–	x
PMP:SR14 Wheelers Manufacturing Block Works,	No change	No change	–	x
PMP:SR15 Land to the East of the St Mary's School, Timsbury	No application submitted. It needs to be reviewed through the new Local Plan. (BNG-completely green field sites)	No change	–	x
PMP:SR2 Leafield, West Harptree	No change	No change	–	x

CS:RA5 Land at Whitchurch Strategic Site Allocation	No change	No change	-	x
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