

Bath & North East Somerset

Local Plan (Core Strategy /Placemaking Plan) 2011-2029

Partial Update

Draft (Reg 19) Consultation

August 2021

Topic Paper: Exceptional Circumstances Case

**In support of the removal of Odd Down, Newbridge
and Lansdown Park and Ride sites from the Green
Belt**

**Bath & North East
Somerset Council**

Improving People's Lives

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1 Introduction

- 1.1 Bath and North East Somerset Council (B&NES) considers that exceptional circumstances exist to justify removing land from the Green Belt at three locations, each on the edge of Bath, currently used for Park and Ride facilities.
- 1.2 Removal from the Green Belt is proposed to facilitate the development of the sites for use as multi-modal transport interchanges.
- 1.3 This Topic Paper outlines the key elements of these exceptional circumstances.

2 The Green Belt in Bath and North East Somerset

- 2.1 The Bristol and Bath Green Belt is roughly 71,700ha distributed across six local planning authorities, with over a third (34.5%) falling within Bath and North East Somerset. The extent of the Green Belt within Bath and North East Somerset is shown at figure 1, with the location of the Park and Ride Sites also indicated.

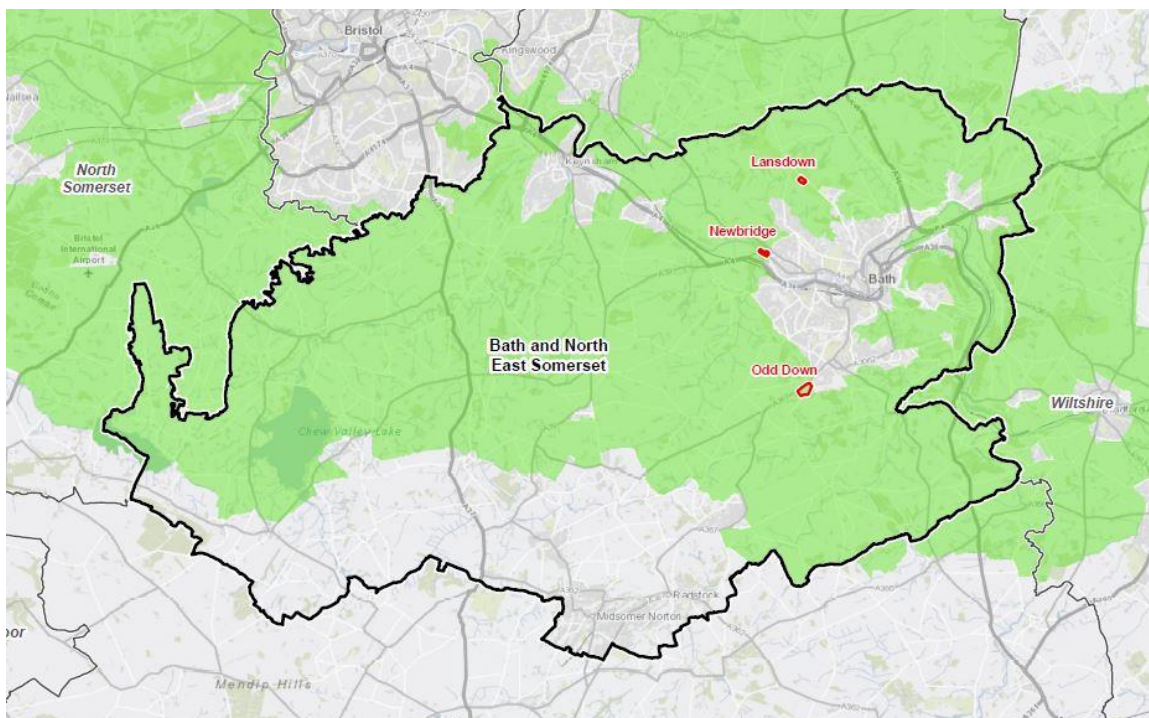


Figure 1: Extract from LUC Green Belt Harm Assessment, showing extent of Bristol and Bath Green Belt and location of three Park and Ride sites.

- 2.2 A detailed assessment of the potential harm to the Green Belt associated with the intensification of development at the three Park and Ride sites, for use as multi-modal transport interchanges, has been prepared for the Council by Land Use Consultants (LUC). The assessment report sets out the evolution of the Bristol and Bath Green Belt at Chapter 2. The assessment report is available to view online as part of the evidence base prepared for the Local Plan Partial Update Regulation 19 consultation.

3 Multi-modal transport interchanges

- 3.1 Removal of the three Park and Ride sites from the Green Belt is proposed to facilitate the development of the sites for use as multi-modal transport interchanges, which will incorporate the continued use of the sites for general Park and Ride purposes.
- 3.2 The concept of multi-modal transport interchanges is to co-locate sustainable transport opportunities in close proximity including bicycle and e-bike hire, bicycle lockers and cycle hubs including bicycle repair kits and pumps, e-car sharing, ridesharing, electric vehicle charging, enhanced bus and Metrobus links, and may be used for freight consolidation and / or parcel lockers.
- 3.3 By providing affordable, convenient, and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in the existing public transport network. In turn they aim to reduce car dependency and congestion, reduce greenhouse gas emissions, and provide opportunities for improved health and well-being.
- 3.4 As well as transport functions, interchange sites are proposed to be well landscaped to be in-keeping with their more rural surroundings with potential for optional small-scale servicing facilities for users and staff, such as small food or drink outlets, renewable energy features, accessible toilets, shower and changing facilities.

4 The Planning Policy Framework

National Planning Policy Framework (2021)

- 4.1 The National Planning Policy Framework (NPPF) (2021) states at paragraph 140 that *“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”*.

4.2 Paragraph 141 sets out further details on establishing exceptional circumstances stating:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

4.3 Paragraph 142 provides further requirements which local planning authorities are required to consider when reviewing Green Belt boundaries and which need to be evidenced as part of the exceptional circumstances case, as follows:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

4.4 Paragraph 143 provides requirements which local planning authorities must consider when defining Green Belt boundaries. These relate to sustainable development, not including land it is unnecessary to keep open, safeguarded land for longer term needs, demonstration that the boundary will not need to be altered, and definition of the boundaries using clear, physical, readily recognisable and permanent features.

5 Exceptional Circumstances

Justifying the need for release

Climate and Ecological Emergencies

- 5.1 Bath and North East Somerset Council declared a Climate Emergency in March 2019 and pledged to provide the leadership to enable carbon neutrality in the district by 2030. The Council also declared an Ecological Emergency in July 2019, in response to the escalating threat to wildlife and ecosystems. The declaration recognises the essential role nature plays in society and the economy and provides a statement of intent to protect wildlife and habitats, enabling residents to benefit from a green, nature rich environment.
- 5.2 The Council's Corporate Strategy includes the core policy to tackle the Climate and Ecological Emergencies, and this shapes all decisions made by the Council. The Climate and Ecological Emergencies are a major influence on the vision, objectives and policies contained in the pre-submission draft Local Plan Partial Update, particularly in relation to updates to transport related policy.
- 5.3 In order to meet the targets pledged, the Council has defined three immediate priorities for action for Bath and North East Somerset including 'a major shift to mass transport, walking and cycling to reduce transport emissions.' The Council are targeting a 25% reduction in vehicle mileage per person and a shift in the types of vehicles in B&NES to comprise 76% ULEV and 14% hybrid vehicles. Only 10% of vehicles can be powered by petrol and diesel, i.e. Internal Combustion Engine (ICE).
- 5.4 Using the Park and Ride sites as multi-modal transport interchanges, providing a choice of sustainable transport modes, plays a significant role in meeting these targets. A primary target outcome from multi-modal transport interchanges is to both reduce private car use and improve mobility by alternative modes, particularly in urban areas. Mode shift away from private car is a key element of the Council's efforts to meet climate related targets.
- 5.5 Complementary uses at the interchanges, such as provision of renewable energy infrastructure, would also assist in the Council meeting another of its immediate priorities, which seeks an increase in local renewable energy generation.

Transport Strategy for the District

- 5.6 The Council's transport strategy for the District is set out within various documents as discussed below, and provides a strategy focused on achieving a well-connected sustainable transport network which is able to accommodate both the existing needs of the District, plus any proposed growth.
- 5.7 Proposed future growth within the district will place more pressure on capacity at the Park and Ride sites. Interchange sites are considered to be more efficient uses of land in terms of the number of person movements that can be supported, in comparison with traditional park and ride sites, which heavily rely on large expanses of private car parking. This is important in accommodating increased travel demand arising from planned growth, with existing Park and Ride sites having limited spare capacity. Encouraging a mode shift away from private car through provision of multi modal transport interchanges will increase the person capacity of the transport network by improving efficiency of people movement, potentially reducing or delaying any need to expand the sites.
- 5.8 Furthermore, the transport sector is evolving rapidly, with increased uptake of new technologies and Mobility as a Service (MaaS) challenging traditional ownership models. The provision of transport interchanges allows flexibility to future-proof for changes to the way users travel as technology becomes more sustainable.
- 5.9 The Joint Local Transport Plan 4 (JLTP4) prepared by the West of England Combined Authority (WECA), working with Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire councils, sets out the vision for transport in these areas up to 2036. It focuses on achieving a well-connected sustainable transport network across the region and providing a network that offers greater, realistic travel choices and makes walking, cycling and public transport the natural way to travel. It considered the range of options available for meeting transport objectives in developing a coherent transport plan for the West of England.
- 5.10 JLTP4 states that Park & Ride sites will play an important role in the region in enabling people living outside the urban areas, who do not have easy access to public transport, to access central areas by non-car modes. In addition, it sets out aspirations for expanding the variety of uses for existing and new Park and Ride sites including the potential for sites to act as transport interchanges which could include improved links to public transport, substantial increases in cycle parking, cycle hire facilities, improved wayfinding infrastructure to facilitate walking, innovative last mile freight solutions and access to electric charging points. In Bath specifically, further

improvement of the existing Park and Ride sites at Odd Down, Lansdown and Newbridge are referenced.

- 5.11 WECA has been successful in receiving £28 million funding to create a West of England Future Transport Zone (FTZ). A key element of the FTZ will be the creation of new 'Mobility Stations' which build on the aspirations of the JLTP4 to make better use of park & ride sites. Mobility Stations are physical multi-modal interchange points, integrating multiple modes and service offerings for users. The proposed use of the park and ride sites as multi-modal transport interchanges is directly related to the proposed delivery of an FTZ for the region.
- 5.12 The West of England Bus Strategy adopted in June 2020 sets out options to improve the bus network and set out how further growth in bus usage can be encouraged across B&NES, Bristol, North Somerset and South Gloucestershire. This strategy highlights that Park and Ride sites will be designed to fit the emerging strategic network and operate as transfer locations for connecting bus services and key interchanges between other transport modes. This effectively proposes to increase the functionality of park and ride sites to incorporate a wider range of bus network connections, which would be part of Interchange proposals.
- 5.13 The Bath Parking Strategy sets out that Park and Ride facilities are key to providing access to the centre of Bath from rural parts of the authority area and beyond without resulting in large increases in traffic and air pollution in central Bath. The Parking Strategy promotes continued use of the existing sites around Bath and a review of the operation of existing sites.
- 5.14 Strategic measures to reduce traffic and parking in urban areas, in this case Interchanges, have the potential to allow greater flexibility in how B&NES can manage the urban transport network. This could include re-allocating road space used for traffic capacity or parking to allow for walking/cycling/public transport improvements. Additionally, interchanges will support city dwellers in gaining access to countryside, with associated health and wellbeing benefits, and improve connectivity for a range of destinations.

Summary

- 5.15 The reasons outlined above clearly identify a strategic need for improved Park and Ride facilities in Bath and North East Somerset. Provision of multi-modal transport interchanges at the three existing Park and Ride sites in Bath is considered to be vital in meeting the aims of the transport strategies for the district, in order to achieve a sustainable transport network which is able to accommodate both the existing needs of the District, plus any proposed

growth. The proposals will futureproof the sites in terms of dealing with increased demand through the improvement of site efficiency and will ensure the Council is able to maximise the uptake of new technologies providing the most sustainable travel options for users.

- 5.16 The proposals are also considered to be significant in helping the Council to achieve the targets pledged in relation to the declaration of climate and ecological emergencies.

Examination of all other reasonable options

- 5.17 The NPPF requires that prior to concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the local authority should demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.
- 5.18 Given the nature of the unique opportunity which has arisen through the existing brownfield Park and Ride sites being available to accommodate the facilities associated with the proposed transport interchanges, whilst continuing to provide a Park and Ride service, it is considered that no other reasonable options apply to this situation. The location of the existing Park and Ride sites have been proven to be sustainable locations for such uses and promoting complimentary land uses is considered to maximise the use of the sites without the need to provide facilities outside of the previously developed areas.
- 5.19 In addition, no realistic alternatives outside the Green Belt exist that could play the role of transport interchanges to serve the City. The only other alternative would be to remove additional undeveloped land from the Green Belt to provide a transport interchange.
- 5.20 The NPPF seeks to optimise the density of development in locations served well by public transport. Although located on the edge of the city, the Park and Ride sites are, by the nature of their use, well serviced by public transport, providing users with the choice of a sustainable transport option into the City. Proposals for the use of the sites as multi-modal transport interchanges will optimise the density of the sites for such uses by providing the facilities and services required to improve the choice of sustainable transport options for users of the site. In addition, the Park and Ride sites represent the most suitable location to achieve full transport interchange services, including buses, as the existing Park and Ride service into the city already operates from these sites.

- 5.21 The requirement set out in the NPPF relating to discussions with neighbouring authorities, as to whether they could accommodate some of the identified need for development, is not considered relevant to this case, due to the nature of the proposals being located at existing Park and Ride sites within Bath and North East Somerset.

Promotion of sustainable patterns of development

- 5.22 A sustainable pattern of development is proposed due to the nature of the sites already being used for Park and Ride facilities. This provides the Council with an opportunity to locate the proposed transport interchanges at locations already developed for a similar use. Such uses have already been demonstrated to be sustainable in these locations and no additional land is required in order to bring forward the interchanges.
- 5.23 The proposed transport interchanges themselves will promote even greater sustainability by encouraging use of various sustainable transport options and providing more choice for users. Furthermore, diversification of the Park and Rides offers scope to promote the beneficial use of the remaining Green Belt within their immediate vicinity through improved access and recreation routes, such as cycling and walking.

Minimising harm to the Green Belt and provision of compensatory improvements

Green Belt Harm Assessment

- 5.24 LUC have carried out an assessment of the harm of release of each site on behalf of Bath and North East Somerset Council.
- 5.25 The full assessment is available to view online as part of the evidence base prepared for the Local Plan Partial Update Regulation 19 consultation.
- 5.26 In summary, the assessment concluded that releasing the Park and Ride sites from the Green Belt for use as transport interchanges would result in the following harm:
- Odd Down Park and Ride – Low-moderate harm
 - Newbridge – Low harm
 - Lansdown – Low-moderate harm
- 5.27 The harm assessment assumes a low intensity of development at the sites. It recommends that the Local Plan Partial Update be as explicit as possible in the allocation of development at each Park and Ride site, setting out clear

parameters to manage the height, visibility and degree and direction of activity in and around each Park and Ride site to guard against the inappropriate intensification of development that might be harmful to the wider Green Belt.

- 5.28 The harm assessment for the Odd Down Park and Ride recommends potential mitigation, including retaining a greenfield gap between Fullers Earthworks to the south west of the site and the Park and Ride site, and provision of planting.
- 5.29 The harm assessment for the Newbridge Park and Ride site recommends the retention of existing trees within the site, separating the two easternmost parking areas, in order to minimise harm.

Minimising Harm

- 5.30 The following steps are proposed to ensure minimal harm to the Green Belt following the site's removal:
- Site allocation policy SB26 in the Local Plan Partial Update allocates the sites as transport interchanges. The policy wording requires any development to be contained within the areas of the sites already developed for Park and Ride use and to be removed from the Green Belt. These areas shall be specified on the Policies Map. This will ensure that no development encroaches outside of the areas already developed for Park and Ride use.
 - The policy wording also requires any built form proposed to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, to minimise visual impact from the surrounding areas. Any development is required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impact on Areas of Outstanding Natural Beauty and other sensitive landscape features.
 - Policy SB26 requires the protection and enhancement of existing green infrastructure and habitats within the site, including all trees, hedgerows, and grassland habitats.
 - Policy SB26 also requires the delivery of high-quality architectural design, informed by the sites' sensitive landscape surroundings.

- Policy ST6 in the Local Plan Partial Update provides a general policy for developing transport interchanges. The policy wording states that development of a transport interchange will only be permitted where:
 - The development accords with all relevant planning and environmental policies, such as those relating to the World Heritage Site, AONB, European Sites, Green Belt and any other special designations and protections as may be affected by development proposals. It must be robustly demonstrated that potential impacts can be successfully mitigated, and the degree of public benefit outweighs the level of harm to any such assets; and
 - The development does not result in unacceptable environmental impacts in line with relevant local, regional and national planning policies and regulations when weighed against the benefits of scheme proposals.

5.31 Planning Practice Guidance provides guidance on assessing the impact of a proposal on the openness of the Green Belt, and sets out examples of issues that may be taken into account in making the assessment. One of these refers to the degree of activity likely to be generated by the proposal, such as traffic generation.

5.32 Each visit to the existing Park and Ride sites either arrives by car and departs by bus, or vice versa. Thus, every usage of the facility generates two car trips (inbound and outbound) per day. Transport interchanges seek to improve multi-modal travel choices, giving people the opportunity to travel to and from the site by means other than the car. The principal is therefore that a significant reduction in existing car trips to and from the sites could be achieved by providing people with an alternative to car usage for that leg of a journey.

5.33 Providing better first and last mile options to access the Park and Ride bus services, and providing greater travel choice for a wide range of journeys rather than solely radial corridors, can also attract people who may otherwise drive the whole of a longer journey. This also has the potential to reduce the number of car trips on the network as a whole, rather than just to and from the sites themselves.

5.34 There has been very limited academic research to specifically quantify the mode shift resulting directly from a change from Park and Ride to multi-modal transport interchange. This is likely to be largely due to the number of additional contributing factors to mode shift and travel behaviour change. However, there is clear evidence that shared mobility services such as car

club and bike share schemes, which would form part of Interchanges, result in reductions in car ownership and annual mileage. CoMoUK's annual survey (2019/20) results showed:

- 26% of car club members have reduced private car use, 16% walk more and 10% cycle more than before they joined a car club
- 27% of bike share commuters had previously commuted by car and 41% of users reported using their own car less often for any journeys

5.35 Furthermore, there are multiple case studies across Europe of successful implementation of multi-modal interchanges and mobility hubs, including Bremen, Ghent and Dresden.

5.36 The change from Park and Ride to transport interchange is intended to improve the person capacity of the sites, and accommodate increased travel demand from wider planned development efficiently and sustainably. There is the potential that there will be some local increases in traffic generation as a result of planned developments and improvements to onward travel options making the sites more attractive as part of a longer journey. However, it is likely that the mode shift achieved by implementing multimodal interchange, as opposed to retaining existing Park and Ride, will minimise the traffic generation impact of wider increases in travel demand, potentially leading to an overall net reduction in traffic.

5.37 Policy ST6 in the Local Plan Partial Update states that development of transport interchanges will only be permitted where the transport effects of the proposed development have been comprehensively and robustly identified through a Transport Assessment in line with current national guidance. This will include, but not be limited to:

- Benefits related to reductions in onward city centre car travel;
- Potential level of mode shift away from other transport modes, especially existing local bus and rail services;
- Changes to the overall modal share;
- Future viability of public transport services, including those that will experience loss of patronage as a result of the new facility; and
- Any mitigation measures required to address any negative impacts.

Compensatory Improvements

5.38 The following compensatory improvements to environmental quality and accessibility are proposed:

- Ecological improvement in the form of Biodiversity Net Gain of at least 10% at each site. Site allocation policy wording requires full exploration of opportunities to deliver Biodiversity Net Gain within the site curtilage before any off-site measures are proposed. The wording requires the Biodiversity Net Gain focus at Odd Down to be on increasing the area and improving the quality of calcareous grassland priority habitat and maintaining suitable conditions for the Small Blue Butterfly (and other invertebrate interest) across the site.
- Policy wording requires, where feasible, any existing calcareous grassland to be buffered with supporting habitat.
- Policy wording requires that all green infrastructure, key habitats, and features of ecological value are retained and enhanced, with any development being informed by an ecological survey of each site.
- The proposals provide a unique opportunity to facilitate new safe walking and cycling routes through the sites, with connections to the surrounding countryside and into the City. Provision of such routes is a requirement set out in the policy wording.

Proposed Green Belt Boundaries

5.39 Figures 2 - 7 below show the existing Green Belt boundaries, compared to the areas proposed for removal from the Green Belt. The boundaries have been proposed in line with recommendations in the LUC harm assessment. They also take into consideration paragraph 143 of the NPPF which sets out requirements when defining Green Belt boundaries.

5.40 Section 5 of this report sets out how the Council will ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development. It clearly identifies a strategic need for the proposed facilities in the District, as well as alignment with the existing development plan strategy and sets out the reasons as to why the proposals are considered to amount to sustainable development.

5.41 The new Green Belt boundaries proposed for each of the Park and Ride sites relate to the previously developed areas of the sites, with any land located between the previously developed areas and the recognisable physical

features used for boundary definition also removed, as it is considered unnecessary to keep these areas permanently open. For example, at the Odd Down Park and Ride site, the areas of land between the previously developed hard standing and the A367, and that located between the previously developed hardstanding and Combe Hay Lane, shall also be removed from the Green Belt.

- 5.42 The NPPF requires boundaries to be clearly defined, using physical features that are readily recognisable and likely to be permanent. Details for each site are set out at pages 15 – 17.

5.43 The new Green Belt boundary at Odd Down is proposed as shown at figure 3. The A367 forms a strong Green Belt boundary to the west and north, and Coombe Hay Lane and its adjacent tree cover form a clear boundary to the east. The southern edge of the site is less strongly defined, and the brownfield site to the south west of the Park and Ride creates a weaker distinction than would be the case if it were open farmland. Therefore, a greenfield gap is retained between the two, with this area retained as Green Belt.



Figure 2: Existing Green Belt boundary – Odd Down Park and Ride site



Figure 3: Proposed Green Belt boundary – Odd Down Park and Ride site

5.44 The new Green Belt boundary at Newbridge is proposed as shown at figure 5. The retention of the significant existing tree coverage on every edge of the site forms a clear Green Belt boundary, with the boundary to the south strengthened further by the presence of the A4.



Figure 4: Existing Green Belt boundary - Newbridge Park and Ride site



Figure 5: Proposed Green Belt boundary - Newbridge Park and Ride site

5.45 The new Green Belt boundary at Lansdown is proposed as shown in figure 7. The retention of the existing tree belts along the north eastern, north western, and the majority of the south western edges of the site form a clear Green Belt boundary, with along the north east of the site strengthened further by the presence of Lansdown Road.



Figure 6: Existing green belt boundary – Lansdown Park and Ride site



Figure 7: Proposed green belt boundary – Lansdown Park and Ride site

6 Summary and Conclusion

- 6.1 This paper has set out the arguments that the Council consider amount to exceptional circumstances that justify amendments to the Green Belt boundary at Odd Down, Lansdown and Newbridge Park and Ride sites, to provide multi-modal transport interchanges.
- 6.2 For the reasons set out within the report, it is considered that the benefits of the proposals relating to climate change, and the transport strategy for the district, outweigh the relatively modest harm to the Green Belt indicated by the Green Belt harm assessment by LUC.
- 6.3 Given the nature of the unique opportunity which has arisen through the existing brownfield Park and Ride sites being available to accommodate the facilities associated with the proposed transport interchanges, whilst continuing to provide a Park and Ride service, it is considered that no other reasonable options apply to this situation.
- 6.4 Policy requirements have been included within the Draft Local Plan Partial Update in order to minimise harm to the Green Belt, and also provide potential for delivering compensatory improvements, relating to biodiversity and sustainable travel and access opportunities.