

**Bath & North East Somerset
Local Plan (Core Strategy /Placemaking Plan) 2011-2029
Partial Update**

**Draft Plan (Reg 19) Consultation
August 2021**

**The Habitat Regulations Assessment of
the B&NES Local Plan Partial Update
(Pre-Submission version)**

**Bath & North East
Somerset Council**

Improving People's Lives

1. Introduction

This document provides a record of the HRA process and Appropriate Assessment undertaken for the B&NES Local Plan Partial Update (Pre-Submission version) 2021 in accordance with the *Conservation of Habitats and Species Regulations 2017 (updated)*¹It draws on content and format from the West of England Joint Spatial Plan (JSP) Habitats Regulations Assessment: November 2018 update. This was produced by the four unitary authorities (UAs) which make up the West of England sub-region, in association with LUC. Although the JSP was withdrawn following examination, much of the content and format of the HRA assessment are relevant. Updated screening buffers and other plan information have also been used.

Context

Under Regulations 102-105 of the Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations) all strategic and local development plans must be assessed for their impacts upon National Site Network sites (previously called “Natura 2000 sites” & here referred to as “European Sites”).

The regulations originally transposed the requirements of the EC Habitats Directives into to UK law. They are designed to protect the integrity of European Sites within the UK. They require the assessment of impacts and avoidance of harm to the Conservation Objectives of European sites. The process is generally referred to as a Habitats Regulation Assessment (HRA). The Regulations have been further amended to address post-Brexit legal requirements, and the currently applicable version of the Habitats Regulations came into force in 2019. The overall intent and requirements for HRA remain unchanged. In terms of the HRA process and reporting it is just the name of the ecological network, and collective terms for the protected sites which has changed, along with the over-seeing body which will become the Office of Environmental Protection.

HRA is an iterative, multi-staged process, which should be applied at points throughout the plan making process. It should be used to help shape, form, and refine Development Plans so that adopted policies and site allocations do not result in adverse impacts to the integrity of National Site Network/European sites.

The first stage of the process involves a high level assessment or screening of whether the plan is likely to have a significant effect on one or more European sites either alone or in combination. Sites that may be affected by the plan need to be identified, and screened to determine if they could be adversely affected by new development, and then components of the plan need to be assessed for their likely impact on those sites. Assessing the plan changes involves pre-screening to first remove plan changes that in themselves do not lead to development, and so could have no effect on protected sites. This allows text changes within the plan that are purely aspirational or administrative to be quickly and reasonably removed from the screening assessment. This allows the HRA to focus on policies and objectives that require assessment of Likely Significant Effect (LSE) as they will result in development or local environmental changes.

¹ Following the changes made to the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU’s Natura 2000 ecological network and now form part of the UK’s national site network. In this document they are still referred to as European Sites.

A precautionary approach should be used, and, since new caselaw established in 2018, any measures within the plan designed to specifically mitigate impacts to European sites should not be considered when assessing Likely Significant Effect.

Where a likely significant effect is identified the process moves to the stage where an Appropriate Assessment is undertaken. This represents a more detailed investigation and assessment of possible impacts. Except in exceptional circumstances to be approved by government/office of environmental protection, where there are no alternative solutions and where there are imperative reasons of overriding public interest, Development Plans should only be adopted if the Appropriate Assessment ascertains that the plan will not adversely affect the integrity of any European Site. These stages are described in more detail below.

Stages of the Habitat Regulations Assessment

Table 1.1 summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA.

Stage	Task	Outcome
Stage 1: HRA Screening	Description of the development plan. Identification of potentially affected European sites and factors contributing to their integrity. Review of other plans and projects. Assessment of likely significant effects of the development plan alone or in combination with other plans and projects.	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)	Information gathering (development plan and European Sites). Impact prediction. Evaluation of development plan impacts in view of conservation objectives. Where impacts are considered to affect qualifying features, identify how these effects will be avoided or reduced.	Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

In assessing the effects of a plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, as is the case for the B&NES Local Plan Partial Update, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes proceed to Step 3.
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test') In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.
- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site. This assertion should be made in accordance with the scale and nature of the plan. As described in Natural England's guidance document The Habitats Regulations Assessment of Local Development Documents (Revised Draft) (The Habitats Regulations Assessment of Local Development Documents, Natural England, 2009):

“...it should be borne in mind that appropriate assessment for a plan is unlikely to be as detailed an assessment as one undertaken at project level.”
- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI)

The emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects, and should therefore prevent the need to progress to stage 3 which is much more onerous.

The need to consider alternatives is likely to require more significant changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with government/ the Office of Environmental Protection.

The HRA should be undertaken by the 'competent authority' - in this case Bath & North East Somerset Council. The HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals required.

The assessment should be proportionate to the nature, scale and detail of the plan being considered. The B&NES local plan is a strategic plan that guides and informs future development projects. The current Local Plan has been subject to an HRA and is formally adopted. For the Local Partial Update it is only the changes to the plan that need to be subject to this HRA process. The key policy changes are

summarised in Appendix D. It should be noted that individual planning projects that come forward will themselves be subject to project level HRA where appropriate.

Structure of this Report

This section (Section 1) describes the background to the preparation of the B&NES Local Plan Partial Update, and the requirement to undertake HRA. The remainder of the report is structured as follows:

- **Section 2: Overview of the B&NES Local Plan Partial Update.** This summarises the reasons for and nature of changes being made to the local plan
- **Section 3: HRA Methodology.** This sets out the approach used and the specific tasks undertaken during the screening and appropriate assessment stages of the HRA.
- **Section 4: HRA Screening Assessment & Results.** This presents the results and findings of the screening stage and provides conclusions regarding whether significant effects on European sites are likely to result from the implementation of the B&NES Local Plan Partial Update, either alone or in-combination.
- **Section 5: Appropriate Assessment.** This determines whether, in light of mitigation and avoidance measures, the Local Plan changes will adversely affect the integrity of European sites, either alone or in-combination.
- **Section 6: Conclusion.** This summarises the conclusions the HRA for the Local Plan Partial Update.

The report is accompanied by a series of appendices:

- **Appendix A** – European site profiles lists the sites covered in this HRA and presents their qualifying features, conservation objectives and key sensitivities
- **Appendix B** – European site maps.
- **Appendix C** – In-combination assessment of other plans and projects.
- **Appendix D** – Summary of policy changes made
- **Appendix E&F** – Screening matrices – site based
- **Appendix G&H** – Screening matrices – policy based

2. The Bath and North East Somerset Local Plan Partial Update (LPPU)

The current 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 form the adopted Local Plan for B&NES. Both pre-date recent caselaw concerning the consideration of mitigation measures, (European Court of Justice (CJEU) ruling on People Over Wind, Sweetman v Coillte Teoranta (Case C-323/17), April 2018). Both were subject to an iterative HRA screening process prior to their adoption. The HRA processes resulted in some policy changes to mitigate potential impacts identified such that the final plans were considered unlikely to result in significant adverse effects to any European Protected site.

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 updated.

In March 2019 the Council declared a climate emergency and pledged to enable carbon neutrality in the district by 2030. An ecological emergency has also been declared in response to the escalating loss of wildlife and ecosystem decline. The Council has also reviewed its corporate strategy and has identified 2 corporate priorities – tackling the climate and nature emergency, and, giving people a bigger say. The Council’s planning policy framework therefore needs to be updated in order to ensure that it is aligned with these priorities and in particular helps to facilitate solutions that address the climate and ecological emergency.

A crucial role of the Local Plan is also to maintain the supply of new housing. In order to ensure that the Core Strategy housing requirement can be met and that an ongoing supply of housing is maintained (as required by the NPPF) the partial update is replenishing housing supply, including through identifying new site allocations.

In addition, some policies have been updated in order to ensure the outcomes sought are delivered in accordance with the current National Planning Policy Framework (NPPF) as well as other legislative changes. Finally, some policies have been revised in response to changes in circumstances resulting from covid-19 and facilitating the post-covid recovery. These latter changes principally relate to town centres or economic development.

A full review of the Local Plan will be undertaken alongside the WECA Spatial Development Strategy (SDS) which is scheduled for publication in 2023. Therefore, in the interim, B&NES is undertaking a Partial Update of the Local Plan to address the issues described above.

The nature of the substantive changes being made are :

- To update policies to better address the climate and ecological emergencies including facilitating
 - zero carbon development – *this will influence the design, form and operation of new development, but does not in itself lead to new development or site allocations*
 - provision for renewable energy, to include wind power as well as solar -*whilst no site allocations are proposed, the policy encourages development in certain areas and could lead to new development*
 - a Biodiversity Net Gain policy – *in terms of the natural environment this will positively influence the design and functioning of new development, but does not in itself lead to new development*
 - Strengthening of existing Natural Environment and Green Infrastructure policies – *from a site protection perspective this will positively influence the location, design and functioning of new development, but does not in itself lead to new development*
 - Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency *this will influence the design and functioning of new development, but does not in itself lead to new development other than some low intensity development of the three Park & Ride sites for them to become transport interchanges*

- To replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained
 - an increase of housing land for about 1,100 houses to meet the Core Strategy target – *this leads to new and modified housing allocations*

- Addressing a limited range of other urgent local issues including
 - houses in multiple occupation *this will influence the design and functioning of new development, but does not in itself lead to new development*
 - new purpose built student accommodation policy – this could lead to new development primarily on the University campus
 - green recovery – strengthening the protection of industrial sites *this will safeguard existing development zones, but does not in itself lead to new development*

- Amending policies for clarity and to ensure they are aligned with up to date national policy – this will aid clarity but will not lead to new development

A summary of the key policy changes is provided in Appendix D

The local plan changes proposed have been subject to the HRA to ensure that new and modified policies and site allocations do not deliver developments that would or could have adverse effects upon the integrity of European sites within or adjacent to the district. It is only the plan changes that have been considered.

An iterative and pre-cautionary approach to assessing the impacts of the proposed changes upon European Sites has been adopted. This began with the screening of the initial Local Plan Partial Review Options document, and will end with the consideration of the final Publication Plan Update proposed for adoption. Possible in-combination effects are considered at key stages.

The purpose of policy level HRAs is to assess whether particular policies will impact on designated sites. If it cannot be ruled out that there will be no adverse effects on the integrity of the European sites, then policies must be amended or deleted. Where appropriate, safeguarding conditions can be used and/or deliverable mitigation identified to avoid or remove the potential adverse impacts of a policy. This approach will ensure the plan is robust and deliverable. It is supported by the decision in the case of *Feeney v Oxford City Council* [2011] EWHC 2699, in which the Court ruled that the use of safeguard conditions is not excluded by the precautionary principle; on the contrary such a condition is based upon advance consideration of potential future risks.

A precautionary approach is taken throughout when assessing the likelihood of a significant effect or impact pathway, and all plan policy and site allocation changes proposed are considered, together with plan modifications resulting from public consultation and ultimately examination in public. At each stage, where necessary and appropriate, policy wording and

site development requirements have and will be modified or changed to avoid and/or reduce any potential negative impacts identified by the HRA process. This will include addressing the results of consultation with Natural England. This process is designed to avoid, where possible, adverse impacts on the integrity of any European site.

This document sets out the approach and details of the HRA undertaken for the pre-submission version (August 2021).

3.HRA Methodology

The HRA methodology used is based on the guidance and methods set out in The Habitats Regulations Assessment Handbook, (2013), the HRA work undertaken for the WoE JSP 2018, work underway for the WoE SDS, and from the GOV UK website. The screening of policy and site allocations changes uses the screening processes and categories set out in the 2013 HRA handbook, and is guided by the use of impact alert buffers. These are based upon emerging best practice, existing knowledge of possible impact pathways, existing knowledge and assumptions about functionally linked habitat. The buffers selected are designed to be precautionary.

The process for development plans typically involves the first two stages of the HRA process, and will rarely move to stage 3:

- Stage 1: Screening.
- Stage 2: Appropriate Assessment.

Stage 1: Screening

The screening stage is required firstly to determine which, if any, European Sites could potentially be impacted by the development plan. This process typically begins with the identification of European sites within the likely zone of influence of the plan, and then screens these sites to determine if they could be affected by development. The likely zone of influence for the plan area is here taken to be the B&NES area and up to 15km beyond. (NB: In line with Design Manual for Roads and Bridges 30km zone of influence for Bat SACS was also considered, but there are no additional bat SACS in this extended zone).

Secondly, the screening seeks to determine which, if any, plan changes could potentially cause a significant effect on those sites. The screening assessments should be conducted without taking mitigation into account, in accordance with the 'People over Wind' judgement 2018. If likely significant effects cannot be ruled out for one or more sites the assessment process moves to stage 2.

Identification of European Sites within or adjacent to B&NES

A 15km buffer around B&NES was used to identify the European sites within and adjacent to B&NES which could potentially be affected by the local plan partial update (LPPU) . This distance is in accordance with the HRA screening assessments carried out on previous Local Plan documents and other strategic plans within the local area. The results of this screening are set out in Section 4.

Identification of European sites which could be affected by the Local Plan Partial Update

The next stage of screening involves a more considered assessment of potential impact pathways and site attributes to determine if any of the European site identified within the LPPU zone of influence can reasonably be screened out from further consideration. Potential impacts and activities associated with development are summarised in table 3.1. These are used, in conjunction with precautionary impact alert buffers, to help consider potential impact pathways.

Table 3.1 Potential impacts and activities adversely affecting European sites

Broad categories and examples of potential impacts on European sites	Examples of activities responsible for impacts
<p>Physical loss Removal (including off-site effects, e.g. foraging habitat) Smothering Habitat degradation</p>	<p>Development (e.g. housing, employment, infrastructure, tourism) Infilling (e.g. of mines, water bodies) Alterations or works to disused quarries Structural alterations to buildings (bat roosts) Afforestation Tipping Cessation of or inappropriate management for nature conservation Mine collapse</p>
<p>Physical damage Sedimentation / silting Prevention of natural processes Habitat degradation Erosion Trampling Fragmentation Severance / barrier effect Edge effects Fire</p>	<p>Flood defences Dredging Mineral extraction Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.) Vandalism Arson Cessation of or inappropriate management for nature conservation</p>
<p>Non-physical disturbance Noise Vibration Visual presence Human presence Light pollution</p>	<p>Development (e.g. housing, industrial, increased recreation) Recreation (e.g. dog walking, water sports) Industrial activity Mineral extraction Navigation Vehicular traffic Artificial lighting (e.g. street lighting)</p>
<p>Water table / availability Drying Flooding / storm water Water level and stability Water flow (e.g. reduction in velocity of surface water Barrier effect (on migratory species)</p>	<p>Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Increased discharge (e.g. drainage, runoff)</p>
<p>Toxic contamination Water pollution Soil contamination Air pollution</p>	<p>Agrochemical application and runoff Navigation Oil / chemical spills Tipping Landfill Vehicular traffic Industrial waste / emissions</p>
<p>Non-toxic contamination Nutrient enrichment (e.g. of soils and water) Algal blooms Changes in salinity Changes in thermal regime Changes in turbidity Air pollution (dust)</p>	<p>Agricultural runoff Sewage discharge Water abstraction Industrial activity Flood defences Navigation Construction</p>
<p>Biological disturbance Direct mortality Out-competition by non-native species Selective extraction of species Introduction of disease Rapid population fluctuations Natural succession</p>	<p>Development (e.g. housing areas with domestic and public gardens, & increased recreation) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Agriculture Changes in management practices (e.g. grazing regimes, access controls, cutting/clearing)</p>

Ecological attributes and detailed screening of the European sites

An understanding of the designated features of each European site and the factors contributing to its integrity is used to inform the assessment of the potential likely significant effects of the Local Plan Partial Update on individual sites, and is used to guide the screening in of sites for detailed assessment.

The qualifying features and conservation objectives of the European sites within 15km of B&NES, together with current pressures and potential threats, are presented in Appendix A. The information has been taken from the Standard Data Forms for SACs and SPAs, Natural England’s Site Improvement Plans and from the most recent conservation objectives published on the Natural England website (most were published in 2014). Maps showing the boundary of each European site are included in Appendix B. This information can be used to help guide the assessment of likely significant effects, but the assessment can only be to a level of detail pertinent to the Local Plan Partial Update.

Different types of broad impact and impact pathways are identified in Table 3.1 above. These, together with an understanding of site attributes and vulnerabilities, and screening buffers and assumptions set out in section 4 are used to judge which sites could be subject to likely significant effects. This screening approach and results are described in Section 4 and in Appendices E & F

Detailed Assessment of ‘likely significant effects’

Having identified the sites at potential risk of likely significant effects a detailed screening of plan changes is then undertaken to determine which elements of the plan, if any, pose likely risks to the screened in European sites.

A risk-based approach to the assessment of Likely Significant Effect involving the application of the precautionary principle is adopted in the assessment of LPPU policies and the likelihood of their impacting negatively on the sites screened in for detailed assessment. A conclusion of ‘no Likely Significant Effect’ is only reached where it was considered very unlikely, based on current knowledge and the information available, that a policy or site allocation would have a Likely Significant Effect on a European site.

3.2: Screening criteria to inform the HRA

Effects on European Sites	Code
Screened out	
General statement of policy/general aspiration	A
Policy listing general criteria for testing the acceptability /sustainability of proposals	B
Proposal referred to but not proposed by the plan	C
Environmental protection/site safeguarding policy	D
Policies or proposals which steer change in such a way as to protect European sites from adverse effects	E
Policy that cannot lead to development or other change (eg design)	F
Policy or proposal that could not have any conceivable effect on a site	G
Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)	H
Screened in	
Policy or proposal with a likely significant effect on a site alone	I
Screening conclusion made after checking for likely significant effects in combination	
Policy or proposal with an effect on a site but not likely to be significant alone – screen in or out after in combination test	J

Policy or proposal with no likely Significant Effect even in combination	K
Policy or proposal with likely significant effect in combination	L

Screening criteria and information used to determine which plan changes should be screened in for detailed assessment.

This stage of the screening assessment involves considering the potential for each of the changes proposed to the Local Plan to have a significant effect on any of the European sites screened in for further review. The screening criteria set out in **Table 3.2 above** are used to screen the LPPU changes.

The outcomes of the Screening assessment are included in Appendices G& H. Appendix G uses the traffic light approach to identify all policy changes that could potentially result in a likely significant effect. The majority of the changes listed relate to text changes only and so have no material effect. These can be screened out as part of the pre-screening process. It is only some new policies or substantive policy or site allocation changes that raise concern. These are listed in Appendix H, which provides details about:

- The LPPU change being assessed
- The activities (operations) likely to result as a consequence of the policy or allocation change.
- The likely effects (e.g. habitat loss, non-physical disturbance, air pollution etc.)
- The European sites likely to be significantly affected by those components of the LPPU.
- The screening criteria and conclusion, including the reasons for coming to the judgement of whether or not there are to be likely significant effects.

In combination effects are considered where appropriate at this stage through a review of residual effects associated with other relevant plans and projects. A list of relevant plans and projects is provided in appendix C. This approach is required for plan changes that don't have a likely significant effect on their own, but which are deemed to have some residual impact.

The 'traffic light' approach is used to record the likely impacts of the policies and allocations on European sites and their qualifying habitats and species, using the colour categories shown below. This screening does not consider any specific mitigation measures included within the policies to avoid potential impacts.

Red	There are likely significant effects (Appropriate Assessment required).
Amber	There may be likely significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	No likely significant effects have been identified (Appropriate Assessment not required)

Interpretation of 'likely significant effect'

Relevant case law helps to interpret when effects should be considered as being likely to result in a significant effect, when carrying out a HRA of a plan.

In the Waddenzee case²¹, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 105 in the Habitats Regulations), including that:

- .15 An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48).
- .16 Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).
- .17 An opinion delivered to the Court of Justice of the European Union commented that:
- .18 "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."
- .19 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "which have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

In-combination effects

Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the “*management of the site*”. Therefore, as well as considering the likely effects of the LPPU alone on European sites, it is necessary to consider whether there may be significant effects from the LPPU in combination with other plans or projects.

In accordance with recent guidance on HRA the potential for in-combination effects need only be considered for effects of the LPPU identified as unlikely to have a significant effect alone, but which could combine with the effects of other plans and projects to produce a significant effect.

Identifying potential ‘in-combination’ effects involves identifying which other plans and projects in addition to the LPPU may affect the European sites that will be the focus of the HRA. There are a large number of plans and strategy documents which could be considered.

The review here reflects that undertaken for the now withdrawn WoE JSP HRA 2018, and focusses on Local and Strategic Plans for authorities adjacent to and within Bath & North East Somerset, including the West of England Joint Waste Core Strategy and Joint Local Transport Plan and Bristol Water and Wessex Water’s Water Resources Management Plan. The findings of any associated HRA work for these plans has been reviewed, where available and relevant to the District level. Other projects planned or underway were also considered, though in this case, no significant projects were identified.

Appendix C presents the review of these other plans and projects, outlining the components of each plan or project that could have an impact on nearby European sites and considering the findings of the accompanying HRA work, where available. The following plans and HRA work have been considered:

- **West of England** Joint Waste Core Strategy (2011).
- **West of England** Joint Local Transport Plan 3 2011-2026 (2011).
- **Bristol Water** Water Resources Management Plan (2014) and Emerging Bristol Water: Water Resources Management Plan (2019).
- **Wessex Water** Water Resources Management Plan (2014) and Emerging Wessex Water: Water Resources Management Plan (2019).
- **Bath & North East Somerset** Local Plan: Core Strategy (2014), Placemaking Plan (2017), and saved Local Plan (2007) Policies.
- **Bristol** Development Framework: Core Strategy (2011), Site Allocations and Development Management Policies (2014), Bristol Central Area Plan (2015).
- **North Somerset** Council Local Plan: Core Strategy (2017), Development Management Policies (2016), Site Allocations Plan (2018).
- **South Gloucestershire** Local Plan: Core Strategy (2013), Policies, Sites and Places Plan (2017).
- **Cotswold** District Local Plan 2011-2031 (2018).
- **Mendip** District Local Plan 2006-2029 (2014) and Mendip District Pre Submission Draft Local Plan Part II (2018).
- **Wiltshire** Local Plan: Core Strategy (2015) and saved Local Plan (2003-2012) Policies

Stage 2: Appropriate Assessment

The Appropriate Assessment stage of HRA focuses on those policies and related impacts judged likely to have a significant effect at the Screening stage, and seeks to conclude whether they would result in an adverse effect on the integrity of the qualifying features of a European site(s), or where insufficient certainty regarding this remains. The integrity of a site depends on the site being able to sustain its 'qualifying features' across the whole of the site and ensure their continued viability. Mitigation techniques are considered at this stage.

As stated in HRA Guidance assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the LPPU policies (either alone or in combination) have the potential to:

- Cause delays to achieving the conservation objectives of the site.
- Interrupt progress towards achieving the conservation objectives of the site.
- Disrupt those factors that help to maintain favourable condition of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features.

Section 5 sets out the findings of the Appropriate Assessment undertaken. Each European site for which likely significant effects could not be screened out is discussed in turn. The Appropriate Assessment considers each type of impact that might give rise to a likely significant effect (based on the Screening conclusions in Section 4), and has drawn on the latest available data sources and discussions with Natural England. Mitigation measures are considered.

Where adverse effects on integrity cannot be ruled out as a result of the changes proposed in the LPPU, an assessment of additional mitigation solutions has been undertaken to consider the extent to which such effects can be avoided. In the context of a development plan such as the LPPU, such mitigation includes the clarification of policies to remove areas of uncertainty leading to predicted impacts, or to include conditions or restrictions relating to their implementation, the modification of policies to include alternative solutions, locations or development requirements for particular developments, or the omission of policies where no alternatives exist.

Drafting changes to the Local Plan has been an iterative process and policy changes have been incorporated to avoid or mitigate against the potential for any adverse impacts to site integrity.

4) Screening Results

European Sites within B&NES and within the LPPU Zone of Influence (15km)

The following European sites were identified for review (shown in Appendix B):

- Bath & Bradford-on-Avon Bats SAC; (SSSI components within & close to B&NES)
- North Somerset and Mendip Bats SAC; (SSSI component within & others close to B&NES)
- Chew Valley SPA (entirely within B&NES)
- Mells Valley SAC; (SSSI components outside B&NES but within zone of influence)
- Avon Gorge Woodlands SAC (SSSI components outside B&NES but within zone of influence)
- Mendip Limestone Grasslands SAC; (SSSI components outside B&NES but within zone of influence)
- Mendip Woodlands SAC; (SSSI components outside B&NES but within zone of influence)
- Salisbury Plain SAC & SPA (SSSI components outside B&NES but within zone of influence)
- Severn Estuary SAC, SPA and Ramsar site; (SSSI components outside B&NES but within zone of influence)
- Somerset Levels and Moors SPA and Ramsar; (SSSI components outside B&NES but within zone of influence)

European Sites Screened in

The next screening assessment was carried out to identify those European sites located within B&NES or within 15km of the District that could potentially be at risk of significant effects from the LPPU. A number of screening assumptions and buffers are used to identify European sites with potential to be significantly affected. These assumptions were developed and refined through the JSP HRA process, drawing on existing research, best practice in HRAs undertaken on other Local Plans, from more recent work associated with SDS, and in discussion with Natural England. The details are set out in Appendix F. The screening assumptions are discussed below, and conclude with a summary of European sites screened in for further detailed assessment.

Screening assumptions and information used to determine which sites should be screened in for detailed assessment.

Physical damage/loss

Any development proposed within the LPPU would take place within B&NES. Therefore, it is only possible for European sites inside the UA boundary to be affected through direct physical loss and damage of habitat within the boundary of the European site. Only components of the Bath and Bradford-on-Avon Bats SAC, and North Somerset and Mendip Bats SAC, and Chew Valley SAC therefore have the potential to be affected by direct physical damage and/or loss from development proposed in the LPPU.

However, none of the site allocations are located within the boundaries of these European sites, and it is unlikely given the other strong policy restrictions contained in the Local Plan that future development proposals coming forward as small windfall sites will be located within the boundaries of any European sites. **Therefore, all sites were screened out in relation to direct physical damage/loss.**

However, habitat loss from development in areas outside of the European site boundaries may also result in likely significant effects where that habitat contributes towards

maintaining the interest feature for which the European site is designated. This is often described as “functionally linked land”. This includes land which may provide off-site foraging, flight lines and roosting habitat for mobile species such as birds and bats.

In relation to bats, the fragmentation and severance of habitat used by bats to forage and commute within the European site and in the wider area can have a significant impact on the population of qualifying bat species. Qualifying bat species from the Bath and Bradford-on-Avon Bats SAC, Mendip Limestone Grasslands SAC, Mells Valley SAC, and North Somerset and Mendips Bats SAC could potentially be at risk of likely significant effects from habitat loss and fragmentation from proposed development within 8km of these European sites.

For birds, Natural England has previously advised in other HRA work that the recognised foraging distance for the majority of wetland bird species is 2km from the designated site. A pre-cautionary 4km buffers is used here initially, with reference also to a 2km buffer. These distance buffers has been applied to the Severn Estuary SPA and Ramsar site and Chew Valley SPA in relation to off-site habitat damage/loss. However, the foraging distance for golden plover and lapwing, for which the Somerset Levels and Moors SPA and Ramsar is designated, is recognised as being up to 15km.

Having reviewed site allocations in the context of these buffers, and in light of the strengthened Natural Environment policies the following European sites were screened out from likely significant effects associated with off-site physical damage/loss: Avon Gorge Woodlands SAC, Mells Valley SAC, Mendip Woodlands SAC, Mendip Limestone Grassland SAC, Severn Estuary SAC. No in-combination effects were identified for these sites.

While the Somerset Levels and Moors SPA and Ramsar is within 15km of B&NES there are no obvious flight paths or functional land connectivity between the site allocations and the SPA, being separated by the Mendip Hills. Therefore, the SPA golden plover population is not expected to depend upon land allocated for development within the LPPU. The Somerset Levels and Moors SPA and Ramsar is therefore also screened out from off-site physical loss or damage.

Therefore, likely significant effects from development proposed in the LPPU as a result of off-site physical loss, or damage to habitat need to be considered in relation to:

- **Bath and Bradford-on-Avon Bats SAC;**
- **North Somerset & Mendips Bat SAC,**
- **Chew Valley SPA**

Non-physical disturbance (noise vibration and light)

Noise and vibration effects, e.g. during the construction of new housing or employment development, are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features. Artificial lighting at night (e.g. from street lamps, glazed buildings, flood lighting and security lights) has the potential to affect species where it occurs in close proximity to key habitat areas, such as key foraging and commuting routes for SAC bats and roosting sites of SPA birds.

It has been assumed that the effects of noise, vibration and light are most likely to be significant within a distance of 500 metres. There is also evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise; however, it has been assumed (on a precautionary basis) that the effects of noise, vibration

and light pollution are most likely to cause an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances.

European sites situated within or adjacent to B&NES that support qualifying species which are vulnerable to non-physical disturbance include Bath and Bradford-on-Avon Bats SAC, Chew Valley Lake SPA, Mells Valley SAC, Mendip Limestone Grasslands SAC, North Somerset and Mendip Bat SAC, Severn Estuary SPA and Ramsar. However, a number of these sites (Mells Valley SAC, Mendip Limestone Grasslands SAC; Severn Estuary SAC/SPA/Ramsar) are not within 500m of B&NES, and so are not at risk from any locations proposed for development through the LPPU, and wouldn't be at risk from windfall development.

All other European sites do not lie within or adjacent to the LPPU boundary and/or do not support qualifying species which are vulnerable to non-physical disturbance and were screened out from the assessment.

Based on the 500m buffer distance, the potential for likely significant effects of noise, vibration and light needs to be considered only in relation to Bath and Bradford-on-Avon Bats SAC due to site allocations. However, some policy changes could also potentially cause impacts to Bath & Bradford on Avon Bat SAC, Chew Valley SPA, and North Somerset and Mendip Bat SACs (eg location of solar or wind farms, or windfall development within 500m of site or functionally linked land). No in-combination effects were identified for the sites initially screened out for non-physical disturbance.

Therefore, likely significant effects relating to increased Non-physical disturbance (noise vibration and light) needs to be considered only in relation to :

- **Bath & Bradford-on-Avon Bats SAC;**
- **North Somerset & Mendips Bats SAC,**
- **Chew Valley Lake SPA.**

Air pollution

Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels that can then affect plant health, productivity and species composition.

Possible increase in vehicle traffic is likely to be the main risk to air pollution from the LPPU. In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Atmospheric nitrogen deposition is when the pollutant settles onto the ground (referred to as 'deposition') causing nutrient enrichment of the soil ('eutrophication') or changes to the soil pH ('acidification'). These effects can decrease the ability of qualifying plant species to compete with other plant species; the nitrogen acts as a fertiliser and plants that thrive on high nitrogen levels can change the composition and dominate plant communities. The speed with which a given pollutant settles (or deposits) after it is released into the atmosphere is different for each pollutant, and is influenced by how dense (or heavy) the particles are. Some pollutants travel a long distance before deposition occurs whilst others will settle much closer to their source. Wind speed and direction will also have an influence on deposition properties. Information in relation to impacts on qualifying habitats of European sites is provided by the Air Pollution Information System (APIS) and can

be found at <http://www.apis.ac.uk/>.

Based on the Highways Agency Design Manual for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 127 (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that the contribution to air pollution from a road is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the Screening Stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- Daily average speed will change by 10 km/hr or more; or
- Peak hour speed will change by 20 km/hr or more; or
- Road alignment will change by 5 m or more.

Traffic forecast data (based on the planned level of growth) is therefore needed to determine if LPPU driven changes in vehicle traffic are likely to meet the criteria for assessment on roads within 200m of European sites.

It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

European sites within 15km of B&NES that are within 200m of 'A' roads or motorways are limited to Avon Gorge Woodlands SAC (A4, A369), Bath and Bradford-on-Avon Bats SAC (A4), Chew Valley SPA (A368), Mendip Limestone Grasslands SAC (A38), Mendip Woodlands SAC (A371), North Somerset and Mendip Bats SAC (A370, A371, M5), and Severn Estuary SAC, SPA and Ramsar (M5, M48, M403).

Of these, the following European sites are identified as being vulnerable to air pollution in the Site Improvement Plans prepared by Natural England: Avon Gorge Woodlands SAC, Mendip Limestone Grasslands SAC, Mendip Woodlands SAC, and the Severn Estuary SAC, SPA and Ramsar

None of these sites are considered likely to be affected by increased road trips and transport emissions generated by the LPPU. No in-combination effects were identified for the sites potentially vulnerable to air pollution.

The qualifying features of the other sites screened out (Bath & Bradford on Avon Bat SAC, Chew valley Lake SPA, North Somerset & Mendips Bat SAC) are not considered to be vulnerable to any air quality impacts to functionally linked land within 200m of A roads.

Impacts of Recreation

Recreation activities and human presence can result in significant effects on European sites as a result of erosion and trampling, associated impacts such as fire and vandalism or other disturbance to sensitive features, such as bats and birds. The LPPU will result in housing growth at specific site allocations, and associated population increase. Where increases in population are likely to result in significant increases in recreation at a European site, either alone or in-combination, the potential for likely significant effects requires assessment.

Zones of Influence

Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a European Site.

At this stage, a precautionary approach has been used to establish a ZOI influence of 7km, which will be applied for all European sites. This ZOI has been informed by the Thames Basin Heath SPA Delivery Framework and is based upon studies indicating the distance people travel for recreation. This distance is also broadly comparable with typical zones of influence being used to inform HRAs of Local Plans, and Strategic approaches adopted by Local Authorities elsewhere within the UK.

Based on this ZOI, and the proposed site allocations it is only the Bath & Bradford on Avon Bat SAC, that has potential to be affected by recreational impacts, as a result of proposed development within the LPPU site allocations. No in-combination effects were identified for the other sites. It is considered that most windfall sites would not be of significant scale to cause effect. Any exceptions to this would be subject to EIA and project level HRA.

Therefore, likely significant effects relating to increased recreational disturbance need to be considered only in relation to the:

- **Bath & Bradford-on-Avon Bats SAC.**

Water Quantity and Quality

An increase in demand for water abstraction and treatment resulting from the growth proposed in the LPPU could potentially result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, there could be a likely significant effect, for example due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

The Chew Valley Lake SPA lies within and is directly connected to the waterbodies within the UA. Changes in water quantity and quality through increased demand for water supply and increased wastewater discharges, which result in the degradation of habitats, are therefore considered an issue.

The edge of the Somerset Levels and Moors SPA and Ramsar lies just within 15km of B&NES. However given the distance of this site, and intervening landscape and landuse, and hydrological sub catchments, between the site and much of B&NES, and the lack of hydrological connectivity to water resources within B&NES, no likely significant effects were judged for this sites and it was therefore screened out from the assessment.

Avon Gorge Woodlands SAC, Bath and Bradford-on-Avon Bats SAC, Mells Valley SAC, Mendip Limestone Grasslands SAC, Mendip Woodlands SAC, North Somerset and Mendip Bats SAC, were also screened out because their qualifying features are not susceptible to changes in water quantity and quality, and/ or because they lack hydrological connectivity with water resources which could be affected as a result of the LPPU. No in-combination effects were identified for these sites.

Therefore, likely significant effects relating to water quality and quantity need to be considered only in relation to :

- **Chew Valley Lake SPA.**

Sites with potential for likely significant effects

Based on the above screening assumptions, the following European sites were identified with potential for likely significant effects arising from the B&NES LPPU and have been screened in for Appropriate Assessment:

- Bath and Bradford-on-Avon Bats SAC.
- Chew Valley Lake SPA.
- North Somerset and Mendip Bats SAC.

No pathways were identified that would lead to likely significant effects on all other European sites within or adjacent to B&NES, either alone or in-combination with other plans and projects. These other European sites were therefore screened out from further assessment.

Plan Screening :pre-screening to determine which plan changes should be screened in for review.

A pre-screening exercise was initially undertaken to identify all policies that will not result in future development/ environmental change i.e. aspirational or administrative in nature, and therefore have no ability to impact upon European sites

This stage of the screening assessment involves considering the potential for each of the changes proposed to the Local Plan to have likely a significant effect on any of the European sites screened in for further review. The screening criteria set out in **Table 3.2 above** are used to screen the LPPU changes.

The outcomes of the Screening assessment are included in **Appendix G& H**. Plan changes screened in as having potential likely significant effect are summarised in Table 4.3 below.

Plan screening conclusions

The majority LPPU changes are unlikely to have significant effects. This is because they are text changes, or policy changes that are either : very minor changes to policy wording; general aspirational statements; criteria relating to development proposed under other policies, or site allocations with no likely impact pathway..

However, for some policies and site allocations there is uncertainty and therefore, in line with the precautionary approach being applied in the HRA, until significant effects can be ruled out, they are treated as giving rise to 'likely significant effects'. In addition, some policies and site allocations, in the absence of mitigation measures, are considered likely to cause a significant effects on the sites screened in for assessment. Appendix E details the policy and site allocations where likely significant effects cannot be ruled out, and table 4.2 below summarises the screening results for the European sites potentially affected. Table 4.3 below summarises the local plan changes of concern.

Table 4.2: Summary of screening conclusions for the screened in European sites

European Site	Physical Damage/Loss	Non-physical Disturbance	Air Pollution	Recreational Pressures	Water Quantity or Quality
Bath and Bradford-on Avon Bats SAC	Uncertain (off-site only)	Uncertain	No LSE	Uncertain	No LSE
Chew Valley Lake SPA	Uncertain (off-site only)	Uncertain	No LSE	No LSE	Uncertain
North Somerset and Mendip Bats SAC	Uncertain (off-site only)	Uncertain	No LSE	No LSE	No LSE

Table 4.3: Summary of LPPU changes with potential to cause likely significant effect

Policy Number	Policy Description	Likely activities (operations) to result as a consequence of the proposal	Likely effect if proposal is implemented	European site/s potentially affected	Could the proposal have likely significant effect
Policy CP3 I	<p>POLICY CP3 RENEWABLE ENERGY</p> <p>The amendments are substantial and seek to secure proposals for wind energy; ground mounted solar energy & includes provision for Energy Balancing Plants</p>	Land take for solar farms & associated development; loss of grazing; disruption of flight paths from wind turbines	Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise disturbance	Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC	Yes – without mitigation
<p>New Policy H2A for Purpose Built Student Accommodation</p> <p>A/I/J</p> <p>Any allocations will have considered mitigation requirements.</p> <p>& Include protective clause for Nature Conservation</p> <p>Windfalls must comply with NE & GI policies</p>	<p><u>POLICY H2A: PURPOSE BUILT STUDENT ACCOMMODATION</u></p> <p><u>This is a new policy that seeks to control purpose built student accommodation to specifically allocated sites and other locations where need is demonstrated.</u></p>	Land take for new or redeveloped buildings.	Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance	Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC	Possibly, for any windfall sites in Bath close to the river corridor -_but should be controlled by Policy NE3

<p><u>Policy RE1</u></p> <p>previously developed land can have high biodiversity value – reliant on other policies to safeguard biodiversity – not a significant HRA issue though, but unsure</p>	<p>POLICY RE1: EMPLOYMENT USES IN THE COUNTRYSIDE</p> <p>The change adds “previously developed land” to the policy;</p> <p>Could add “where not habitat functionally linked to a European site” if AA requires it.</p>	<p>Change of form and function of derelict / previously developed land that could be valued bat habitat</p>	<p>Potential for off-site physical damage/ loss through loss of foraging habitat and disruption to flight paths, and non-physical disturbance through additional light spill</p>	<p>Bath and Bradford-on Avon Bats SAC North Somerset and Mendip Bats SAC</p>	<p>Can’t be ruled out, but should be controlled by Policy NE3, could add change suggested</p>
<p>Policy ST6</p> <p>K//J</p> <p>Changes reasonably substantive & could result in development within new sites that have impacts</p> <p>Includes clause to protect European sites...and any other special designations and protections</p>	<p>POLICY ST6: Transport Interchange</p> <p>This involves substantive change to the existing Park & Ride policy to allow development of facilities within the existing sites & potentially new sites to accommodate facilities needed to support a transport interchange</p>	<p>This could involve land take and habitat loss or fragmentation where new site are provided, and potential increase in light spill at existing sites.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Potentially – without mitigation</p>
<p>B/D/K//J</p> <p>Includes clause to protect natural environment</p>	<p>POLICY ST7 TRANSPORT REQUIREMENTS FOR MANAGING DEVELOPMENT</p> <p>The changes are quite substantive requiring various additional measures that need to be addressed when managing new development</p>	<p>The new requirements could result in additional land take, creation of new barriers to wildlife and new lighting</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Potentially- without mitigation</p>

<p>SB8</p> <p>Includes clause to protect natural environment</p> <p>I/J/L</p>	<p>Delete all development requirements for policy SB8 and replace with new development requirements to deliver 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.</p>	<p>The new housing numbers & change to site development requirements could result in loss and disturbance to the riverside habitat and impacts to habitat functionally linked to the Bath & Bradford on Avon SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>
<p>SB22 New Policy for Locksbrook Creative Hub</p> <p>Requires mitigation clause</p> <p>I/J/L</p>	<p>POLICY SB 22: DEVELOPMENT REQUIREMENTS AND</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitats and disturbance/loss to land functionally linked to SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>
<p>SB23 New Policy</p> <p>I/J/L</p> <p>Site requirements provide mitigation</p>	<p>SB23 Weston Island – the proposal is to accommodate builders merchants or similar depot type development within the existing hard-standing within the site, and subject to various development requirements</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitats and disturbance/loss to land functionally linked to SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>
<p>SB18 RUH</p> <p>Requires mitigation</p>	<p>Policy SB18 for RUH – this policy has been changed to increase the development requirements needed, and to increase the housing units delivered.</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitat features, particularly loss of mature trees.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>

<p>New Policy SB 24</p> <p>I/J/L</p> <p>Site requirements provide mitigation</p>	<p>Policy SB24 New allocation for Sion Hill</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitat features, particularly loss of mature trees.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>
<p>New allocation SB25</p> <p>J?</p> <p>Site requirements provide mitigation</p>	<p>SB25 St Martin's Hospital POLICY APPROACH – new site allocation to deliver 50 dwellings</p>	<p>The new development could result in habitat loss or disturbance to key habitat features.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>
<p>Policy SB19</p> <p>J/K/L ?</p> <p>Site requirements provide mitigation</p>	<p>Development Framework Plan The strategy seeks the development of around 870 study bedrooms and 48,000 sq.m. of academic, research and support space at the Claverton Campus to address the potential long-term development needs of the University of Bath.</p>	<p>The changes provide greater clarification for how the site should be developed including detailed development requirements,</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>
<p>New Policy SB26</p> <p>I/J/L?</p> <p>Site requirements provide mitigation</p>	<p>POLICY SB26: PARK AND RIDE SITES -this new policy specifies what the existing park and ride sites should deliver.</p>	<p>The changes will result in more development and some change in function of the existing sites, and could result in some loss of existing habitats and landscape and an increase in lighting</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>

<p>Policy KE2b</p> <p>K/J ?</p> <p>Possible river habitat issues / lighting?</p> <p>Site requirements provide mitigation</p>	<p>RIVERSIDE AND FIRE STATION SITE – the changes alter development expectations and development requirements for the site</p>	<p>The changes could result in increased light spill to the river</p>	<p>Potential for non-physical disturbance through disruption to flight paths and access to foraging areas through noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially-without mitigation</p>
<p>New Policy KE3c</p> <p>Site requirements need additional clause to address light spill</p>	<p>The new policy requires Delivery of residential development (Class C3) of around 210 dwellings in the plan period, in the areas as shown on the concept diagram, and also set out a number of development requirements.</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially-without mitigation</p>
<p>New Policy KE3d</p> <p>J/L?</p> <p>Site requirements provide mitigation</p>	<p>The new policy requires Delivery of residential development (Class C3) of around 70 dwellings in the plan period, in the areas as shown on the concept diagram, and also set out a number of development requirements.</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially-without mitigation</p>

<p>PMP:SSV9: Old Mills Industrial Estate</p> <p>Site requirements provide mitigation</p>	<p>OLD MILLS INDUSTRIAL ESTATE (Incorporating Somer Valley Enterprise Zone)</p> <p>The changes include various new development requirements designed to safeguard the environment, but also allows some new development</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially-without mitigation</p>
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An Appropriate Assessment of these elements of the plan is therefore required. This must determine whether or not they would result in an adverse effect on the integrity of the European sites (see **Section 5**), allowing for any mitigation solutions proposed, to avoid such impacts.

Many of the policies are already worded to avoid or reduce potential adverse effects. The effectiveness of these are considered first within the Appropriate Assessments, and where necessary further recommendations are made.

5) Appropriate Assessment

This section presents the findings of the Appropriate Assessment stage of the HRA. The screening conclusions were summarised in Tables 4.2 and 4.3. Those policy changes for which likely significant effects are uncertain (coloured amber) or likely (coloured red) in table 4.3 have been considered in more detail in relation to the relevant European sites to determine whether they would result in adverse effects on integrity of the European site(s) alone or in combination with other plans or projects. This process of assessment included consideration of any proposed mitigation measures, and, identified any additional mitigation requirements that may be needed. Where additional measures are needed specific recommendations for further plan changes are made.

The overarching conservation objectives for every European Site in England are to ensure that the integrity of each site is maintained or restored as appropriate, and that each site contributes to achieving the aims of the Habitats and/or Wild Birds Directive, by either maintaining or restoring (as appropriate):

- The extent and distribution of their qualifying natural habitats;
- The structure and function (including typical species) of their qualifying natural habitats;
- The supporting processes on which their qualifying natural habitats rely;
- The supporting processes on which the habitats of their qualifying features rely;
- The population of each of their qualifying features; and
- The distribution of their qualifying features within the site.

Reference has been made to these conservation objectives along with relevant issues and actions in the Natural England Site Improvement Plans to help understand what ongoing management and/or new initiatives are or have been put in place to try to address some of these impacts, and to identify any additional potential mitigation measures that could be implemented to avoid adverse effects on integrity.

Appropriate Assessment conclusions

Bath and Bradford-on-Avon Bats SAC

The screening assessment concluded there may be likely significant effects from off-site habitat loss or damage, non-physical disturbance and recreation pressure on the Bath and Bradford-on-Avon Bats SAC. The potential for these effects to result in adverse effects on integrity of the site has been assessed in more detail below.

Site Description

The SAC as a whole supports 15% of the UK population of Greater Horseshoe bats *Rhinolophus ferrumequinum*, internationally-significant populations of Lesser Horseshoe *Rhinolophus hipposideros* and Bechstein's bats *Myotis bechsteinii*.

Appendix C: In-combination assessment of other plans and projects

The SAC comprises four component sites: Brown's Folly, Box Mine, Winsley Mines, and Combe Down and Bathampton Down Mines. These are distributed over a wide geographical area to the south and east of Bath, both within and outside of the authority boundary. They have different known bat usages, which over the whole of the SAC include breeding, hibernation, swarming and dispersal. The sites are all abandoned limestone mines and some include areas of supporting habitat: broadleaved woodland and species rich calcareous grassland. The surrounding landscape provides feeding and commuting opportunities between the component SSSIs, other SAC sites and other undesignated roosts which is vital in supporting the bats throughout their life cycle.

Features of significance within the wider landscape are watercourses, woodland, grazed pasture, hay meadows, hedgerows, linear trees and scrub. Within the city of Bath, the River Avon corridor has been subject to quite detailed surveys and is recognised as functionally linked habitat to the SAC.

Physical Damage/Loss – off-site habitat

None of the policy changes promote development within the boundary of the SAC, however, the qualifying bat species are sensitive to off-site habitat loss within 8km of the SAC (as set out in the screening assumptions). There is therefore some potential for adverse effects on site integrity to occur due to development at Bath arising through some site allocations, and potentially elsewhere at the edges of Bath from other policies such as the renewable energy policy, transport policies and possible windfall developments.

Mitigation

The wording of the majority of new and amended policies and site allocations of potential concern (See table 4.3 eg, renewables policy; transport policies); do include requirements or clauses to prevent damaging off-site Physical Damage/Loss. Where needed specific site development requirements have been added to site allocations, and amendments have been made to the renewables energy policy for both wind and solar energy generation, and for transport related policies. The only exceptions are for site allocation SB18; RE1 and SB22 which all require additional mitigation clauses. Specific recommendations are set out below.,

Mitigation Recommendations:

- For SB18RUH –a protective clause to prevent loss of key habitat required. A similar approach for that included in the Development Requirements for Sion hill is recommended
- For SB22 – a protective clause to retain riverside is recommended. A similar approach to Bath Western Riverside could be used
- For RE1- recommend adding “where not habitat functionally linked to a European site” after “previously developed land”

The strengthening of the Natural Environment planning policies and addition of the Biodiversity Net Gain Policy should prevent impacts from windfall development, and project level HRAs will be required as appropriate for individual projects.

Non-physical disturbance

Some site allocations within Bath are within 500m of the SAC components/or SAC supporting habitat, and have the potential to cause non-physical disturbance through potential lighting impacts. In addition Windfall developments and the renewables policy could cause effects within 500m of the SAC components/or SAC supporting habitat, and have the potential to cause non-physical disturbance through potential lighting impacts.

Mitigation

The new and amended policies and site allocations of potential concern include requirements or clauses to prevent damaging Non-physical disturbance. This is particularly the case for site allocations adjacent to the river Avon through Bath which is recognised as functionally linked habitat for the SAC. The council's guidance document "Protecting Bats in Waterside Development", which provides detailed guidance to ensure lighting design of the new development avoids light spill into the River Avon corridor, is also referenced, and specific site development requirements are included for site allocations where needed. The only exceptions are for site allocation SB18; RE1 and SB22 which all require additional mitigation clauses. Specific recommendations are set out below.,

Mitigation Recommendations :

- For SB18RUH –a protective clause to prevent harmful lighting is required. A similar approach for that included in the Development Requirements for Sion hill is recommended
- For SB22 – a protective clause to retain riverside habitat and to control light spill is recommended. A similar approach to Bath Western Riverside could be used
- For RE1 recommend adding "where not habitat functionally linked to a European site "after "previously developed land"

The renewables policy includes specific protective clauses as mentioned above, and project level HRAs will be required as appropriate for individual projects

Impact of Recreation

The SAC qualifying bat species are sensitive to illegal recreation pressures (e.g. one-off events such as: fire juggling near to the maternity colony; use of aerosol spray paints underground; use of fuel of any type underground, general disturbance underground, and bonfires at the mine entrances). It could therefore be at risk from increased recreation pressure due to the increased population at Bath resulting from the increased housing numbers and location of the site allocations.

The Site Improvement Plan notes that it is very difficult to close the sites to public access. However, the sites are privately owned and managed with locked grills in such a way that visitor disturbance should not present a significant pressure unless the volume and frequency of visitors were to increase significantly, leading to the increase of illegal entry and disturbance. It is considered unlikely that the increased population planned for the urban areas of Bath will significantly increase the one-off illegal events near to, or within the SAC sites.

Mitigation

There is a commitment to, and policy changes within the LPPU to maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment. This may help to offer alternative more easily accessible recreation destinations for new residents rather than the Bath and Bradford-on Avon Bats SAC. In addition new housing allocations seek to provide additional green spaces.

Summary of Appropriate Assessment conclusions for Bath and Bradford-on-Avon Bats SAC

Given the mitigation clauses within the policies and site allocations initially identified as being of potential concern in terms of likely significant effects on the Bath & Bradford on Avon Bat SAC, and given the strengthening of the Green infrastructure policies, the Natural Environment Policies and the Lighting policy, and, given the new Biodiversity Net Gain Policy, AND, subject to the recommendations listed above, it is likely that any potential for adverse effects on the integrity of this SAC from off-site habitat loss or damage, non-physical disturbance, and from recreational pressures or damage would be avoided

Chew Valley Lake SPA

The Screening assessment concluded uncertainty about likely significant effects from possible physical loss or damage and changes in water quantity on the Chew Valley Lake SPA. The potential for these effects to result in adverse effects on integrity has been assessed in more detail below.

Site description

Chew Valley Lake is a large, shallow, artificial reservoir with some fringing reedbeds, carr woodland and grassland. The water conditions are eutrophic and open water plant communities are rather sparse, largely comprising Fennel Pondweed *Potamogeton pectinatus* and Lesser Pondweed *Potamogeton pusillus*, Opposite-leaved Pondweed *Groenlandia densa* and Water-crowfoot *Ranunculus* spp. On neutral soils around the reservoir, Pepper-saxifrage *Silaum silaus*, Burnet-saxifrage *Pimpinella saxifraga* and Devil'sbit Scabious *Succisa pratensis* occur, and on calcareous soils Fairy Flax *Linum catharticum*, Dwarf Thistle *Cirsium acaule* and Salad Burnet *Sanguisorba* minor subsp. minor are found. The open water of the reservoir and its margins are of greatest value for wintering waterbirds, including Northern shoveler, which is the qualifying species for this SPA.

Physical Damage/Loss – off-site habitat

No development is proposed within the boundary of the SPA through the LPPU, however, the qualifying bird species are sensitive to off-site habitat loss within 2-4km of the SAC (as set out in the screening assumptions). There is therefore some potential for likely significant effects to occur due to windfall developments and potentially from the renewables policy.

Mitigation

The new and amended policies of potential concern (See table 4.3, eg.renewables policy; transport policies) include requirements or clauses to prevent damaging off-site Physical Damage/Loss. In addition the Natural Environment Policies are strengthened and would protect the site from any damaging effects from windfall developments, and the renewables policy also includes specific clauses to protect mobile species.

Water Quantity and Quality

The site is owned and managed by Bristol Water Plc to supply drinking water to the city of Bristol and surrounding area. Natural England's Site Improvement Plan notes there is evidence that water levels can significantly impact upon the suitability of the site for its qualifying bird species (Northern shoveler) (a relationship indicated by Wetland Bird Survey data). This issue is affected both by annual changes in rainfall and the functioning of the reservoir. Both increases and reductions can impact upon the Northern shoveler, due to their need for soft mud in which to feed.

Bristol Water noted in its position summary within the JSP Infrastructure Position Statement (April 2018) "we do not at present anticipate any potential deficit in water supplies until into the 2030's, at which point new water sources or methods to reduce demand for water may need to be sought".

Bristol Water has prepared its Water Resources Management Plan (WRMP) for the period 2020 to 2045. The WRMP identifies potential deficits in the future availability of water, taking into account predicted future demand for water based on government data for population and housing growth plans (i.e. Local Plans and the SDS).

Bristol Water predicts that there will be a small supply-demand deficit over the planning period. This will be resolved through the following measures:

Leakage Reduction / Distribution Management Options:

- Option D21 (Active Leakage Control): The continuation of the current leakage detection find and fix policy.
- Option D22 (Pressure Management): A programme of distribution pressure management to reduce leakage.
- Option PO20 (Reduced leakage from raw water mains): A programme of leakage detection for raw water mains.

Supply-side Options:

- Option R32 – Reduction of bulk transfer agreement with Wessex Water.

These options have been screened for their potential to affect European sites in an HRA for the Draft WRMP. There are no options to modify the use of Chew Valley Lake in water supply. The conclusion of the HRA of the consultation draft WRMP is that Bristol Water's WRMP will not have any significant effects on European sites (including Chew Valley Lake SPA) that cannot be avoided at the scheme-level with normal best-practice measures. As a result, the preliminary conclusion of the HRA of the consultation draft WRMP is that the plan will have no significant effects, alone or in combination. It is therefore considered unlikely that there will be adverse effects on integrity of the SPA as a result of changes in water quantity from the LPPU alone or in-combination with other plans or projects.

Summary of appropriate assessment conclusions for Chew Valley Lake SPA:

Given the mitigation clauses within the policies of potential concern, given the strengthening of the Natural Environment Policies, and given the new Biodiversity Net Gain Policy, it is likely that the potential for adverse effects on integrity of this SPA from off-site habitat loss or damage, or water quantity or quality impacts would be avoided.

North Somerset and Mendip Bats SAC

The Screening assessment concluded uncertainty about likely significant effects from off-site habitat loss/damage and non-physical disturbance for the North Somerset and Mendip Bats SAC.

The potential for these effects to result in adverse effects on integrity has been assessed in more detail below.

Site Description

The Cheddar complex and Wookey Hole areas support a wide range of habitats which provide feeding grounds for bats. These include semi-natural dry grasslands of which the principal community present is sheep's-fescue – meadow oat-grass (*Festuca ovina* – *Helictotrichon pratense*) grassland which occurs on rock ledges and on steep slopes with shallow limestone soil, especially in the dry valleys and gorges and on the south-facing scarp of the Mendips. King's Wood and Urchin Wood have developed over limestone which outcrops in parts of the site and forms a steep scarp to the south-east. There is mostly oak *Quercus robur* and ash *Fraxinus excelsior* woodland, though some areas are dominated by small-leaved lime *Tilia cordata* with both maiden and coppice trees. Other canopy trees include yew *Taxus baccata*, cherry *Prunus avium* and wild service tree *Sorbus torminalis*. There is a rich ground flora including many ferns and mosses.

The limestone caves and mines of the Mendips and the north Somerset hills provide a range of important breeding and hibernation sites for lesser horseshoe bat *Rhinolophus hipposideros* and greater horseshoe bat *Rhinolophus ferrumequinum*.

Physical Damage/Loss – off-site habitat

No development is proposed within the boundary of the SAC through the LPPU, however, the qualifying bat species are sensitive to off-site habitat loss within 8km of the SAC (as set out in the screening assumptions). There is therefore some potential for likely significant effects to occur due to windfall development and from policies such as the renewable energy policy (see Table 4.3).

Mitigation

The new and amended policies of potential concern (see table 4.3) include clauses to prevent damaging off-site Physical Damage/Loss. The strengthening of the Natural Environment planning policies and addition of the Biodiversity Net Gain Policy should prevent impacts from windfall developments. Project level HRAs will be required as appropriate for individual projects.

Non-physical disturbance

No site allocations are proposed within 500m of the SAC. Windfall developments and the renewables policy could cause effects within 500m of the SAC components/or SAC supporting habitat, and have the potential to cause non-physical disturbance through potential lighting impacts.

Mitigation

The renewables and transport policies of potential concern includes clauses to prevent damaging Non-physical disturbance, particularly in terms of lighting. In addition strengthening of the Natural environment policies, and the lighting policy would ensure no adverse impacts on site integrity. Project level HRAs will be required as appropriate for individual projects.

Summary of Appropriate Assessment conclusions for the North Somerset & Mendips Bat SAC

Given the mitigation clauses within the policies initially identified as being of potential concern in terms of likely significant effect on the North Somerset and Mendips Bat SAC (see table 4.3), and given the strengthening of the Green infrastructure policies, the Natural Environment Policies and the Lighting policy, and, given the new Biodiversity Net Gain Policy, it is likely that any potential for adverse effects on the integrity of this SAC from off-site habitat loss or damage, and non-physical disturbance would be avoided.

Table 5.7: Summary of Appropriate Assessment conclusions for the screened in European sites

European Site	Physical Damage/Loss	Non-physical Disturbance	Air Pollution	Recreational Pressures	Water Quantity or Quality
Bath and Bradford-on Avon Bats SAC	No AEOI	No AEOI	No LSE	NO AEOI	No LSE
Chew Valley Lake SPA	No AEOI	No LSE	No LSE	No LSE	No AEOI
North Somerset and Mendip Bats SAC	No AEOI	No AEOI	No LSE	No LSE	No LSE

Conclusions and recommendations

The appropriate assessment stage of the LPPU HRA has concluded that, subject to some recommendations for additional site development requirement for a limited number of allocations and a small change to one policy, the LPPU will not have an adverse effect on the integrity of any of the European sites included in the HRA, either alone or in combination with other plans and projects. This is based upon consideration of the sites conservation objectives, site attributes, impact pathways and the mitigation measures included within new and amended policies, and within site development requirements for new or amended site allocations.

The assessments and conclusions are based upon assumptions and consideration of effects appropriate to the scale of the plan. The full effects of the existing approved plan, and these plan changes cannot be known until the plan is implemented and individual development projects come forward. Many individual development projects have and will need to be subject to project level HRA. For this reason the plan includes the following statement :

“For clarity, development likely to have a significant effect on a European site either alone or in combination with other plans or projects, and which cannot be adequately mitigated, would not be in accordance with the Development Plan”

Appendix C: In-combination assessment of other plans and projects

For greater clarity, particularly in relations to windfall developments, it is recommended that this existing statement is expanded to include the following :

Any planning project with potential direct or indirect impacts on these sites must be appropriately assessed, mitigated, and/or compensated for, in line with existing best practice and relevant legislation over the lifetime of the Plan. This would require project level Habitats Regulation Assessments to be carried out, as necessary, prior to final planning decisions being made on such projects

References:

Tyldesley, D and Chapman, C (2013) *The Habitats Regulations Assessment Handbook*, DTA Publications Limited

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Avon Gorge Woodlands SAC</p>	<p>Annex 1 Habitats that are a primary reason for selection:</p> <ul style="list-style-type: none"> • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* <p>Annex 1 Habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely 	<p><u>Public Access/Disturbance:</u> The site is under a lot of pressure from recreational pressure with key issues relating to inappropriate activities, such as mountain biking being undertaken without consent.</p> <p><u>Air Pollution: impact of Pressure Not yet determined atmospheric nitrogen deposition:</u> Nitrogen deposition exceeds site-relevant critical loads. The site is situated on the edge of a city and there are major roads and other transport routes currently running directly through and adjacent to it.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Bath and Bradford-on-Avon Bats SAC</p>	<p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat • S1323. Myotis bechsteinii; Bechstein`s bat 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p>	<p><u>Direct impact from third party:</u> Impacts to roosting bats as a result of vandalism and/or recreational pursuits.</p>
	<p>Annex II species present as a qualifying feature, but not a primary reason for selection of the site:</p> <p>S1303. Rhinolophus hipposideros; Lesser horseshoe bat</p>	<ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, The distribution of qualifying species within the site. 	<p><u>Offsite habitat Threat availability/management:</u> There are potential for impacts to occur from development as a result of habitat loss/ fragmentation/severance of key commuting/foraging corridors.</p> <p><u>Public Access/Disturbance:</u> From one-off events, such as fire juggling near to the maternity colony; use of aerosol spray paints underground; use of fuel of any type underground, and bonfires at the mine entrances.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Chew Valley SPA</p>	<p>Internationally important bird assemblage. This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>Over winter:</p> <ul style="list-style-type: none"> • A056. Anas clypeata; Northern shoveler (Non- breeding) 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, <ul style="list-style-type: none"> • The distribution of the qualifying features within the site. 	<p><u>Hydrological changes:</u> The site is owned and managed by Bristol Water Plc to supply drinking water to the city of Bristol and surrounding area. There is evidence that water levels can significantly impact upon the suitability of the site for shoveler.</p> <p><u>Public Access/Disturbance:</u> The site supports a large number of visitors to the site who use the area for fishing for trout and pike, sailing, and walking. It is uncertain whether existing facilities are sufficient for the number of visitors to the site.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Mells Valley SAC</p>	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia); Dry grasslands and scrublands on chalk or limestone • H8310. Caves not open to the public <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • S1304. <i>Rhinolophus ferrumequinum</i>; Greater horseshoe bat 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. 	<p><u>Public</u> <u>Offsite habitat Threat availability/ management:</u> There are potential for impacts to occur from development as a result of habitat loss/ fragmentation/severance of key commuting/foraging corridors. <u>Access/Disturbance:</u> The Old Ironstone Works Mells is regularly accessed by the public and as a result has the potential to disturb known hibernaculum. <u>Wildfire/ arson</u> There evidence of fires within the Old Ironstone Works Mells, which has potential to affect hibernating bats. <u>Direct impact from third party:</u> There is a significant problem with trespass vandalism and associated disturbance. This has potential to affect roosting bats. <u>Air Pollution: impact of Pressure</u> Not yet determined atmospheric nitrogen deposition: Nitrogen deposition exceeds site relevant critical loads</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Mendip Limestone Grasslands SAC</p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia); Dry grasslands and scrublands on chalk or limestone <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> • H4030. European dry heaths • H8310. Caves not open to the public • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. 	<p><u>Air Pollution: impact of atmospheric nitrogen deposition:</u> Nitrogen deposition exceeds site relevant critical loads. Impacts of exceedance could include: changes in ground vegetation; decline in lichens; decline in diversity; increased mineralisation; N leaching; surface acidification, and increased sensitivity to abiotic stress.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Mendip Woodlands SAC</p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> The extent and distribution of qualifying natural habitats The structure and function (including typical species) of qualifying natural habitats, and The supporting processes on which qualifying natural habitats rely 	<p><u>Vehicles: illicit:</u> Asham Wood has a history of trespass by off road vehicles. This has resulted in serious damage to parts of the ride network and also to the woodland proper.</p> <p><u>Air Pollution: impact of atmospheric nitrogen deposition:</u> Nitrogen deposition exceeds site relevant critical loads. Impacts of exceedance could be manifested in changes in ground vegetation but there are currently no noticeable effects on the site.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>North Somerset and Mendip Bats SAC</p>	<p>Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> • H8310. Caves not open to the public <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • S1303. Rhinolophus hipposideros; Lesser horseshoe bat • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying • species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site 	<p><u>Planning Permission:</u> <u>general:</u> Development on the land between the sites that make up the North Somerset and Mendip SAC could have an impact on bats through loss of foraging habitat, loss of minor roost sites, and disruption of flightpaths.</p> <p><u>Air Pollution:</u> impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds site-relevant critical loads.</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Salisbury Plain SAC and SPA</p>	<p><u>SAC</u> Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> • 5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>). (Dry grasslands and scrublands on chalk or limestone) • 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco Brometalia</i>) (* important orchid sites) <p>Annex II species that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • 1065 Marsh fritillary <p><u>SPA</u> This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season; Stone Curlew <i>Burhinus oedicephalus</i>, 22 pairs representing at least 11.6% of the breeding population in Great Britain (Count as at 1998)</p> <p>Over winter;</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features/aims of the Wild Bird Directive, by maintaining or restoring;</p> <p><u>SAC</u></p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. <p><u>SPA</u></p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and • The distribution of the qualifying features within 	<p>The below issues are relevant to the SAC and SPA:</p> <ul style="list-style-type: none"> • Changes in species distribution, particularly the juniper population due to management • Air pollution due to atmospheric nitrogen deposition which currently exceeds critical loads

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

	<p>Hen Harrier <i>Circus cyaneus</i>, 14 individuals representing at least 1.9% of the wintering population in Great Britain (RSPB 1996/7)</p> <p>Qualifying individual species not listed in Annex I of the Wild Birds Directive (Article 4.2)</p> <p>During the breeding season the SPA regularly supports:</p> <ul style="list-style-type: none"> • Hobby <i>Falco subbuteo</i> <p>At the time of its classification in 1993, the SPA supported 1% of the British breeding population.</p> <p>The hobby occurs on this SPA as a nationally important breeding population of a regularly occurring migratory species. This small falcon arrives in Britain during April each year to breed and returns to its wintering grounds in Africa during September/October.</p> <p>Within or close to the SPA, it nests in small woods (e.g. Everleigh Ashes, outside of the SPA) or more isolated copses, with Scots pine and Douglas fir being favoured trees (Wiltshire Ornithological Society - records). They always use the old nests of other species, usually carrion crow and raven. The hobby feeds on insects and small birds, usually caught on the wing.</p> <p>During the breeding season the SPA regularly supports:</p> <ul style="list-style-type: none"> • Common Quail <i>Coturnix coturnix</i> 	<p>the site</p>	
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Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

	<p>At the time of its classification in 1993, the SPA supported approximately 20% of the British breeding population. The common quail occurs as a nationally important breeding population of a regularly occurring migratory species not listed in Annex 1. It is the UK's only migrant gamebird. Within or close to the SPA, the quail nests and feeds in chalk grassland and arable land, particularly meadow-like wild grasslands and winter cereals, with a vegetation structure that allows good movement with protection from avian predators and with a source of insect food (Wiltshire Ornithological Society, 2007). The quail feeds on seeds and insects on the ground.</p>		
Site	Qualifying features	Conservation objectives	Key
<p>Severn Estuary SAC, SPA and Ramsar</p>	<p>SAC Annex I habitats that are a primary reason for the selection of the site:</p> <ul style="list-style-type: none"> • 1130. Estuaries • 1140. Mudflats and sandflats not covered by seawater at low tide • 1330. Atlantic salt meadows (<i>Glauco Puccinellietalia maritimae</i>) <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, 	<p><u>Public Access/Disturbance:</u> There are a wide range of recreational activities within the site (walking, dog walking, horse riding, biking, beach activities, angling, wildfowling, other shooting (e.g. clay pigeon)) that may cause damage to habitats where</p>

Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

	<ul style="list-style-type: none"> • 1110. Sandbanks slightly covered by sea water all the time • 1170. Reefs <p>Annex II species that are a primary reason for selection of the site:</p> <p>of the site:</p> <ul style="list-style-type: none"> • 1095. <i>Petromyzon marinus</i> (Sea lamprey) • 1099. <i>Lampetra fluviatilis</i> (River lamprey) • 1109. <i>Alosa fallax</i> (Twaite shad) <p>SPA This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over winter:</p> <ul style="list-style-type: none"> • A037. <i>Cygnus columbianus bewickii</i> (Bewick's swan) • Internationally important bird assemblage. 	<p>and,</p> <ul style="list-style-type: none"> • The distribution of the qualifying features within the site. 	<p>pressure is high.</p> <p><u>Impacts of development:</u></p> <p><u>Water Pollution</u> There is uncertainty over water quality in the Estuary due to diffuse and/or direct pollution.</p> <p><u>Air Pollution:</u> impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds site relevant critical loads, with potential impacts on vegetation structure and diversity.</p> <p>Fisheries: Recreational marine and estuarine: There are potential impacts from recreational bait digging and recreational fishing/angling.</p> <p><u>Fisheries: Commercial marine and estuarine:</u> Dredges, benthic trawls and seines are categorised as 'red' for the reef features as part of Defra's revised approach to commercial fisheries management in European Marine Sites (EMS).</p>
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Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

	<p>This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>On passage:</p> <ul style="list-style-type: none"> • <i>Charadrius hiaticula</i> (Ringed plover) • <i>Calidris alpina alpina</i> (Dunlin) • <i>Nuntenius phaeopus</i> (Whimbrel) • <i>Tringa tetanus</i> (Redshank) <p>Over winter:</p> <ul style="list-style-type: none"> • A394. <i>Anser albifrons albifrons</i>; Greater white-fronted goose (Non-breeding) • A048. <i>Tadorna tadorna</i>; Common shelduck <p>(Non-breeding)</p> <ul style="list-style-type: none"> • A051. <i>Anas strepera</i>; Gadwall (Non-breeding) • A149. <i>Calidris alpina alpina</i>; Dunlin (Non-breeding) • A162. <i>Tringa totanus</i>; Common redshank (Non-breeding) <p>The Estuary also supports nationally important wintering populations of a further 10 species:</p> <ul style="list-style-type: none"> • <i>Anas Penelope</i> (Wigeon) • <i>Anas crecca</i> (Teal) • <i>Anas acuta</i> (Pintail) • <i>Aythya ferina</i> (Pochard) 		<p>Commercial fishing activities categorised as ‘amber or green’ under Defra’s revised approach to commercial fisheries in EMSs require assessment and management.</p>
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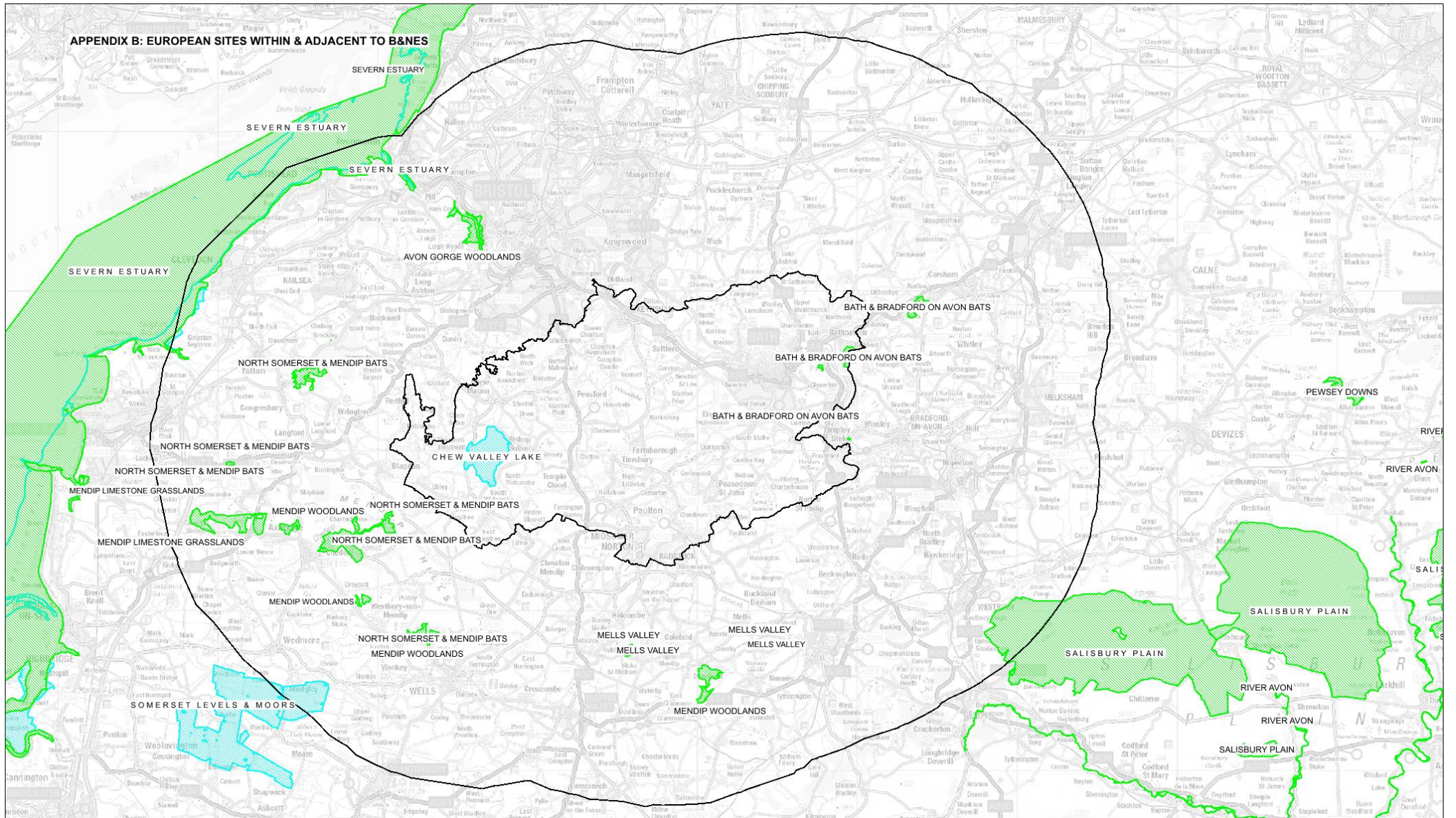
Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

	<ul style="list-style-type: none"> • Aythya fuligula (Tufted duck) • Charadrius hiaticula (Ringed plover) • Pluvialis squatarola (Grey plover) • Numenius arquata (Curlew) • Nuntenius phaeopus (Whimbrel) • Tringa tetanus (Redshank) <p>Ramsar</p> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.</p> <ul style="list-style-type: none"> • Criterion 1: Presence of Annex I features listed above for SAC. • Criterion 3: Unusual estuarine communities. • Criterion 4: Run of migratory fish between sea and river via estuary. • Criterion 5/6: Bird assemblages and species of international importance. • Criterion 8: Diverse fish populations, important feeding, nursery ground and migration route 		
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Appendix A: European sites within or adjacent to B&NES with qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
<p>Somerset Levels and Moors SPA and Ramsar</p>	<p>SPA</p> <p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over winter:</p> <ul style="list-style-type: none"> • A037 <i>Cygnus columbianus bewickii</i>; Bewick’s swan (Non-breeding) • A140 <i>Pluvialis apricaria</i>; European golden plover (Non-breeding) • Waterbird assemblage <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>Over winter:</p> <ul style="list-style-type: none"> • A052 <i>Anas crecca</i>; Eurasian teal (Non-breeding) • A142 <i>Vanellus vanellus</i>; Northern lapwing (Non-breeding) • <i>Anas clypeata</i> (Shoveler) 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site. 	<p><u>Drainage:</u> Excessive drainage reduces the extent of feeding and roosting sites for SPA birds.</p> <p><u>Inappropriate water levels:</u> Summer flooding and prolonged and deep winter flooding has been a major problem on the Somerset Levels. These events can reduce the extent of feeding and roosting sites for SPA birds.</p> <p><u>Public Access/Disturbance:</u> Dog walking and other activities can cause disturbance to SPA birds</p> <p><u>Offsite habitat availability/management:</u> There are potential impacts as a result of loss of offsite foraging and nesting habitats.</p>

APPENDIX B: EUROPEAN SITES WITHIN & ADJACENT TO B&NES



In-combination assessment of other plans and projects
<p>The consideration of in-combination effects is based upon a shortened and updated list of plans identified for in-combination scrutiny through the West of England Joint Spatial Plan Updated Habitats Regulations Assessment 2018.</p>
<p>Regional Plans</p>
<p>West of England Joint Green Infrastructure Strategy (2020-2030)</p>
<p>Status The Joint Green Infrastructure Strategy (JGIS) has been produced and endorsed by the West of England Combined Authority (WECA) and Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire councils.</p> <p>The JGIS is a prospectus for how organisations and key partners can engage in joint programmes and projects to work collaboratively to ensure GI is recognised as a key component of providing sustainable places for people and wildlife</p> <p>It can support measures which support the resilience of European sites. Therefore, there are no likely in-combination effects of the adopted West Of England Joint Green Infrastructure Strategy with the Partial Update of the B&NES Local Plan</p>
<p>West Of England Joint Waste Core Strategy (2011)</p>
<p>Status The West Of England Joint Waste Core Strategy was produced in February 2011 and was adopted by Bath & North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council in March 2011.</p> <p>Development Provision The Waste Core Strategy safeguards operational waste sites and allocates the following residual waste sites over the plan period to 2026:</p> <p>Bath and North East Somerset</p> <ul style="list-style-type: none"> - BA19 Broadmead Lane, Keynsham - BA12 Former Fuller’s Earth Works, Fosseway - Land located on existing industrial land in Yate within Strategic Area A - on land located on existing industrial land in Yate within Strategic Area A? <p>Bristol</p> <ul style="list-style-type: none"> - BR505 Hartcliffe Way - DS05 Merebank, Kings Weston Lane - DS06 BZL Site, Kings Weston Lane - DS07 Sevalco Plant (northern part), Severn Road - DS13 Rhodia Chemical Works, Kings Weston Lane - DS14 Gypsy and Traveller Site, Kings Weston Lane - DS15 Advanced Transport System Ltd Site, Severn Rd <p>South Gloucestershire</p> <ul style="list-style-type: none"> - SG39 South of Severnside Works <p>North Somerset</p> <ul style="list-style-type: none"> - IS8 Warne Rd, Weston-super-Mare - on land located within the redevelopment area of Weston within Strategic Area B <p>HRA The August 2009 HRA of the Waste Core Strategy concluded that there are no likely significant effects on European sites for the impacts of traffic emissions, hydraulic – ground water, hydraulic – surface water</p>

Appendix C: In-combination assessment of other plans and projects

and for some of the pollutants for stack emissions (eg heavy metals). The HRA was not able to conclude no likely significant effects for other effects including other stack emissions (eg NOx and NH3, nitrogen deposition and acid deposition) at some sites and disturbance to the Severn Estuary SPA for one site. However, these effects were predominantly in regard to sites that were not included in the adopted version of the plan.

In addition, the August 2009 HRA identified sites requiring consideration of bird mitigation to avoid likely significant effects. The requirements for this mitigation was also incorporated within the adopted version of the plan and sites at which development has been identified as likely to result in significant disturbance to birds must be able to demonstrate that no adverse effects on the integrity of European sites will result. moreover, the May 2010 and July 2010 HRA Recommendations were produced to ensure there would be no likely significant effects on European sites and these recommendations were incorporated within the adopted version of the plan.

Therefore, there are no likely in-combination effects of the adopted West Of England Joint Waste Core Strategy with the Partial Update of the B&NES Local Plan

West of England Joint Local Transport Plan 4 2020-2036 (2011)
<p>Status</p> <p>The West of England Joint Local Transport Plan 3 2011-2026 was produced in March 2011 and was adopted by Bath & North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council. Plan 4 is being developed (2020-2036), but not yet finalised?</p> <p>Development Provision</p> <p>The Transport Plan makes provision for 11 major transport schemes over the plan period to 2026:</p> <ul style="list-style-type: none">- Greater Bristol Bus Network- Bath Transportation Package- Ashton Vale to Temple Meads Rapid Transit- Weston Package Phase 1- South Bristol Link- North Fringe to Hengrove Package- Portishead Rail Corridor- M5 Junction 21 Bypass- Greater Bristol Metro- Emerson's Green to Temple Meads Rapid Transit- Callington Road Link/Bath Road Improvements <p>In addition, the plan makes provision for future significant transport schemes:</p> <ul style="list-style-type: none">- Further Rapid Transit routes in the main urban centres of Bath, Bristol and Weston-super- Mare;- Further Park and Ride schemes;- Further rail enhancements (with Network Rail and train operators) for example re-opening the Radstock to Frome line and the Henbury loop;- Improvements at M5 Junction 19;- Cycling and walking major scheme;- Banwell Bypass;- Second Avon Crossing (possible Highways Agency scheme);- A38 - A370 Barrow Gurney Bypass;- Whitchurch Bypass- Saltford Bypass;- Yate Package;- A4174 Avon Ring Road Package;- Temple Cloud/Clutton Bypass;- Infrastructure to support Weston-super-Mare new villages;- Investigation of additional transport links including a new road link between the M5 and South

Appendix C: In-combination assessment of other plans and projects

Bristol, A36/A46 link and M4 link.

Likely effects of major and significant transport schemes:

- Additional infrastructure improving road, rail, walking and cycling routes
- Additional road infrastructure to reduce congestion
- Improved sustainable transport infrastructure links
- Increased P&R infrastructure – including additional parking sites
- Additional railway lines and stations

HRA

The June 2010 HRA of the Transport Plan found there to be potential impacts with regard to air pollution effects (NOx and Nitrogen deposition from vehicles), habitat loss and fragmentation, increased recreation impacts on SPA/Ramsar bird species due to increased transport/ access to sites, noise and light disturbance to bird and bat species, and disturbance to flight paths of SPA/Ramsar bird species or bat species. However, the HRA concluded that no schemes in the plan were considered to have unavoidable likely significant effects on any international site and it anticipated that all of the potential effects can be avoided or mitigated at project level with a full HRA undertaken for each major transport scheme

Therefore, there are no likely in-combination effects of the adopted West of England Joint Local Transport Plan 3 with the Partial Update of the B&NES Local Plan.

Bristol Water: Water Resources Management Plan (2019)

Status

The existing Management Plan was produced in July 2019..

Plan Provision

The Management Plan sets out how, with the active participation of customers, Bristol Water proposes to ensure that there is a sufficient supply of water to meet the demand forecast from all customers over the 25-year planning period from 2020 to 2045. The Management Plan identifies a number of preferred options relating to supply, distribution management and leakage reduction, but concludes that no new supply options need to be developed.

HRA

The HRA of the Final Water resources Management Plan 2019 concludes that the plan will not have any significant effects that cannot be avoided at the scheme-level with normal best-practice measures, and that the plan will have no significant effects, alone or in combination.

Therefore, there are no likely in-combination effects of the emerging Bristol Water: Water Resources Management Plan with Partial Update of the B&NES Local Plan

Wessex Water: Water Resources Management Plan (2019)

Status

The existing Management Plan was produced in August 2019.

Plan Provision

The adopted Management Plans describe how Wessex Water expect to balance the demand for water from customers with available supplies and protect the environment over the next 25 years from 2020 to 2045.

HRA

The HRA of the adopted Management plan concluded that the plan is not likely to have a significant effect, alone or in combination, on the integrity of any European sites.

Therefore, there are no likely in-combination effects of the existing Wessex Water: Water Resources Management Plan with the Partial Update of the B&NES Local Plan.

Local Plans and Strategies adjoining the Bath & North East Somerset Plan area
Bristol Development Framework: Core Strategy (2011), Site Allocations and Development Management Policies (2014), Bristol Central Area Plan (2015)
<p>Status The adopted Local Plan comprises of the Core Strategy which was adopted in June 2011, the Site Allocations Development Management Polices document which was adopted in July 2014 and the Bristol Central Area Plan which was adopted in 2015. A new local plan is being prepared for examination in 2023.</p> <p>Housing Provision The adopted Core Strategy makes provisions for 30,600 homes during the plan period with the majority of these being delivered in the built up area. The remaining dwellings will be delivered in small unidentified sites and Green Belt areas of land.</p> <p>Employment Land Provision The adopted Core Strategy makes provisions for up to 236,000m2 of additional office floorspace during the plan period. Around 150,000m2 of this office floorspace will be delivered in the city centre, around 60,000m2 will be delivered in South Bristol and 26,000m2 will be delivered in town, district and local centres in the rest of the Bristol area.</p> <p>HRA The May 2014 HRA of the Bristol Core Strategy conducted Appropriate Assessment of Avon Gorge Woodlands SAC, Chew Valley Lake SPA, Mendip Limestone Grasslands SAC, North Somerset & Mendip Bats SAC And Severn Estuary SAC and SPA. It was concluded that there is unlikely to be significant adverse effects on all these European sites due to there being sufficient mitigation measures in place in the Core Strategy. Therefore, there are no likely in-combination effects of the adopted Bristol Local Plan with Partial Update of the B&NES Local Plan</p>
North Somerset Council Local Plan: Core Strategy (2017), Development Management Policies (2016), Site Allocations Plan (2018)
<p>Status The Core Strategy was adopted in April 2012. However, following a high court challenge nine policies were remitted for re-examination. One of the policies was re-adopted in September 2015 and the remaining policies were re-adopted following re-examination in January 2017. A new local plan is being prepared for examination in 2023.</p> <p>The Development Management Policies were adopted in July 2016 and the Site Allocations Plan was adopted in April 2018.</p> <p>Housing Provision The adopted Core Strategy makes provisions for 20,985 additional dwellings during the plan period up to 2026. The delivery of this housing development will be focussed in Weston urban area (6,300 dwellings), Weston Villages (6,500 dwellings), Clevedon, Nailsea and Portishead (5,100 dwellings), service villages (2,100 dwellings) and other settlements and countryside (985 dwellings).</p> <p>The 2018 adopted Site Allocations plan makes provisions for a slight increase in housing delivery at 22,285 additional dwellings during the plan period. This is due to the Core Strategy examination of remitted policies increasing flexibility at Weston-super-Mare, the towns and service villages by allowing new residential growth of an appropriate scale.</p> <p>Employment Land Provision The adopted Core Strategy makes provisions for 10, 100 additional jobs in the plan period until 2026. This will be delivered through 114 hectares of land for B1, B2 and B8 uses.</p>

Appendix C: In-combination assessment of other plans and projects

This employment development will be focussed in Weston urban area (43.82ha), Weston villages (37.70ha), Clevedon (8.95ha), Nailsea (1.40ha), Portishead (3.17ha) and the remainder of the district (18.87ha).

HRA

The February 2011 HRA of the Core Strategy concluded that there are sufficient mitigation measures in place to suggest that it is unlikely that there will be any significant adverse effects on European sites. The June 2015 HRA for the Development Management Policies document concluded that the mitigation measures detailed in the Core Strategy are sufficient to suggest that there is unlikely to be any significant adverse effects on European sites.

Therefore, there are no likely in-combination effects of the adopted North Somerset Local Plan with the Partial Update of the B&NES Local Plan

South Gloucestershire Local Plan: Core Strategy (2013), Policies, Sites and Places Plan (2017)

Status

The Core Strategy was adopted in December 2013 and the Policies, Sites and Places Plan was adopted in November 2017. A new local plan is being prepared for examination in 2023.

Housing Provision

The adopted Local Plan makes provisions for up to 22,545 additional dwellings during the plan period 2013- 2027. This housing development will be delivered in the North and East Fringes of Bristol urban area and in new sites in the rest of South Gloucestershire (new neighbourhood at Yate and housing opportunities at Thornbury).

Employment Land Provision

The adopted Local Plan makes provisions for safeguarding and providing additional economic development land in North Fringe of Bristol urban area (355Ha), East Fringe of Bristol urban area (147Ha), Yate and Chipping Sodbury (88Ha). Thornbury (19Ha), Rural Area (14Ha) and Severnside (635Ha).

HRA

The March 2011 HRA of the Core Strategy concluded that the majority of policies are unlikely to have significant adverse effects on European sites. However, it was suggested that a series of policies within the Core Strategy do have the potential to have a significant effect on the Severn Estuary N2K site. It was recommended that revision of policy wording and/or amendment to supporting text will remove the likelihood of these policies to have adverse significant effects on European sites. This recommendation was addressed within the plan.

The June 2016 HRA of the Policies, Sites and Places Development Plan document concluded that there is unlikely to be significant adverse effects upon European sites.

Therefore, there are no likely in-combination effects of the adopted South Gloucestershire Local Plan with the Partial Update of the B&NES Local Plan

Local Plans and Strategies adjoining the West of England Joint Spatial Plan area

Mendip District Council Local Plan Part I: Strategy and Policies 2006-2029 (2014)

Pre Submission Local Plan Part II: Sites & Policies (2018)

Status

The Mendip District Council Local Plan Part 1 was adopted in December 2014.

The Pre Submission Local Plan Part II was published in January 2018 and consultation was closed on 12th February 2018.

Housing Provision

The adopted Local Plan makes provisions for 9,635 additional dwellings during the plan period up to 2029 at a development rate of 420 dwellings per annum. The housing development will be delivered in Frome (2,300 dwellings), Glastonbury (1,000 dwellings), Street (1,300 dwellings), Shepton Mallet (1,300 dwellings), Wells (1,450 dwellings) and in rural areas (1,780 dwellings).

The Pre Submission Local Plan Part II put forward further allocations for housing increasing the total additional dwellings to 10,528 for the plan period. This represents a 21% for Frome, a 1% for Glastonbury, a 13% increase for Street and Shepton Mallet and a 9% increase for Wells compared to

Appendix C: In-combination assessment of other plans and projects

the growth proposals in the original Local Plan.

Employment Land Provision

The adopted Local Plan makes provisions for 7,391 additional jobs and 88,650m² of additional employment floorspace during the plan period up to 2029. The employment development will be delivered in Frome, Glastonbury, Shepton Mallet, Street and Wells.

The Pre Submission Local Plan Part II allocates 19.4ha of employment land, over the plan period, including 5.9ha in Frome, 7.5ha in Shepton Mallet, 1.7ha in Glastonbury and 4.3ha in Street.

HRA

The January 2011 HRA of the Local Plan Part I: Strategy and Policies, referred to in the HRA as the Core Strategy, concluded that there is unlikely to be any significant adverse effects on European sites. This was subject to recommended policy amendments and additions being made in the plan to comply with the requirements of HRA and remove the need for any further assessment.

The December 2017 HRA of the Pre Submission Local Plan Part II: Sites & Policies concluded that there is unlikely to be any significant adverse effects on European sites so long as policy wording for STR001, WAL022b and WAL026 were amended in line with the recommendations of the HRA. This recommendation has been included within the plan.

Therefore, there are no likely in-combination effects of the adopted Mendip Local Plan Part I: Strategy and Policies and the Local Plan Part II: Sites & Policies with the Partial Update of the B&NES Local Plan

Sedgemoor Local Plan 2011-2032 (2017)

Status

Local Plan was adopted in February 2019.

Housing Provision

The Local Plan makes provision for 13,530 new homes over the plan period from 2011-2032,

Employment Land Provision

The Local Plan makes provision for 75ha of employment land to create 9,795 new jobs over the plan period from 2011-2032

HRA.

The July 2018 HRA of the Proposed Submission Local Plan 2011-2032 concludes that, provided the counteracting measures recommended by the HRA are incorporated into the plan, the plan is unlikely to have a significant effect on the conservation objectives of European sites. The plan was submitted for examination in January 2017 and therefore these recommendations had not yet been incorporated within the plan. However, proposed modifications to the plan address these recommendations. (Assume these recommendations were taken on -havnt found final HRA!)

Therefore, there are no likely in-combination effects of the emerging Sedgemoor Local Plan with the . Partial Update of the B&NES Local Plan

Commented [KR1]: Need to resolve

Wiltshire Local Plan: Core Strategy (2015), saved Local Plan (2003-2012) Policies

Status

The adopted Local Plan comprises the Core Strategy, saved Local Plan (2003-2012) Policies and the Chippenham Site Allocations Plan. The Core Strategy was adopted in 2015, the Chippenham Site Allocations Plan was adopted in 2017. The saved former District Council Local Plan policies were adopted in 2003 (Salisbury District Local Plan), 2004 (Kennet District Local Plan and West Wiltshire District Plan), 2006 (North Wiltshire Local Plan), 2009 (West Wiltshire Leisure and Recreation DPD) and 2012 (South Wiltshire Core Strategy). The plan is under review.

Housing Provision

The Core Strategy makes provision for 42,000 homes from 2006-2026, including strategic housing sites in

Commented [KR2]: Need to check latest

Appendix C: In-combination assessment of other plans and projects

Salisbury and Wilton, Amesbury, Tidworth and Lugershall, Marlborough, Warminster, Westbury, Trowbridge, Bradford on Avon, and Chippenham.

Employment Land Provision

The Core Strategy makes provision for 27,500 jobs from 2006-2026, including the provision of strategic employment sites at Salisbury and Wilton, Devizes, Westbury, Trowbridge, and Chippenham.

HRA

The February 2012 HRA of the Core Strategy concluded that, provided recommended text is included within the plan to demonstrate that the Core Strategy will not give rise to significant adverse effects, the Core Strategy will not give rise to significant adverse effects on European sites. The recommended text is included within the adopted version of the plan.

The March 2014 HRA of the Core Strategy was produced in light of all modifications proposed to the plan following examination. The HRA concluded that the plan would not lead to adverse effects on European sites, either alone or in-combinations, provided that some sites be subject to HRA at the planning application stage or within the Site Allocations DPD or a neighbourhood plans.

Therefore, there are no likely in-combination effects of the adopted Wiltshire Local Plan with the Partial Update of the B&NES Local Plan.

Appendix D : summary of Key Policy Changes

Policies	Summary
Updating policies to better address the climate and ecological emergencies	
Police CP1 Retrofitting existing buildings	Amend the policy to require new houses in multiple occupation to achieve an Energy Performance Certificate 'C' rating.
Policy CP3 Renewable Energy	Maintain the overall targets for renewable electricity and heat generation and provide further guidance and requirements for renewable energy technology to facilitate more renewable energy schemes.
Policy SCR6(residential) and SCR7(non-residential) Sustainable Construction	Facilitate zero carbon development by: <ul style="list-style-type: none"> • reducing space heating demand • reducing total energy use • requiring renewable energy to match the total energy use • considering district heating networks • requiring a financial offset contribution for residual carbon emissions
Policy SCR8 Embodied Carbon	Introduce a requirement to submit an Embodied Carbon Assessment and set a standard to be achieved by large scale new development.
Policy CP4 District Heating	Amend Keynsham Hight Street to include as an opportunity area rather than a district heating priority area as the majority of land allocated for development in Keynsham Town Centre has been built out.
Policy SCR9 EV charging	Require electric vehicle charging infrastructure for both residential and non-residential development. Further guidance will be provided by the Transport and Development Supplementary Planning Document.
Policy NE3 Sites Species and Habitats	Strengthen the protection of protected sites, National Network Sites (SPAs and SACs) and internationally protected species and habitats as well as nationally important sites and species and their habitats.
Policy NE3a Biodiversity Net Gain	Require a Biodiversity Net Gain of at least 10% from major developments and secure in perpetuity (at least 30 years)
Policy NE5 Ecological Networks and Nature Recovery	Facilitate enhancement of Nature Recovery Networks and local ecological networks.
Policy NE6 Trees and woodland	Strengthen the protection of veteran trees.

conservation	
Policy CP7 Green Infrastructure and Policy NE1 Development and GI	Facilitate nature recovery and introduction of the Bath River Line, a strategic green infrastructure project.
Policy D8 Lighting	Require lighting to be designed to protect wildlife habits following the best practice as set out in current guidance (inc. B&NES Waterspace Design Guidance and Bats and Lighting in the UK (ILP 2018))
Transport policies in general	Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency, linking with the Climate and Ecological Emergency Declarations and 2030 Carbon Neutrality
Policy ST1 Promoting Sustainable Travel	Increased recognition of the importance of location and design in the sustainability of development. Ensure that development transport choices e.g. access strategy and mitigation, are required to place sustainable modes first.
Policy ST2 Safeguarded Sustainable Transport Routes	Widen the scope to include other land to be safeguarded through Policies Map.
Policy ST2A Active Travel Recreational Routes	Require developments to enhance active travel routes, rather than just maintaining them or avoiding harm. Onus placed on developer to provide, rather than Council to negotiate additional linkages.
Policy ST3: Transport Infrastructure	Require infrastructure to be planned and designed promoting mode shift to sustainable transport as a priority over traffic capacity. Schemes which increase traffic capacity must demonstrate that opportunities to achieve mode shift as an alternative solution have been exhausted.
Policy ST5: Traffic Management Proposals	Include additional requirements and detail reflecting Liveable Neighbourhoods Strategy
Policy ST6: Park and Ride Policy SB26 Park and Ride Sites	increase role of the existing Park & Ride sites to act as transport interchanges, where users can switch to a wider range of sustainable transport modes to access both the city and countryside All three Park & Ride sites are proposed to be removed from the Green Belt.
ST7 Transport Requirements for Managing Development	Include strengthened requirement for development to offer genuine travel choice through opportunities to travel sustainably. include requirement for transport improvements and/or mitigation to maximise sustainable travel opportunities. Remove parking standards from the PMP (parking standards to be included in the new Transport and Development SPD)
Replenish housing supply in order that the Core Strategy housing requirement can	

be met and the necessary supply of housing land maintained

Spatial distribution of the Housing Requirement

Monitoring (March 2021) shows that there is a housing supply shortfall of about 1,100 dwellings against the Core Strategy housing target (13,000 dwellings). This takes into account the annual requirement to deliver 722 dwellings for the rest of the plan period.

In order to meet this shortfall, the LPPU allocates sites for housing in accordance with the spatial strategy set out in the Core Strategy.

Site	Capacity (homes)
Policy SB8 Bath Riverside	250 additional (total 1,750)
Policy SB18 RUH	50 additional (total 100)
Policy SB24 Sion Hill	100
Policy SB14 Twerton Park	80
Policy SB25 St Martin's Hospital	50
Policy KE2b Keynsham Fire Station	20
Policy KE5 Keynsham Treetops	35
Policies KE3C and KE3D Keynsham safeguard land (2 sites)	280
Policy SSV21 Midsomer Norton, Silver Street	10
SSV9 Paulton (former printworks)	80
Total (allocations)	955

Taking into account sites in the Development Management process, it is expected to increase the housing supply by 1,205 homes.

Addressing a limited range of other urgent local issues

Policy PCS5

Amend the policy to avoid development resulting in the contamination of land.

Policy H2 Houses in multiple occupation (HMO)

Amend the policy to cover a change of use from non C3 uses to HMO (use class C4 and SG) and intensification (small to large HMO applications). Introduce a requirement for an Energy Performance Certificate.

Policy H2a

New policy to guide new Purpose Build Student Accommodation development.

Policy H7 Housing Accessibility	Set the accessibility standards to be achieved by both new market and affordable housing.
Policy LCR6 New and replacement sports and recreational facilities	Require a management plan to be submitted with an application for a new artificial grass pitch to avoid potential harm and pollution.
Policy ED1B Change of use & redevelopment of office to residential use	Reflect the latest Use Class Order and include a change of use from office to Sui Generis (large HMO and purpose built student accommodation)
Policy ED2A Strategic Industrial Estates and ED2B Non-Strategic Industrial Premises	Strengthen the protection of non-strategic industrial sites and introduction of the Locksbrook Creative Industry Hub.
Policy SB22 Locksbrook Creative Industrial Hub	Allocate the area as a Creative Industry Hub where Bath Spa University and businesses will work together to increase local growth and innovation.
Policy SB23 Weston Island	Facilitate relocation of valued employment uses from more central locations in the city
Amending policies for clarity and to ensure they are aligned with up to date national policy	
Policy D8	Require lighting to be designed to protect wildlife habitats following the best practice as set out in current
Policy NE2 Conserving and enhancing the landscape and landscape character	Amend to give greater weight to conserving and enhancing landscape and scenic beauty of AONBs with particular reference to their special qualities.
Policy GB2 Development in Green Belt villages	Define the infill boundaries to guide new developments in villages in the GB.
Policy GB3 Extensions and alterations to buildings in the Green Belt	Include alteration to buildings.
Policy H3 Residential uses in existing buildings	Amend to include outbuildings in considering the sub-division of existing buildings.
Policy H5 Retention of existing housing stock	Amend 'residential accommodation' to 'residential units.
Policy ED1C Change of use and redevelopment of office use to other town centre use	Remove the reference to change of use from office space to A1, A2 and A3 uses as they are all part of the new E use class.
Policy RE1 Employment uses in the Countryside	Include new employment on previously developed land.
Policy CR1 Sequential Test	Include the text 'expected to become available within a reasonable period' when considering the availability of alternative sites.
Policy CR2 Impact assessment Policy CR3 Primary shopping areas and primary shopping frontages	Remove the reference to use class A1-5 and the reference to the impact assessment for office development

Appendix E: Screening of Long List against impact alert buffers

BUFFER (m)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Woodlands Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
15000										
8000										
7000										
4000										
2000										
1000										
500										
200										

NB : Could be other sites to factor in if LPPU causes significant increased traffic movements on A roads within 200m of any other site.

Appendix F: Precautionary screening results from consideration of impact alert buffers, site interests, priority issues and generic impacts to identify sites at risk of Likely Significant Effect (LSE) from LPPU

BUFFER (m)	BUFFER (Alert type)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Mendips Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
15000	To identify potential risk of habitat loss or fragmentation for golden plover and lapwing associated with Somerset Levels and Moors SPA and RAMSAR	No LPPU or functional habitat links to golden plover or lapwing habitat	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing	No LPPU or functional habitat links to golden plover or lapwing habitat	Not designated for golden plover or lapwing	Not designated for golden plover or lapwing
8000	To identify potential risks to Bat SACs designated for greater horseshoe bats where loss of bat foraging and commuting habitat would be most likely to affect the ability of the SAC to continue to support its bat population.		Not designated for SAC Bat interest	LSE	No significant site allocations within 8 km buffer		LSE	Not designated for SAC Bat interest			Not designated for SAC Bat interest

BUFFER (m)	BUFFER (Alert type)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Mendips Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/ RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
8000	To identify potential risk of water pollution/litter applicable to all European sites where water quality is a priority issue currently affecting or threatening the condition of a feature of the site. (Severn Estuary; Chew Valley Lake; Somerset Levels and Moors		Water/ litter pollution not priority issue for SAC	Water/ litter pollution not priority issue for SAC	Water/ litter pollution not priority issue for SAC		Water/ litter pollution not priority issue for SAC	Water/ litter pollution not priority issue for SAC			LSE
7000	To identify potential risk of increased recreational pressures applicable to all European sites where recreational pressure is a priority issue currently affecting or threatening the condition of a feature of the site.	No site allocations within 7km buffer ;	No site allocations within 7km buffer	No significant site allocations within 7km buffer		LSE		No site allocations within 7km buffer			No site allocations within 7km buffer

BUFFER (m)	BUFFER (Alert type)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Mendips Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/ RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
4000	To identify potential risks to Bat SACs designated for lesser horseshoe bats where loss of bat foraging and commuting habitat would be most likely to affect the ability of the SAC to continue to support its bat population. (NB Generally, lesser horseshoe bats forage between 2 and 3km from their roost but they have been observed to range up to 4km in their nightly foraging trips -4000m is precautionary)			LSE			LSE				Not designated for SAC Bat interest
4000	To identify potential risk of habitat loss around SPAs designated for wintering waterfowl and wader bird assemblages not including golden plover and lapwing (NB Foraging distance for the majority of wetland bird species is 2000m so this precautionary)		Not designated for wintering waterfowl /waders				Not designated for wintering waterfowl/ waders				LSE

BUFFER (m)	BUFFER (Alert type)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Mendips Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
2000	Foraging distance for the majority of wetland bird species			Not designated for wintering waterfowl/waders			Not designated for wintering waterfowl/waders				No allocations within 2000m buffer – possible vulnerability to energy infrastructure - LSE unknown?
1000	To identify potential risk of urban effects i.e. fire/arson or fly tipping applicable to all European sites where urban effects are priority issues currently affecting or threatening the condition of a feature of the site.			Not a priority issue & no site allocations within buffer			No site allocations within 1000m buffer				Not priority issue &
1000	To identify potential risk of impacts to Bechstein bat swarming sites			Not designated for Bechstein bats			No site allocations within 1000m buffer				Not designated for Bechstein bats
500	To identify the risk of the effects of noise, vibration and light impacting on site			No site allocations within			No site allocations within				No site allocations within

BUFFER (m)	BUFFER (Alert type)	Somerset Levels & Moors SPA	Mendip Woodlands SAC	North Somerset & Mendips Bat SAC	Mells Valley SAC	Salisbury Plain SPA/SAC	Bath & Bradford on Avon Bat SAC	Avon Gorge Woodland SAC	Severn Estuary SPA/SAC/ RAMSAR	Mendip Limestone Grasslands SAC	Chew Valley Lake SPA
	interests		500m buffer				500m buffer				500m buffer
200	To identify potential risk of localised (rather than dispersed) effects on air quality applicable to all European sites where air quality is a priority issue currently affecting or threatening the condition of a feature of the site.		No site allocations within 200m buffer , & no significant increase in traffic movements				No site allocations within 200m buffer & site not a priority issue				Not priority issue
	No LSE		Potential LSE		LSE						

Appendix G – Screening of proposed submission draft B&NES Local Plan Partial Update changes for likely significant effects (pre delegated changes 14/7/21)

Local Plan Partial Update

Note: in the changes below additional text is **underlined** and deletions are shown as a ~~strike through~~. Please don't change the para numbers.

Volume 1 (District wide Development Management Policies)

Paragraph/Policy	Amendments
<p>New unnumbered para at start of Plan</p> <p>A</p>	<p><u>In order to address a range of urgent issues in B&NES, including the climate and ecological emergency declarations, the Council is preparing a partial update of the Core Strategy and Placemaking Plan (which together comprise the Local Plan). The Local Plan Partial Update (LPPU) is set out as a schedule of changes to the Core Strategy & Placemaking Plan combined document. Within the schedule of changes new text is shown as underlined and bold and deleted text is struck through. The schedule of changes below is published for consultation under Regulation 19. In addition to the schedule below the Council will also be publishing the composite plan showing the changes, in order that the reader can see the proposed changes in context. The composite plan is not available for comment and is published for information only. Every effort has been made to ensure the changes shown in both the schedule and composite plan are the same. However, should there be a difference the proposed change shown in the schedule takes precedence.</u></p>

After para 5

A

5a. 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 updated. A full review of the Local Plan will be undertaken alongside the West of England Combined Authority Spatial Development Strategy (SDS) which is scheduled for publication in 2023. Therefore, in the interim, B&NES is undertaking a Partial Update of the Local Plan to address a number of urgent issues.

5b. In March 2019 the Council declared a climate emergency and pledged to enable carbon neutrality in the district by 2030. An ecological emergency has also been declared 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 and its core policies are addressing the climate and nature emergency and giving people a bigger say. As this is a partial update to the existing Plan, and not a new Plan, the scope of the changes is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.

5c. The scope of the partial update is therefore, confined to:

- Updating policies in order that they better address the climate and ecological emergencies
- Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained
- Addressing a limited range of other urgent local issues e.g. related to the 'green recovery'
- Amending policies for clarity and to ensure they are aligned with up to date national policy

<p>Para 23 A</p>	<p>23. This will enable us to contribute to meeting the national, statutory carbon reduction target of 45% by 2020 78% by 2035 from 1990 levels <u>and to achieve net zero by 2050.</u></p> <p><u>23a. The Council has declared a climate emergency and has committed to providing the leadership for the District to be carbon neutral by 2030. This will contribute to the UK’s legally binding target of net zero carbon by 2050. There are three key priorities to achieve this which are;</u></p> <ul style="list-style-type: none"> <u>• Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build;</u> <u>• A major shift to mass transport, walking and cycling to reduce transport emissions;</u> <u>• A rapid and large-scale increase in local renewable energy generation.</u> <p><u>23b. The Council’s Climate Emergency Progress Report set out the scale of action needed to meet these priorities, including that “new homes and development need to be zero carbon or net positive carbon from now”. The Report was adopted in October 2019. As part of this work the council is seeking to update their adopted policies on climate change including a net zero carbon construction policy.</u></p> <p><u>24c. The Council also declared an Ecological Emergency 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 our wildlife and habitats, enabling residents to benefit from a green, nature rich environment.</u></p>
<p>After para 29 A</p>	<p><u>29a. Paragraph 21 of NPPF19 states that “plans should make explicit which policies are strategic policies.” Where a single Local Plan is prepared, the non-strategic policies should be clearly distinguished from the strategic policies. Local Plan Part 1: Core Strategy sets out a strategic planning framework to guide change and development in the District and Part 2: Placemaking Plan covers site allocations and detailed development management policies, and together they address B&NES council’s priorities for the development and use of land in its area. Therefore, it is considered that all policies in the Core Strategy and Placemaking Plan are ‘strategic’ policies.</u></p>
<p>Para 50 A</p>	<p>--- However, infrastructure constraints and national Green Belt objectives limit the level of development that the Town can accommodate. Land is also removed from the Green Belt at East Keynsham and safeguarded for possible development in the future. Development of this land will be permitted only when allocated for development following a review of the plan. <u>The land removed from the Green Belt and safeguarded for development at East Keynsham is allocated for housing through the Local Plan Partial Update.</u> These changes do not undermine the Core Strategy objective to maintain the town's separate identity.</p>

After para 56

56a. Paragraph 65 of the NPPF states that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Set out below is a list of designated neighbourhood areas and their proposed housing requirement, comprising the total number of dwellings on site allocations (both within the adopted Core Strategy and Placemaking Plan and additional allocations proposed in the partial update) for the remainder of the plan period (2021 - 2029).

Table 1C – Designated Neighbourhood Areas Housing Requirement

<u>Designated Neighbourhood Area</u>	<u>Allocations in adopted Core Strategy/ Placemaking Plan</u>	<u>Proposed LPPU allocations</u>	<u>Housing requirement</u>
<u>Bathampton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Batheaston</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Chew Valley</u>	<u>8</u>	<u>0</u>	<u>8</u>
<u>Claverton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Clutton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Englishcombe</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Freshford and Limpley Stoke</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>High Littleton and Hallatrow</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Keynsham</u>	<u>288</u>	<u>336</u>	<u>624</u>
<u>Midsomer Norton</u>	<u>100</u>	<u>10</u>	<u>110</u>
<u>Paulton</u>	<u>73</u>	<u>80</u>	<u>153</u>
<u>Publow and</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Radstock</u>	<u>10</u>	<u>0</u>	<u>10</u>
<u>Stanton Drew</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Stowey Sutton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Timsbury</u>	<u>26</u>	<u>0</u>	<u>26</u>
<u>Westfield</u>	<u>81</u>	<u>0</u>	<u>81</u>
<u>Whitchurch</u>	<u>0</u>	<u>0</u>	<u>0</u>

Policy DW1 A	<p>Add</p> <p>4. retaining the general extent of Bristol - Bath Green Belt within B&NES, other than removing land to meet the District's development needs at the following locations identified on the Key Diagram and allocated on the Policies Map:</p> <ul style="list-style-type: none"> • Land adjoining Odd Down • Land adjoining East (<u>now incorporating allocation of land previously safeguarded for development</u>) • Land adjoining South West Keynsham • Land at Whitchurch <p>---</p> <p>The first review will be timed to co-ordinate with the review of the West of England Core Strategies in around 2016.</p>
Table 2 Locational Policy Framework A	<p>Policy GB2</p> <p><u>Burnett, Chelwood</u>, Chew Magna, Chew Stoke, Claverton, Combe Hay, <u>Compton Dando</u>, Corston, <u>Dunkerton</u>, Englishcombe, Freshford, Hinton Charterhouse, Kelston, Marksbury, Monkton Combe, Newton St. Loe, <u>North Stoke, Norton Malreward</u>, Pensford, Priston, <u>Queen Charlton</u>, Shoscombe, South Stoke, Stanton Drew (including Upper Stanton Drew and Highfields), <u>Stanton Prior</u>, Tunley, Upper Swainswick and, <u>Wellow and Woolley</u></p>
Para 59 A	<p>The villages identified in Table 2 are those with a Housing Development Boundary <u>or an infill boundary in the case of villages washed over by the Green Belt and subject to Policy GB2</u>. In addition to the villages identified above there is a range of smaller villages and hamlets in the District where a Housing Development Boundary <u>or an Infill Boundary</u> is not defined. These settlements are treated as open countryside with regard to the policy framework for residential development.</p>
Para 61 A	<p>For Keynsham, the policy approach for considering housing development proposals on non-allocated sites is made clear in the Core Strategy. Policy KE1(2b) in the Keynsham place-based section allows residential development if it is within the Housing Development Boundary (HDB) or forms an element of Policies KE2 (Town Centre/Somerdale Strategic Policy), KE3 (East Keynsham Strategic Site Allocation <u>and the previously safeguarded land</u>), or KE4 (South West Keynsham Strategic Site Allocation).</p>
Para 64 A	<p>Any proposals outside the HDBs <u>Infill Boundaries</u> would be considered inappropriate development in the Green Belt and Core Strategy Policy CP8 would apply.</p>
Para 71 A	<p>In villages washed over by the Green Belt with a housing development boundary <u>an Infill Boundary</u> as defined on the Policies Map proposals for residential and employment development will be determined in accordance with national policy set out in the NPPF.</p>
64 A	<p>Although the construction of new buildings is regarded as inappropriate development in Green Belt, limited infilling in villages is an exception to this policy. For settlements washed over by the Green Belt, Policy GB2 will apply as set out in the Green Belt Development Management Policies section. Any proposals outside the HDBs <u>Infill Boundaries</u> would be considered inappropriate development in the Green Belt and Core Strategy Policy CP8 would apply.</p>
80-83 A	<p>Paragraphs 80-83 on the Duty to Co-operate will be updated to reflect work on the WECA Spatial Development Strategy and associated Local Housing Needs Assessment.</p>
88	<p>The core and development management policies and the place <u>and site</u> specific policies are complementary so it is important that the policy framework is read as a whole. <u>For each of the sites allocated for development in order to meet the plan requirements a policy is set out which details specific requirements of development for that site. For the allocated sites the plan must also be read as a whole as the district-wide development management policies also</u></p>

A	<p><u>apply, including (but not limited to) policies relating to sustainable construction, biodiversity net gain, affordable housing and sustainable transport.</u> The policies set out below do not replicate existing national policy.</p>
	<p>Responding to Climate Change</p>
<p>Paras 90-91</p> <p>A</p>	<p>Delete paragraphs 90-91 and replace as follows;</p> <p><u>Bath and North East Somerset has declared a climate emergency. The council intends for BANES to be carbon neutral by 2030. There are three key priorities to achieve this which are:</u></p> <ul style="list-style-type: none"> • <u>Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build;</u> • <u>A major shift to mass transport, walking and cycling to reduce transport emissions;</u> • <u>A rapid and large-scale increase in local renewable energy generation</u> <p><u>90a In July 2020 the Council also declared an Ecological Emergency 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 our wildlife and habitats, enabling residents to benefit from a green, nature rich environment.</u></p>
<p>93</p> <p>A</p>	<p>Amend paragraph 93 as follows;</p> <p>The UK has agreed to make a <u>78% 80%</u> carbon emission reduction by 2050 2025 (based on 1990 levels) <u>and to achieve net zero by 2050.</u> As 41% of Bath & North East Somerset's carbon emissions come from domestic properties and 34% from commercial premises (DEFRA, 2007) improving the energy efficiency of existing buildings is a priority particularly for those vulnerable households in, or at risk of, fuel poverty.</p>
<p>Policy CP1</p> <p>D/G & F</p> <p>Any retrofitting is legally bound to protect bats and their roost, any redevelopment will be covered by Policy NE3 which covers species protection.</p>	<p>POLICY CP1 RETROFITTING EXISTING BUILDINGS</p> <p>Retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and the appropriate incorporation of micro-renewables will be encouraged.</p> <p>Priority will be given to facilitating carbon reduction through retrofitting at whole street or neighbourhood scales to reduce costs, improve viability and support coordinated programmes of improvement.</p> <p>Masterplanning and 'major development' (as defined in the Town & Country Planning (Development Management Procedure (England) Order 2010) in the District should demonstrate that opportunities for the retention and retrofitting of existing buildings within the site have been included within the scheme. All schemes should consider retrofitting opportunities as part of their design brief and measures to support this will be introduced.</p>

The actual change from the hRA compliant policy is to specify reduction rates of CO2 through use of renewables or energy efficiency : F

B	<p>Retrofitting Historic Buildings The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy.</p> <p>The policy will be supported by the Council's Energy Efficiency, Retrofitting and Sustainable Construction Supplementary Planning Document.</p> <p><u>Houses in Multiple Occupation</u></p> <p><u>In the case of a house in multiple occupation the property must achieve an Energy Performance Certificate “C” rating as required by policy H2.</u></p> <p>Part 2 amend as follows;</p> <p>2 This policy will provide a basis for Development Management and will be supported by the Sustainable Construction and Retrofitting Supplementary Planning Document and sustainable construction checklist. The Sustainable Construction Checklist will be updated to include a section on sustainable refurbishment to raise awareness of the measures recommended in retrofitting existing buildings</p> <p>Part 4 delete as follows</p> <p>4 Signposting of retrofitting information including Government financial initiatives and schemes, public awareness and demonstration events will also be provided by the Council.</p>
Para 96 A	<p>Sustainable Construction and Renewable Energy</p> <p>The EU has set a target for Nearly Zero Energy Buildings by 2020 which member states must respond to.</p>
Policy CP2 G	<p>Superseded by new Policy SCR6 and SCR8</p> <p>POLICY CP2 SUSTAINABLE CONSTRUCTION</p> <p>Sustainable design and construction will be integral to new development in Bath & North East Somerset. All planning applications should include evidence that the standards below will be addressed:</p> <ul style="list-style-type: none"> ● Maximising energy efficiency and integrating the use of renewable and low-carbon energy (i.e. in the form of an energy strategy with reference to Policy CP4 as necessary); ● Minimisation of waste and maximising of recycling of any waste generated during construction and in operation; ● Conserving water resources and minimising vulnerability to flooding; ● Efficiency in materials use, including the type, life cycle and source of materials to be used;

	<ul style="list-style-type: none"> ● Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting; ● Consideration of climate change adaptation. <p>Applications for all development will need to be accompanied by a B&NES Sustainable Construction Checklist.</p> <p>Delivery</p> <ol style="list-style-type: none"> 1. This policy will provide a basis for Development Management. 2. The Sustainable Construction Checklist and Sustainability Statements will be used to assess the approach taken to sustainable construction in planning applications.
Para 98	<p>98. In order to assist identifying the potential for supply and demand for renewable and low carbon energy and the impacts this might have on environmental and heritage assets in Bath and North East Somerset, the Council commissioned 'Renewable Energy Research and Planning' (June 2009) and a Research Update (Nov 2010). This Renewable Energy Research is available as a snapshot to assist in considering possible proposals and may be updated by the Council as technologies develop. was used to inform the renewable energy target in the Core Strategy.</p> <p>99. Policy CP3 of the Core Strategy seeks to achieve an increase in the level of renewable energy generation in the District. These will be monitored and adjusted as technologies and initiatives improve. Whilst these targets are challenging, recent national commitments such as expansion of permitted development rights and financial incentives such as 'Feed in Tariff' and 'the Green Deal', should accelerate energy provision from renewable low carbon sources. These standards may be revised and updated through the Core Strategy review as sustainability methodologies, technologies and initiatives develop. The Local Plan Partial Update provides the opportunity to review progress towards achieving the target and recognise changes in Government Policy and trends in technologies.</p> <p><u>Add new paragraphs</u></p> <p><u>99a. National Policy Statement for Renewable Energy Infrastructure EN-3 notes the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions. The latest monitoring in the district shows that only 21.7 MW electricity and 7.4 MW heat are available as of 2019. A significant increase in the development of renewable energy is needed to achieve the policy targets. Policy CP3 has therefore been reviewed and aims to set out a positive approach for determining applications and guiding development to the right locations.</u></p> <p><u>99b. In addition, since the adoption of the Placemaking Plan in 2017, the Council has declared a climate emergency and has committed to providing the leadership for the District to be carbon neutral by 2030. This will contribute to the UK's legally binding target of net zero carbon by 2050. Whilst it should be noted that Core Strategy targets cannot be reviewed through the Local Plan Partial Update, it should be noted that the targets for renewable energy and heat generation are not a cap and are the minimum level to achieve by 2029.</u></p> <p><u>Standalone renewable generation</u></p> <p><u>99c. The revised Policy CP3 sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar (previous shown in Policy SCR3). Where generation types are proposed in the Green Belt, reference will also need to be made to relevant Green Belt policies. The Council has previously prepared a Guidance Note on renewable energy in the Green Belt.</u></p>

<p>New paragraphs A</p>	<p><u>Wind energy</u> <u>99d. For some time it has been Government policy for local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources including the identification of suitable areas for renewable and low carbon energy sources.</u></p> <p><u>99e. Particularly for wind energy development Local Plans should identify suitable areas for wind energy development and make clear what criteria have determined their selection, including what size of development is considered suitable in these areas. The NPPF (Feb 2019) states that: ‘A proposed wind energy development involving one or more wind turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.’</u></p> <p><u>99f. In 2020 onshore wind energy was recognised in a report by the Department for Business, Energy & Industrial Strategy as being one of the cheapest forms of energy generation (including conventional generational sources). The Local Plan Partial Update presents an opportunity to reconsider the Council’s approach to wind energy development in light of the need from NPPF to identify suitable areas for development and the contribution that it can make to help meeting our targets.</u></p> <p><u>99g. An evidence base study has been undertaken to assess the Landscape Potential for wind energy of different scales of wind turbine within the district. The output of this study has been used to identify suitable areas for development, recognising that other considerations need to be addressed and are set out in the policy criteria below. The Landscape evidence also provides guidance for wind energy development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals.</u></p> <p><u>99h. In the NPPF, and outlined above, developments for wind energy need to be able to demonstrate that, through consultation, the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. It is recognised that any development may not be able to achieve 100% of the support from the community, particularly in relation to renewable energy development in rural areas, however examples of community support could be:</u></p> <ul style="list-style-type: none"> - <u>Community Renewable Energy Schemes (as set out in SCR4)</u> - <u>Support from representative organisations, such as Parish Councils</u> <p><u>99i. Neighbourhood Planning Groups can also identify suitable areas for wind energy development through their Neighbourhood Plan.</u></p>
<p>New paragraphs A</p>	<p><u>Ground Mounted Solar Arrays</u> <u>99j. Ground mounted solar arrays (also known as solar farms/solar fields) can make a significant contribution to our renewable energy target in Core Policy CP3.</u></p> <p><u>99k. Given the rural nature of the district, and the opportunities for ground mounted solar arrays as part of the renewable energy mix, it is</u></p>

anticipated that Ground Mounted Solar Arrays to be sited on land of lower agricultural quality will continue to contribute significantly towards the district wide renewable energy target in CP3, and to facilitate Green Infrastructure and biodiversity gains this policy is considered necessary (e.g. provisions for wildlife and inclusion of permissive paths).

99l. In addition, ground-mounted solar arrays can provide benefits to biodiversity and soils by providing an undisturbed area that can host a rich variety of species and rest core soil nutrients. Solar arrays can also retain agricultural uses such as sheep grazing, and can support rural businesses and the rural economy.

99m. An evidence base study has been undertaken to assess the Landscape Potential for solar energy of different scales of solar farm within the district. The Council particularly encourages ground mounted Solar energy development proposals in the high, moderate-high and moderate potential areas set out in the Solar Assessment Report however proposals can be submitted in other landscape areas, provided that applicants clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated and recognising that other considerations need to be addressed and as set out in the policy criteria below. The Landscape evidence also provides guidance for solar development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals.

99n. As the most common renewable energy sources are intermittent there is a greater need for power reserves that can “balance” the grid by releasing power onto the grid at times when demand exceeds supply. Balancing plant can be gas turbines or gas engines that can be turned on at short notice to meet temporary demand. Alternatively, energy storage plants can be used to balance the grid, most commonly battery packs although other technologies are emerging. These either store energy from the grid to release when supply is scarce or can be co-located with renewable energy infrastructure to release renewable power when renewable energy production is otherwise unable to meet demand.

99o. It is acknowledged that there is a need for flexibility and stability in the energy supply, and that grid balancing plant will be required to help enable transition to 100% renewable electricity. However, the burning of fossil fuels for energy generation, including by gas balancing plants, would increase the district’s carbon dioxide emissions and is therefore not supported since it is inconsistent with the Council’s Climate Emergency Declaration.

Policy CP3

POLICY CP3 RENEWABLE ENERGY

Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2029.

	Capacity (Megawatt)
Electricity	110MWe (Megawatt Electricity)
Heat	165MWth (Megawatt Thermal)

~~Proposals for low carbon and renewable energy infrastructure, including large-scale freestanding installations, will be assessed under the national policies and against the following:~~

- ~~a: potential social and economic benefits including local job creation opportunities~~
- ~~b: contribution to significant community benefits~~

c: the need for secure and reliable energy generation capacity
d: environmental impact (see Policy CP6)

1) Proposals for all renewable and low carbon energy-generating and distribution networks, will be supported in the context of sustainable development and climate change, where:

- a) They balance the wider environmental, social and economic benefits of renewable electricity, heat and/or fuel production and distribution; and
- b) They will not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including:
 - impacts to biodiversity;
 - landscape and visual impacts including cumulative effects;
 - the special qualities of all nationally important landscapes; and
- c) They are informed by an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath World Heritage Site. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused; and
- d) They are supportive of land diversification and continued agricultural use; and
- e) They provide at least 10% biodiversity net gain or multi-functional Green Infrastructure e.g. permissive paths and wildlife corridors; and
- f) They provide for a community benefit in terms of either profit sharing or proportion of community ownership or deliver local social and community benefits. Commercial led energy schemes with a capacity over 5MW shall provide an option to communities to own at least 5% of the scheme; and
- g) There are appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use;

Opportunities for co-location of energy producers with energy users will be supported.

Significant weight will be given to community led energy schemes where evidence of community support can be demonstrated, with administrative and financial structures in place to deliver/manage the project and any income from it.

In addition, the following criteria will be used to assess each of the following energy generation types:

Wind energy

2) Wind energy development proposals will be supported where they:

- a) Lie within a landscape area identified as being potentially suitable for this type of development (high, moderate-high, moderate and low-moderate potential areas set out in the Wind Energy Assessment Report and shown on the Policies Map). There will be a presumption against wind energy development proposals in low potential landscape areas. Applicants would need to clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated in these areas; and
- b) Demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal; and
- c) Avoid or adequately mitigate shadow flicker, noise and adverse impact on air traffic operations, radar and air navigational installations; and

d) Flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected

Ground Mounted Solar Energy

3) The Council particularly encourages ground mounted solar energy development proposals in the high, moderate-high, moderate potential areas set out in the Solar Assessment Report and shown on the Policies Map (subject to the other criteria in this policy). Proposals will be acceptable in other areas (of lower potential) provided that applicants clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated (as set out in 1b). (See SCR2 for roof mounted solar)

In addition, ground mounted solar energy development proposals will be supported where they:

- a. Are not sited on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless significant sustainability benefits are demonstrated to outweigh any loss
- b. Maintain grazing regimes within SAC bat sustenance zones
- c. Avoid the loss of hedgerow & woodland connectivity, and
- d. Avoid the loss and deterioration of UK priority habitats (as shown on the Policies Map)
- e. Meet current best practice guidelines and standards on protection and enhancement of biodiversity

Energy balancing plants

Energy installations to balance electricity demand and supply in order to assist the transition to 100% renewable electricity must be met by:

- 1. Energy storage plant co-located with renewable energy generation plant; or
- 2. Freestanding energy storage plant

Balancing plant, or other freestanding energy generation plant, that increases the district's carbon emissions, for example those that burn fossil fuels directly, such as gas or fuels derived from oil, will be refused unless it can be demonstrated by the applicant that the proposal is required for the purposes of temporarily supporting energy needs for a specified and limited temporary period of time.

Applications for energy plant utilising virgin plant feedstocks will need to robustly demonstrate that the feedstock will be sourced sustainably

Para 100-102

110. Climate change and environmental sustainability objectives are enshrined in the highest level of local policy, as follows:

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- The Environmental Sustainability & Climate Change Strategy: Sets the target of a 45% reduction in the area's CO₂ emissions by 2026, in line with national climate change targets.
- The Climate emergency sets the target of being carbon neutral by 2030

A

101. Within the Local Plan Partial Update Placemaking Plan there is an opportunity to build on the planning policies contained within the Core Strategy (including policies CP1 on Retrofitting, CP2 Sustainable Construction, CP3 Renewable Energy and CP4 District Heating) **and Placemaking Plan (Policies SCR1 On-site Renewable Energy Requirement, SCR3 Ground-mounted Solar Arrays)** to further support and promote sustainable construction and design and facilitate the delivery of renewable energy schemes in the district. The policy approach set out in the Local Plan Partial Update Placemaking Plan reflects evolving national

	<p>policy.</p> <p>102.B&NES Council has reviewed and combined the has an adopted Sustainable Construction & Retrofitting Supplementary Planning Document and an Energy Efficiency & Renewable Energy Guidance for Listed Buildings and Undesignated Historic Buildings, which provides detailed guidance – this guidance is aimed at householders and small scale developers. <u>The combined SPD will be entitled the ‘Energy Efficiency Retrofitting & Sustainable Construction SPD’.</u></p>
Para 107 A	<p>The following Local Plan Placemaking Plan policies aim to add to existing policies, and to specifically:</p> <ul style="list-style-type: none"> • Support community led renewable energy and low zero carbon development
Paras 108 G	Delete paragraphs 108 – 110
Policy SCR1 superseded by SCR6 G	<p>POLICY SCR1: ON-SITE RENEWABLE ENERGY REQUIREMENT</p> <p>On-site renewable energy requirement</p> <p>Developers of major proposals above a threshold of 1,000 square metres or 10 dwellings, excluding Industrial B2 and B8 uses, will be required to provide sufficient renewable energy generation to reduce carbon emissions from anticipated (regulated) energy use in the building by at least 10%.</p> <p>Supplements Core Strategy policy CP3 Renewable Energy.</p>

After para 107

A

Sustainable Construction for Residential Buildings

107a Through the Local Plan Partial Update there is an opportunity to revise the sustainable construction policies with an aim to achieve net zero construction. Therefore, policy CP2 of the Core Strategy and SCR1 of the Placemaking Plan will be replaced with a new sustainable construction policy.

107b The government is proposing to update part L of the Building Regulations to achieve more energy efficient homes. The new Part L is called the Future Homes Standard. In January 2021 the government released their response to the Future Homes Standards Consultation. The results of the consultation have confirmed that local authorities will still be able to set their own standards. The government has stated their intention to bring in the Future Homes Standards in 2025 but the exact method of how carbon reduction will be enacted is still subject to future consultation. As an interim measure the government are now proposing an uplift of 31% above current Building Regulations requirements. This is due to be published in December 2021 and come into effect June 2022.

107c Due to the uncertainty of the Future Homes Standard, the plan will continue to pursue a zero carbon construction standard but to change the metric from carbon reduction to energy use. The energy metric has two key advantages
-firstly, it does not rely on Part L as a baseline, so won't have to be changed each time Part L changes.
-secondly, energy metrics are more technically robust and designed to lead to better building outcomes – improved focus on fabric and ability to monitor performance.

107d The revised energy metric will look at three things.

	<ul style="list-style-type: none"> • <u>Space Heating - The energy used specifically for heating the building</u> • <u>Energy Use Intensity – the predicted total energy use</u> • <u>Provide enough renewable energy output to match the total energy use.</u> <p><u>107e The compliance tools for Building Regulations are not intended to accurately evaluate overheating, so large scale proposals are to use the more sophisticated CIBSE (Chartered Institute of Building Service Engineers) standards TM52 for non-residential development and TM59 for residential development . The CIBSE methodologies use the criteria below:</u></p> <ul style="list-style-type: none"> • <u>TM59 & TM52: “Hours of Exceedance”, a measure of how often the temperature exceeds a threshold comfort temperature during a typical warm season and sets a limit of 3% of occupied hours</u> • <u>TM52: “Daily Weighted Exceedance”; the severity of overheating within any one day. The limit is no more than 6 hours a day above the thermal comfort threshold.</u> • <u>TM52: “Upper Limit Temperature” which sets an absolute maximum temperature for a room beyond which the level of overheating is unacceptable.</u>
<p>New Policy SCR6</p> <p>F</p>	<p><u>SCR6 Sustainable Construction Policy for New Build Residential Development</u></p> <p><u>New build residential development will be required to meet the standards set out below.</u></p> <p><u>New build residential development will aim to achieve zero operational emissions by reducing heat and power demand then supplying all energy demand through onsite renewables. Through the submission of a sustainable construction checklist, proposed new dwellings will demonstrate the following:</u></p> <ul style="list-style-type: none"> • <u>Space heating demand less than 30kWh/m2/annum;</u> • <u>Total energy use less than 40kWh/m2/annum; and</u> • <u>On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV</u> • <u>Connection to a district heating network where available</u> <p><u>Major residential development</u></p> <p><u>In the case of major developments where the use of onsite renewables to match total energy consumption is demonstrated to be not technically feasible (for example with apartments) or economically viable, renewable energy generation should be maximised and the residual carbon must be offset by a financial contribution</u></p> <p><u>Applications for 50 dwellings or more are required to demonstrate that the CIBSE TM59 overheating target has been met in the current climate, and a strategy submitted to show how overheating can be mitigated in the future climate.</u></p>

<p>New Paras 107g – 107h</p> <p>A</p>	<p><u>Sustainable Construction Policy for New Build Non-Residential Buildings</u></p> <p><u>107f. The government is consulting on Buildings Regulations Part L for non-domestic buildings. This is called the Future Buildings Standard. The outcome of this consultation is not yet known. As it is currently uncertain what the new non-domestic Part L will be it is proposed to require non-residential buildings to demonstrate BREEAM excellent plus net zero carbon.</u></p> <p><u>108g. Applicants must adhere to the energy hierarchy of improving fabric first, then adding renewables and finally offsetting emissions that can't be mitigated onsite, but with no fixed targets at each stage due to the difficulty of setting targets when Part L (the baseline) is changing.</u></p> <p><u>109h. BREEAM (Building Research Establishment Environmental Assessment Method) is a tool for assessing the environmental sustainability of a development. The BREEAM standards will be applied to major non-residential developments</u></p>
<p>New Policy SCR7</p> <p>F</p>	<p><u>SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</u></p> <p><u>New build non-residential major development will maximise carbon reduction through sustainable construction measures. Through the submission of a sustainable construction checklist all planning applications will provide evidence that the standards below are met.</u></p> <p><u>Major development is to achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2013 (or future equivalent legislation), following the hierarchy set out below.</u></p> <ul style="list-style-type: none"> • <u>Minimise energy use through the use of energy efficient fabric and services</u> • <u>Residual energy use should be met through connection to a heat network if available.</u> • <u>Maximise Opportunities for renewable energy to mitigate all regulated operational emissions.</u> • <u>Residual carbon emission that cannot be mitigated on site should be offset through a financial contribution to the council's carbon offset fund</u>
<p>New para 107i.</p> <p>A</p>	<p><u>Embodied Carbon</u></p> <p><u>107i. Embodied carbon emissions are the carbon emissions resulting from the materials, production, demolition and disposal. An embodied carbon assessment provides details of a building's materials used in the substructure, superstructure and finishes. This provides a true picture of a buildings carbon impact on the environment.</u></p>

New Policy SCR8
Embodied Carbon

A

SCR8

Large scale new-build developments (a minimum of 50 dwellings or a minimum of 5000m² of commercial floor space) are required to submit an **Embodied Carbon Assessment that demonstrates a score of less than 900kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.**

Para 112 A	112. Designing solar arrays as a complementary part of a building can enable the PV arrays to complement the aesthetic of a building or development and need not compromise the character of protected areas such as the World Heritage Site and Conservation Areas provided proposals are consistent with Policy HE1 . When designing building-mounted solar arrays, consideration should be aesthetics and character in design choices in line with the Policy SCR2.
Para 113 - 118	Delete paragraphs 113-118
Policy SCR3 Superseded by revised Policy CP3 G	<p>Delete Policy SCR3-Ground mounted Solar Arrays</p> <p>In addition to the policy considerations of CP3, planning applications for ground mounted solar arrays which follow best practice (e.g. BRE National Solar Centre guidance and the Solar Trade Association best practice commitments, or successor guidance), should achieve as many of the following factors as possible:</p> <ul style="list-style-type: none"> a Proposals are focused on nonagricultural land or land of lower agricultural quality b Proposals are sensitive to nationally and locally protected landscapes and nature conservation areas, and take opportunities to enhance the ecological value of the land. To this end, the application should be supported by a Biodiversity Management Plan, which reflects the BRE National Solar Centre “Biodiversity Guidance for Solar Developments” (or successor guidance) c Proposals seek to minimise visual impact where possible and maintain appropriate screening throughout the lifetime of the project (managed through a land management and/or ecology plan) d Engagement at a pre-application stage with the community takes place e Proposals are supportive of land diversification and continued agricultural use, biodiversity measures and supporting the provision of multi-functional Green Infrastructure e.g. permissive paths and wildlife corridors f Proposals are used as an educational opportunity where appropriate g Land is returned to its former use at the end of a project <p>In all cases proposals will be expected to be consistent with the relevant design, heritage and landscape policies.</p> <p>Supplements Core Strategy policy CP3 Renewable Energy</p>
Policy CP4 District heating G	<p>Policy CP4</p> <p>---</p> <p>Within the remaining 12 “district heating opportunity areas” shown on Diagram 19, (Radstock, Midsomer Norton, Paulton, Bath Spa University, Twerton, Kingsway, Bathwick, Moorfields, Odd Down, Lansdown, RUH, Keynsham High Street & Keynsham Somerdale), development will be encouraged to incorporate infrastructure for district heating, and will be expected to connect to any existing suitable systems (including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable. ---</p>

130 G	<p>Para 130 Policy CP4 applies to allocated sites within the “Bath Central” and “Bath Riverside” and “Keynsham High Street”; the “district heating priority areas” as shown in Diagram 5 and in more detail in the OS base maps within <u>District Heating Opportunity Assessment Study- Part 5 (AECOM, 2010)</u>. The site allocations within Bath and Keynsham to which this policy applies include:</p> <p><i>Keynsham:</i></p>
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	<ul style="list-style-type: none"> ●—— Town Centre ●—— Riverside & Fire Station Site
<p>New paragraphs A/G</p>	<p><u>Electric vehicles</u> <u>132a.</u>In 2018 the government launched its Road to Zero strategy. The ambition being to see at least half of new cars to be ultra low emissions by 2030. As part of this the government aims to roll out infrastructure to support electric vehicles. Electric vehicle chargers can be installed under permitted development. Part 2, class C allows for the installation of a charging unit within a parking area, subject to certain conditions. On street chargers can be provided under Part 12, class A which allows for on street charging when installed by Local Authorities.</p> <p><u>132b.</u>Electric Vehicle Infrastructure is best provided at the construction stage. This policy seeks to provide electric vehicle infrastructure within new residential and non-residential development where parking is provided. The policy will complement the aims set out in the councils On Street Electric Vehicle Charging Strategy.</p> <p><u>132c.</u>From the Issues and Options consultation it is understood that electric vehicles and charging infrastructure are a rapidly evolving industry, where uptake in electric vehicles is currently low. The policy should be implemented alongside the existing transport policies. It will be read in conjunction with the parking and electric vehicle SPD that will detail parking standards for development.</p> <p><u>132d.</u>Western Power Distribution maintain the grid and electricity supply for Bath and North East Somerset. As part of this they monitor housing development within the district to respond to any need for increased capacity. Western Power Distribution have an online network capacity map on their website which can be used to estimate potential grid capacity. Anyone wishing to install a new charger has to make an application to Western Power Distribution.</p>
<p>New Policy SCR9 F</p>	<p><u>New Policy SCR9 Electric vehicles charging infrastructure</u></p> <p><u>New Build Residential Development:</u></p> <p><u>All dwellings with one or more dedicated parking space or garage must provide access to electric vehicle charging infrastructure. Further guidance will be set out in the Transport and Development Supplementary Planning Documents. Where off street parking is not provided and parking is provided on street within a development proposal, the design and layout of the development should incorporate infrastructure to enable the on-street charging of electric vehicles which does not compromise any special characteristics of the area, the public realm or the mobility of other users.</u></p> <p><u>New Build Non-residential development</u></p> <p><u>In all non-residential developments providing 1 or more car parking bays, access to electric vehicle charging infrastructure must be</u></p>

	<p><u>provided. Further guidance will be set out in the Transport and Development Supplementary Planning Document Grid Capacity</u></p> <p><u>Where the costs of providing the necessary capacity in the local electric grid infrastructure connections to support electric vehicle infrastructure are abnormally high the applicant must provide evidence to robustly demonstrate why they are not able to comply with the above policy.</u></p>
	Environmental quality
Policy D8 D	<p>2 Development will be expected to reduce or at best maintain existing light levels to protect <u>retain</u> or improve 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 to protect wildlife habitats following best practice as set out in current guidance including B&NES 2018 Waterspace Design Guidance and Bats and Lighting in the UK (ILP, 2018).</u></p>
208 D	<p>208. Publications and websites providing further information, advice and guidance lighting specifications (not exhaustive):</p> <ul style="list-style-type: none"> - Bats and Lighting in the UK, Bat Conservation Trust, 2008 http://www.bats.org.uk/data/files/bats_and_lighting_in_the_uk_final_version_version_3_may_09.pdf - Guidance Notes for the Reduction of Obtrusive Light GN01:2011 (Institute of Lighting Professionals) ILP guidancenotes-light-pollution-2011.pdf - UK Road Lighting Standards: http://www.ukroads.org/ukroadlighting/scripts/standards.asp - Institute of Lighting Professionals (ILP) https://www.theilp.org.uk/resources/freeresources/ - Society of Light and Lighting http://www.cibse.org/society-of-light-and-lighting-sll/lighting-publications - Bath Lighting Strategy (part of the Pattern Book) - Bath waterside development – guidance on the protection of bats https://beta.bathnes.gov.uk/policy-and-documents-library/bath-waterside-development-guidance-protection-bats - Bats and artificial lighting in the UK https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/ - Dark skies in the AONB Position Statement https://www.mendiphillsaonb.org.uk/wp-content/uploads/2020/12/Dark-Skies-in-the-Mendip-Hills-AONB_statement-Final-Dec-2020.pdf - Cotswolds Conservation Board Position Statement Dark Skies and Artificial Light https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf

After Para 249

A/D

249a. The Cotswold and Mendip Hills AONB Management Plans set out the managing body's policy for the management of the AONB and the carrying out of their functions in relation to it. The Countryside and Rights of Way (CRoW) Act 2000, Section 85 places a statutory duty on all relevant authorities to have regard to conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty.

<p>Policy NE2</p> <p>D</p>	<p>POLICY NE2: CONSERVING AND ENHANCING THE LANDSCAPE AND LANDSCAPE CHARACTER</p> <p>Add</p> <p><u>4 Great weight will be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities.</u></p>
<p>267</p> <p>A/D</p>	<p>267. Policy NE3 seeks to conserve and increase the abundance and diversity of Bath and North East Somerset’s wildlife habitats and species and to minimise adverse effects where conflicts of interest are unavoidable. It covers internationally, nationally, and locally important sites, species and habitats, as well as seeking to protect a range of natural features which are valuable for wildlife, amenity, historic, recreational or visual reasons and aas routes for wildlife migration. The policy articulates what is required of developers when submitting a planning application which either directly or indirectly affects wildlife sites or habitats.</p>

Policy NE3

POLICY NE3: Sites, Species and Habitats

D

1 Development that would adversely affect, directly or indirectly, internationally or nationally protected **sites, National Network Sites (SPAS and SACS) or internationally protected** species and/or their habitats will not be permitted **(such development needs to be approved by the Government/New Office for Environmental Protection)**.

2 Development that would adversely affect, directly or indirectly, internationally Important Sites **nationally important sites or species (and/or their habitats)** will not be permitted except in exceptional circumstances where:

a) there is no alternative solution; and,

b) there are imperative reasons of overriding public interest for the development; and

c) mitigation measures can be secured to prevent any significant adverse effect on the site, **including retention of existing habitat and vegetation in situ; replacement habitat creation and bespoke measures.**

3 Development ~~which~~ **that** would adversely affect, directly or indirectly other, species, habitats or features of biodiversity/ geodiversity importance or value will only be permitted in the following cases:

a) for Sites of Special Scientific Interest, where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest **for irreplaceable habitats (such as ancient woodlands; veteran trees; ancient grasslands; or SAC bat habitat within juvenile substances zones) development will not be permitted unless there are wholly exceptional circumstances* and a suitable mitigation and compensation strategy is provided;**

b) for Sites of Nature Conservation Importance; Local Nature Reserves, Regionally Important Geological/ Geomorphological Sites and other sites of equivalent nature conservation value, where material considerations are sufficient to outweigh the local biological geological / geomorphological and community/amenity value of the site; **where impacts have been minimised; and where there are opportunities to replace and/or offset the loss; and where the test of 'No Satisfactory Alternative' (including do nothing) have been met;**

c) for UK Priority Species and UK Priority Habitats **(not covered by clause 3a)**, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat; **and where impacts have been minimised; and where it can be demonstrated that it is possible to replace and/or offset the loss to at least equivalent or greater ecological value; and where the test of No Satisfactory Alternative (including do nothing)**

have been met:

d) for locally important species and habitats, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat;

e) for features of the landscape such as trees, copses, woodlands, **woodland edge**, grasslands, batches, ponds, ~~roadside~~ verges, veteran trees, hedgerows, walls, orchards, and watercourses and their corridors if they are of amenity, wildlife, or landscape value, or if they contribute to a wider network of habitats, where such features are retained and enhanced unless the loss of such features is unavoidable and material considerations outweigh the need to retain the features.

4 In all cases:

a) ~~Firstly~~, any harm to the nature conservation value of the site is minimised; and

b) ~~secondly~~, compensatory provision of at least equal nature conservation value is made for any outstanding harm, and

c) ~~Thirdly, ecological enhancements are made~~ **Biodiversity Net Gain will be delivered and managed in perpetuity (minimum of 30 years) through the appropriate means e.g. a legal agreement; and**

d) ~~Then~~, as appropriate:

i Measures for the protection and recovery of priority species are made.

ii Provision is made for the management of retained and created habitat features.

iii Site lighting details are designed to avoid harm to nature conservation interests; including habitat connectivity and function as part of an ecological corridor.

Note: wholly exceptional reasons mean, for example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

New Paras 267a-
267f

A/D

267a. The National Planning Policy Framework (NPPF) 2019 sets out that 'Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impact on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.' 'Enhancing biodiversity is integral to sustainable development, and BNG is an approach to embed and demonstrate biodiversity enhancement within development. It involves first avoiding and then minimising biodiversity loss as far as possible, and achieving measurable net gains that contribute towards local and strategic biodiversity priorities.' (CIRIA, C776a).

267b. Biodiversity Net Gain (BNG) is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development. The Environment Bill proposes to introduce a 10% mandatory requirement for biodiversity net gain for certain development types, and will set out specific requirements, including use of different DEFRA metrics for major and minor schemes, and the requirement for long term habitat management plans for BNG habitats retained, created or enhanced.

267c. Prior to the mandatory BNG requirements coming into effect the Council's BNG policy will reflect the proposed mandatory measures, including use of the DEFRA metrics and emerging national guidance. The council will also seek use of the 10 BNG Good Practice Principles Biodiversity Net Gain: Good practice principles for development (CIEEM, CIRIA, IEMA, 2016)

	<p><u>267d. Proposals for off-site BNG will be expected to demonstrate how they contribute to areas of significance for local nature recovery including enhancing, buffering or linking protected sites and/or contributions to the WENP Nature Recovery Network Policy NE5). Where there is evidence of deliberate neglect or damage to any of the habitats and species on a site before an application, their deteriorated condition will not be taken into consideration and the ecological potential and or previously recorded habitats of the site will be used to decide the acceptability of any development proposals.</u></p> <p><u>267e. Work is progressing on the B&NES Biodiversity Supplementary Planning Document (SPD) setting out local requirements for delivering biodiversity net gain and opportunities to deliver biodiversity net gain on householder and exempted brownfield sites.</u></p> <p><u>267f. It is proposed to take forward a requirement of 15% BNG within the full Local Plan Review.</u></p>
<p>Insert after Policy NE3 New Policy NE3a Biodiversity Net Gain D</p>	<p><u>New Policy NE3a Biodiversity Net Gain</u> <u>Development will only be permitted for major developments where a Biodiversity Net Gain of at least 10% is demonstrated and secured in perpetuity (at least 30 years) subject to the following requirements:</u></p> <p><u>a The latest DEFRA metric or agreed equivalent is used to quantify the biodiversity value of the site pre-development, post-development after application of the mitigation hierarchy and for any off-site areas proposed for habitat creation or enhancement both pre- and post development.</u> <u>b That the assessment be undertaken by a suitably qualified and/or experience ecologist and is submitted together with baseline and proposed habitat mapping in a digital format with the application.</u> <u>c A management plan will be required, detailing how the post-development biodiversity values of the site and any supporting off-site provision will be secured, managed and monitored in perpetuity.</u> <u>d Any off-site habitats created or enhanced are well located to maximise opportunities for local nature recovery.</u></p> <p><u>For minor developments, development will only be permitted where no net loss and appropriate net gain of biodiversity is secured using the latest DEFRA Small Sites metric or agreed equivalent.</u></p> <p><u>Opportunities to secure Biodiversity Net Gain on householder developments and exempted brownfield sites will be supported.</u></p>

271

Ecological Networks **and Nature Recovery**

A/D

271. National planning policy requires that components of the local ecological networks are identified and mapped. This should include the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them.

Bath & North East Somerset is part of the West of England Nature Partnership (WENP) which has mapped a series of Nature Recovery Networks, focussed on grasslands, woodlands and waterways. These include the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones. These are the B&NES's Ecological Networks. Bath & North East Somerset's Ecological Networks

comprises:

– The Cotswolds Nature Improvement Area (NIA)

	<ul style="list-style-type: none"> - Strategic Nature Areas (SNAs) - Horseshoe Bat Foraging Corridor (Draft) - Protected Wildlife sites (Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, Sites of Nature Conservation Interest, Local Nature Reserves) - UK Priority Habitats including conservation buffers/ restoration zones - Flood Zones 2 and 3 - Local BAP Habitat (Post Industrial Sites)
Policy NE5	POLICY NE5: Ecological <i>Networks</i> and Nature Recovery
D	Development proposals will be expected to demonstrate what that a positive contribution will be made to ecological networks Nature Recovery Networks as shown on the Policies Map and for maintaining or creating local ecological networks through habitat creation, protection, enhancement, restoration and/or management.
Policy NE6	3 Development proposals directly or indirectly affecting ancient woodland or and ancient trees or veteran trees will not be permitted.
D	
277	Supplementary Planning Documents and Guidance and other relevant guidance will be used to guide decisions-making on proposals for development. <u>The Government is currently formulating its England Tree Strategy and has published The England Tree Action Plan (May 2021) which sets out the Government's vision for the treescape it wants to see by 2050 and policy actions to achieve it. The Forest of Avon Plan: A Tree and Woodland Strategy for the West of England was launched in June 2021 and B&NES as a West of England Nature Partnership partner is committed to its part in delivering the vision, goals and actions proposed in the strategy including through a B&NES Tree and Woodland Delivery Plan currently in preparation.</u>
D/A	<p>Other relevant guidance This includes:</p> <ul style="list-style-type: none"> - Trees and Design Action Group (TDAG) best practice guides including <u>Trees, Planning and Development: A guide for Delivery (2021)</u> and Trees in the Townscape, a Guide for Decision Makers (2012) - Green Infrastructure Strategy (March 2013) - Planning Obligations SPD - City of Bath World Heritage Site Setting SPD (August 2013) <p>Conservation Area Statements and Appraisals</p>
Included all text to show context.	278. The concept of green infrastructure (GI) is now firmly embedded in national policy with the NPPF requiring local planning authorities to set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It defines green infrastructure as a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
D/A	279. The wider benefits of GI for B&NES are set out in the Council's Green Infrastructure Strategy <u>currently being updated (see below)</u> . <u>The B&NES Green Space Strategy (2015-2029) includes green spaces within Bath and North East Somerset and set out standards for quantity, quality, and access to green spaces. The</u>

importance of GI is further highlighted in the B&NES Health and Wellbeing Strategy 2015-2019, with priority 1 being to 'Create healthy and sustainable places', with a key measure under this priority being access to high quality open and green spaces. The NHS and Public Health England are committed to driving a 'whole person' approach to health and considers the wider determinants of health and wellbeing, in which the natural environment plays an imperative role.

279a. B&NES Council has adopted the West of England Joint Green Infrastructure Strategy 2020-2030 (JGIS). The creation, maintenance, and enhancement of a GI network at a variety of spatial scales is central to nature recovery and the Council's commitments in relation to the ecological emergency. The nature-based solutions which flow from this include the following as set out in the WoE JGIS:

- supporting health and well-being and improving health equity. This includes improving mental and physical health, greater community cohesion and reduced social isolation,**
- mitigating and adapting to climate change, for example through natural flood management, through carefully designed SUDs within new developments and through tree and woodland planting**
- protecting, managing, and enhancing landscape character**
- reducing air and noise pollution**
- increasing the sustainability of food production**
- promoting economic growth, employment and skills improvement**

280. A well designed, managed and integrated network of GI provides a wide range of direct and indirect benefits to people, places and wildlife. Where this is linked with good public access and recreational opportunities it provides invaluable assets for developing and supporting healthy, happy and vibrant local communities. In harnessing, sustaining managing the natural environment it will deliver services that are essential to quality of life. It will provide local solutions to mitigate and adapt to climate change. GI can also help local responses to sustainable travel, wildlife habitats, local food production, water management including use of sustainable drainage and conserving or enhancing sense of place, landscape character, historical and cultural features. It can deliver economic benefits and opportunities, assisting ecotourism, business location and investment decisions.

281. B&NES already has a wealth of existing green assets including open green spaces, street trees and woodland, other natural habitats, recreational routes, historic landscape, allotments and waterways such as the Kennet and Avon canal. However, the concept of GI looks beyond existing designations, seeking opportunities to enhance the physical and functional connectivity of assets, and to extend the benefits for the community and make them much more accessible to people and wildlife.

282. B&NES Strategic GI network diagram (see Diagram 6) is illustrative and shows a strategic overview of existing GI assets and some of the key opportunities. In the rural areas the network is based around the key recreational routes, river corridors, existing networks of wildlife sites and Strategic Nature Areas (SNAs). SNAs represent the most important areas for the conservation, expansion and restoration of important habitats. The Strategic GI corridors indicate functioning networks for recreation and biodiversity. GI networks and areas exist at a variety of spatial scales from the regional, West of England, to B&NES-wide, to local neighbourhoods and areas. GI does not distinguish between rural and urban but permeates everywhere.

283. In urban areas the network is influenced by the existing urban form and function, but and GI links through and within urban areas are an integral part of creating healthy and sustainable communities. The introduction of GI in urban areas has multiple economic, health and environmental benefits. Urban street planting provides shade and shelter and reduces the risk of heat island effects. Urban trees can play a significant part in removing particulate

matter from the air and even having an indirect interaction with nature, such as viewing trees or the countryside through windows, has been associated

with lower blood pressure. Existing GI assets and networks (including the nature recovery network, hydrological network and sustainable movement network) need to be protected and enhanced to achieve their full value at local and ~~District~~ **and regional** levels. The River corridor through Bath and beyond is a key GI asset that requires a "whole river" approach to realise its full potential as a multifunctional green corridor. The Placemaking Plan will set out how new developments can contribute effectively to green infrastructure.

Strategic GI projects within B&NES include:

283a. Bath River Line: The River corridor through Bath and beyond is a key GI asset that requires a "whole river" approach to realise its full potential as a multifunctional green corridor. The Bath River Line will provide a high-quality walking and cycling route between Newbridge and Batheaston connecting adjacent communities. It will protect and enhance the natural environment, resorting habitats and biodiversity. Bath River Line will provide spaces for all to enjoy whilst invigorating the local economy and providing new opportunities for tourism. It will celebrate the unique built heritage and landscape character of the city, providing a strong sense of place and enhancing the setting of the World Heritage Site.

283b. Bathscape: The Bathscape Scheme aims to restore and enhance the complex landscape of Bathscape (essentially its woodlands and calcareous grasslands), make it more accessible and help ensure it is appreciated and actively enjoyed by more people in Bath, both residents and visitors alike. The programme is helping to develop Bath and the Bathscape as a Landscape City – developing understanding of the landscape as both fundamental to the WHS designation and to every aspect of life and work in the City.

283c. Somer Valley Rediscovered: This partnership project aims to improve biodiversity and, by increasing people's connections to nature, improve their health and wellbeing. Projects include providing better access to greenspace, habitat restoration, setting up volunteer networks to manage sites and a programme of events to intrigue and inspire people to enjoy and value their local natural spaces. The project area includes Radstock, Midsomer Norton and Westfield, the large villages of Paulton and Peasedown St John and surrounding countryside and smaller villages. It is an area that has been profoundly influenced by the former coal mining industry.

283d. WaterSpace Connected – from Dundas to Avonmouth: This is partnership project covering the Local Authority areas of B&NES and Bristol. It is in development, and expands on the successful B&NES WaterSpace study and project area. The Bath River Line is a flagship B&NES Waterspace project. Waterspace focusses on the themes of water quality & environmental enhancement; recreation and leisure; assets and asset Management; mooring strategy and navigation; regeneration & development

283e. River Chew Reconnected: A partnership project covering the River Chew sub-catchment between the Mendip Hills and Keynsham. It is currently in development and will focus on nature recovery, natural flood management, and health & wellbeing through sustainable movement networks.

283f. AONB Link: This is a partnership project in development to connect the National Landscapes of the Cotswolds and Mendip Hills and linking with Bathscape.

284. The Council's adopted Green Infrastructure Strategy was developed within the subregional context **now covered by the WoE JGIS**, to ensure that crossboundary GI issues are addressed. As well as identifying the existing network, assets and opportunities for the improvement and creation of new GI, the Green Infrastructure Strategy will ensure that GI is delivered, maintained and managed sustainably and creatively well into the future. **Core GI B&NES-wide principles are set out in Policy CP7.**

<p>Policy CP7</p> <p>D</p>	<p>POLICY CP7: Green infrastructure</p> <p>The integrity, multi-functionality, quality and connectivity of the strategic Green Infrastructure (GI) network will be protected, enhanced and managed. Opportunities will be taken to connect with, improve and extend the network. Existing and new GI must be planned, delivered and managed as <u>a key delivery mechanism for nature recovery and</u> an integral part of creating <u>healthy and</u> sustainable communities.</p> <p>Delivery</p> <p>The Council has a central role in the provision, delivery and planning of GI through its role as local planning authority and direct provider of significant areas of open spaces. It will also work in partnership with key public and private bodies, local communities and the voluntary sector to protect and enhance the GI network and ensure a strategic approach is taken.</p> <p><u>The Bath River Line is a strategic green infrastructure project which will provide a high-quality walking and cycling route between Newbridge to Batheaston. It will protect and enhance the natural environment and will provide spaces for all as part of a wider network of green infrastructure. Development proposals must where possible take the opportunity to connect into and enhance the Bath River Line walking and cycling route safeguarded under Policy ST2A. The Bath River Line is subject to a number of policies within the Local Plan including NE1, NE3 and B1.</u></p> <p>The impact of new development on GI will be assessed through the Development Management process. The <u>WoE JGIS and B&NES</u> Council's adopted GI Strategy sets out further guidance as to how GI principles should be applied to development proposals including provision of major infrastructure improvements. Deliver will also be through the planning process by integrating green infrastructure principles into the Placemaking Plan and other Local Plan documents.</p>
<p>287 and 288</p>	

<p>Policy NE1</p> <p>D</p>	<p>POLICY NE1: Development and Green Infrastructure</p> <p>1 Within the context of Policy CP7-dDevelopment will be permitted provided:</p> <p>a) it can be demonstrated that <u>the proposed development design will maximise</u> opportunities <u>for effective and functional</u> have been maximised to design Green Infrastructure (GI), <u> focussing on the use of nature based solutions to deliver community benefits</u> into the proposed development;</p> <p>b) it does not adversely affect the integrity and value of strategic GI corridors;</p> <p>c) the scheme makes a positive contribution to the GI network through the creation, enhancement and management of new, and existing GI assets, <u>linking to active travel routes where feasible to improve accessibility and where possible creating or enhancing linkages with existing or in-development strategic GI projects</u>; and</p> <p>2 Proposals for major developments should also be accompanied by:</p> <p>a) a plan of the existing green infrastructure assets within and around the development site; and</p> <p>b) a GI “proposal” demonstrating how GI has been incorporated into the scheme in order to increase function and improve connectivity of GI assets, <u>demonstrate the delivery of a range of nature-based solutions and</u> including links to existing the local and strategic networks <u>and providing new connections between existing and/or new linear wildlife habitats.</u></p> <p>3 Developers will be required to address GI in any submitted site Masterplan which as a minimum fulfils the requirements of clauses 1) and 2) above.</p>
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Para 301 A	<p>delete paragraph and replace with:</p> <p><u>There are a number of settlements in the District that are washed over by the Green Belt. The following that have been identified to be a village and have a defined infill boundary are:</u></p> <p>Burnett, Chewlwood, Chew Magna, Chew Stoke, Claverton, Combe Hay, Compton Dando, Corston, Dunkerton, Englishcombe, Freshford, Hinton Charterhouse, Kelston, Marksbury, Monkton Combe, Newton St. Loe, North Stoke, Norton Malreward, Pensford, Priston, Queen Charlton, Shoscombe, South Stoke, Stanton Drew (including Upper Stanton Drew and Highfields), Stanton Prior, Tunley, Upper Swainswick, Wellow and Woolley.</p>
Para 302 A	<p>The NPPF confirms that although the construction of new buildings is regarded as inappropriate development in Green Belt, limited infilling in villages is considered an exception to this policy. The Core Strategy defines 'infilling' in relation to housing as the filling of small gaps within existing development e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage, the plot generally being surrounded on at least three sides by developed sites or roads.</p>
New para after 302 and delete 303 A	<p>Delete paragraph and replace with:</p> <p><u>302a. As the NPPF confirms that infilling in villages within the Green Belt is not regarded as inappropriate development, infill boundaries were defined in consultation with parish councils for all villages washed over by the Green Belt. Infill boundaries have been defined so as to encompass all parts of the village where there are opportunities for infill development and to exclude those areas where development would not be infill. As such the infill boundaries define the areas where infill development that meets the definition in the Core Strategy would be acceptable in principle to help to avoid dispute over whether particular sites are covered by infill policies and provide certainty as to where new buildings would be acceptable in Green Belt settlements, subject to other material considerations.</u></p> <p>303. There is no longer any specific reference to the need to define 'infill boundaries' or distinction made between residential and other developments in this context. Nevertheless, Housing Development Boundaries continue to be defined for those washed over Green Belt villages in which infilling for housing development would be acceptable and to help avoid dispute over whether particular sites are covered by infill policies and provide certainty as to where residential development would be acceptable in Green Belt settlements.</p>
Policy GB2 A/D	<p>POLICY GB2 DEVELOPMENT IN GREEN BELT VILLAGES</p> <p>Development New buildings in villages in the Green Belt will not be permitted unless it is limited to infilling and <u>the proposal is located within the defined Infill Boundary.</u> in the case of residential development the proposal is within the defined Housing Development Boundary.</p>
Policy GB3 B	<p>POLICY GB3: EXTENSIONS AND ALTERATIONS TO BUILDINGS IN THE GREEN BELT</p> <p>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</p>
POLICY PCS5:	POLICY PCS5: CONTAMINATION

<p>CONTAMINATION</p> <p>D</p>	<p>Development will only be permitted on land either known to be or strongly suspected of being contaminated, or where development may result in <u>the contamination of land or</u> the release of contaminants from adjoining land, provided:</p> <p>1) the proposal would not cause significant harm or risk of significant harm to health or the environment or cause pollution of any watercourse, water body or aquifer</p>
<p>Building strong & vibrant communities</p>	
<p>New para 349a</p> <p>A</p>	<p><u>349a. On 24th May 2021, Government published a Written Ministerial Statement setting out First Homes requirements and published First Homes Planning Practice Guidance, with changes coming into effect from 28 June 2021. First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of ‘affordable housing’ for planning purposes. The Council will publish a First Homes Position Statement.</u></p>
<p>Policy H2</p> <p>B</p>	<p>POLICY H2: HOUSES IN MULTIPLE OCCUPATION</p> <p>District-wide a change of use from residential (C3) to a large HMO (Sui Generis use class) will require planning permission. In Bath, a change of use from residential to a small HMO (C4) will also require planning permission as there is a City-wide Article 4 Direction in place. The following criteria will be considered when determining these applications:</p> <p><u>Proposals for:</u></p> <ul style="list-style-type: none"> - <u>A change of use from residential (C3) to small HMO (C4) in Bath;</u> - <u>A change of use from residential (C3) to large HMO (Sui Generis) district-wide;</u> - <u>Provision of new build HMO district-wide;</u> - <u>A change of use from other uses to HMO district-wide; and</u> - <u>Intensification of small HMO (C4) to large HMO (Sui Generis) district-wide</u> <p><u>will be refused if:</u></p> <ul style="list-style-type: none"> i. If the site is within Bath, and within an area with a high concentration of existing HMOs (as defined in the Houses in Multiple Occupation in Bath Supplementary Planning Document, or successor document), further changes of use to HMO use will not be supported as they will be contrary to supporting a balanced community; ii. The HMO use is incompatible with the character and amenity of established adjacent uses; iii. The HMO use significantly harms the amenity of adjoining residents through a loss of privacy, visual and noise intrusion;

	<p>iv. The HMO use creates a severe transport impact;</p> <p>v. <u>The HMO does not provide a good standard of accommodation for occupiers;</u></p> <p>vi. <u>The HMO property does not achieve an Energy Performance Certificate “C” rating</u></p> <p>vii. The HMO use results in the unacceptable loss of accommodation in a locality, in terms of mix, size and type;</p> <p>viii. The development prejudices the continued commercial use of ground/lower floors.</p> <p><u>Where a new build HMO is proposed, development should be consistent with other relevant Local Plan policies and guidance relating to new build residential accommodation.</u></p> <p><u>A condition restricting the number of occupants may be attached to permissions where deemed necessary to ensure that no further harmful intensification will occur.</u></p>
<p>New policy and supporting text</p> <p>A</p> <p>Any allocations will have considered mitigation requirements. & Include protective clause for Nature Conservation</p> <p>Windfalls must comply with NE & GI policies</p>	<p>Insert after policy H2</p> <p><u>Purpose Built Student Accommodation</u></p> <p><u>370a. Purpose Built Student Accommodation (PBSA) is accommodation built, or converted, with the specific intention of being occupied by students. Such accommodation is usually provided in the form of cluster flats with shared facilities, individual en-suite units, or studios, and relates to buildings which are not classified by planning use class, or licensing, as HMOs.</u></p> <p><u>370b. The Council’s policy framework seeks to address student accommodation needs arising from educational establishments, whilst not prejudicing other economic, environmental and social objectives from being achieved across the district.</u></p> <p><u>370c. Policies B5 and H2A set out that as a first priority PBSA should be developed on-campus, and that it will only be allowed on other sites where a need can be demonstrated. Policy H2A sets out the policy requirements for all new, extensions to and conversions to PBSA on sites not allocated for student accommodation, including the demonstration of need in the form of a formal agreement between a developer and an education provider, confirming the number of bed-spaces and accommodation type required.</u></p>

New Policy H2A for Purpose Built Student Accommodation

A/I/J

Any allocations will have considered mitigation requirements.

& Include protective clause for Nature Conservation

Windfalls must comply with NE & GI policies

POLICY H2A: PURPOSE BUILT STUDENT ACCOMMODATION

Purpose built student accommodation of an appropriate scale and design will be permitted:

a) **On allocated sites where student accommodation use is specifically identified within the Development Principles; or**

b) **Elsewhere in the district (except for areas restricted by policy B5), only where it can be demonstrated that there is a need for additional**

	<p><u>student accommodation.</u></p> <p><u>All proposals for new, extensions to, or conversions to, Purpose-Built Student Accommodation on sites not allocated for student accommodation, will be required to demonstrate that:</u></p> <p><u>i. There is a need for additional student accommodation of the type and in the location proposed, evidenced by a formal agreement between the developer and a relevant education provider, for the supply of bed spaces created by the development;</u></p> <p><u>ii. The proposal will not result in a significant negative impact on retail, employment, leisure, tourism, housing or the council’s wider strategic objectives;</u></p> <p><u>iii. The site is in a location accessible by sustainable transport methods, including to the educational establishment to which it is associated;</u></p> <p><u>iv. The use of the site for student accommodation is appropriate in relation to neighbouring uses;</u></p> <p><u>v. The development will not have an unacceptable impact on the amenity of surrounding residents. A management plan will be provided prior to occupation of the development, to ensure adequate management arrangements have been incorporated;</u></p> <p><u>vi. The internal design, layout and size of accommodation and facilities are of an appropriate standard;</u></p> <p><u>vii. The proposal provides an appropriate level of car parking having regard to relevant standards, and provides adequate provision for servicing, pick up and drop off;</u></p> <p><u>viii. The proposal provides adequate storage for recycling/refuse and bicycles, in line with relevant standards;</u></p> <p><u>ix. The development has been designed in such a way that it is capable of being re-configured through internal alterations to meet general housing needs in the future if necessary; and</u></p> <p><u>x. The proposal accords with other relevant Local Plan policies relating to, but not limited to, impact on the historic environment, high quality design, landscape, transport and access, flood risk and drainage, nature conservation, pollution and contamination, and responding to climate change.</u></p>
<p>Policy H3 G – schemes must comply with species legislation & NE planning policies</p>	<p>POLICY H3: RESIDENTIAL USES IN EXISTING BUILDINGS</p> <p>The sub-division of existing buildings <u>including outbuildings</u> will be permitted, unless:</p> <p>i. The residential use creates a severe transport impact, (in a way that the existing use would not);</p> <p>ii. The development prejudices the continued commercial use of ground/lower floors.</p>

	<p>iii. It would lead to a form of sub-division that would harm the significance of a listed building.</p> <p>The re-use of existing empty homes in continuing residential use will be strongly supported.</p>
<p>Policy H5 Retention of Existing Housing Stock B</p>	<p>POLICY H5: RETENTION OF EXISTING HOUSING STOCK</p> <p>Development which would result in the net loss of existing residential accommodation <u>units</u> will not be permitted unless, there are benefits that outweigh any harm, such as:</p> <ul style="list-style-type: none"> i. demonstrable and substantial conservation benefits ii. demonstrable and substantial economic, social or environmental benefits iii. benefits in terms of providing visitor accommodation

387 and 388

Accessibility Standards

A

387. Local Authorities have the opportunity to apply optional technical accessibility standards in relation to wheelchair accessibility and level access/adaptability of buildings, where they can demonstrate evidence of need and accommodate viability impacts. The standards are applied through Building Regulations but are introduced via local planning policies. Where there are existing local standards in place a “passport” approach is applied and the national optional technical standards can be applied as an equivalent. As B&NES already applied a local standard via its Planning Obligations SPD for Affordable Housing – which includes a requirement for 10% wheelchair accessible dwellings and a requirement for ground floor accessed residential properties to have access thresholds of a minimum gradient – the national standard will be applied in these circumstances.

388. The current evidence in the housing Accessibility Standards Needs Assessment shows that during the Plan period the newly arising demand for housing meeting enhanced accessibility standards equates to around 19% of all new market housing to be provided. A guidance note to support the operation of Policy H7 has been prepared.

387. The B&NES Corporate Strategy 2020-2024 overriding purpose is to improve people’s lives with principles focusing on prevention and preparing for the future. As set out in Planning Practice Guidance, ‘Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.’ (Paragraph: 008 Reference ID: 63-008-20190626)

387a. Paragraph 127 within the NPPF sets out that ‘Planning policies and decisions should ensure that developments... create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...’ Footnote 46 clarifies this paragraph setting out that ‘Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.’

387b. The Bath Strategic Housing Market Assessment (SHMA) Volume II (March 2019) sets out the evidence base to housing accessibility requirements within Bath and North East Somerset. The Bath and North East Somerset: Local Plan Partial Update Viability Study undertaken by BNP Paribas Real

Estate on behalf of B&NES Council, tested the housing accessibility standards as set out in the SHMA and concluded that the policy requirement could 'be absorbed with little impact on residual land values'.

387c. Whilst planning policy sets out the requirements for accessibility standards through the Local Plan, requirements are implemented under Building Regulations - The Building Regulations 2010 Access to and use of buildings Approved Document M Volume 1: Dwellings. Standards include:

M4(1) Category 1: Visitable dwellings

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Within the M4(3) standard there are two sub-categories:

M4(3)(2a): wheelchair adaptable (meaning that they meet spatial and layout requirements but may not have been fully fitted and finished to accommodate immediate use by a wheelchair user)

M4(3)(2b): wheelchair accessible (meaning that the dwelling is fully ready for occupation by a wheelchair user household)

387d. If it is agreed at the planning stage that a specific development warrants flexibility in the application of the accessible housing standards M4(2) and M4(3), affected dwellings would be required to satisfy the mandatory building regulations requirements of M4(1) under Building Regulations.

387e. For the purposes of this policy, residential development includes student accommodation, co-living, build to rent, specialist housing and older person housing.

387f. M4(2) and M4(3) dwellings should be secured via planning condition to allow the Building Control body to check compliance of a development against the optional Building Regulation standards.

Policy H7

POLICY H7: Housing Accessibility

F

Accessibility standards for Affordable Housing will be applied in accordance with the Council's Planning Obligations Supplementary Planning Document, or successor guidance. For market housing, dwellings should have enhanced accessibility standards and should meet the optional technical standard 4(2) in the Building Regulations Approved Document M.

To provide suitable housing that meets the needs of different groups in the community, including disabled people, older people and families with young children, new residential development must ensure that:

For affordable housing, 7.8% of dwellings be built to meet Building Regulation M4(3)(2b) standard (wheelchair accessible housing) and the remainder to M4(2) accessible and adaptable dwellings standard within houses, ground floor flats and upper floor flats where a lift is installed, and age restricted homes.

	<p><u>For market housing, 5.6% of dwellings to be built to Building Regulation M4(3)(2a) standard (wheelchair adaptable housing) and 48% of the remainder to M4(2) accessible and adaptable dwellings standard.</u></p> <p><u>In exceptional circumstances, factors such as vulnerability to flooding, site topography and where the provision of a lift to dwelling entrances may not be achievable, may determine a reduced requirement in terms of Building Regulation M4(2) and M4(3) accessibility standards.</u></p>
<p>430</p> <p>A/D</p>	<p>Add new paragraph after 430</p> <p><u>430a Within the region there is an insufficient supply of youth play space, parks and recreational grounds across all area profiles. Difficulties maintaining natural turf and a shortage of available space has amplified the growth in artificial alternatives. Since the late 1970s when artificial alternatives gained popularity, technologies have advanced and third generation (3G) pitches are being employed with the backing of Sport England and the Football Association among other sporting bodies. Artificial pitches are useful mainly due to their ability to withstand inclement weather and provide significant benefits supporting active lifestyle and well-being by allowing people to play and exercise longer especially in winter.</u></p> <p><u>430b.3G pitches are constructed using longer pile artificial grass with a rubber crumb infill. These crumb granules are typically styrene butadiene rubber (SBR) originating from shredded waste tyres. Even though the Construction (Design and Management) Regulations 2007 place additional duties on those designing artificial pitches to eliminate or reduce hazards and risks during design, there are some concerns regarding impact on people's health resulting from exposure to contaminated granular material and through the contamination of soil and water. Investigations are ongoing by the European Chemicals Agency (ECHA) to determine whether crumb infill poses a risk to the health of those using third generation sports pitches. Users are advised to follow the safety recommendations made by the ECHA.</u></p> <p><u>430c. The NPPF states that planning policies and decisions should aim to avoid new and existing developments contributing to land contamination, soil degradation and water pollution. Policy PCS1 embodies the 'precautionary principle' toward the healthy functioning of environmental systems. Development will only be permitted provided a management plan is submitted in accordance with policy LCR6. This principle also applies to public safety and the health risks associated with exposure from playing on these surfaces. Users should follow the safety recommendations made by the European Chemical Agency (ECHA).</u></p>

LCR6 D	<p>Amend 3 as below:</p> <p>In all cases:</p> <ul style="list-style-type: none">a) the proposal would not give rise to significant adverse environmental conditions including the impact of air, noise, water, <u>soil</u> quality and light pollution and be detrimental to public safety and the amenities of local residents; andb) vehicle access and on-site vehicle parking would be provided to an appropriate standard; andc) adequate access to and between the facilities would be provided for people with disabilities. <p><u>Add</u></p> <p><u>A management plan should be submitted with an application for a new artificial grass pitch. The management plan should outline the materials used and should consider potential sources of pollution from the installation phase through to end of life, including disposal. This includes both chemical and solid wastes including microplastics. Adequate remediation measures must be implemented and reported to ensure any identified potential harm</u></p>
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	<u>can be suitably mitigated.</u>
	Building a prosperous economy
Sub-heading A	Proposals involving Office and Industrial Land and Floorspace (B1, B2, B8)
Sub-heading A	Office Development (B1a uses classes)
Sub-heading A	Change of use & redevelopment of B1(a) office to residential use C2 (residential institutions), C3 (dwelling houses), and C4 (HMOs) and Sui Generis
Paras479-408 A	<p>479.Paragraph 51 of the NPPF (March 2012) states that “local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate” <u>The Town and Country Planning (General Permitted Development etc.)(England)(Amendment)Order 2021 introduced a new Class MA – commercial, business and service uses to dwellinghouses subject to a prior approval process covering various impacts such as of the character or sustainability of the conservation area, noise, flooding, highways and transport issues and contamination. The Order sets out various limitations and exclusions including listed and buildings within a World Heritage Site.</u></p> <p>408.The term ‘change to’ encompasses both a change of use and redevelopment as ultimately both result in a ‘change to’ the use of land. Residential <u>in terms of Policy ED1B</u> is defined as development in the C2, C3 and C4 and use classes. Residential also encompasses sui generis residential uses such as large Houses in Multiple Occupation (HMO) (i.e. blocks of student accommodation with shared flats hosting more than 6 persons) <u>and Purpose Build Student Accommodation (PBSA).</u></p>
Paras 482-483 (delete) G	<p>482 In May 2013, Government amended the GPDO to introduce permitted development rights to enable premises in B1(a) office use (subject to some exclusions including but not limited to listed buildings and space built since May 2013) to change to C3 dwelling houses (though not C2, C4 or sui-generis residential uses) without the need for a planning application, and subject to a prior approval process covering noise, flooding, highways and transport issues and contamination.</p> <p>483 The most commonly occurring exclusion in B&NES relates to a listed buildings. If the building is listed or within the curtilage of a listed building (which is often the case in the centre of Bath), permitted development is not applicable and a planning application is needed. However, the Council considers that the purpose of such an application is to deal with (in addition to the prior approval matters listed above) any risk to the significance of heritage assets and not ‘in-principle’ issues. The permitted development rights initially lasted until May 2016, in April 2016, legislation came in to force to make this change permanent.</p>
Paras 484 – 486 A	<p>484. The utilisation of permitted development rights has had a meaningful negative impact on the supply of office space in Bath city centre, including on good quality occupied space. This means that more new office space will be needed than previously proposed when the Core Strategy was adopted. Whilst an expectation of losses was built into the Plan based on trends, permitted development rights have meant that those expectations have already been exceeded. The gross amount of new office space to be planned for has thus been increased as set out in Core Strategy Policy B1 in order to achieve the necessary net outcome. <u>The Article 4 Direction to remove permitted development rights was introduced on 24th May 2019 and it operates until the implementation of the new Class MA on 31st July 2021.</u> the rights permanent further risks undermining the spatial strategy for the city as a whole and therefore the Council will consider</p>

	<p>making an Article 4 Direction to remove the rights in specific parts of the District. In 2013 it applied to Government for parts of the District to be exempted as Article 2(5) land but was not successful.</p> <p>485. The current permitted development rights only apply to a literal 'change of use' (not redevelopment). Currently, proposals for the 'redevelopment' of office space to C3 residential use still require a planning application, which can test in-principle matters. (albeit against the background of the NPPF:51). However, in October 2015 Government announced that it intended to extend permitted development rights to redevelopment. The extended rights will enable the demolition of offices and new build as residential use but will be subject to as yet unknown limitations and prior approval tests by the local planning authority. Further, the Council will consider making an Article 4 Direction to remove change of use and redevelopment rights in specific parts of the District. The policies below are written to be sound in the current national planning context and to be flexible enough to be able to respond to changes at a national or local level, without requiring a review of the policy.</p> <p>486. Proposals for the redevelopment of offices to a C2, C4 or sui generis residential uses do not benefit from permitted development rights and will, in the case of non-student C2 & C4 uses, be judged against policy ED1B. Where a proposal is for student accommodation, Policy B5 of the Core Strategy will be used in decision-taking</p>
<p>Policy ED1B K</p> <p>The changes are probably limited in their impact to European sites since they correct terms and define more clearly the link between change of use & redevelopment of Office to residential. In addition they clarify issues related to listed buildings.</p>	<p>POLICY ED1B: CHANGE OF USE & REDEVELOPMENT OF B1 (A) OFFICE TO RESIDENTIAL USE</p> <ol style="list-style-type: none"> 1. Change of use (i.e. conversion) <p>The conversion of office space (B1a) to residential C3 is normally permitted development, subject to the exceptions set out in the <u>GPDO</u> GDPO. (which includes listed). The principle of change of use through conversion of listed buildings in office use to C3 residential use is also accepted, <u>provided there is no adverse impact on the significance of the listed building.</u></p> 2. <u>Change of use and Redevelopment</u> (i.e. demolition and construction of a new building) <p>The <u>Change of use and</u> redevelopment of office space (B1a) to non-student C2, C3 or C4, <u>or Sui Generis (large HMO and PBSA)</u> residential will be permitted unless there are strong economic reasons for refusal, as set out below.</p> 3. Strong economic reasons <p>Strong economic reasons will exist if:</p> <ul style="list-style-type: none"> a the site is within the Bath Central Area, the Bath City Riverside Enterprise Zone, Somerdale, or a town centre listed in Policy CP12, or on a site that has been granted permission since 2011; and b the loss of the space would be a significant loss to strategically important office accommodation in B&NES and significantly harm the Council's ability to plan positively for economic development. <p>In assessing whether strong economic reasons exist, consideration will be given to:</p> <ul style="list-style-type: none"> • the quality of the office space (existing or permitted) to be lost or not implemented compared to alternative, available premises in the locality, and whether these are suitable for any displaced existing occupiers;

	<ul style="list-style-type: none"> • the need to retain the space in the context of the achievement of strategic Core Strategy targets set out in B1, KE1 and SV1; • current market signals and forecasts (to ensure the long-term targets of Core Strategy policies B1, KE1 and SV1 remain justified throughout the plan period); • in the case of a mixed-use residential- led site granted permission since 2011, whether the premises are critical to the sustainability of the permission and whether implementation remains viable, and realistic in light of market signals. <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 and buildings within the World Heritage Site, 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 Use Class E former B1a use to C3 use will no longer be automatically considered acceptable.</p> <p>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 and buildings within the World Heritage Site.</p>
<p>Heading</p> <p>G</p>	<p>Change of use and redevelopment of B1 (a) office use to other town centre uses</p>
<p>Paras 487-488</p> <p>G</p>	<p>487. In May 2013, Government introduced permitted development rights that enabled B1 uses (up to 150 sq.m and excluding listed buildings) to change use to shops and other retail premises (A1, A2, A3 uses) for a single period of up to two years. After two years the use must revert back to B1. These rights ended in May 2015 (although a change of use implemented in April 2015 would be valid until 2017).</p> <p>488. The LPA has monitored the take up and impact of these rights. There were no adverse impacts to suggest that the Development Plan needs to be restrictive once the rights are extinguished. Retail uses normally require a ground floor premises and a permissive stance is therefore unlikely to cause a significant reduction to the stock of office space in the District, which usually occupies the space above shops. Accordingly, in designated city, town, district and local centres, and elsewhere there will be a permissive approach to applications to change use from B1 (a) offices to shops. If this approach results in significant unintended negative effects on the office market, the Council will undertake a partial review of the Plan via the fast track route set out in the NPPG.</p>
<p>New Para 488a</p> <p>G</p>	<p><u>488a</u></p> <p><u>In September 2020 the Government implemented changes to the Planning Use Class Order to combine a number of different town centre type uses including offices (former B1 use class), shops (former A1), restaurants (former A3), banks and estate agents (former A2), gyms (former D2), health facilities (former D1) into a single Class E “Commercial, Business and Service” use. Uses can change within this use class without the need to apply for planning permission thereby allowing an office for example to be converted to a shop, restaurant, health facility or gym, or vice versa.</u></p>

489

The use classes for hotels (Class C1) residential uses and industry (B2) and warehousing (B8) are retained, and there are new use classes for Learning and Non Residential Institutions (Class F1) and Local Community uses (Class F2) Permitted development rights do not exist for the change of use of office space to **hotel use (use class C1) and Sui Generis uses** D1 and D2 uses aside from in relation to a state-funded school (subject to exemptions and via a prior approval process). Where the control of **change of** use is possible the Council will prioritise the retention of office space over C1, D1 and D2 **hotel and other**

	uses not with Class E . It is necessary to do this due to the erosion of planning control in relation to changes of use (and potentially redevelopment) from office to C3. In practice this is most likely to be of use in protecting office space from hotel conversion/redevelopment in circumstances where this would be detrimental to the operation of the office market. In some cases this may not be detrimental.
Policy ED1C K Minor clarification	<p>POLICY ED1C: CHANGE OF USE AND REDEVELOPMENT OF B1 (A) OFFICE USE TO OTHER TOWN CENTRE USE (not within Use Class E)</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>2. The change of use or redevelopment of office space to other town centre uses (not within Use Class E) 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>
Sub Heading G	Light Industrial E(g)(iii) (B1c), Heavy Industrial (B2) and Warehousing (B8) Uses
490 G	<p>Paragraph 20 of NPPF expects LPAs to plan proactively to meet development needs of business, including industrial type activity. Planning positively for industrial development in B&NES means protecting the best of what the District has to offer in terms of supply, whilst adding to the stock of available land where needed. Permitted development rights enable both extensions to and losses of industrial space in certain circumstances and in some cases are subject to a prior approval process. Paragraph 80 of NPPF expects that ‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.’</p>
491 G	<p>Historically, Policy ET.3 of the B&NES Local Plan (2007) identified ‘Core Business Areas’ for B1c (now E(g)(iii)), B2 and B8 uses. These areas were afforded a high level of protection from alternative (higher value) uses. The Core Employment Areas have been reviewed to assess whether they should be specifically identified for protection in the current Local Plan as Strategic Industrial Estates or Other Primary Industrial Estates. In reviewing land the Council has had regard to:</p> <p>...</p> <p>5) Paragraph 22 of the NPPF (2012), which advises that there must be a reasonable prospect of a site being used for the allocated employment use. This applies equally to land currently or last used for employment purposes and new greenfield allocations.</p>

New paras 494a-
494d
A/G

494a The monitoring evidence shows that since the start of the Local Plan period in 2011 losses of industrial sites across the District have exceeded the levels set out in the Plan, and the necessary new employment development has not been realised. Additionally, evidence shows that demand for industrial space has increased and is greater than was envisaged at the time of preparing the current Local Plan. There are also limited opportunities

	<p><u>to provide new industrial land, especially in Bath. Therefore, Policies ED2A and ED2B have been amended through the Partial Update.</u></p> <p><u>494b Placemaking Plan Policy ED2B was adopted in the context of the National Planning Policy Framework 2012. The NPPF 2012 set out a presumption that employment land and premises should be redeveloped for housing, unless there are 'strong economic reasons' as to why this would be inappropriate. The revised NPPF published in 2018 continues to encourage the use of previously developed land for housing, and that using currently unallocated retail and employment land for homes should be supported but only where it does not undermine key economic sectors and would be compatible with other policies in the Framework (including those relating to supporting economic growth and productivity).</u></p> <p><u>494c Due to the chronic shortage of industrial space within the Bath City area, all existing industrial sites including small sites play an important role to Bath remaining a fully functioning economy. It is also important in ensuring that climate emergency goals are fulfilled - both in terms of employment and last mile delivery. Furthermore, industrial space is required to help facilitate green recovery with evidence of demand for such space shown by enquiries registered with the Council. The ongoing presence of industrial space within the city is essential to a functional employment ecosystem.</u></p> <p><u>494d Reflecting the latest national policy (NPPF 2019) and the significant losses of industrial land that have occurred since 2011; and the increased demand for industrial accommodation Policy ED2B has been strengthened to provide greater policy protection of non-strategic or other industrial sites.</u></p>
495-499 G	Delete paras 495-500
Policy ED2A C Limited change for clarification & reference to a new policy	<p>POLICY ED2A: STRATEGIC (*) AND OTHER PRIMARY INDUSTRIAL ESTATES</p> <p>1. Proposals for light industrial, heavy industrial, warehousing (classes <u>E(g)(iii)B4e</u>, B2, B8), builders merchants will be acceptable in principle within the following Industrial Estates identified on the Policies Map. Proposals for car showrooms will also be acceptable on undeveloped land in these areas and where this would not replace <u>E(g)(iii) B4e</u> and B2 land and premises.</p> <p>2.The identification of these areas as Strategic and Other Primary Industrial Sites means that there is a presumption in favour of retaining them for the aforementioned <u>E(g)(iii) B4e</u>, B2 & B8 uses. ...</p> <p><u>4) A Locksbrook Creative Industry Hub has been designated within the Newbridge Riverside area focusing on business development in the creative industry. Clauses above do not apply to this area and Policy X sets out the specific development requirements.</u></p>
Policy ED2B C	POLICY ED2B: NON-STRATEGIC INDUSTRIAL PREMISES

	<p>1. Proposals for the uses listed in ED2A will be acceptable in-principle at sites already occupied by smaller clusters and stand-alone industrial premises provided that this would not cause unacceptable environmental, residential amenity or highways problems.</p> <p>2. Non-strategic sites are not afforded the same level of protection for industrial and warehousing (E(g)(iii) B4e, B2 & B8) uses as those listed in ED2A. Applications for residential development or others uses will normally be approved unless there is a strong economic reason why this would be inappropriate. Evidence of unsuccessful marketing on reasonable terms for 12 months prior to an application and during a sustained period of UK economic growth will be taken as evidence that there is not a strong economic reason for refusal. <u>However, there are strong economic reasons why other uses on these sites would be inappropriate because of the significant loss and lack of supply of industrial land. Applicants seeking to challenge this presumption should provide compelling evidence that circumstances have changed to the extent that there is no reasonable prospect of land or premises being used for industrial and warehousing uses, by reference to:</u></p> <p><u>a) whether the existing premises are being used productively, or if not, the viability of reusing vacant premises or developing allocated land for industrial use,</u></p> <p><u>b) the level of interest in the existing premises following a marketing period of 12 months, on reasonable terms, during a sustained period of UK economic growth.</u></p> <p><u>c) general market signals of demand across the District and in relation to the locality i.e. the relevant settlement(s)</u></p> <p><u>d) the availability and quality of alternative premises</u></p> <p><u>e) whether any other evidence casts critical doubt on the validity of Policy B1, KE1 and SV1 insofar as they relate to the required supply of industrial space</u></p> <p><u>3. Applicants will also need to demonstrate that non-industrial uses would not be in conflict with the industrial premises that remained around the site.</u></p>
<p>Policy RE1</p> <p>L/K?</p> <p><u>previously developed land can have high biodiversity value – reliant on other policies to safeguard biodiversity – not a significant HRA issue though?</u></p>	<p>POLICY 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 relevant policies, and involves:</p> <p>i) replacement of existing buildings;</p> <p>ii) the limited expansion, intensification or redevelopment of existing premises <u>or previously developed land</u>; and</p> <p>iii) they would not lead to dispersal of activity that prejudices town and village vitality and viability.</p>

541 A	Active ground floor uses referred to in Policy CP12 are generally those falling within use Classes A1 to A5 but can also include other town centre uses which are visited by large numbers of people.
542 A	NPPF paragraph 23 (2012) requires Local Plans to allocate a range of suitable sites to meet the scale and type of retail development needed in town centres. It is important that, as appropriate, this need is met in full and is not compromised by limited site availability. The Council is required in NPPF paragraph 161 (2012) to assess the quantitative and qualitative needs for land or floorspace for retail development over the plan period.
548 A	The site allocations sections of the Plan identify where new retail floorspace within town centres is intended to be met. However, other retail proposals outside of

	the centres may still come forward. The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available (or expected to become available within a reasonable period) , to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available (or expected to become available within a reasonable period) , to out of town centre locations, with preference for accessible sites which are well connected to the town centre.
551 A	In line with paragraph 27 of the NPPF, where a proposal fails to satisfy the sequential test, it should be refused.
Policy CR1 A	Where there are no suitable and viable sites available (or expected to become available within a reasonable period) 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. 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 (or expected to become available within a reasonable period) 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
Paras 554 -555 A	554.Paragraph 26 89 of the NPPF (2019) states that when assessing applications for retail, and leisure and office development outside of town centres, which are not in accordance with a Local Plan, Local Planning Authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. 555.The purpose of the test, as defined in the NPPG, is to ensure that the impact over time of the proposal on existing town centres is not significantly adverse. The test relates to retail, office and commercial leisure development only. The impact must be assessed in relation to all town centres that may be affected.

Policy CR2

POLICY CR2: IMPACT ASSESSMENTS

A

Outside the scope of Policy CR4, retail, ~~office~~ and commercial leisure development outside of centres will not be permitted if:

- i. It would be liable to have a significant adverse impact on the vitality, viability and diversity of existing centres; or
- 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.

Within Bath, an Impact Assessment will be required for ~~Use Class A1-5~~ 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~~ retail proposals over 280sqm (gross) that are located outside of the designated town centres and not in accordance with the Local Plan.

For commercial leisure proposals anywhere in the District, an Impact Assessment will be required for schemes over 1,000sqm (gross) that are located outside of a designated town centre and not in accordance with the Local Plan.

~~For office proposals anywhere in the District, an Impact Assessment will be required for schemes over 2,500sqm (gross) that are located outside of a designated~~

	<p>town centre and not in accordance with the Local Plan.</p> <p>The application of the impact test should be proportionate and appropriate for the given proposal.</p>
<p>Paras 562 – 566</p> <p>A</p>	<p>562. Primary Shopping Frontages are defined where there will be are a high proportion of Use Class A1 retail uses. A Primary Shopping Area is a defined area where Class A1-A5 retail development is concentrated.</p> <p>563. The previous Local Plan was very restrictive about the uses permitted within Primary Shopping Frontages (the loss of an A1 shop use from the ground floor was not permitted). This has been very successful in maintaining the Primary Shopping Frontages as predominantly A1 retail areas. Conversely, it has also had the effect of restricting other uses such as cafes and restaurants to areas outside of the frontages, and concentrating them within certain areas of the city centre.</p> <p>564. Consultation feedback suggested that in some areas, these uses had become over concentrated and that there was a negative impact on resident's amenity, resulting from noise and anti-social behaviour. Other feedback suggested that some non-A1 uses, such as banks and cafes can have a positive effect on footfall within centres.</p> <p>565. Policy CR3 therefore introduces a more provides a flexible approach in relation to Primary Shopping Frontages, acknowledging that retail can benefit from having diverse, non-A1 retail neighbours, creating a richer mix of footfall. It allows the Local Planning Authority to maintain a primary shopping function in the defined frontages whilst allowing other Class A uses which can also add to the attractiveness of, and vitality within, a town centre. However, it is imperative that a balance is maintained and the focus of the centres remains retail (A1) based.</p> <p><u>565a. While the NPPF refers to Primary Shopping Areas, the Government has introduced changes to the planning system that enable flexibility between town centre type uses. The Government has amended the Use Classes Order to combine a number of former different town centre type use classes including shops (former A1 use class), restaurants (former A3), banks and estate agents (former A2), gyms (former D2), health facilities (former D1) and offices (former B1), into a single Use Class E “Commercial, Business and Service” use. Uses can change within the use class without the need to apply for planning permission thereby allowing a shop for example to be converted to a restaurant, office or gym, or vice versa. Planning permission will still be required for what is termed sui generis uses, including drinking establishments, hot food take away outlets, betting shops and pay day loan shops, cinemas and nightclubs.</u></p> <p><u>565B. There is also greater protection for local shops “Shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres)” which are in a new use class F2(a). This is reflective of the trends in more home working and less travel that has lead to greater use of local shops and facilities during the Covid 19 pandemic.</u></p> <p>566. The main centres were subject to a Goad survey in 2014 which forms the basis of the definition of Primary Shopping Frontages and Primary Shopping Areas. A Frontage is considered to be the active parts of the shop, usually containing the shop entrance and/or large shop window. <u>Definitions of Active Frontage and Active Ground Floor uses are defined in the glossary to Placemaking Plan (see volume 6).</u></p>
<p>Policy CR3 part</p>	<p>POLICY CR3: PRIMARY SHOPPING AREAS AND PRIMARY SHOPPING FRONTAGES</p>

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	<p>Development within Primary Shopping Frontages</p> <p>Within Primary Shopping Frontages applications for 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> <ul style="list-style-type: none"> 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>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 balance and diversity of uses is retained and concentrations of uses other than Use Class A1 retail are avoided. ...</p>
569 3 rd bullet A	<p>The number and distribution of other existing and committed non-A1 retail uses within the defined primary retail frontage (including any premises subject to current Permitted Development changes of use);</p>
578 -580 A	<p>Permitted Development Rights and Prior Approval affecting Centres and Retailing within B&NES</p> <p>578. The Government has introduced new national permitted development rights in order to make it easier for businesses to make best use of their premises; deliver more homes; support high streets; simplify the change of use system; and support sustainability by promoting the reuse of buildings. They are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. The Prior Approval procedure requires a developer to provide some basic information about a proposed extension and involves a process of consultation with immediate neighbours. These rights mostly sit within Part 3 of Schedule 2 to the General Permitted Development Order.</p> <p>579. The GPDO may in some cases override the Development Plan.</p> <p>580. Where the GPDO refers to 'key shopping areas', The Local Planning Authority interprets these as the designated centres identified in Core Strategy Policy CP12.</p>
Para 581 A	<p>581. Our overarching approach to transport policy is to build on achievements to date and continue to The approach of the Local Development Framework is to continue the longstanding theme of reduce ing car dependency and make working towards making walking, cycling and use of public transport, the more attractive and convenient options for travel. Across the West of England, Joint Local Transport Plans over ten years have seen the number of cycling trips more double, and bus passenger trips increase by more than one third, in the context of a national 1% fall. This approach is embodied in the strategic objectives of the Core Strategy, and the place based section in seeking to enhance the walking, cycling and public transport network from existing communities to jobs, local services, facilities and attractions. The Placemaking Plan (2017) established strong foundations for this approach. However, the declaration of the Climate and Ecological Emergency (2019) with a target of carbon neutrality by 2030, coupled with the adoption of JLTP4 (2020), identifies and supports the need for substantial transport improvements to deliver a step-change in enabling sustainable transport and movement. The Council has recognised that “business as usual is not an option and that the Council and</p>

all our partners and contractors need to review all existing strategies and plans to re-align to the Climate Emergency. The Council will continue to work with neighbouring authorities **and the West of England Combined Authority (WECA)** to **address impacts of car dependency and deliver a transformational rebalancing of our transport network to address the Climate Emergency, support sustainable travel and healthier lifestyle.**
address these issues.

582. Notwithstanding achievements to date, the B&NES highway network remains heavily trafficked **with a high dependency on car travel,** highlighting the need to **fundamentally change the way we travel, with a strong focus on mode shift away from the private car usage. We will need to** undertake **transformational** transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to **work towards achieve carbon neutrality, to** minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres. **The Council's approach to strategic transport issues and major schemes is to set out in the current adopted Joint Local Transport Plan (JLTP), which has been developed with WECA partners. This includes a schedule of major schemes and adopted policy position on each. The purpose of the Development Plan is to set Council Policy relating to development and safeguarding land. it is not intended to duplicate or supersede the adopted JLTP, rather, both Plans are complementary. B&NES has also developed Transport Strategies for Bath and Keynsham, and are continually working on place-based solutions to transport issues within the District. Our Transport Strategies are intended to identify the key local-level issues, develop approaches to provide solutions, and form the basis for the development of specific schemes to come forward in line with the Strategy as a whole. The Place-based Strategies are important as they are bespoke to the locality and are a mechanism to translate overarching transport policy to local scheme delivery.** The Council remains concerned with the impact of through traffic, particularly HGVs, on the WHS. This is compounded by the incomplete nature of the Trunk Road Network to the east of the city. The Council will work with neighbouring authorities, including Wiltshire Council, to address the problem of through traffic in Bath, particularly traffic that currently uses the A36-A46 route through the city and continue to press Highways England and Transport Ministers to take steps for solutions to be identified and funded in the next Road Investment Strategy to be published in 2020. The Council will also review ~~t~~**The A4 corridor is a key strategic corridor which carries high volumes of people but experiences significant traffic congestions and negative environmental effects such as poor air quality in places such as Saltford. The A4 corridor has been identified as a Mass Transit route between Bristol and Bath within the JLTP4. We will work with WECA to support the delivery of transformational Mass Transit proposals which will increase transport options, dramatically improve journey times and significantly decrease congestion. For Saltford, we will fully assess options to provide bus priority before a decision on a bypass is made. We will also explore the possibility of introducing Mass Transit in Bath to help provide clean, efficient transport for those living, working and visiting the city whilst also meeting the future growth and transport needs of the City.** and, in particular, consider how best to improve the environment within Saltford and improve journey times and reliability between Bristol and Bath. This will include the options for a bypass of the village.

583. This approach is in line with national objectives and the Council's **Corporate** Sustainable Community Strategy. The approach also follows on from the five key **objectives** goals of the Joint Local Transport Plan (JLTP3), which are:

- **Take action against climate change and address poor air quality;** Reduce carbon emissions;
- Support **sustainable and inclusive** economic growth;
- **Enable equality and improve** promote accessibility;
- Contribute to better **health, wellbeing,** safety, **and** security and health;
- **Create better places** improve quality of life and a healthy natural environment.

583a. Our approach to transport within both the current adopted Joint Local Transport Plan and this Local Plan is both ambitious and realistic. However, we also need to achieve transformational change in the way we travel to meet our Climate Emergency obligations. The Council is fully committed to the target of Carbon Neutrality by 2030 and will keep progress towards this target and our approach to transport under review. If progress is not great enough, or fast enough, we are prepared to explore further interventions to reduce car usage, potentially including charging mechanisms such as a Workplace Parking Levy or Road User Charging.

Creating Better Places

584. This approach brings with it a wide range of benefits. The most significant, long term benefit to B&NES is that this approach creates more economically successful, more sociable, healthier, more **inclusive**, more accessible and more inviting places in which to live, work and visit. **Our Liveable Neighbourhoods Strategy sets out the key principles of our transport approach to creating better places.**
585. Whilst good accessibility is of absolute importance for places to function effectively, better and more sociable places are created where people dominate, rather than vehicular traffic. Streets are not just for movement; they form the shared public space between buildings, where city, town or village life takes place. **Streets needs to integrate and not segregate our communities and neighbourhoods, and promote an inclusive environment.** This is particularly the case in our historic settlements that have not been designed to accommodate the current levels of vehicular traffic that they often have to endure. There is a strong correlation between an enhanced public realm and better places; the experience of numerous cities around the world is testament to this approach. **Enhancing street environments can help stimulate local economic activity, reduce street crime and encourage a sense of local community. The Getting Around Bath Transport Strategy highlights the vision for the City. "Bath will enhance its unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core. This will enable more economic activity and growth, whilst enhancing its special character and environment and improving the quality of life for local people."**
586. Measures that support the shift to more sustainable modes of transport and that improve levels of accessibility to and within Bath, Keynsham, Somer Valley and the Rural Areas will be supported and promoted. **We will support measures that enhance the liveability of our neighbourhoods by reducing traffic volumes and speeds, making walking and cycling the mode of choice for local trips, and offering a range of choices for longer distance trips.**
587. Other critical benefits to undertaking this approach include meeting our **carbon neutrality obligations** reduction in CO2 emission targets, addressing **health and impacts of air pollution, combatting** rising obesity levels and general health **risks issues** arising through a lack of physical activity, **improving residents' wellbeing, reducing levels of inequality** and enabling improvements to be made to our historic environment and public realm. **Creating better places that people can live and spend time in, will also have a vast impact on other health and wellbeing aspects including social isolation and mental health.**
In creating better places, we must ensure that the principles of inclusive design (Manual for Streets, 2007) are followed. Inclusive design:
 - **Places people at the heart of the design process;**

	<ul style="list-style-type: none"> - <u>Acknowledges diversity and difference;</u> - <u>Offers choice where a single solution cannot accommodate all users;</u> - <u>Provides for flexibility in use; and</u> - <u>Provides buildings and environments that are convenient and enjoyable to use for everyone.</u>
<p>Paras 589 – 589f.</p> <p>A</p>	<p>Climate Change and Air Quality</p> <p>589. JLTP3 states ‘In 2008, road transport represented 32% of West of England CO2 emissions. This amounts to some 2.16 tonnes per head of population, similar to the national average of 2.13 tonnes. In reducing road transport carbon emissions JLTP3 focuses on:</p> <ul style="list-style-type: none"> ● Promotion of lower carbon choices ● Providing alternatives to the car ● Influencing travel behaviour and managing travel demand ● Workplace and school travel plans ● Personalised travel planning ● Improvements to walking and cycling infrastructure ● Public transport enhancements ● Integration of travel modes ● Better information ● Demand management and reducing the need to travel through technology and spatial planning ● Introduction of an appraisal of the impact of scheme/programme/policy options to inform their selection or otherwise for inclusion in JLTP3 delivery plans ● Robust understanding of the contribution to carbon reduction (or carbon increase) that each scheme, programme, policy is expected to deliver <p><u>589a.B&NES Council declared a Climate Emergency in 2019 and committed to achieving carbon neutrality by 2030. Transport contributes 29% (216,110t/CO2e/yr) of all direct and indirect emissions (Scope 1 & 2) within B&NES, emphasising the degree to which decarbonising the transport sector can contribute to carbon neutrality. The Council has declared three priorities to achieve the carbon neutrality, including “a major shift to mass transit, walking and cycling to reduce transport emissions.” Our approach will play a vital role in addressing inequalities across B&NES, which we have seen exacerbated by the COVID-19 pandemic.</u></p> <p><u>589b. Carbon neutrality cannot be achieved solely by gradual shift to Ultra-Low Emission Vehicles (ULEV), we need a big change in how people choose to travel, with a major shift to public transport, walking and cycling. This is especially important in Bath, where 42% of all journeys under 3km are taken by the private car. Our 2030 targets are as follows:</u></p> <ul style="list-style-type: none"> - <u>25% reduction in car and van mileage per person</u> - <u>76% electric vehicles, 14% hybrid, 10% petrol/diesel, private vehicle fleet</u> - <u>76% electric, 24% hybrid bus fleet</u> - <u>Full electrification of passenger rail by 2030</u> <p><u>589c. The Council is committed to providing the leadership needed to enable this scale of ambition to be realised, and recognises that this requires a</u></p>

	<p><u>significant and fundamental cultural shift. To transform the way we travel, we will need to be flexible, agile and brave as technologies evolve and lifestyles and future strategic and local development planning change. There is a significant uncertainty as to the medium and long term effect of Covid-19 on our work and travel patterns, and how that could translate into car usage, and we need to ensure that we capitalise on opportunities, and proactively manage risks associated, to drive a sustainable future. We will continuously maximise every opportunity and work in partnership with WECA, sustainable transport organisation, Public Health bus and rail operators and other key stakeholders to enable people to switch from car usage and ownership to cycling, walking, public transport, and shared mobility options such as car clubs.</u></p> <p><u>589d. Whilst the Council is committed to addressing the Climate and Ecological Emergency, we must achieve this equitably and inclusively. Data on household emission by income (2011) shows that the wealthiest (top 10% of earnings) produces over seven times more CO₂ emissions from cars, and indeed three to four times more overall, than the least wealthy (bottom 10% of earnings). Likewise we also know that those in lower income brackets are disproportionately more likely to suffer from the adverse effects of car usage, including health impacts from poor air quality.</u></p> <p><u>589e. B&NES has five designated Air Quality Management Areas (AQMA), where levels of Nitrogen Dioxide exceed the national annual average of 40 micrograms per cubic metre (µg/m³). The AQMAs are located in Bath, Keynsham, Saltford, Farrington Gurney and Temple Cloud. Air Quality Action Plans (AQAP) have been produced for these areas, outlining the actions required to reduce concentrations of air pollutants and exposure to air pollution.</u></p> <p><u>589f. Specifically, Bath's Clean Air Plan includes a Class C Clean Air Zone (CAZ), which came into effect in March 2021. The CAZ is required to help the city meet UK air quality legislation, as several places in Bath currently exceed the legal limits for Nitrogen Dioxide pollution, which is mainly caused by diesel and older petrol vehicles. The CAZ will charge all higher emissions vehicles, except private cars and motorcycles, to drive in Bath's City Centre. Its aim is to deter the majority of drivers of higher emissions vehicles from entering the inner city area. It is accompanied by traffic management in Queen's Square, to provide the necessary additional localised measure to reduce emissions to acceptable level without charging private vehicles.</u></p> <p>590. The reduction of the adverse effects of transport on climate change and air quality, particularly in Air Quality Management Areas (AQMA) in Bath and Keynsham and in future AQMAs, will be proactively managed in accordance with the NPPF.</p>
<p>New Paras 590a – 591</p> <p>A</p>	<p>Health, Obesity, <u>Health</u> and Well Being</p> <p><u>590a. The intrinsic link between transport, particularly opportunities for active travel, and health and well-being outcomes is well established and multi-faceted. Active Travel has the potential to achieve major population-wide health benefits. It is one of the most cost-effective and easiest ways of embedding physical activity in people's lives, resulting in array of physical and mental health and wellbeing benefits. Walking and cycling offer enjoyment, independence and contact with outdoor environments and these benefits may be particularly important for disabled people whose participation in other activities may be more restricted. Therefore, it is imperative that the built environment in B&NES is designed, created and built to support and enable people to incorporate movement, particularly walking and cycling, into their daily lives.</u></p> <p><u>590b. Physical inactivity contributes to one in six deaths in the UK,</u></p>

	<p><u>Doing regular exercise, like walking and cycling, can help to prevent and manage over 20 chronic conditions and diseases, including heart disease, type 2 diabetes and some cancers. Active travel also has an impact on mental health, with just 20 minutes of exercise a day cutting the risk of developing depression by 31%.</u></p> <p><u>590c. Vulnerable road users continue to be more seriously affected by road traffic incidents, and concerns about safety and security are a significant barrier to active travel for large numbers of people. Parental concern about road traffic injury is a major contributor to physical inactivity in children, due to reluctance to allow children outside without supervision. Severance and noise caused by motorised traffic exacerbates this and deters the use of active modes. Consequently, these factors can increase vehicle trips and perpetuate the issue.</u></p> <p><u>590d. High car dependency, poor air quality and inactive lifestyles pose a major threat to public health, including obesity and associated conditions. Public Health England identifies that 1.2m lives are lost each year as a result of excess weight, and that air pollution causes 28,000 -36,000 deaths each year. As well as physical health, there are growing concerns about impacts on integration and viability of local communities, quality of life, and mental health and well-being.</u></p> <p><u>590e. Disadvantaged areas tend to have a high density of main roads, leading to poorer air quality, higher noise levels and higher collision rates, exacerbating health inequalities. Children in the 10% most deprived wards in the UK are four times more likely to be hit by a car than by those in the 10% least deprived.</u></p> <p>591. <u>Transport therefore offers a great opportunity to contribute to better health, well-being, safety and security, and to address health inequalities, for those who live, work and travel in B&NES.</u> Continuing with the shift to more active travel is a key way of helping to tackle the pressing issues associated with poor health, rising obesity and general well-being. <u>We need to achieve a step change in the number of healthy, low carbon, walking and cycling trips. Furthermore, we need to continue to reduce the number of road casualties and improve personal safety, including from crime, on our transport network, particularly for those most vulnerable.</u> It is estimated that by 2050 almost 60% of the UK population could be obese with the economic cost reaching £49.9 billion at today's prices (Government Office of Science, Foresight Tackling Obesities: Future Choices, 2007). Increased levels of walking and cycling in particular will help to achieve the strategic objective of promoting health and well-being, <u>and will need to be enabled through transport interventions.</u></p>
<p>Para 592.</p> <p>A</p>	<p>Historic Environment and Public Realm</p> <p>592. Improvements to parts of the District's historic settlements will become possible by reducing the volume and speed of traffic using historic streets and spaces. The management of the highway network, particularly in local centres, residential areas, places of higher pedestrian footfall and/or areas of historic significance, to support the development of stronger communities and the creation of high quality public realm and better places is supported by the Local Development Framework. This approach is reflected in a number of recent the Council's public realm schemes located across the district, including Saw Close, Milsom Street and Seven Dials in Bath, Market Place in Keynsham with further planned improvements for the High Street and Radstock town centre. Public Realm and Movement Strategy for Bath City Centre.</p>

Paras 593 – 599

Promoting sustainable travel

A

593. It is important that ~~the need for~~ new development is **delivered sustainably, through the provision of low carbon transport options** providing

sustainable transport choices, that deliver improved ~~improving~~ accessibility, balanced with whilst minimising traffic congestion and creating better places. Sustainability must be embedded into development schemes at conception, and be a fundamental factor in decisions on land use planning, composition of developments, and master planning. 35% of car trips within B&NES are less than 5km in length, which offers significant opportunity to reduce the number of car trips on our roads through designing sustainable alternatives and Liveable Neighbourhoods. Making places more accessible by sustainable modes of transport. This reflects the approach outlined in the Core Strategy and 'Getting Around Bath – A Transport Strategy for Bath' which place emphasis on the need to reduce car dependency and promote sustainable modes of transport. This is key in making places more accessible for all and healthier environments.

593a. There are substantial bodies of research and Best Practice that provide the evidence and tools needed to avoid creating car-dependent patterns of development which would significantly compromise the aims and objectives of this Local Plan. This includes the Transport for New Homes Checklist and Building for a Healthy Life, a design toolkit for neighbourhoods, streets, home and public spaces. The Council will draw upon guidance such as these documents in decision-making regarding the sustainability of development proposals.

593b. All developments will need to be planned and designed in line with Sustainable Transport Hierarchy. In the first instance, opportunities to reduce the need to travel should be maximised, including through the provision of ancillary facilities on site and through measures that enable people to work from home, such as high speed broadband. Development should be located, and intensified, in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance. This is in line with the NPPF principle to 'actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.'

593c. Masterplans must be designed to prioritise active travel and micro-mobility modes, including e-bikes and e-scooters, over private car usage. Gear Change sets out the UK Government's vision for cycling and walking to be the natural choice of many journeys, with half of all journeys in towns and cities being cycled or walked by 2030. LTN1/20 provides clear unequivocal guidance for Local Authorities, Developers and Highways Engineers on designing high quality cycle infrastructure to support the realisation of this bold vision. All new developments will be expected to be designed in line with current national guidance and best practice.

Masterplan layouts are expected to be designed to include direct and legible routes, with residential streets designed to a 20mph speed limit to enhance pedestrian and cycle safety and limit severance. Measures need to be included to limit through traffic in residential areas and keep traffic to main routes, potentially including modal filters or other techniques to create low traffic neighbourhoods. Bus permeability and associated facilities should be incorporated into development proposals where they support the public transport network as a whole, and suitable pedestrian facilities must be provided for people of all abilities to access bus services, either on or off-site. Shared mobility opportunities will need to be explored and accommodated, with the aim of reducing car ownership whilst also maintaining personal mobility.

593d. Developments will be required to connect into surrounding infrastructure and contribute to new and improved walking, cycling and public transport facilities. Sustainable transport facilities will be required to be put in place as early as possible to ensure that opportunities for sustainable transport are available to support early occupiers in establishing sustainable travel patterns. Formulation of transport strategies for developments will be expected to use the "Decide and Provide" methodology, identifying desirable sustainable travel patterns and providing the opportunities to enable them to be achieved. Sustainable transport measures will be promoted and prioritised ahead of increases to traffic capacity, which will only be

accepted once sustainable transport opportunities have been exhausted or where there is a significant risk to safety.

593e. The rise in e-commerce has resulted in an increase in the movement of light goods vehicles to homes. National data shows that vehicle mileage for vans has increased by 106% between 1990 and 2018, and increased from 9% to 16% of transport emissions over the same time period. Locally, it is estimated that there will be over 40% growth in goods traffic in Bath between 2013 and 2036. Reducing or removing multiple door-to-door vehicle trips from our residential streets, in favour of consolidation, can significantly contribute to our transport objectives and decarbonise last mile delivery of goods. Developments will be expected to contribute towards this objective, for example through the establishment of consolidation hubs providing centralised points for deliveries. Collection could then be done personally on foot or by bike, or through a centrally administered low carbon service such as using e-cargo bikes. Ten new e-cargo bikes have been introduced in Bath (November 2020) to help businesses make sustainable pollution-free deliveries following a successful B&NES bid to the Energy Savings Trust. B&NES will continue to support the introduction of low carbon measures for goods transport across the District.

593f. B&NES has produced area-specific transport strategies across the district. These strategies are tailored to addressing local issues and capitalising on local opportunities. At their heart, they each aim to create better places by reducing the negative impacts of traffic and provide improved facilities and create better conditions for sustainable modes of transport. Development proposals coming forward in these areas will be expected to support, and avoid prejudicing, the delivery of the relevant transport strategy and be in line with overarching transport plans and policies relevant at the time of application, including the current adopted Joint Local Transport Plan.

594. One of the core principles of the NPPF is to *‘actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.’* This principle will underpin the sustainable transport policies in this Plan.

595. ‘Getting Around Bath – A Transport Strategy for Bath’ was adopted in November 2014. Its principal objectives are:

- Supporting and enabling economic growth, competitiveness and jobs;
- Improving air quality and health, reducing vehicle carbon emissions;
- Promoting sustainable mobility;
- Widening travel choice;
- Widening access to opportunities: jobs/learning/training;
- Safeguarding and enhancing the unique historic environment and World Heritage Site status; and
- Improving the quality of life in the city.

596. To complement the Bath Transport Strategy, further transport strategies are being progressed for other areas within B&NES, initially Keynsham. Transport Strategies for Somer Valley and Chew Valley are in development. The ‘Getting Around Keynsham – Transport Strategy’ has the following objectives:

- Minimising the future increase in traffic congestion;

- Supporting and enabling the local economy;
- Promoting sustainable mobility;
- Widening travel choice;
- Improving connections, particularly to improved rail services and the town centre;
- Widening access to opportunities: jobs, learning, training, leisure and other local facilities;
- Improving air quality and reducing vehicle carbon emissions;
- Improving the quality of life for residents;
- Ensuring that all traffic management and pedestrian schemes are designed to take mobility needs in to account; and
- Maximising safety for all transport users.

Policy aims

- **Enable and achieve transformational mode** Enable a shift to more sustainable modes of transport
 - **Ensure that sustainability is embedded into the location, design and planning of new developments**
 - Need to identify and safeguard routes crucial to widen transport choice and support major new development
 - Need to provide safe sustainable transport **facilities and** routes
 - Promote walking and cycling to ~~promote~~ improve health and wellbeing
 - Improve accessibility for people of all ages and ~~mobility and sensory~~ abilities
 - **Reduce transport impacts of goods delivery, particularly e-commerce, through enabling low carbon last mile delivery solutions.**
597. The NPPF recognises the key role transport policies have in facilitating **low carbon** sustainable development and contributing to wider **environmental sustainability** and health objectives by supporting and promoting sustainable transport modes, so that people **have a realistic choice over how they can choose how they travel**. It also acknowledges that different place specific policy solutions and measures may be required.
598. The vision for the Joint Local Transport Plan 4 3 (JLTP4 3) is **“Connecting people and places for a vibrant, inclusive and carbon neutral West of England.” Transport is crucial to supporting economic growth, but the choices that we make in how it is planned and delivered will determine whether that is achieved sustainably and inclusively, and whether it addresses or exacerbates climate change and poor air quality.** ~~To seek an affordable, low carbon, accessible, integrated, efficient and reliable transport network to achieve a more competitive economy and better connected, more active and healthy communities by 2026.~~
599. Policy ST1 seeks to help achieve these aims and objectives by setting out the key principles which should be addressed when **locating, planning and designing a development. The application of the policy will be sensitive and appropriate to the context of the site location and type of development proposed.**

Policy ST1

POLICY ST1: PROMOTING SUSTAINABLE TRAVEL **AND HEALTHY STREET**

D/B

In order to ensure delivery of well-connected places accessible by sustainable means of transport, planning permission will be permitted provided the following principles are addressed, **appropriate to the context and type of development and within the requirements of the NPPF:**

- 1) **Development is located where there are, or will be at the time of development, a range of realistic travel opportunities to provide genuine alternatives to private car usage and where opportunities to reduce travel distances exist;**
- 2) **The design of the development reduces car dependency and actively supports travel by sustainable modes, including providing attractive sustainable travel connections;** ~~Reduce dependency on the private car;~~
- 3) ~~Reduce~~ The growth and the overall level of traffic and congestion **are reduced** by measures which encourage movement by public transport, bicycle and on foot, including traffic management and assisting the integration of all forms of transport;
- 4) **Mitigation for traffic impacts maximises opportunities to achieve mode shift towards sustainable transport modes before proposing traffic capacity enhancements;**
- 5) **Transport proposals align with relevant area-specific transport strategies, plans, policy documents, local guidance and the current adopted Joint Local Transport Plan;**
- 6) **Proposals provide and enhance facilities for pedestrians, cyclists and the mobility impaired, including disabled people, including segregated provision that is fit for purpose and in line with the B&NES Walking and Cycling SPD;**
- 7) **Proposals** safeguard, enhance and extend the network of public rights of way and cycle routes;
- 8) **Opportunities for low-carbon, last mile transport of goods and deliveries have been taken up which are appropriate to the location and scale of the development;**
- 9) **The development reduces the adverse impact of all forms of travel on the natural and built environment;** ~~reduce the adverse impact of all forms of travel on the natural and built environment;~~
- 10) **Development does not prejudice the efficient functioning and acceptable development of the railway network;** ~~ensure development does not prejudice the efficient functioning and acceptable development of the railway network;~~
- 11) **The use of car clubs and Ultra-Low Emissions Vehicles (ULEV) electric cars are promoted;** ~~promote the use of car clubs and Ultra-Low Emissions Vehicles (ULEV)~~
- 12) ~~Ensure~~ **Access to high quality public transport facilities is achieved by improving existing and providing new public transport facilities which would increase the proportion of journeys made by public transport; and**
- 13) **Proposals** support and promote measures which reduce the levels of traffic pollution in the interests of improving health and quality of life and reducing harmful impacts on the built and natural environment.
- 14) ~~schemes should safeguard affected heritage assets and the historic environment.~~

Paras 600 – 601.

B/D

Safeguarded Sustainable Transport Routes

600. B&NES Council and Sustrans have carried out a wide ranging review of cycle routes and developed a number of cycle proposals for Chew Valley, Keynsham, Midsomer Norton, Radstock and Bath. B&NES Council has worked with the West of England Authorities, WECA and stakeholder groups to produce a Local Cycling and Walking Infrastructure Plan (LCWIP) for the West of England Region. This uses DfT methodology to identify and prioritise improvements which will bring about the greatest increases in walking and cycling. The LCWIP is a key element in our plans to achieve significant improvements in our active travel network to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey. It sets out specific priority locations where we are seeking to improve our active travel network. The LCWIP is the next step in the WoE's ambitious plans to improve the walking and cycling environment, making it accessible for all users, including those with mobility aids, kick-scooter and adapted cycles, whilst future proofing for new modes such as electric scooters and other forms of sustainable, individual transport modes.

	<p><u>600a. Our plans and ambitions for walking and cycling are not limited to the WoE LCWIP. Through our place-based transport strategies, other transport planning workstreams and the development management process, we will seek to deliver rural routes, both short distance within villages and longer routes, as well as additional urban routes.</u></p> <p>601. There are sections of safeguarded former railway land not included in Sustrans' recommended cycle routes, and whilst further work needs to be undertaken in the context of the Sustrans review, the Council will continue to give policy protection to these. This will include the line of the sustainable transport link from the Newbridge area to Bath city centre serving the Bath City Riverside Enterprise Area. Land safeguarded for Sustainable Transport purposes is shown on the Policies Map. <u>This will include the line of the sustainable transport link from the Newbridge area to Bath city centre serving the Bath City Riverside Enterprise Zone. Land safeguarded for Sustainable Transport purposes is shown on the Policies Map.</u></p>
<p>Policy ST2</p> <p>B/D</p>	<p>POLICY ST2: SUSTAINABLE TRANSPORT ROUTES</p> <p>Development which prejudices the use of <u>safeguarded land</u> including former railway land for sustainable transport purposes as shown on the Policies Map will not be permitted.</p>

Paras 602-605a

Active Travel Routes ~~Recreational Routes~~

B

602. National planning policy promotes the protection and enhancement of public rights of way (PROW) and access including making links to existing rights of way networks. Bath and North East Somerset has an extensive network of PROW including a number of long distance and circular routes ~~which form an integral part of the overall leisure and recreational provision.~~ **The Council recognises the importance of this network in terms of facilitating active lifestyles, providing access to the countryside, and supporting the health and wellbeing of our population. Given the contribution these routes make to our overall objectives, these routes should be seen as an integral part of our transport network, and not of secondary importance compared with traditional residential to employment routes. Opportunities to enhance this network in terms of quality, connectivity and functionality should be capitalised on.**
603. The Council aims to develop a safe, convenient, efficient transport infrastructure which encourages and facilitates walking and cycling, and which minimises reliance on, and discourages unnecessary use of, private cars, especially for local trips. This will help increase the role of walking and cycling as key transport modes and to assist in reducing the use of private cars, by raising the status of walking and cycling and promoting them as safe and healthy means of transport.
604. This accords with **the current adopted JLTP which will provide the means to enable active travel to be the preferred choice for shorter journeys, and 'Getting Around Bath – A Transport Strategy for Bath',** which identifies that walking is the highest modal priority in the transport strategy.
605. Policy ST2A seeks to ensure that any publicly accessible routes are not adversely affected by development proposals **and that opportunities to enhance the active travel route network are taken up.** Where an active travel ~~recreational~~ route follows the line of a former railway, its course is protected as a sustainable transport route.

605a. The Bath River line is a key green infrastructure project in Bath and will provide a high-quality walking and cycling route from Newbridge to

	<p><u>Batheaston. The route is approximately 10km in length and will connect communities along the length of the river, enabling more people to explore the city in a healthy and sustainable way. The western section of the Bath River Line will run alongside the River Avon, following the same route as the existing towpath/ path, from Newbridge to Pulteney Bridge. The exact route of the Bath River Line in the east, from Pulteney Bridge to Batheaston, is still to be determined. Following the transfer of Bathampton Meadows to the National Trust, Bath and North East Somerset Council will work together with the National Trust and the community to develop a vision and route options for this section of the Bath River Line.</u></p>
<p>Policy ST2A B</p>	<p>POLICY ST2A: <u>Active Travel Routes</u> RECREATIONAL ROUTES</p> <ol style="list-style-type: none"> 1. Development which adversely affects the recreational and amenity value of, or access to, public rights of way and other publicly accessible routes for walking, cycling and riding will not be permitted, unless any harm can be successfully mitigated. 2. A development proposal affecting a publicly accessible recreational <u>active travel</u> route will be expected to maintain and/or incorporate the route within the scheme, <u>provide appropriate enhancements to the route in line with guidance set out in the Walking and Cycling SPD</u>, and depending on the location, the Council will seek to negotiate the provision of <u>support</u> additional linkages between urban areas and the wider countryside, open spaces and the River or Canal. <u>Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible.</u> 3. Development that adversely impacts on the established cycle <u>active travel</u> routes shown on the Policies Map will not be permitted, unless any harm can be successfully mitigated.
<p>Paras 606 – 611. A</p>	<p>Transport infrastructure</p> <p>606. The Core Strategy highlights the need to carry out transport and access improvements and to secure the necessary capital infrastructure projects to enable the increase in housing numbers and jobs to be delivered. Core Strategy Policy CP13 also required the new development is supported <u>by the timely delivery</u> of physical infrastructure necessary to support that development. <u>We require sustainable travel opportunities to be available for the first occupiers of new developments.</u></p> <p>607. The Council inherited a number of highway improvement schemes from the former Avon County Council. The only former scheme being pursued is the improvement of the Lower Bristol Road (A36) east of Fieldings Road to Churchill Bridge, which now includes the Pines Way gyratory as shown on the Policies Map. This route is safeguarded to provide for future improvements to bus priority, cycle and pedestrian facilities, and public realm enhancements. The principles listed in Policy ST3 will be expected to apply to the implementation of the scheme. <u>The Council is working with neighbouring authorities and WECA to develop a significant number of transport infrastructure schemes as set out in the current adopted JLTP, designed to achieve a step change in uptake of sustainable travel. Further, the place-based Transport Strategies provide mechanisms for bringing forward transport infrastructure and other measures to improve accessibility in those areas.</u></p> <p>608. The Council recognises the need for further studies to assess <u>and design a number of the schemes set out in the current adopted JLTP. Mass Transit proposals are being developed for the A4 Bath to Bristol corridor. At Saltford, we will fully assess options to provide bus priority before a decision on a bypass is made. We will also explore the possibility of introducing Mass Transit in Bath to help provide clean, efficient transport for those living, working and visiting the city whilst also meeting the future growth and transport needs of the City.</u> The A4 Saltford bypass, and</p>

	<p>an east of Bath link designed to remove through traffic. The Keynsham Transport Strategy recognised the need to provide an alternative route for traffic seeking to travel between the A4 and the A37. BANES will work with Bristol and South Gloucestershire to develop a solution to this issue.</p> <p><u>608a. Transport infrastructure encompasses how we use and manage our existing infrastructure, including how we allocate space on our transport network. Interventions designed to amend our existing infrastructure to improve conditions for vulnerable road users and support active travel and public transport will be investigated and progressed. This will include both physical provision of improved infrastructure for these users, and measures which reduce traffic volumes and speeds in inappropriate areas to make our environment conducive to walking and cycling. Our Liveable Neighbourhoods Strategy sets out how we create better place in this way.</u></p> <p>Development of transport infrastructure</p> <p>609. As with other development w Well planned solutions are paramount in the design of transport infrastructure proposals. Core Strategy Policy CP6(1) requires high quality and inclusive design of schemes, including transport infrastructure, which reinforces and contributes to its specific local context, creating attractive, inspiring and safe places.</p> <p>610. The Council aims to give as much attention as possible to the details of both public and private proposals. There will also be a rigorous assessment of the need for the scheme, <u>the issues the scheme is designed to address, and the choices made in the type of scheme being proposed. Wherever possible, transport infrastructure will be designed to achieve mode shift away from private car usage, to address congestion by reducing traffic demand rather than increasing capacity as the default approach. Any traffic capacity schemes will need to incorporate commensurate improvements for sustainable modes and not prejudice the condition of highway safety, particularly for vulnerable road users.</u></p> <p>611. Policy ST3 seeks to ensure that transport infrastructure is designed to the highest standards possible. 'Getting Around Bath – A Transport Strategy for Bath' highlights that consideration for the needs of <u>disabled</u> people with mobility impairments is regarded as a core element of the strategy. This is reflected in Policy ST3.</p>
<p>Policy ST3</p> <p>B</p> <p>The changes proposed seek to minimise environmental impacts & don't change the protective measures already in place.</p> <p>B/D/K/J/I</p>	<p>POLICY ST3: TRANSPORT INFRASTRUCTURE</p> <p>Within the context of Core Strategy Policy CP6(1) the development of transport infrastructure will only be permitted provided that the following requirements have been met:</p> <ol style="list-style-type: none"> 1) <u>The need for intervention has been robustly justified and decisions in relation to the planning and design of the scheme have been made in line with the sustainable transport hierarchy, promoting the use of sustainable modes;</u> 2) <u>The needs of pedestrians, disabled people cyclists and horseriders are met;</u> 3) The quality, patronage and efficiency of public transport operations must not be compromised; 4) <u>Schemes which propose increases in traffic capacity will need to demonstrate that all other can be justified in terms of whether opportunities to achieve mode shift as an alternative solution have been exhausted;</u> 5) <u>Schemes which propose increases in traffic capacity will also be required to incorporate commensurate improvements to the sustainable transport network;</u> 6) The environmental benefits to be secured through implementation of the scheme and any additional traffic management or calming measures needed to maximise those benefits should be clearly articulated;

Includes a clause to
protect Natura 2000
sites

NEED TO BE
CONSISTENT
THROUGH DOC &
CHECK CORRECT
TERM (post Brexit!)

- 7) There is no unacceptable impact on heritage and environmental assets and amenity including the World Heritage Site and its setting, Areas of Outstanding Natural Beauty and Natura 2000 sites (SACs/SPA);
 - 8) The visual and functional impact of the scheme and any associated elements such as surface-treatment, street furniture, signing, road markings, roadside verges and lighting upon the character of the area is minimised;
 - 9) The **environmental** impact of **the scheme, such as from** noise and other forms of pollution, ~~on surrounding land uses from traffic likely to be generated by the proposal~~ is minimised **and of an acceptable level in accordance with relevant topic-specific environmental guidance and standards;**
 - 10) The need for provision in ~~appropriate cases~~ of street furniture which aids security of premises without adversely affecting **mobility** ~~pedestrian circulation~~;
 - 11) ~~The needs of pedestrians including those with impaired mobility, cyclists and horseriders are met;~~
 - 12) ~~The environmental benefits to be secured through implementation of the scheme and any additional traffic management or calming measures needed to maximise these benefits should be clearly articulated;~~
 - 13) ~~The quality, patronage and efficiency of public transport operations must not be compromised;~~
 - 14) The response time of emergency services must not be compromised; and
 - 15) The acceptable provision for the transportation of materials to and from the site or disposal of spoil during construction.
- All highway infrastructure will be required to comply with national guidance and standards set out in 'Manual for Streets', 'Manual for Streets 2 – wider application of the principles', **LTN1/20**, the 'Design Manual for Roads and Bridges' and any subsequent updates to these documents.

<p>Paras 613- 616.</p> <p>A</p>	<p>Rail Station at Salford</p> <p>613. The opportunity for re-opening a station at Salford has arisen from work undertaken by the West of England on the MetroWest Project. <u>MetroWest is a significant rail infrastructure programme that will dramatically increase rail travel in the region, connect more people to the rail network and improve air quality.</u> This will provide an additional train service between Bath and Bristol each hour (in both directions) and the potential for an additional station as well.</p> <p>614. A public consultation on the three potential options for the proposed station was completed in 2013 and the results considered by Cabinet in 2014 when it was agreed that, before deciding to progress to the next stage of Network Rail's Governance for Railway Investment Projects (GRIP) process, further work should be undertaken to see if there were a location for a station which would have additional parking and better access from the A4. In addition confirmation that the new rail timetable could accommodate the station at Salford is still needed. <u>In October 2019, the Council declared its support for a new Station at Salford. Salford is included in JLTP4 as a potential new station for consideration due to the recognition of its potential role to play in tackling existing and future transport challenges, and would be delivered in the period 2030-2045. A key challenge in delivering a new Station at Salford is the network capacity issues on the railway line between Bath and Bristol, and therefore the ability to identify capacity to stop trains at a new station. However, the Greater Bristol Area Rail Feasibility Study (GBARFS) found that the new infrastructure required to deliver enhanced MetroWest services on the Bristol to Bath Spa line could provide the additional capacity required to enable additional stops at Salford.</u></p> <p>615. <u>In order to progress a station at Salford, it will be necessary to work through Network Rail's Governance for Railway Investment Projects (GRIP) process, and undertake Strategic and Outline Business Cases.</u> No timescale has currently been <u>confirmed</u> set for the delivery of the project, <u>albeit it is likely that scheme development will be in the period 2020-2030, for delivery 2030-2045;</u> however progress is dependent on the successful completion of Phase 1 of the MetroWest project, <u>the Development Consent Order Examination for which is due to conclude in 2021.</u></p>
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	<p>which is due for completion in 2019.</p> <p>616. The next step will be to consider and identify a preferred option/site for the new station, which will require an estimated 200 parking spaces in order to be viable. However, it may need to be addressed as part of any future Local Plan review.</p>
<p>Paras 617-617a</p> <p>A</p>	<p>Traffic management proposals</p> <p>617. The Core Strategy highlights that <i>'improvements to parts of the District's historic settlements will become possible by reducing the volume of traffic using historic streets and spaces.'</i> It supports the management of the highway network, particularly in local centres, residential areas, places of higher pedestrian footfall and/or areas of historic significance. This also helps with the creation of high quality public realm and better, <u>more inclusive, healthier</u> places, and is an approach reflected in the Council's Public Realm and Movement Strategy.</p> <p><u>617a. Our Liveable Neighbourhoods Strategy has been developed to breathe new life into residential areas by reducing the dominance of vehicles and rethinking how road space is used. The intention is to reduce overall traffic volumes, rather than displacing traffic onto alternative routes. Liveable neighbourhoods promote and prioritise walking, cycling and public realm movements without disadvantaging people with mobility restrictions. The focus is in enhancing community, health and wellbeing through the introduction of high quality, attractive, outdoor space, achieved by rebalancing space currently used for vehicles. Importantly, changes can be made on a trial basis to allow effective consultation on the effects of interventions.</u></p>

Policy ST5

B

POLICY ST5: TRAFFIC MANAGEMENT PROPOSALS

With reference to the principles in Policy ST3, traffic management proposals for the centres of Bath, Keynsham , Midsomer Norton, Radstock, Westfield and Peasedown St John will be expected to:

- 1 ~~discourage~~ reduce through traffic and other unnecessary motorised vehicle **journeys** ~~from the main shopping streets;~~
- 2 enhance vitality and viability;
- 3 secure improvements for pedestrians, cyclists **and disabled people**
- 4 facilitate the improvement of public transport integration;
- 5 ensure the needs of all road users are taken into account and the servicing needs of commercial, cultural, recreational and residential activities are met;
- 6 improve air quality; and
- 7 ~~be designed to~~ respect local distinctiveness and not detract from the quality of the historic, environmental and cultural assets

Traffic Management schemes in residential areas **will be expected** ~~should aim to~~:

- 1) Reduce the speed of traffic and ~~to remove~~ ~~reduce-discourage~~ through traffic from using unsuitable routes, **whilst maintaining** allowing access for only **those who need it;**
- 2) **Create attractive places to enhance the sense of community and improve health and wellbeing through re-balancing space towards people and away from vehicles;**
- 3) **Achieve mode shift through discouraging short car journeys and prioritising walking and cycling;**
- 4) **Support disabled people and others with restricted mobility;**
- 5) **Reduce on-street non-residential parking and provide opportunities for EV charging, car clubs, social spaces and improved walking and cycling routes;** and

6) Retain vehicular access for residents and businesses; and

The implementation of schemes on a trial basis will be supported as this can be a useful tool in enabling changes to be made in consultation with the council and community.

New paras 618a-618c. Paras 619-621

A/D

Interchange Hubs Park & Ride

618a. Our transport network facilitates people moving around the district, and many of these journeys are, or could be, made via a number of different types of transport. The ability for people to change between modes is integral to improve the efficiency of the system, and can be an important factor in reducing car usage for whole journeys where a viable, realistic sustainable alternative exists for part of the journey. The traditional form of “interchange” is the Park & Ride (P&R). Traditional P&R services which are serviced by a high frequency, direct dedicated bus service, have been used successfully to intercept car trips into the historic centre of Bath, and enable us to release road space in central areas for walking, cycling and public transport. P&R continues to play a key role in our transport system, but we need to broaden its scope to reflect modern transport ambitions.

618b. There is a great potential for the function of our traditional “Park and Ride” services, at existing and new facilities, to be expanded to “Interchange Hubs.” Such sites would enable interchange between a range of modes and in a range of directions, rather than solely moving people from their car to the bus and the periphery to the city centre. Facilities could include safe and secure cycle parking, electric bike hire and charging, micro mobility such as e-scooters, walking infrastructure and wayfinding, electric vehicle charging, last mile freight consolidation, coach parking and interchange with a range of public transport services including the integration of local bus services. Complementary uses, such as renewable energy generation and community uses will be considered and supported, subject to impact assessment. The Council will also investigate opportunities for providing formalised off-street parking on key bus corridors, and Park and Share facilities, to support bus use and car sharing in order to reduce car trips into Bath whilst better managing impacts in local areas where these activities are known to occur.

618c. Interchange does not need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place.

619. The Council proposes to **build on the success** ~~expand the provision~~ of Park and Ride facilities serving Bath as part of a wider strategy promoting **sustainable** means of transport **across the district** and reducing the impact of vehicles in the city and in particular its historic core. **This includes seeking to increase opportunities to transfer car trips into urban centres onto sustainable alternatives, and to support multi-modal travel through facilitating interchange hubs.** Enhanced ~~interchange~~ Park & Ride provision will help **maintain existing public transport provision** to remove a variety of vehicular trips from the city arising from both existing pressures and those associated with growth generated by the Enterprise Zone. In addition to the Park & Ride improvements already implemented through the Bath Transport Package **we will seek to enhance** the existing Park & Ride sites at Newbridge, Odd Down and Lansdown **though expansion and increased interchange functionality** are likely to need further expansion and a new Park & Ride site to the East of Bath provided to improve access from that side of the city. **Data shows that many trips into Bath originate in the east and some motorists choose to use the facilities at Odd Down and Lansdown in the absence of a facility to the east. B&NES will continue to work towards identifying and developing innovative solutions to increase existing levels of sustainable transport options** ~~intercept trips into Bath from the east.~~

620. An independent review of potential sites for a Park and Ride facility was carried out in 2013. The Council has also consulted with the public to help identify the most appropriate location. No final decision has been made on a preferred site. The general area under consideration is indicated on the Bath

	<p>Spatial Strategy diagram for reference. In addition, the strategy diagram also indicates the locations for the future expansion of existing Park & Ride sites.</p> <p>621. Policy ST6 will be used to assess future interchange hub Park & Ride schemes, including both extensions to existing Park & Ride sites, and potential new facilities to intercept traffic heading into our historic centres, and hubs supporting multi-modal travel a new facility to the East of Bath. All proposals for Interchange Hubs should be thoroughly evaluated to ensure that the most suitable and sustainable locations are selected. As with all development the need for and benefits of extending existing sites and/or developing a new facility facilities will need to be considered in the planning balance, including thorough assessment of environmental impact and other planning factors such as weighed against the harm to environmental assets and, where relevant, the Green Belt. It is proposed required that the criteria in Policy ST6 guide all development relating to Interchange Hubs, including existing Park & Ride site development to ensure a consistency of approach. In order to facilitate the provision of Interchange Hubs on the existing Bath Park & Ride sites it is proposed that they be removed from the Green Belt (subject to the demonstration of the necessary exceptional circumstances) and an allocation policy is set out in the Bath section (volume 2) of the Plan setting out site specific development requirements.</p>
<p>Policy ST6</p> <p>K/I/J</p> <p>Changes reasonably substantive & could result in development within new sites that have impacts</p> <p>Includes clause to protect European sites...and any other special designations and protections</p> <p><u>NEED TO BE CONSISTENT THROUGH DOC & CHECK CORRECT TERM (post Brexit!)</u></p>	<p>POLICY ST6: <u>Transport Interchange</u> PARK AND RIDE</p> <p>Development of new or expansion of existing <u>Transport Interchange sites, including</u> Park and Ride, sites will be permitted provided:</p> <ol style="list-style-type: none"> 1) <u>Opportunities to enhance the transport benefits of proposed schemes to incorporate wider interchange functionality have been fully assessed and incorporated into proposals;</u> 2) <u>Proposed site(s) have been thoroughly evaluated with a robust evidence base demonstrating that the most suitable and sustainable site has been selected;</u> 3) <u>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:</u> <ol style="list-style-type: none"> a. <u>Benefits related to reductions in onward city centre car travel;</u> b. <u>Potential level of mode shift away from other transport modes, especially existing local bus and rail services;</u> c. <u>Changes to the overall modal share;</u> d. <u>Future viability of public transport services, including those that will experience loss of patronage as a result of the new facility; and</u> e. <u>Any mitigation measures required to address any negative impacts.</u> 4) Provision is made for the needs of those with impaired mobility disabled people and for the safety and security of all users; 5) <u>The development accords with all relevant planning and environmental policies, such as those relating to the WHS, 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</u> 6) <u>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. In this regard it should be noted that the Odd Down site meets the criteria for SNCI designation and supports a colony of Small Blue butterflies. The key site development requirements are set out in the site allocation development requirements.</u>

	<p><u>Applicants will also be required to demonstrate that the scheme complies with all other relevant national and local planning policies that affect the site and its location.</u></p>
A	<p>Development management, transport, access and parking</p> <p>625. Developers are required to submit sufficient information to enable the Council to assess these matters, and to demonstrate that any traffic reduction targets or initiatives aimed at promoting public transport, cycling and walking set out in <u>JLTP4 or any of the area-specific Transport Strategies</u> the Local Transport Plan will not be jeopardised by their proposals. <u>Development proposals will be expected to positively contribute towards the delivery of these plans or strategies.</u></p> <p>626. National planning policy requires that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:</p> <ul style="list-style-type: none"> - the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure; - safe and suitable access to the site can be achieved for all people; and - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. - <u>Appropriate opportunities for sustainable transport modes can be- or have been-taken up, given the type of development and its location;</u> - <u>Safe and suitable access to the site can be achieved for all users; and</u> - <u>Any significant impacts from the development. On the transport network (in terms of capacity or congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</u> Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. <p>627. Developments should also make a positive contribution towards the achievement of the Council's <u>ambitious</u> traffic reduction targets. This can be achieved through, for example:</p> <ul style="list-style-type: none"> - development being located and designed in such a way that it seeks to discourage car use and encourages travel by other modes. - occupier(s) of the development seeking to secure changes in the travel behaviour of employees, clients or other visitors by drawing up a workplace or school travel plan to be submitted to the Council for approval very often as a Planning Obligation. These Plans do not have to be associated with development and can be phased to take account of planned improvements in public transport for example. - Developers of <u>residential schemes providing proportionate measures to encourage occupants to travel sustainably, including</u> smaller scale residential schemes providing 'Welcome Packs' setting out sustainable travel options to encourage occupants to travel sustainably - Development <u>directly delivering measures and/or</u> making a financial contribution towards the implementation of the Council's transport strategies. Such contributions will be tailored as far as possible according to the nature and location of the development. <u>Where developments are assessed as having an unacceptable impact on the local highway network, including in terms of capacity, safety or amenity, developers will be</u>

expected to identify and assess appropriate mitigation, agree said mitigation and its delivery mechanism with the Highway Authority, and comply with relevant planning conditions and obligations relating to its delivery. Mitigation proposals will be expected to maximise opportunities to achieve mode shift away from the private car before proposing any traffic capacity enhancements.

628. More detailed information on travel plans, transport assessments and statements in decision-taking can be found in the National Planning Policy Framework and Planning Practice Guidance. **Additionally, B&NES Council has developed a Travel Plan SPD. This sets out the requirement for development to provide robust Travel Plans and details the Council's expectations on the content of such plans, This will include development thresholds at which different level of Travel Plan are required, types of sustainable transport measures which will be expected, targets and monitoring and evaluation targets. Each Travel Plan will need to be tailored to the specific development and the location context in order to ensure that the optimal package of measures is provided to enable future users of the development to travel sustainably. The SPD is intended to support developers, site owners and operators in producing Travel Plans, and ensure that Travel Plans secured through the planning process are of a consistently high standard to help us achieve our ambitious traffic reduction targets.**
629. Policy ST7, **in conjunction with relevant SPDs including the Parking SPD and upcoming Travel Plan SPD** sets out the policy framework for considering the requirements and implications of development for the highway, transport systems and their users. This will ensure that the direct and indirect impacts of schemes are properly assessed.

B/D/K/I/J

Changes reasonably significant – could result in new facilities that cause impacts.

Includes clause to protect natural environment

POLICY ST7 TRANSPORT REQUIREMENTS FOR MANAGING DEVELOPMENT

- 1) Development will be permitted providing the following provisions are met:
 - a. **Users of the development benefit from genuine choice in their mode of travel through opportunities to travel by sustainable modes;**
 - b. Highway safety is not prejudiced;
 - c. ~~Safe and convenient access to and within the site for pedestrians, cyclists and those with a mobility impairment is provided or enhanced.~~
Walking and cycling assessment and facilities are provided in line with the Walking and Cycling SPD, including safe, convenient and inclusive access to and within the site for pedestrians and cyclists;
 - d. ~~Suitable~~ Vehicular access **is both safe and suitable;**
 - e. No introduction to traffic of excessive volume, size or weight onto an unsuitable road system or into an environmentally sensitive area;
 - f. ~~No traffic mitigation measures are required that would harm the historic or natural environment;~~
 - g. Provision **is** made for any improvements to the transport system required to render the development proposal acceptable. **Improvement requirements will maximise opportunities to travel by sustainable modes;**
 - h. ~~Necessary no traffic mitigation measures are required that would harm the~~ **mitigation measures can be delivered without unacceptable harm to the historic or natural environment;** and
- 2) In the case of new development proposals, facilities for charging plug-in and other ultra-low emission vehicles will be sought **in line with the Ultra-Low Emissions Vehicle SPD.**
- 3) Transport assessments/statements & Travel Plans
 - a. Planning applications for developments that generate significant levels of movement should be accompanied by a transport assessment or transport statement in accordance with National Planning Policy Framework and Planning Practice Guidance. Schemes will be expected to be

- tested through transport the Council's modelling, as necessary.
- b. Travel Plans will be expected to be provided in line with the Travel Planning SPD.

4) Car and cycle parking provision and design must contribute to the aims of the Climate and Ecological Emergency, support creating better and healthier places, and be appropriate to the context of the development. Parking needs to be provided at a level appropriate to reduce the convenience of unnecessary car usage and make sustainable transport a more attractive choice. Parking provision must support good urban design and placemaking through minimising the proportion of space allocated to vehicle storage and usage, and reducing car dominance on our natural and built environment. Proposals must avoid contributing to haphazard, informal or inconsiderate parking behaviours and their associated effects, including through ensuring suitable parking controls and management, availability of alternative travel options including car clubs, and ensuring sufficient parking provision to meet residual demand. There should be no increase in on-street parking in the vicinity of the site which would affect highway safety and/or the operational function of the local highway network in terms of emergency access, refuse collection, goods delivery and accessibility. Detailed parking policy guidance and parking standards for all forms of development are set out in the Transport and Developments SPD.

Any reduction in minimum residential parking standards will require the completion of an accessibility assessment which will form the basis for any discount from the prescribed standard.

Para 630-632

G

630. Bath and North East Somerset's previous Local Plan (2007) set out the maximum car parking standards required for new development proposals reflecting previous national planning policy set out in PPG13 (Transport). The policy of restricting the level of parking provision particularly in new residential developments, has promoted less reliance on the motor vehicle and a move to more sustainable and healthy methods of travel, particularly for shorter journeys.
631. In January 2011, the Government announced the removal of national limits on residential parking. Local authorities are still able to set parking standards for their areas, but they should do so having regard to local circumstances and without trying to control car ownership. However the need to promote sustainable transport outcomes is not affected.
632. The NPPF **requires** reflects this approach to parking by referring to both residential and non-residential development, leaving it to local authorities to decide whether there is a need for parking standards, **for both residential and non-residential development** by advising:

If setting local parking----

After para 633
New Paras

A

633a. B&NES Council considers that clear and compelling justification exists to use parking standards as a policy tool to reduce the dominance of the motor vehicle on our built environment. Good parking policy can facilitate high quality and well-designed parking provision appropriate to the type and scale of development within the context and location. Parking restraint can encourage modal-shift to non-car alternatives. The 2017 Placemaking Plan included parking standards for cars, blue badge holders and cycles. B&NES Council has decided to review these parking standards in the light of the clear and compelling justification presented by the Climate Emergency and target to achieve carbon neutrality by 2030 to ensure that parking standards remain appropriate. As part of this review, parking standards are relocated from the PMP into a new Parking SPD. This provides the flexibility to allow B&NES Council to continually review and update the parking standards to ensure we are in line with current national policy and guidance and on target with regards the objectives of the authority's ies Climate Emergency.

633b. The Council understands the variation on transport requirements and opportunities in different parts of the District and continues to ensure that the standards, and application of those standards, recognise these differences. Whilst reducing car usage overall remains the most important factor in

	<u>achieving carbon neutrality, fleet transition towards ULEV and EV/hybrid vehicles is a key part of our decarbonisation strategy. The standards within the Parking SPD reflect this need to enable increased uptake of ULEV technology, without encouraging increased car use overall</u>
Pars 634-657 G	Parking Standards in Bath & North East Somerset Delete paras 634 – 657 and Diagrams 9 and 10
Para 658 – 659 A	Cycle Parking 658. Cycling is a key form of low carbon transport and is also part of a healthy lifestyle. The Council’s policies and programmes facilitate the construction of cycle routes and cycling infrastructure throughout the area, <u>and this is required to be in accordance with LTN1/20 and the B&NES Walking and Cycling SPD.</u> However for cycling rates to increase, it is equally important that homes and workplaces have provision for people to easily and safely keep and store bicycles. 659. <u>Safe and accessible</u> cycle parking <u>at appropriate levels, that is prioritised over vehicle parking must</u> should be incorporated into the design of all developments <u>from the outset</u> (new, extensions or change of use). <u>Cycle parking standards for new development are included in the Parking SPD.</u> The numbers of stands required are expressed as minimum standards to reflect the sustainable nature of this mode of travel <u>and ensure that the quality and accessibility of cycle parking does not form a barrier to usage. Cycle policy within the Parking SPD also reflects the need to accommodate and encourage the use of adapted cycles, cargo bikes and e-bikes as these technologies enable cycling to be a viable mode choice for a greater range of trip types, routes and distances.</u> These are set out in Schedule 2 – Parking Standards at the end of this volume.
G	<u>Residential Cycle Provision</u> <u>Delete paras 660- 666</u>

Para 667 and new
Para 667a.

A

Provision for people with disabilities

667. Many disabled people rely on cars for getting about. Whether they drive themselves or ride with someone else. The ease with which they can reach their destination is almost always determined by where the car can be parked. Parking standards for people with disabilities **are included in the Parking SPD** ~~is provided in the Schedule 1 below.~~ These standards conform with **relevant national** guidance including provided in the Department for Transport's Traffic Advisory Leaflet 05/95 'Parking for Disabled People', **'Inclusive Mobility' and BS 8300 'Design of an accessible and inclusive built environment'**.

667a. It should also be noted that many disabled people do not own a car, and inclusive mobility is embedded throughout Placemaking Plan Policy, not just in car parking policy. Some disabled people use adapted cycles for personal mobility, and the cycle parking standards in the Parking SPD reflect this and ensure that this mobility need is catered for. A transport network with reduced car dominance, where people feel safe and comfortable in public spaces, and with improved bus accessibility, all inherently support mobility for disabled people. Wider Policies designed to reduce car dominance of our public spaces aim to ensure inclusive mobility, whilst providing access for those who need a car due to disability.

Schedule 1 and 2

Schedule 1 and Schedule 2 to be deleted.

Local Plan Partial Update

Note: in the changes below additional text is underlined and deletions are shown as a ~~strike-through~~.

Volume 2 (Bath)

Para /Policy	Amendments
Policy B1	Amend housing figure to reflect updated supply from existing and additional allocations.
38 A/D	<p>In enabling development the Placemaking Plan sets out a detailed planning and design framework for specific sites throughout the city. These will:</p> <ul style="list-style-type: none"> • Set out a vision for the site. • Provide clear development and design principles as part of the policy framework for the determination of planning applications. • Resolve conflicting objectives in areas subject to development pressures • Protect environmental assets that are particularly sensitive to change • Help to stimulate development and enable the delivery of planned growth and economic potential • Act as a focus and a catalyst for key agencies and landowners to work together <p><u>For these allocated sites the plan must also be read as a whole as district-wide development management policies also apply to their development, including (but not limited to) policies relating to sustainable construction, biodiversity net gain, affordable housing and sustainable transport.</u></p>
106 A	<p>The Core Strategy identifies strategic policy areas within the valley bottom of the River Avon. It sets out their roles, the scope and scale of change to be achieved and placemaking principles to shape change. The policy areas are:</p> <ul style="list-style-type: none"> • The Central Area (comprising the City Centre, <u>Milsom Quarter</u>, South Quays and Western Riverside East) • Western Riverside, • Twerton and Newbridge Riverside • <u>Locksbrook Creative Industry Hub</u>
After 107 A	<p><u>107a The Milsom Quarter, within the Bath Central Area, (the area shown on the map/aerial photograph below) is a newly defined area. The area is in decline, shown by falling footfall and increasing vacancy rates, greater than other areas of the City Centre. Many upper floors are also currently underutilised or empty.</u></p> <p><u>107b The overarching ambition is to transform and re-imagine the future of Milsom Quarter, creating a more viable, vibrant & diverse part of the city with a greater balance in the mix of uses, activity and increased residential development, all combining to redefine the sense of community and increased local purpose. The Council wants to invest to improve the commercial offer, support increased footfall and usage of the Milsom Quarter area by both</u></p>

	<p><u>local people and visitors.</u></p> <p><u>107c In the short-term the Council is focussing on a range of interventions which aim to stop the decline of Milsom Street, protect businesses and local jobs and give residents and visitors reasons to visit Milsom Street. Over the medium-term repurposing of retail space, increasing the mix and diversity of uses to include redevelopment of upper floors and meanwhile uses is planned. In the longer term there is a significant opportunity to transform Milsom Quarter with the Council already commencing a Commercial Estates Review.</u></p> <p><u>107d In addition, the Council are also preparing an evidence-based Vision and Masterplan for Milsom Quarter to underpin the future redevelopment and regeneration of this area, working alongside the Top of the City Access and Movement Strategy. The masterplan considers the mix of uses and capacity that this area could support, creating a unique offer and a new identity for this quarter.</u></p>
Diagram 2 A	Add Locksbrook Industrial Hub
Policy B2 A	<p>POLICY B2 CENTRAL AREA STRATEGIC POLICY</p> <p>2. Placemaking Principles</p> <p>Risks to the Central Area</p> <p>Add the following</p> <p><u>x: Parts of the Central Area in particular the Milsom Quarter, has underutilised space, falling footfall and increasing vacancy rates.</u></p> <p><u>3.key Development Opportunities</u></p> <p>City Centre</p> <p>a: North of Pulteney Bridge <u>Milsom Quarter (including</u> Commarket, Cattlemarket, <u>Broad Street Car Park, King Edwards School)</u>, Hilton Hotel, and The Podium).</p> <p><u>4.Scope and Scale of Change</u></p> <p>i: A cultural / performance / arts venue/ <u>museum.</u></p>

Para 114.

A

Located on a key route into and out of the city centre, the Cornmarket and the Cattlemarket site, and at some point in the future, the Hilton Hotel, provide significant opportunities to remodel the fabric of this area, providing a more engaging experience that seamlessly integrates the whole of Walcot Street into the city centre. river and street frontage and their key features are as follows:

- **Cornmarket:** The two storey former Cornmarket Building is Grade II listed, and is a Building at Risk due to its poor structural condition. It is also vacant. ~~See list description here.~~
- **Cattlemarket:** This former cattle market has been used for decades as a surface level car park, and it continues to hold a market use on part of the site every

Saturday. It is a complex and diverse site with river frontage, and historic vaults underneath a significant portion of the site which are used by bats, including species linked to the Bath and Bradford on Avon Bat SAC. The archaeology in this area is significant, and there are likely to be contamination and structural issues associated with redevelopment proposals. The site sits at a key ecological node, and is a key section of a dark habitat corridor.

- **Hilton Hotel:** Despite being a very successful hotel, this is a building of poor aesthetic quality with a negative relationship to its context. Its redevelopment has been an aspiration for a considerable time, but its economic value as a successful hotel has worked against the viability of any proposed schemes. **Given its recent refurbishment it is very unlikely that it will be redeveloped in anything less than the longer term.**
Adjacent development proposals should not prejudice its eventual redevelopment.

The Council would support in principle a deliverable scheme that enables the redevelopment of the Hilton Hotel building and adjoining sites as this would have the potential to deliver increased retail and hotel floorspace, and replace the Hilton Hotel building. The Council's support is subject to an appropriate response to the character of the area, including as appropriate, the development requirements and design principles as set out below and compliance with other relevant development management policies.

Policy SB1

K – changes are small & don't modify existing provision to protect bat interests

POLICY SB1: DEVELOPMENT REQUIREMENTS AND DESIGN PRINCIPLES

Development across the whole site will be expected to:

1. Provide a ~~fine grained~~, mix of uses that reflect the diverse and varied nature of Walcot Street, containing units of varied size and tenure. This **should** is to comprise
a mixed of some of the following uses:
 - a. Retail space that reinforces the important character of Walcot Street;
 - b. ~~B4~~ workspace;
 - c. ~~A3~~ food and drink uses, including creating opportunities for outdoor tables and chairs; ~~which may be particularly suited to the Cornmarket building and associated vault;~~
 - d. A-residential **use element**, to include affordable housing;
 - e. The retention of adequate and suitable space for use by a market, if viable;
 - f. Other city centre uses that contribute to the rich mix of uses in the area; ~~and/or~~
 - g. **Public realm/open space.**

It will not be acceptable for individual elements of the site to come forward where they may prejudice **the deliverability of the wider site.** ~~this overall requirement for a mixed use development.~~

Given the history and complexity of the site, meanwhile and temporary uses will be strongly encouraged.

Purpose built student accommodation in this area is not acceptable as this would impede the delivery of other Council objectives.

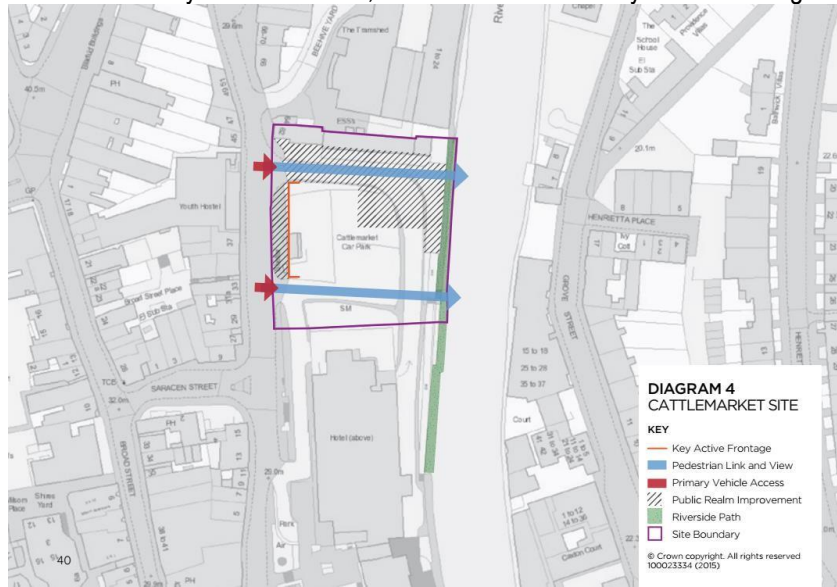
2. ~~Repair the broken street frontage of Walcot Street by re-establishing the historic building line. Behind the Walcot Street frontage, developers are invited to~~
Provide an engaging and varied architectural response that enhances the diverse built character and riverside setting of the area.

3. ~~Be designed so that the frontage building onto Walcot Street is flanked by two streets, one adjacent to the Cornmarket building, and the other adjacent to the Hilton Hotel. The latter should provide for revised egress from the Podium multi-storey car park, and if feasible, service access to and from Waitrose. The streets will provide views of the river corridor and the hillsides beyond, and provide pedestrian access to the riverside walkway.~~ **Consider the potential for revised**
4. Undertake associated public realm works to Walcot Street and the public realm within the site in accordance with the Bath Pattern Book.
5. Respond to the important views related to the site and to the general character of the area. An analysis is therefore required to inform the height, massing and design of buildings.

The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development ‘the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.’ (Note that this is a recommendation for the general height only and is subject to modifiers). This Bath Building Heights Strategy will apply in particular to the frontage of this site, and the appropriate building heights elsewhere will be informed by the analysis described above.
6. Conserve and retain the whole of the Cornmarket Building, and provide a public space adjacent to it. This public space should relate to, and interact with the ground floor of the Cornmarket building and uses within, and have a positive but sensitive relationship with the vaults beneath part of the Cattlemarket Site, and with the river corridor.
7. Embrace the existing function of the vaults as a bat roost, and deliver imaginative and compatible re-use of the vaults.
8. ~~Demonstrably explore opportunities to facilitate the redevelopment or remodelling of the adjacent Hilton hotel building as well as adjoining sites, within a comprehensive redevelopment proposal. Should this be achieved then the retention of the existing number of hotel bedspaces as a minimum and additional retail floorspace within the wider site and as part of a mixed use scheme, will be required. The other Development Requirements and Design Principles here would also apply. Where there is evidence to robustly demonstrate that an appropriate form of mixed use redevelopment of the wider site (incorporating the Hilton Hotel and potentially the Podium) is deliverable Proposals that prejudice redevelopment of the wider site will be refused.~~
9. Restore and enhance the biodiversity value of the river and the river edge by retaining and enhancing the green edge to the riverside, and ensuring the provision of a dark corridor to the river to enhance conditions for bats.
10. Provide a riverside walkway that connects to the existing and adjacent riverside walkways. This will enable the provision of a continuous riverside walkway from Pulteney Bridge northwards. It will require sensitive and appropriate lighting solutions to retain the existing dark corridor.
11. Explore the potential of a new pedestrian and cycling bridge over the River Avon to provide additional choice of routes through the city which will be supported in principle.
12. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.

Diagram 4

Cattlemarket site diagram to be updated to reflect policy changes above.
*Remove Primary Vehicle Access, Pedestrian Link and Key Active Frontage.



Paras 153
– 156

Western Riverside

Delete paragraphs 153 – 156, and replace with new supporting text as follows:

A

153. — The area formerly occupied by the Stothert and Pitt engineering company and adjoining land has been earmarked for a major programme of residential-led regeneration for a number of years. Western Riverside was first allocated for residential led development in Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007). This policy was supported by a Master Plan Supplementary Document (March, 2008). This is a complex site that has, inter alia, required flood mitigation and remediation works to decommission and remove the Windsor Gas Holder Station. However, but significant planning development management and implementation progress has been made with the delivery of phase I commencing in December 2010. Much of the land is derelict or vacant but other parts are occupied. Not all areas within the Western Riverside zone may be regenerated during the Pan period e.g. part of the Lower Bristol Road frontage where there are car showrooms that are successfully trading and investing in their estate. However, should such land become available the strategy is to enable residential led redevelopment. The estimated housing potential of this area for the plan period is around 2,200. Bath Riverside, on land formally occupied by Stothert & Pitt— ‘Cranemakers to the World’ and various railway lines and associated infrastructure, has been transformed over the past ten years. The first phase of development on the main site has delivered over 800 new dwellings, provided new and refurbished bridges and enhanced public realm and open spaces. The second phase of development will offer a high-density urban form residential redevelopment to be delivered over the next ten-year period.

Extent of Western Riverside

154. — The Core Strategy Western Riverside policy area is a smaller area than that to which the 2007 Local Plan Policy (GDS.1/B1) and its accompanying SPD applies. It does not include the majority of the area referred to as Western Riverside East aside from the area to the north of the Homebase car park. Western Riverside East is now conceptualised as forming part of the Central Area because of the commercially led mixed use emphasis being sought for this area.

Western Riverside Policy Approach

155. — The spatial strategy retains the planning principles that have been established for this area within Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007) and the 2008 Masterplan SPD. The principles of GDS.1/B1 are rolled forward into Placemaking Policy SB8. The 2008 Masterplan SPD will continue to give further guidance in respect of the implementation of this policy.

Context

156. — That part of the strategic policy area that has yet to be redeveloped is allocated for residential redevelopment and associated social infrastructure. Whilst much of the area benefits from outline or full planning permission (notably for majority of the land to the south of the river and the civic amenity site/ waster transfer station), the retention of a policy allocation will secure the strategy for this area. The extent of this area may change during the examination phase on Draft Plan and therefore need to evolve (contract) to reflect change on the ground. The estimated housing potential of the allocated area during the plan period is around 1,500 (after taking onto account what has been or is substantially under construction)

Context

152a. Bath Riverside, on land formally occupied by Stothert & Pitt – ‘Cranemakers to the World’ and various railway lines and associated infrastructure, has been transformed over the past ten years. The first phase of development on the main site has delivered over 800 new dwellings, provided new and refurbished bridges and enhanced public realm and open spaces.

The second phase of development will offer a high-density urban form residential redevelopment to be delivered over the next ten-year period, on various parcels of land making up the site allocation (see diagram 13).

152b. Western Riverside was first allocated for residential led development in Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007). This policy was supported by a Master Plan Supplementary Document (March, 2008). The principles of GDS.1/B1 were rolled forward into Placemaking Policy SB8 in 2017, and the Master Plan Supplementary Planning Document continued to give further guidance in respect of the implementation of this policy. Adopted Site Allocation Policy SB8 has now been updated as part of the Local Plan Partial Update. The 2008 SPD continues to provide guidance on policy implementation.

Vision

152c. In addition to delivering the vision as set out in the adopted Bath Western Riverside Supplementary Planning Document (SPD), development will need

to deliver the Council's priorities with regards to the climate and ecological emergency. The adopted Site Allocation Policy SB8 has been updated to help to facilitate the appropriate development of the site, providing clarity and certainty on the development requirements and design expectations to help shape this next major phase of regeneration.

152d. The second phase of the Bath Riverside development offers great potential to further deliver sustainable connections through the site and with the wider area to the benefit of the city. The route of the former railway line that runs through the site and westwards through the Newbridge Riverside Policy area to connect to the Bristol-Bath Railway Path (BBRP) is safeguarded as a Sustainable Transport Route. The delivery of this route through this site is a key requirement. It is also a requirement to provide a direct, well-aligned and high quality crossing over Windsor Bridge Road and to deliver an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists and to link the site with the BBRP.

152e. The location of the site provides the opportunity to create a low-car environment. This must be supported by delivery of a wide range of high-quality sustainable transport choices, including alternatives to car ownership such as access to an Electric Car Club.

SB8

Delete all development requirements for policy SB8 and replace with:

I/J/L

Development Requirements and Design Principles

Development proposals will:

- 1 **Deliver residential development of around 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.**
- 2 **Deliver a Primary School, an early years facility and a new community hub with communal facilities to promote healthy lifestyles and community cohesion.**
- 3 **Development must provide a positive relationship with the adjacent public realm at ground floor level, and the number of main entrances into buildings must be maximised in order to create an active, human scale public realm. The provision of active building frontages, such as building entrances and commercial activity is required on the elevations fronting Lower Bristol Road, Upper Bristol Road, Windsor Bridge Road, the continuation of Stothert Avenue and to internal streets and spaces throughout the development area.**
- 4 **New streets and spaces throughout the area are required to be implemented by the developer/s and are to be in accordance with the relevant typology as set out in the Bath Pattern Book.**
- 5 **A comprehensive Transport Assessment will be required to assess the transport requirements of development proposals. This will need to include a traffic impact assessment modelling the effects of additional transport demand on the Upper Bristol Road and Lower Bristol Road corridors and additional locations to be agreed with the Local Highways Authority. Development is to provide comprehensive on and off site transport infrastructure including, but not limited to:**

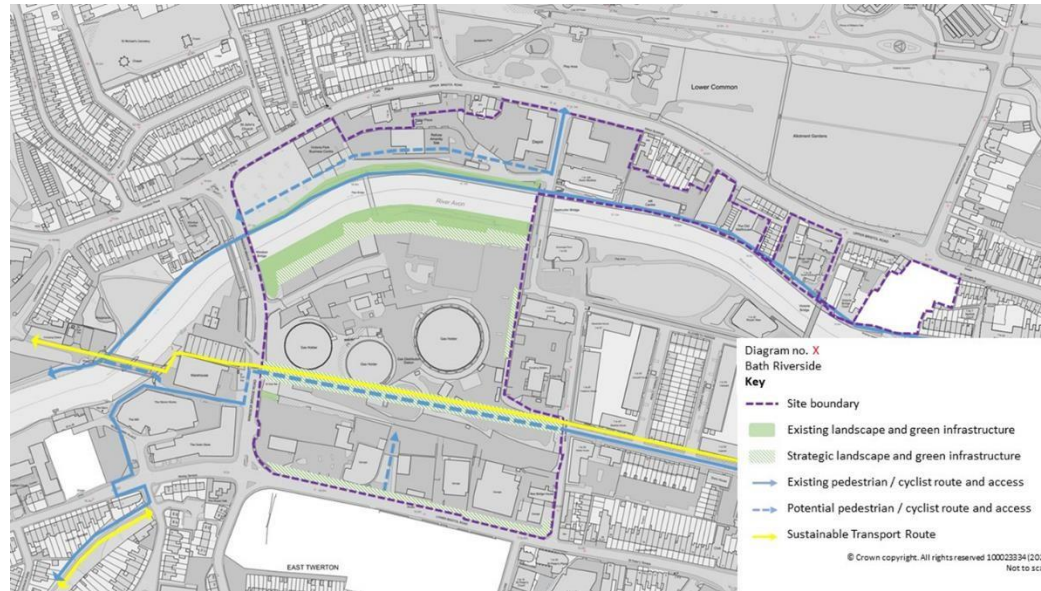
- a. A clear hierarchy of pedestrian and cycling routes throughout the site, providing good permeability across the site as a whole, and linking individual sites with the surrounding context.
- b. An integrated transport system and clear route network linking individual sites to each other and to the surrounding context.
- c. Low car development will be supported and must be accompanied by high quality sustainable transport alternatives to car usage and ownership, including providing access to electric car club vehicles.
- d. Provide a level of car parking consistent with the standards set out in the Council's Transport & Development SPD, with any departure from these standards robustly justified on the basis that proposals are an exemplar for sustainable travel.
- e. Deliver improvements to walking and cycling routes along and across Upper Bristol Road and Lower Bristol Road, connecting to existing infrastructure, and improving permeability through the development.
- f. Investigate and deliver opportunities to improve pedestrian and cycle facilities at the Windsor Bridge Road junctions with Upper Bristol Road and Lower Bristol Road
- g. Deliver the Sustainable Transport Route from east to west across the site. This is required to:
 - i. be designed to a high quality in accordance with Cycle Infrastructure Design Guidance LTN 1/20, with cycle routes segregated from pedestrians.
 - ii. integrate high quality green infrastructure, as part of the Biodiversity Net Gain requirements.
 - iii. deliver a direct, well-aligned and high-quality pedestrian and cycle crossing over Windsor Bridge Road to connect to the former railway bridge over the river and to the Bath Riverside Site. Modelling will be required to demonstrate the effects of interaction between the crossing and adjacent junctions.
 - iv. deliver an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists. This is needed to link the site and the Bristol to Bath Railway Path (BBRP) further west of Windsor Bridge Road. Proposals will need to demonstrate pedestrian and cycle linkages between the bridge and the crossing over Windsor Bridge Road
 - v. Integrate with emerging Mass Transit proposals. Design of the route should support Mass Transit proposals as they emerge, which may involve direct usage of the route by the Mass Transit scheme.
 - vi. Accommodate bus services and be accompanied by a public transport routeing and service strategy which maximises available opportunities to provide bus priority and deliver attractive services for existing and future residents.
- 6 Retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. Built form shall be set back from the existing riverside habitat infrastructure by a buffer of at least 10 metres This buffer could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.
- 7 Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a . Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. If any off-site provision of biodiversity net gain is required, this should be provided along the Sustainable Transport Route, if practicable.
- 8 Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone

features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.

- 9 Where appropriate to the layout of development blocks, seek to retain and enhance existing hedgerows throughout the site, providing a 10m protective buffer of new grassland habitat for all retained hedgerows. Any deviation from this buffer allowance must be appropriately justified. Provision of additional hedgerows is encouraged, to create a link across the site, where appropriate in terms of proposed site layout. Any loss of hedgerows must be off set.
- 10 Ensure that lighting at this location is designed to safeguard the important ecological function of the river corridor, including the retention of a dark corridor for bats.
- 11 Provide high quality public realm, building on the requirements 5-9 and structural landscaping, designed to provide green infrastructure with a focus on nature recovery and nature-based solutions (visual amenity, health and well-being, green walking and cycling routes, air quality improvements and shading / cooling).
- 12 Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment to include assessment of the effects of development proposals on the wider City of Bath WHS, OUVs and Attributes and other heritage assets including the Georgian city, Bath CA, listed buildings, Royal Victoria Park, undesignated heritage assets and archaeology, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation. Therefore a heritage-led and contextual approach is strongly encouraged. A strong tree infrastructure will be required throughout the site using large growing species to provide both GI nature-based solutions and structural landscaping to break up extensive massing of buildings
- 13 Development should not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints as set out in the WHS Setting SPD; and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response and to influence the height, massing and design of buildings. The Bath Building Heights Strategy (BBHS) should be used as part of the evidence base and the starting point for this analysis which must also include a detailed Landscape and Visual Impact Assessment (LVIA). The BBHS identifies this site as being within zone 3 – the Valley Floor and recommends that for new development 'building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable'. Note that this is a recommendation for the general height only and is subject to modifiers.
- 14 Optimise sustainability innovations, including district heating infrastructure, on-site renewable energy generation, and demonstrate that all reasonable opportunities to reduce the embodied carbon emissions associated with development have been explored.

15 Optimise the solar energy potential of development by careful design and orientation.

16 Be informed by a site specific FRA, with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.



Policy B3

A/J//L

POLICY B3: STRATEGIC POLICY FOR TWERTON AND NEWBRIDGE RIVERSIDES

1. Role of Newbridge and Twerton Riversides (including the Bath Press)

These locations form the western extent of the City of Ideas Enterprise Area

- Newbridge Riverside will function as Bath's primary location for industrial enterprise, providing about 12 ha of land at Locksbrook Road, Brassmill Lane and the Maltings for a range of activities including advanced manufacturing. There is therefore a presumption in favour of retaining land and premises in the **E(g)**B1, B2 and B8 use class where identified on the Policies Map as being within a Strategic Industrial Estate under policy ED.2A. Proposals for other uses will be subject to the application Policy ED.2B.
- **Locksbrook Creative Industry Hub: Within Newbridge Riverside, an area is identified to facilitate a creative business hub, maximising the benefit of collaboration with Bath Spa University. (see Policy SB22)**
- Twerton Riverside has contracted as an industrial location in recent decades. This area is suitable for a broader range of uses and there is scope to redevelop the area to provide new business (B1a, b and c) premises and housing. The area presents an opportunity to host business that is displaced as a consequence of the residential led development of Western Riverside and the growth of the intensification of the Central Area into BWR East. Whilst Newbridge Riverside will remain the

	<p>core industrial location, Twerton Riverside can provide additional flexibility. It will therefore be necessary to maintain an appropriate level of land in this area for B1c uses alongside office uses and housing.</p> <p>2. Placemaking Principles Assets of Newbridge and Twerton Riverside Development proposals must be informed and shaped by the following characteristics</p> <p>Add</p> <p><u>g. Bath Spa University Locksbrook Campus is located within the Newbridge Riverside. There are significant opportunities for new development increasing activity in creative industries and improving the retention of graduates.</u></p> <p>3. Key Development Opportunities</p> <p>Development proposals in this area that accord with the provisions of this and other relevant policies will be welcomed.</p> <p>Key regeneration opportunities in the Twerton Riverside area include:</p> <ul style="list-style-type: none"> • The Bath Press • Roseberry Place • <u>The Locksbrook Creative Industry Hub</u> • <u>Weston Island</u>
158 G	<p>Delete para 158</p> <p>Weston Island is not included in this policy area but development (subject to the relevance of planning policy on flood risk) could provide an opportunity to significantly improve the image and identity for this part of the city; enhancing the ecological role of the island, improving pedestrian connections between north and south. However, given that an alternative site would need to be identified for a bus depot (notwithstanding any lease arrangements currently in operation), it is not likely that this site will come forward for development during the plan period.</p>

New site allocation after Policy SB10
SB22 Locksbrook Industry

SB 22 Locksbrook Creative Industry Hub

Context

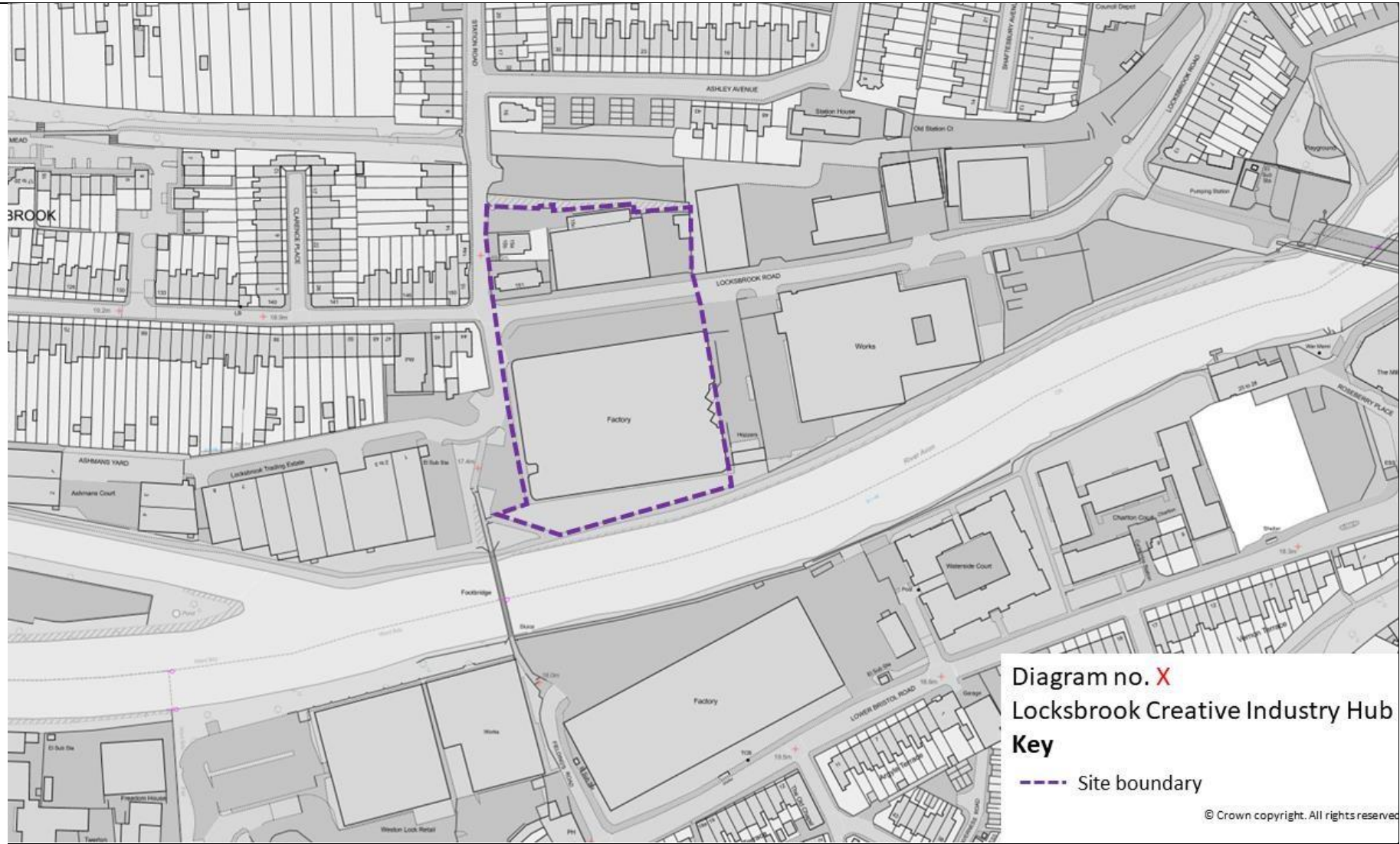
167a. The NPPF (2019) encourages planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The objectives of the B&NES Economic Strategy (2014-2030) includes:

- maintaining an appropriate supply of land in Bath for industrial processes and services to ensure the city retains a mixed economy

<p>Hub A</p>	<p><u>: capitalising on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge based sectors and retaining those skills and talents in the city and wider area</u></p> <p><u>167b.The Locksbrook Creative Industry Hub is located within the Bath Enterprise Zone which plays a leading role in delivering the economic priorities for the City and B&NES. The priorities include ‘addressing the need for new workspace’ and ‘expanding innovation and incubation provision’. It is also located within the Newbridge Riverside Strategic Industrial Estate where Policy ED2A encourages the provision of new industrial land and a strong presumption in favour of retaining industrial floorspace.</u></p> <p><u>167c.In Bath, monitoring shows that significant net loss of and limited supply of industrial spaces. Therefore maintaining land for industrial purposes in this location has strategic importance.</u></p> <p><u>Bath Spa University’s strategy</u></p> <p><u>167d.Bath Spa University (BSU) is a successful, modern university in the south-west of England with a particular focus on fostering creative industries and creating a synergy with Bath’s growing creative economy as well as teacher training for the wider south-west region. BSU has grown in recent years and currently occupies multiple sites across Bath (also satellite sites in Corsham and Bristol), however many are not purpose built and the University considers that they are inefficient and geographically dispersed. This is the major outstanding issue for the University in moving to net zero carbon in terms of transport.</u></p> <p><u>167e.The new University’s Estate Strategy focuses development into two campuses; Newton Park and a new campus area around Locksbrook Road with sustainable travel links between the two campuses. Consolidation of its creative facilities around the Locksbrook area will help to create ‘walkable’ campuses as it is close to purpose built student accommodation. The expansion of the Locksbrook Campus will enable opening the facilities for use beyond the academic timetable and enrolled students within a wider creative zone. This will provide a great opportunity and play an important role in helping the City recover from the pandemic and its effects on employment, skills and will encourage new businesses.</u></p> <p><u>167f.Therefore, the strategy is for the University to enable additional teaching space in the Locksbrook Creative Industry Hub. The teaching space would also be used as studio space with access to specialist equipment and facilities for start-up businesses and workspace for local people, academics and students. This would have a direct connection to the emerging creative and digital industry within B&NES supporting start-ups within this field. It would also maintain the industrial and creative legacy of the Locksbrook Area. This reflects the aim set out in the West of England Industrial Strategy and the West of England Business Plan, including improved partnerships with the University, encouraging research, development and innovation and increasing graduate retention.</u></p> <p><u>167g.The allocation land includes the building (north of the Locksbrook campus) which has an extant planning permission for mixed use development including 72 rooms in cluster flats. (Planning Reference 20/00023/FUL). Purpose built student accommodation is subject to Policy B5 and it is not considered acceptable within the Enterprise Zone where this would adversely affect the realisation of the other aspects of the vision and spatial strategy for the city. Taking into account that the site has an extant permission it is considered acceptable but the priority should be given to employment space therefore the scale of the student accommodation should not exceed the permitted level of accommodation.</u></p>
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Vision

	<p><u>167h. This is the area allocated for a Creative Industry Hub where Bath Spa University and businesses will work together to increase local growth and innovation. The Hub aims to:</u></p> <ul style="list-style-type: none"> • <u>Encourage universities to strengthen their roles as strategic partners in local growth</u> • <u>Stimulate development of incubator or 'grow-on' space for small business in locations that encourage businesses to interact with universities and to innovate</u> • <u>Provide a focal point where universities and businesses work together in a business friendly environment</u> • <u>Implement Bath Spa University walkable campus approach reducing the carbon emissions and responding to the climate emergency</u>
<p>SB22 New Policy for Locksbrook Creative Hub I/J/L</p>	<p><u>POLICY SB 22: DEVELOPMENT REQUIREMENTS AND DESIGN PRINCIPLES</u> <u>DEVELOPMENT REQUIREMENTS AND DESIGN PRINCIPLES</u></p> <p><u>1. Mixed use development comprised of employment space including incubator units and 'grow-on' space and teaching space.</u></p> <p><u>2. Teaching space will be supported subject to:</u></p> <p><u>a) providing flexible workspace that can be offered to small and medium enterprises</u></p> <p><u>b) demonstration of economic benefit to the city especially for industrial uses.</u></p> <p><u>3. Purpose Built Student Accommodation may be accommodated but no more than the extant planning permission allows (up to 72 bedspaces cluster flat equivalent).</u></p>



SB23 New
 Policy for
 Weston
 Island

SB23 WESTON ISLAND
Context

167i. Subject to the relocation of the Bus Depot, there is an opportunity to relocate some existing employment uses that would enable the redevelopment of allocated sites elsewhere in the city. These include the Manvers Street site (site SB6) and South Bank on the Lower Bristol Road (site SB6). The relocation

Paras
167i-

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of these uses will help to unlock the delivery of complex sites which are allocated for higher density mixed use development and would contribute towards achieving strategic planning policy objectives such as the delivery of homes and jobs.

167j. Subject to an assessment of the capacity of the site and in addition to those identified above, there are also opportunities for more public facing uses such as creative, arts-based activities. Such uses could help to animate and overlook a new pedestrian and cycle link that will form a key linkage for active travel between north west and south west Bath. The current link lacks overlooking, feels unsafe, and is of very poor quality.

167k. Given the flood risk constraints and the requirement to allocate specific uses to enable other sites to be released for development, the site is not suitable for residential development. Purpose built student accommodation on this site is also not acceptable, as this use would impede the delivery of these Council objectives.

167l. Given its biodiversity value, the retention and enhancement of the river edge for habitat and the provision of a dark vegetated river edge corridor is essential.

Vision

167m. Subject to the relocation of the Bus Depot, there is an opportunity to relocate some existing employment uses that would enable the redevelopment of allocated sites elsewhere in the city. These include the Manvers Street site (site SB6), and South Bank on the Lower Bristol Road (site SB6). The relocation of these uses will help to unlock the delivery of complex sites which are allocated for higher density mixed use development and would contribute towards achieving strategic planning policy objectives such as the delivery of homes and jobs.

167n. Subject to an assessment of the capacity of the site and in addition to those identified above, there are also opportunities for more public facing uses such as creative, arts-based activities. Such uses could help to animate and overlook a new pedestrian and cycle link that will form a key linkage for active travel between north west and south west Bath. The current link lacks overlooking, feels unsafe, and is of very poor quality.

167o. Given the flood risk constraints, the site is not considered suitable for residential development and therefore, no housing capacity is assumed on this site Purpose built student accommodation on this site is not acceptable, as this use would impede the delivery of other Council objectives.

167p. Given its biodiversity value, the retention and enhancement of the river edge for habitat and the provision of a dark vegetated river edge corridor is essential.

SB23 New
Policy

SB23 Weston Island

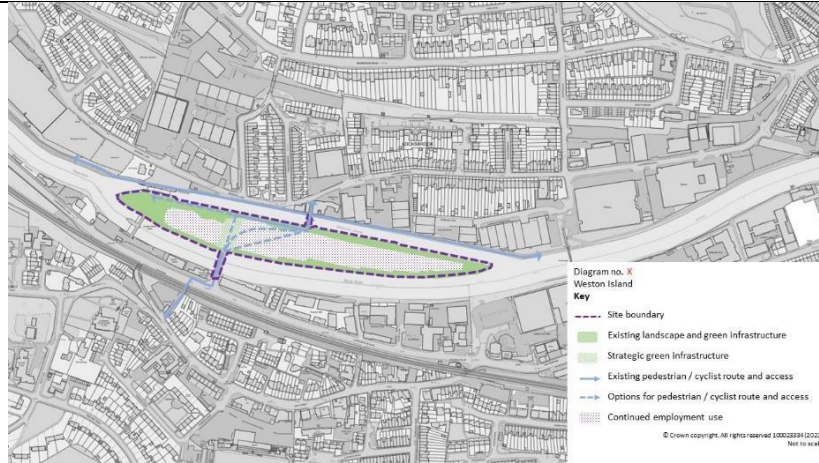
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Development Requirements and Design Principles

Development proposals will:

- 1. Develop the site for builders' merchants or sui generis depot type uses within the existing hardstanding and built up area of the site. Residential and purpose built student accommodation in this area is not acceptable as this would impede the delivery of other Council objectives.**

2. Implement measures that safeguard, restore and enhance the biodiversity value of the site, including the canal, river and river edges and which deliver biodiversity net gain in accordance with policy NE3a. Any proposal must provide significant tree planting to enhance the existing tree/woodland habitat on site and provide an appropriate buffer. Initiatives to deliver for wildlife must include an otter holt, kingfisher tunnel and sandmartin bank. Additional opportunities to provide should be provided including integrated nest boxes; water/ wetland features; public realm nest towers otter cover and bat walls are strongly encouraged.
3. Respond to the restrictions on lightspill from development set out in the the Waterspace Design Guidance (June 2018) “Protecting Bats in Waterside Development” https://www.bathnes.gov.uk/sites/default/files/ba306_bath_bats_and_lighting_guide_10_june_2018.pdf
4. The layout must provide a welcoming, spacious and safe public sustainable transport link across Weston Island and its respective bridges and provide high quality public realm. There may also be opportunities for more public facing uses such as creative, arts-based activities. Such uses could help to animate and overlook this new link. The link should be framed by well-defined structural landscaping / green infrastructure to include large growing tree species forming an avenue and species-rich meadow or under-storey planting, designed to guide users through the site and provide an attractive green link.
5. The development must deliver high quality improvements, including safety improvements, for pedestrians and cyclists and other users to the bridge linking the Island to Lower Bristol Road. The Dolphin Bridge linking the site with the shared use river path will require conservation and upgrading to allow safe access all users.
6. Provision of a new crossing over Lower Bristol Road and improved pedestrian / cycle links between Lower Bristol Road and Twerton HighStreet.
7. The development must respond positively to short and long distance views from and to the Island, having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures.
8. The inspiration and approach should be informed by the immediate and surrounding industrial character.



199

SB14 Twerton Park

Bath City Football Club, who own Twerton Park football stadium is in the middle of a Community Buyout process, the outcome of which will not be known until well into 2016. Previously it has stated that the site will be available for redevelopment during the Plan period that it intended to leave Twerton Park and sell it or facilitate a land swap elsewhere in B&NES on which it can build a new facility. In addition to the football club the adjacent car park is also used for the weekly Twerton Market. The site may therefore be available for redevelopment as part of a residential/mixed-use scheme during the Plan period. Any scheme should preferably benefit or at least not adversely affect the local centre at Twerton. There is considerable uncertainty and the Council does not currently 'budget' for any development occurring here. A site allocation is made so that there is no site specific gap should the site become available. **The site lies on the south side of the River Avon at the bottom of the steep 45-degree, north-facing river valley slope which descends along the adjacent Inox Park. The site is currently occupied by the Twerton Park Football Ground building with ground floor takeaway stands, merchandise shops, and other retail uses forming the north boundary around the building. The Football Ground building is poorly maintained and old-fashioned, clad with corrugated metal which is in disrepair. Immediately adjacent to the north edge of the site are shops which front onto Twerton High Street. The High Street has a mix of uses including a number of convenience stores, a pub, pharmacy, cafes, restaurants, takeaways, barbershops, a community centre and a church. To the north of the High Street is a rail route, Lower Bristol Road (A36), followed by the River Avon. To the south-east of the site is Inox Park, a public recreation ground with Bloomfield Road allotments. To the east and west of the site are residential streets comprised with both terraced and semi-detached housing.**

199a. The predominant building height of the established built form in the surrounding area, both modern and historic, is between two and three storeys. Mature tree planting to the west of the Dominion Road/High Street junction adds significantly to the character and appearance of the public realm and should be protected. Rose Cottage to the north, The Old Crown Public House and Numbers 22, 23, 132 and 133 High Street to the north-east, and Clyde House to the north-west of the site, are all Grade II Listed Buildings

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Vision

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That the Club maintains its presence on its current site whilst being able to pursue the partial redevelopment of its land holdings. This could include the redevelopment

of the stands to the north of the pitch, to include retail, commercial space and of housing, as well as facilities for the football club as required, or simply a partial development of part of the car parking area. There has been a longstanding aspiration to enable a mixed use development on this site that supports the retention and regeneration of Bath City Football Club and its facilities, whilst providing uses that support the High Street and meet an identified community need, including housing.

200a.To deliver a viable scheme that generates sufficient funds to enable the Football Club to implement their proposed enhancements, viability assessment suggests that residential accommodation that delivers small units and therefore, higher values is needed. As such the allocation policy therefore allows for a mix of residential accommodation, potentially including co-living (sui generis), but excluding purpose built student accommodation.

SB14

SB14 Twerton Park

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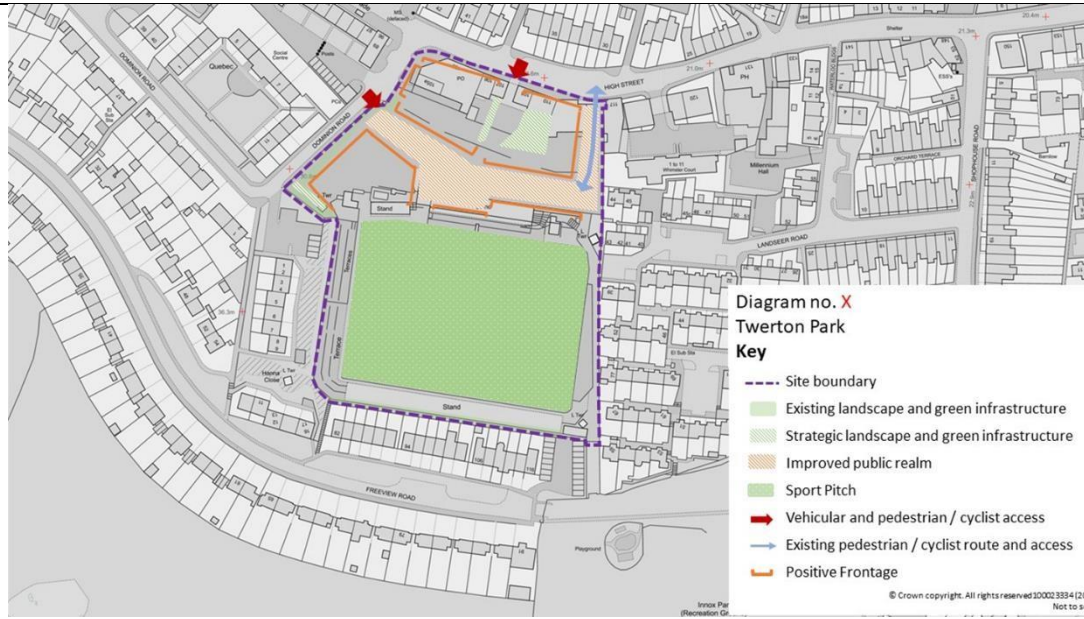
Development Requirements and Design Principles

Development proposals will: Development proposals will:

1. **Provide a mixed use development that supports the retention and regeneration of the Football Club and its facilities, and optimises opportunities to ensure the longevity of the football club in this location, further promoting its existing role as a community hub in Twerton. Development is to comprise:**
 - a. **a mix of residential accommodation, excluding purpose built student accommodation.**
 - b. **active 'Class E' uses on the ground floor fronting onto Twerton High Street**
 - c. **the provision of a new community hub which offers communal facilities to promote healthy lifestyles, community cohesion and employment spaces, including co-working options.**
2. **Ensure that the character of this part of the Conservation Area is preserved or enhanced and that development responds sensitively to the topography of the site, taking cues from existing, locally distinct typologies and built form. This requires building heights to be generally limited to 3.5 storeys at the northern edge of the site along Twerton High Street, and to the south, building heights will generally be limited to 2-3 storeys, reflecting the changing gradient of this site. The height of the stadium must be the dominant feature in views towards and over the site, and new residential buildings associated with the site must be subservient in height, scale and massing.**
3. **Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.**
4. **Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as**

standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required,

5. Reinforce and enhance the quality of existing tree planting along the north-west edge of the site along Dominion Road, incorporating these trees into a wider green-infrastructure strategy to create a joined-up corridor.
6. Undertake public realm improvements to Twerton High Street. This could include, but is not limited to, incorporating pedestrian improvements such as resurfaced and wider pavements, cycle improvements in line with the West of England Local Walking and Cycling Infrastructure Plan (LCWIP) and the provision of appropriately selected and located street trees with appropriate space provided to allow mature canopy to develop and which would not impede street lighting.
7. Provide the main vehicular site access from Dominion Road close to the junction with Twerton High Street to include safe and suitable, inclusively designed, pedestrian and cycle links which appropriately respond to the changing gradients and without loss of trees unless it is demonstrated that there is no alternative design. The existing pedestrian access further east along the High Street will be maintained and enhanced.
8. Car and cycle parking must ensure appropriate provision for the existing football club and the proposed development, without prejudicing the condition of highway safety and level of amenity in the surrounding area. This should include delivery of measures to reduce parking demand for each land use and manage parking efficiently across the site as a whole.
9. The site must be designed to prioritise pedestrian and cycle movements over vehicles and minimise conflict between users, whilst accommodating vehicle movements necessary for the successful commercial operation of the football club and the proposed additional development. The masterplan for the site as a whole must maximise permeability for pedestrians and cyclists and connect well with the wider transport network.
10. Optimise renewable energy and biodiversity interventions within the development for example through the provision of green roof or solar photovoltaic panels, whilst being responsive to sensitive or important viewpoints.
11. Optimise the solar energy potential of development by careful design and orientation.
12. Be required to respond to environment and health related concerns and provide a completely recyclable 3G pitch and natural crumb if replacing the current grass football pitch.



Para 210

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210. Located in Weston the Royal United Hospital is a major sub-regional healthcare facility serving **over** 500,000 people within B&NES, Wiltshire, Somerset and South Gloucestershire. It is managed by the Royal United Hospitals Bath NHS Foundation Trust, which acquired the Royal National Hospital for Rheumatic Diseases (RNHRD) located in the centre of Bath, in February 2015. It is now managing all the services offered by this specialist provider **within the new RNHRD and Brownsword Therapies Centre Therapies Centre at the RUH site. This has further expanded the catchment and portfolio of specialist treatment and rehabilitation activities, attracting patients from other areas of the UK and internationally, particularly for treatment of long term conditions. The Trust also treats people visiting the area, including tourists, students and overseas visitors.** As well as being the main provider of healthcare services the Trust is also the largest employer in Bath & North East Somerset with around **5,500** staff **and over 400 volunteers (predicted to rise to 1,000).**

211. Research and development continues to underpin the high quality, evidence-based care delivered both at the RNHRD and the RUH. The recent affiliation of both research teams has served to create a significant health research resource in the City of Bath, and one of the largest R&D portfolios in the country strengthened further by its links to other local research institutions such as the University of Bath **and other universities and colleges.** This supports the Trust's strategy to develop its R&D and be 'best in class' and provides additional income generating opportunities.

211a

The Trust is committed to being a sustainable organisation that is fit for the future, embedding this within the strategic goals of the Trust. The Trust as set out in their Strategic Plan (2018) is delivering actions to make a positive difference environmentally, socially and financially to create an organisation that supports the well-being of their patients, staff and their wider community. The Trusts Sustainable Development Management Plan (SDMP), and associated Action Plan, details the relevant approaches and projects to embed sustainability in everything the Trust does.

212. Future housing and population growth as planned within the sub-region and other demographic factors such as an ageing population places increased demands upon acute healthcare infrastructure and services. **Healthcare is a challenging environment. Financial and workforce pressures over time have coincided with increasing demand for healthcare services and service delivery. At the same time, new developments in medicine and technology have brought new challenges and opportunities.**

213. The Trust has carried out a comprehensive review of its estate and agreed a strategic plan (known as the Estate Strategy) **in 2014**. The purpose of this is to direct investment and estate renewal, to improve the quality and standard of accommodation, respond to changing service needs for patients and staff alike and to comply with the necessary legislative standards. **With the upcoming construction of the Dyson Cancer Centre the Trust is coming to the end of the existing Estate Strategy and is now starting to develop a new Estate Strategy.**

214. The Trust's **ongoing** priorities **in updating the Estate Strategy** are to provide fit for purpose accommodation **to meet the clinical and operational needs**, demolishing unsuitable and outdated buildings, improving the sustainability of the Estate, co-locating functions to cluster complimentary uses, delivering a parking strategy that will improve on-site parking, improving wayfinding throughout the site, reducing off-site parking impacts and encouraging the use of sustainable modes of travel.

215. Central to delivering the Trust's long term vision and objectives is an overarching car park strategy for the campus that improves the current parking, **site efficiency and circulation** arrangements across the site (numbers, rationalisation of car parks and sign posting) and supports the vision as set out in the **2014** Estate Strategy. **Much has been achieved with the new visitor car park opening in 2016 and wider Trust initiatives including the Travel Plan encouraging changes to staff travel behaviour and modal shift. However, increases in staff, patient numbers, forecast population growth and associated healthcare service demands requires the site wide parking strategy, including the potential for decked car parking, to be reviewed as part of the Estate Strategy update. The Trust is continually assessing how best to improve access to site and implementing improvements, its ability to deliver significant modal shift is tied in significantly to the council strategy and approach. This is acknowledged by the council and a collaborative approach is to be taken.**

216. The Estate Strategy (2014) specifically sets out the proposed RUH North Redevelopment programme over the next five years supported by a phased masterplan. These phases, **all of which now have planning permission approval**, are as follows:-

Phase 1:

a) Proposed new replacement pharmacy with aseptic services **(completed)**

b) Provision of new visitor and patient car park located immediately adjacent to the front entrance (Gate 1) **(completed)**

Phase 2: A new Integrated Rheumatology and Therapies Centre including hydro pool and gym **(completed)**

Phase 3 A new Cancer Centre - a new state of the art facility set within an enhanced greenspace for the campus”-**(demolition works commenced in 2020).**

216a

The Trust has also identified the opportunity to deliver additional staff accommodation on-site supporting the recruitment and retention of staff with flexibility for open market rental accommodation. The potential capacity could deliver new build or refurbished beds (circa 100 net additional units)

predominantly within a cluster flat arrangement. The Council supports the provision (C3) flats of a range of sizes and types, for use by key workers associated with the RUH, along with new purpose built facilities on-site including the principle of providing such accommodation within the restored Grade II* Listed Manor House building. The benefits of such a scheme are recognised in terms of estate renewal, making the most efficient use of land and buildings, delivers new housing stock, reduces travel and congestion and reinvestment back into the RUH to support healthcare facilities.

217. The Council will support investment in the development of the hospital to meet the need for healthcare infrastructure, and endorses the approach adopted in the **existing** Estate Strategy **and it's review process**. Beyond the time period of the current Estate Strategy, the Council will safeguard land within the campus of the RUH for future healthcare infrastructure, unless it can be demonstrated that the RUH can successfully provide its services and operate its site from a smaller land area. **The Council supports the provision of additional housing on-site for occupation by key workers associated with the RUH.**

RUH Sustainability & Green Infrastructure Plan

218. The RUH has also produced a Green Infrastructure Plan (**2015**) that supports the Estate Strategy by setting out a high level vision or framework for the site. This vision is to create a high quality, accessible 'place' with Green Infrastructure as an intrinsic element, for the benefit of staff, patients and visitors. This recognises the well-established benefits to health and well-being provided by access to natural green space. The Green Infrastructure vision is based upon the existing Estate Strategy masterplan and establishes a set of principles to inform the design of each phase. The GI Plan identifies green infrastructure including:
- specific landscape
 - amenity and biodiversity opportunities
 - the types of places that can be created to improve the quality of environment and maximise the health and wellbeing benefits for staff, patients and visitors.
219. Specifically, the Trust identified a number of considerations including:
- 1) Providing enhanced green infrastructure to improve the quality of care and clinical performance
 - 2) Increasing biodiversity opportunities and habitats within the site linking into the wider surrounding green corridors
 - 3) Investigate potential sustainable urban drainage features within the site
 - 4) Creating a legible hierarchy of interesting, linked, usable, wildlife friendly and quality landscaped spaces opportunities for staff, patients and visitors alike
 - 5) Create accessible open spaces with a range of micro-climates i.e. shaded areas in hot weather.
 - 6) Encouraging exercise within the site and improving the connections between existing pedestrian and cycling routes through the site and to GI assets beyond the site.
 - 7) Maintain, improve and expand the existing external 'destination' spaces
 - 8) Identify opportunities to integrate The Trust's art strategy
 - 9) Consider the cost effectiveness of future Estate maintenance
220. This approach responds to the placemaking objectives of the Council, and its approved Green Infrastructure Strategy and is therefore broadly supported by the Council.

220a

The proposed green heart is a central element of the new Dyson Cancer Centre based upon the principles of the RUH Green Infrastructure Plan. In

developing the detailed green heart landscape scheme the GI Plan will be reviewed with a number of existing greenspaces on site, the Trust seek to improve these spaces for flora, fauna and the health of their staff, patients and visitors.

220b

The work around Green Space & Biodiversity is one area of the Trusts Sustainable Development Management Plan (SDMP). When taken as a whole the SDMP ensures a holistic approach is taken to sustainability. Actions within the other areas of the SDMP will aid in supporting the Climate Emergency declared by the council.

New Hospital Plan

220c

The most significant opportunity for the RUH is the announcement that the RUH has been selected for HIP2 funding under the Government's new 'Hospital Infrastructure Programme' (2019), a long-term, rolling five-year programme of investment in health infrastructure, including capital to build new hospitals, modernise the primary care estate, invest in new diagnostics and technology, and help eradicate critical safety issues in the NHS estate. The New Hospital Programme (NHP) actively works towards delivering the NHS Long Term Plan. Particular aspects of the emerging NHP that work towards the Long Term Plan include:

- Digital (best use of technology)
- Preventative care (new clinical models)
- Healthcare integration (Integrated Care System)

220d

The Trust has been awarded seed funding to proceed to the next stage of developing their hospital plans. If successful the funding would be available in the period 2025-30. The Council recognises this a significant healthcare investment opportunity and therefore fully supports the Trust in developing their masterplan and business case.

220e

The Council supports the Trust in the development of the NHP opportunity to reconfigure / regenerate the hospital site and understand that while this is in the earliest stages of development early indications suggest that the following are considered priorities:

- Alongside Midwifery Unit
- Upgrade and/ or replace Emergency Department
- Upgrade and/ or replace Woman's and Children's facilities
- Upgrade and/ or replace Theatres and Recovery facilities

<p>SB18 RUH</p> <p>J?</p> <p>Trees to be retain er and light spill need s to be contr olled.</p>	<p><u>Policy SB18 for RUH</u></p> <ol style="list-style-type: none"> 1. The Council supports the improvement of this essential healthcare facility, including the principles and proposed building programme, and proposals for car parking, as set out in its Estate Strategy 2014. 2. Development proposals will be expected to respond to and to implement the Green Infrastructure Plan <u>principles</u> as highlighted above. 3. Proposals for non-healthcare uses on former RUH land should provide evidence that the land will not be required for healthcare provision or car parking during
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the Plan period. Within this context the council supports the provision (C3) flats of a range of sizes and types, for use by key workers associated with the RUH

Development proposals must:

4. Be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area. The Grade II* Manor House and its setting will require an especially sensitive approach to ensure that its significance is taken into account and both enhanced and better revealed. A heritage-led and contextual approach is therefore required.
5. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.
6. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.
7. Set out a sustainable transport masterplan for the whole of the RUH site.
8. Examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate enhancements to ensure that the walking and cycling are the natural choices for local trips. Specific opportunities for investigation and delivery should include, but not be limited to, the following:
 - a. Pedestrian improvements at the Weston Lane/Crown Road/High Street junction;
 - b. Pedestrian crossing facilities at the Weston Lane/Combe Park junction;
 - c. Cycle linkages with recently delivered LCWIP improvements through Weston Village; and
 - d. Active travel linkages between the site and the Riverside Path to the south.
9. Provide parking for bicycles and cars in line with the parking standards in the Transport and Developments SPD, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land. Contributions to a Residents Parking Zone (RPZ) may be required as part of parking solutions for the site.

New Policy A	<p><u>SB 24 Sion Hill, Bath - Site Allocation Draft Policy Text</u></p> <p><u>Context</u></p> <p><u>220f. The site is currently in use by Bath Spa University for educational purposes. The University’s strategy is to focus development into two campuses; Newton Park and a new campus area around Locksbrook Road, with sustainable travel links between the two, and promoting ‘walkable’ campuses. This approach shall release sites such as Sion Hill for residential use.</u></p> <p><u>220g. The site is located in a highly sensitive hillside location, within the World Heritage Site and Bath Conservation Area. The site has many layers of history prior to its development by Bath Spa University. There are known archaeological deposits in the area including Romano-British burials, an Iron Age site and the former site of St Winifred’s Chapel and Well, the exact locations of which are not known. The site is the former ornamental landscaped garden of St Winifred’s, a 19th century house built in 1803. There may be below ground remains of the property on site, and historic walls and railings survive in places around its perimeter. Various listed buildings are located in the immediate area surrounding the site, including Grade I listed buildings Somerset Place to the east, and Sion Hill Place to the north.</u></p>
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220h. There are currently two small car parks serving the site, with access from Sion Road to the north and Sion Hill to the south. There is no vehicular route through the site, although the site is bounded by roads on all four sides. Winifred's Lane runs in a north-south alignment to the east of the site. It is a steep, narrow lane restricted to one-way northbound, and is known to be used as a through route to Lansdown Road. There is no footway on Winifred's Lane and it is an unattractive environment for pedestrians and cyclists due to lack of facilities and traffic flows. There is an infrequent bus service on Sion Hill linking the site with the city centre, with more regular services available on Lansdown Road c.450m from the main building.

Vision

220i. The site is anticipated to deliver around 100 new dwellings, set within the existing built footprint of the buildings at the site.

220j. Any redevelopment proposal will ensure the protection and enhancement of the site's historic significance, sensitive landscape setting and ecological interests.

220k. There is scope through any redevelopment to enhance the site's walking and cycling opportunities close to and throughout the site, and potentially to deliver biodiversity net gain requirements on site through a combination of habitat enhancements and limited habitat creation (eg small urban orchard; allotments or rain garden).

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Policy SB24 New allocation for Sion Hill

Development Requirements and Design Principles

Development proposals will:

1. Deliver residential (C3 use class) development of around 100 apartments, 40% of which shall be affordable dwellings in line with policy CP9. The proposed market dwellings should provide 2+bed apartments. Affordable dwellings should provide a mix of 1 and 2 bed apartments.
2. Deliver high quality, contemporary and sustainable built form and architectural design, informed by the opportunities presented by the site's sensitive historic and landscape context, and existing habitats. In seeking to preserve or enhance this part of the conservation areas it is anticipated that development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.
3. Demonstrate that all reasonable opportunities to reduce the embodied carbon emissions associated with the development have been explored, including an assessment of the retention and conversion of the existing buildings, in whole or part. If conversion is not considered feasible, other significant opportunities to reduce embodied carbon emissions should be incorporated into development designs.

4. Optimise the solar energy potential of development by careful design and orientation.
5. Ensure that the landscaped garden area located to the south of the site, as depicted on the concept plan, is designated as public open space.
6. Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.
7. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.
8. Retain and enhance substantial boundary planting to protect both short and long views of the site from across Bath.
9. Provide a comprehensive network of walking and cycling public access routes through the landscaped gardens as broadly illustrated on the concept diagram. These will need to be designed to respect the landscape and historic sensitivity of the site. Vehicle and active travel access will need to be segregated. Development proposals will be expected to enhance the pedestrian and cycle environment for north-south movements, broadly along the alignment of Winifred's Lane at the eastern side of the site. This is likely to be through providing a route within the site, but options to reduce traffic flows and speeds along Winifred's Lane to make the route safe and suitable for pedestrians and cyclists should also be investigated. Routes through the site must include appropriate connections to the wider walking and cycling network, including safe crossings where necessary.
10. Development proposals must ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road. A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose and deliver solutions as appropriate. Measures for investigation and delivery should include, but not be limited to:
 - a. Pedestrian crossing facilities over Lansdown Road in the vicinity of the junction with Sion Road;
 - b. Traffic speed reduction measures on Cavendish Road and/or Winifred's Lane; and
 - c. Improvements to cycle routes to the city centre, including options using alternatives to Lansdown Road.
11. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.
12. Ensure continued access to public sewer running from north to south of the site.



SB25

A

SB25 St Martins Hospital

ST MARTIN'S HOSPITAL - Site Allocation Draft Policy Text

Context

220l. The site is currently owned by NHS Property Services. Some areas of the site, namely the clinical buildings to the south-east, continue to play an important role in the NHS's clinical facilities requirement. However, some buildings within the site are expected to soon be declared surplus to the operational healthcare requirements of the NHS by local health commissioners, therefore releasing these areas for use as housing.

220m. The site is historically sensitive. It is located within the World Heritage Site and has many layers of history prior to its development by the NHS. Records show that it may have once been used as a military barracks, before becoming a workhouse, and then a hospital. The main building within the complex, a former workhouse building, which has now been converted to apartments, is Grade II listed, as is the Chapel of St Martin, located to the north of the site. A nineteenth century paupers burial ground is also located within the site, and there are known archaeological deposits in the surrounding area.

220n. The buildings within the site which are due to soon be declared surplus to requirement for clinical use comprise Kempthorne House, Midford House, Ash House and Frome House. The latter is a modern single storey flat roofed building, and a large portacabin. The other three buildings provide an important narrative as part of the site's history, with regards to their hierarchy and design.

220o. Attractive landscaped areas throughout the site are considered important both visually and potentially in terms of biodiversity. There are many trees throughout the site, which require retention and protection, some of which are located very close to the footprint of the buildings.

220p. The site is located c.2.5km from the centre of Bath, and there is a reasonable range of local facilities within walking distance, including education, food retail and healthcare. The A367 Wellsway is located c.250m to the west of the site and offers access to regular bus services to the city centre within walking distance. Thus, the site offers reasonable potential for journeys to be made sustainably.

Vision

220q. The site will deliver around 50 new dwellings, whilst continuing to provide important clinical health care provision within parts of the site.

220r. Provision of new dwellings shall be achieved through conversion of Kempthorne House, Midford House and Ash House, and through the redevelopment of Frome House.

Development proposals will ensure the protection and enhancement of the site's historic significance, and its valued landscaped areas.

220s. The development will capitalise on the location's potential for day to day trips to be made locally and on foot or by bicycle, with public transport being an attractive option for trips to/from the city centre. There is scope to improve the permeability of the site for pedestrians and cyclists, through the improvement of routes throughout the site, particularly joining Midford Road with Frome Road.

New
allocation
SB25

J?

SB25 St Martin's Hospital POLICY APPROACH

Development Requirements and Design Principles

Development proposals will:

1. Ensure a comprehensive mix of uses across the site, comprising the delivery of around 50 residential dwellings, and the continued use of the south-eastern section of the site for clinical health services. Any application for the conversion or redevelopment of buildings within the site to non-clinical uses shall be supported by evidence to show that they have been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.
2. Achieve the delivery of residential dwellings through the conversion of Kempthorne House, Midford House and Ash House, and the redevelopment of Frome House. Any scheme should be informed by a detailed, site-wide heritage assessment, which considers each of the individual buildings within the site, their context and relationship to each other, as well as other heritage assets, including the World Heritage Site, adjacent listed buildings, and undesignated heritage assets. The proposed subdivision and alteration of the buildings, and the design and layout of external areas shall be informed by this heritage assessment.
3. Deliver high quality architectural design in relation to both conversion and redevelopment, informed by the site's sensitive historic surroundings.
4. Retain and convert Kempthorne House, Midford House and Ash House, unless an objective and comprehensive heritage assessment is provided to justify demolition, with a clear evidence base to demonstrate that conversion is not feasible and / or viable.
5. Ensure that any residential use is developed using a comprehensive, site-wide approach, ensuring the existing and future clinical operations within the site continue to function effectively, particularly in relation to access and car parking arrangements.

6. Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, planting, and landscaped areas. Protect all retained connecting habitats from increased light spill. Any extension or redevelopment of existing buildings will be designed to ensure minimal to no encroachment into landscaped areas.
7. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.
8. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.
9. Retain and enhance the existing network of pedestrian footways throughout the site and deliver measures to improve permeability and legibility for pedestrians and cyclists, including publicly accessible routes joining Midford Road and Frome Road. Ensure that such improvements are designed to respect the landscape and habitat infrastructure or heritage of the site.
10. Undertake Transport Assessment for the development proposals to understand potential traffic impacts on the existing network, and scope of mitigation. This must focus on the delivery of sustainable transport measures to provide opportunities for mode shift.
11. Examine the pedestrian and cycle routes between the site and key local facilities and make appropriate enhancements to ensure that the walking and cycling are the natural choice for local trips. This should include, but not be limited to:
 - a. Improve access to Odd Down Sports Ground for pedestrians and cyclists through off-site contributions towards crossing improvements across Wellsway, and a new access to the Sports Ground;
 - b. Upgrade to crossing over Frome Road at the entrance to Fosseyway Infant and Primary School to include widening to accommodate shared pedestrian/cycle use;
 - c. Midford Road cycle improvements between, and including, Clara Cross Lane and Path to Hansford Close; and
 - d. Enhancements to Midford Road/A367 junction to improve road safety and sustainable accessibility.
12. Parking for bicycles and cars will need to be provided in line with current parking standards, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land.
13. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.



<p>Para 222 A</p>	<p>-----The proliferation of Houses in Multiple Occupation (HMOs) in the Oldfield Park/Westmoreland area is the most visible consequence of the mismatch between the growth in students and on-campus development. <u>Therefore Article 4 Direction removing the permitted development from residential (use class C3) to HMO (use class C4) was introduced in 2013.</u></p>
<p>Para 223 A</p>	<p>----The Information Paper on student numbers and accommodation considers the issues in more detail, provides a full assessment of the evidence that has led to the following policy approach and its likely impact. <u>In summary, it is expected that the future increase in student numbers should be accommodated on campuses and allocated sites.</u></p>
<p>Paras 224 - 225- A</p>	<p>224 It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to 2020/21 at a rate which broadly matches the growth of the student population. Based on estimated forecasts of growth, it will enable a modest increase in the student population (compared to rates experienced since 1997), enable all first years to be offered a place in managed accommodation, and potentially lead to a small contraction of the student lettings market – subject to accommodation preferences. To achieve a more significant contraction in the student lettings market would require significant amounts of valuable land within the city to be developed for student accommodation. In order for the vision for Bath to be realised this land will be needed for ‘normal’ housing and other commercial uses.</p> <p>225 It is envisaged that this approach could mean that 2012/13 levels of HMOs will represent the high watermark within the city. The Council has declared an Article 4 direction in relation to HMOs to manage the student lettings market in the south west part of the city and elsewhere. The Council cannot apply HMO powers</p>

	<p>retrospectively.</p> <p>226 Growth beyond 2020 will require additional on and off campus capacity to be identified. No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented.</p> <p>227 At the time of preparation of the <u>Local Plan Partial Update</u> Placemaking Plan, the Council received updated growth plans from both Universities. They are summarised in the separate Information Paper: Student Numbers and Accommodation requirements in Bath Update (May 2016 <u>July 2021</u>). New private educational institutions e.g. language schools have also signalled a desire to increase their presence in the city.</p>
<p>Policy B5 A</p>	<p>POLICY B5 - STRATEGIC POLICY FOR BATH'S UNIVERSITIES <u>OFF-CAMPUS STUDENT ACCOMMODATION AND TEACHING SPACE</u></p> <p>With regards to the development and expansion of the University of Bath the strategy seeks, the development of about 2,000 study bedrooms and 45,000 sq.m. of academic space at the Claverton campus site allocations.</p> <p>Off-campus Student Accommodation and Teaching Space</p> <p>Proposals for off-campus student accommodation (whether in the form, C2, C4 or sui generis residential units) or teaching space (apart from at specific allocations) will be refused within the Central Area, the Enterprise Zone and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to delivering housing, and economic development (in respect of office, industrial, retail and hotel space).</p>
<p>Add new para 229a – 229c. A</p>	<p>SB19 - THE UNIVERSITY OF BATH AT CLAVERTON DOWN (INCLUDING THE SULIS CLUB)</p> <p>Historical-Context Add new para 229a 229a <u>The University of Bath now employs about 3,500 staff, making it the second largest employer in the District. It has great expertise in the STEMM subjects: science, technology, engineering, mathematics and management, which are a particular focus for the West of England Local Economic Partnership (LEP). The education the University provides improves individual life chances and opportunities, and delivers highly skilled industry-ready graduates to the workplace. The University's growing research portfolio generates significant opportunities for investment and employment and the University's successful business incubation role is renowned globally. Its research also makes a significant contribution to our society and day to day lives, notably in addressing the challenges of the declared Climate and Nature Emergencies.</u></p>

	<p><u>229b. The contributions the University of Bath makes socially and economically is strategically significant to the District and policy direction is to help secure the future of the institution and manage its growth in associated student accommodation in a way not detrimental to the normal private housing stock and existing communities. As set out in the 'Strategic Issues' (para 22), there is not enough land in the city to meet its assessed needs as identified by various evidence, therefore the Council has had to prioritise land uses to meet its general housing numbers and employment floorspace. Policy B1 7 facilitates provision of additional student accommodation and academic spaces on campus and Policy B5 does not allow student accommodation where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to delivering housing, and economic development (in respect of office, industrial, retail and hotel space).</u></p> <p><u>229c. Therefore understanding the development capacity on the main Claverton Campus and maximising the potentials responding to the environmental context of the whole campus is essential. Following the adoption of the Placemaking Plan in 2017, the University has revised its masterplan in consultation with the Council and it forms important evidence base for the revised policy for the Claverton Campus.</u></p>
<p>Para 235-246 G</p>	<p>Delete para 235 and 237 The B&NES Local Plan (2007) was prepared and adopted at the same time that the University was preparing its 2009 masterplan. This looked at retrospective development needs (taking into account a deficit in the academic floorspace per student ratio that had emerged over time) and longer term requirements, into the 2020's (whereas the Development Plan itself now looks to 2029). It was concluded by the exam---</p> <p>Delete para 239 Delete para 240-246</p>

New
paras

A

Local Plan Partial Update and new Masterplanning

246a. The original Placemaking Plan (adopted in 2017) provided a Development Framework (see superseded Framework) and an associated suite of design principles as well as clear criteria for consideration of specific development schemes within different parts of the campus. It also required a comprehensive study to explore how and whether any additional development could be taken forward responding to the environmental context of the whole campus, and how the enhancement of its environmental assets would be achieved. The Framework Plan provided a long term steer for change that can endure and within which there is flexibility.

246b. Following the adoption of the Placemaking Plan (2017), the University has prepared a new Masterplan that provides a vision of the future for the Claverton Campus. The purpose of the Masterplan is to enable the delivery of the development and infrastructure required to address the needs and expectations of its students and staff and to facilitate the University's sustainable growth in a manner that also enhances the unique beauty and environmental quality of the campus.

246c. The Masterplan is comprised of complementary building, movement, sport and green infrastructure strategies. In order to maximise the development opportunity within its environment it identifies:

- opportunities for conversion, redevelopment and extensions to the built form in the campus core;
- development opportunities and capacity on the existing main car parks, sports pitches and courts (outside of the Green Belt).
- the re-provision of these essential facilities elsewhere within the estate.

246d. The Masterplan reflects the parameters of the original Policy SB19 Development Framework Plan. It addresses the University's estate strategy and explains its capacity for further development, how its elements are linked and related infrastructure requirements. It was informed by the required evidence base including a Landscape and Ecological Management Plan, Visual Assessment, Transport Statement and sports facility analysis.

246e. It has been prepared in consultation with the Council, and forms part of the evidence base for the review of Policy B5 and Policy SB19 in the Local Plan Partial Update. Revised Policy SB19 provides more detailed requirements and parameters to facilitate sustainable growth on Claverton Campus.

246f. All applications for major development would benefit from early engagement with the Council's Development Team pre-application process. The proactive planning of the campus between the Council and the University will likely result in the most efficient and sustainable outcomes, not only for the campus itself, but for its setting and the city as a whole.

Climate Action Framework

246g. In May 2020 the University declared a climate emergency and adopted a Climate Action Framework that addresses the University's climate impact as an organisation, and how it can impact the agenda through its core mission; research, and teaching and learning. The University has an important role to play in conducting world leading climate emergency related research and in educating students to become future leaders and innovators with the skills and experience to respond to the climate crisis.

246h. The University has committed to the targets of being net zero carbon in Scope 1 and 2 emissions by 2030, and Scope 3 emissions by 2040.

Scope 1 covers direct greenhouse gas emissions from sources owned or controlled by the University.

Scope 2 covers indirect emissions from electricity consumed by the University which it does not generate itself.

Scope 3 covers the other indirect emissions that occur upstream and downstream, associated with the University's activities, including carbon emissions generated from commuting, business travel, procurement, waste, water and construction.

246i. This will require significant increase in the pace and ambition of current actions to meet the challenge of transitioning to a net zero carbon campus, alongside supporting behavioural and cultural changes through engagement with its own community

Policy
SB19

The campus, policy area and policy zones boundaries are identified on the Policies Map. The policy approach that applies within each policy zone as defined on the Policies Map is as follows:

Development Framework Plan

J/K/L ?	
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1 Purple Zones (with no hatching) — **The** areas of pre-existing development (**academic and residential**), including car parking, or fringe areas of the current central landscaped area, where redevelopment or new development for university-related uses is supported in principle. University-related uses include space for learning, research and allied business incubation and knowledge transfer, conferences, university administration and IT and sports, health, creative arts, social, recreational and catering purposes, academic-related retailing (e.g. a bookstore) and additional student residential accommodation.

On-site convenience retailing of a proportionate scale to serve the needs of the academic and student community will also be considered as a university-related use.

2. Purple Zones (hatched) — largely sport-related development, pitches, tennis courts and a car park within the Cotswolds AONB where university-related development is also acceptable in principle. In order to effectively manage development within the AONB and to ensure impact on the wider AONB is comprehensively considered, it will be necessary for the University to undertake a full and detailed assessment preceding planning applications that:

establish the acceptable form and quantity of development; and

sets out the effect on the AONB and SAC and how any negative impacts will be moderated; and describes how development will be integrated into the core of the campus, and its green infrastructure network.

The study is required to cover the whole of the Purple Zone (hatched), and its production should be guided by the latest version of the Cotswold AONB Management Plan. The study will need to demonstrably inform subsequent planning applications for development within this area.

3. Green Zone — the long-term future extent of a precisely defined central landscaped area (the University Park), which has an important green infrastructure function and provides the setting to many developed parts of the campus, shall itself remain as an undeveloped yet enhanced open space as the remainder of the campus intensifies.

4. Yellow Zones — Outdoor Sport area — areas within which proposals for development will be judged against national planning policy within the NPPF on AONB and Green Belt, as relevant. For the Sulis Club this enables the redevelopment of previously developed land, within the parameters set by the NPPF.5.

Clear Zones — other undeveloped areas within the Claverton campus but outwith the University Park that shall remain free of development because of their multi-functional contribution to green infrastructure. This includes a 'hole' in the purple zone to the north of Wessex House. It will be necessary for clear zones to be established in respect of development affecting the purple hatched areas, guided by the general and area-specific development principles, most notably in respect of the perimeter of the campus and the role this plays for protected species of bats. Linked to new development the clear zones should be invested in to maintain habitats and enhance their function.

Development Framework Plan

The strategy seeks the development of around 870 study bedrooms and 48,000 sq.m. of academic, research and support space at the Claverton Campus to address the potential long-term development needs of the University of Bath.

1. The areas of pre-existing development

Redevelopment or new development for university related uses in areas of pre-existing development including academic, research, support, residential, the sports training villages, car parking, service areas or fringe areas of the University Park is supported in principle subject to other policy considerations.

University related uses include space for learning, research and allied business incubation and knowledge transfer, conferences, university administration, IT, sports, health, creative arts, social, recreational and catering purposes, academic related retailing (e.g. a bookstore) and additional student residential accommodation.

On-site convenience retailing of a proportionate scale to serve the needs of the academic and student community will also be considered as a university related use.

2. The area for new academic, research and support buildings (Area 1: current East Car Park)

The surface car parking will be replaced by academic, research or support buildings set within the existing movement network that is required to maintain access to neighbouring uses.

The height of the buildings will respond to their immediate setting, with the western-most blocks to be up to 5 storeys (around 22.5m high including rooftop plant) and the eastern-most block to be up to 3 storeys (around 15m including rooftop plant).

The eastern block will be set back from the campus boundary to provide space for additional tree planting to bolster the existing perimeter vegetation. Careful design of the buildings will be required to ensure that the impact on the adjacent bat corridors (in terms of light spill) and on views from Bushey Norwood (through the careful design of facades and massing) is minimised.

3. The area for new student accommodation (Area 2: currently eastern playing fields)

The rationalisation of the sports pitches and car parking on the campus will allow the surface car parking and grass pitches in the eastern playing fields to be replaced by the development of student accommodation blocks.

The buildings will extend towards the new 3G sports pitch in the south east corner of the campus and will be limited to 4 storeys (around 13m high plus rooftop plant) to reduce the visual impact of the massing in views from Bushey Norwood.

Careful design of the buildings will be required to limit light spill on to the adjacent bat corridor and help assimilate the buildings into their surroundings.

The buildings will be set back by a minimum of 25m from the campus boundary and positioned perpendicular to the eastern campus boundary to reduce light spill and provide space for supplementary tree and hedge planting along this edge. This will include a tree belt of minimum width 10m running along the western side of the boundary footpath and extending the green corridor southwards to meet the existing small copse.

4. South Car Park (Area3)

A new multi storey car park will be constructed on the footprint of the existing surface car park to provide up to 1,000 parking spaces, accessed from the service road to the south.

It will have a split-level arrangement (into northern and southern sections) with 5 levels to the north and 4 levels to the south, with a half storey change between levels. The maximum height of the structure will be approximately 12m (as parts of the lower deck could be set below the existing ground levels). It will have a roof to reduce light spill.

The eastern extent of the existing car park will be returned to landscaped open space to widen the green link through this part of the campus.

The north facing façade will be carefully designed to provide a sympathetic backdrop to the central parkland area.

The southern edge of the multi storey car park should not adversely affect the residential amenity of properties to the south and special regard should be given to the design of the development in this area and the quality of views from The Parade and from outside the campus.

5. West Car Park and academic, research and support building (Area 4)

The existing surface car park and internal planting areas will be replaced by a multi-storey car park to provide up to 700 spaces accessed from Quarry Road to the north. The maximum height of the structure will be approximately 9m. It will have a roof to reduce light spill.

A tree belt approximately 15m wide will be provided on the western/north western side of the new decked car park to tie in with the existing mound and planting. This will provide additional screening of the buildings in views from the city to the west.

The car park will be flanked by an academic, research or support building on its eastern edge providing an active frontage to the adjacent open space and campus buildings. The building will be limited to 4 storeys (up to 19m including any rooftop plant) so that it sits alongside and below the existing campus buildings when viewed from the west.

The facades and rooftop plant of both the car park and building will be carefully designed so that they can be successfully assimilated into views from the west and ensure that light spill is minimised.

A new open space will be located between the building and the adjacent 10W building, providing a key focal point at the western end of the campus, close to the nearby drop-off area and Polden PBSA. Footpath links across this space will provide improved connections to the public footpath route

running along the south western edge of the campus and extending west towards the city.

6. Redevelopment of 2 South

The building height will be limited to 2 storeys (approximately 8-9m) to reflect the massing of the existing building and ensure that it does not harm the amenity of the residential properties to the south.

The south and west facades and fenestration will be carefully designed to limit light spill on to the adjacent bat corridors and help assimilate the buildings into their surroundings and to create a positive backdrop to a key pedestrian entrance into the campus.

7. Green Infrastructure and Landscape (the University Park, Green corridor and green open space)

The landscape and Green Infrastructure on the Campus comprises the University Park, informal open areas and woodland. It directly contributes to the environmental character and quality of the campus and is a key asset for the University. The University Park has an important landscape setting and green infrastructure function to the many developed parts of the campus. It should remain as an undeveloped yet enhanced open space as the remainder of the campus intensifies.

The park will be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits.

Biodiversity will also be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds.

The landscaped buffer along the eastern boundary of the campus will be further enhanced with additional tree planting to mitigate the potential impact of the development proposals on Bushy Norwood and the wider AONB and to strengthen the existing bat corridor.

The green corridors around the perimeter of the campus will be retained as a continuous green ribbon around the campus which includes public rights of way and links to the wider network of public footpaths and bridleways.

8. Sports facilities

The grass pitch provision on St John's Field and Lime Kiln Field in the southern part of the campus will be retained and the lacrosse pitch to the west of 1S & 2S will also be retained in situ.

The provision of a 3G pitch will significantly increase the capacity of the pitch provision across the campus. Responding to environment and health

related concerns, a precautionary approach must be taken and a completely recyclable 3G pitch and natural crumb will be required.

The boundary habitats will be retained with an appropriate buffer and maintained as dark corridors to ensure continued use by horseshoe bats. Light spill levels onto sensitive habitats should not exceed lux level thresholds as defined in current best practice. That will be achieved by new floodlighting (potentially with the replacement of existing flood lighting) being designed to comply with the relevant standards and, if necessary, the provision of additional screening.

The 3G pitch is located in the AONB and the opportunity will be explored to use the required earthworks and additional planting to screen / filter views of the pitch and related infrastructure.

The Tennis Courts on Norwood Avenue will be retained in situ. The clay pitches will, however, need to be relocated to the car park area to the east of the running track in order to facilitate the student residences development.

9. Access and Movement

In accordance with the University's Climate Action Framework, future growth will be accommodated without increasing car trips, facilitating the use of sustainable modes of travel.

An improved Arrivals Area will provide an improved image and sense of arrival/departure around the bus terminus.

Improved footpath and cycle links and facilities will connect the existing pedestrian and cycle access off North Road and public footpath routes to the west to key destinations within the campus.

The use of the two existing vehicular access points to the campus will be maintained.

Sulis Club

Outdoor Sports area - Proposals for development will be judged against national planning policy within the NPPF, including that relating to AONBs and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club this enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF.

General Development Principles

a Development on campus should contribute to the full spectrum of the University's needs, including academic space, all the accommodation space that is needed for the growth in the intake of first years from 2011 and a major share of the accommodation space that is needed for their subsequent years of study.

b In all circumstances, development should optimise the efficient use of developable land within the campus to maximise its floorspace within the constraints that are present, and whilst achieving good design. The siting, orientation, height, scale and massing of buildings, the landscaping response and the design of the spaces between buildings shall be determined having regard to the criteria in this policy and of other relevant policies in the Development Plan. The flexibility and adaptability of buildings will also be assessed in determining the overall quality of design.

c In all circumstances development will be assessed to determine the degree to which it affects the significance of the Bath World Heritage Site (by reference to the Bath

World Heritage Setting SPD), the Bath Conservation Area, the Claverton Conservation Area, the Claverton Manor Historic Garden and the Bathampton Down Scheduled Ancient Monument (including by affecting their settings) and great weight will be given to their conservation and enhancement.

d In all circumstances where development would be visible to views from within the Cotswolds AONB (at Bushey Norwood, Bathampton Down, and Claverton Down, or from within the Limpley Stoke Valley at places such as Warleigh and Conkwell), it should respond to this context and its visual impact must be moderated with a suitable design response including suitable (immediate and longer term) mitigation measures, including any opportunities to enhance the AONB. Impacts on the AONB will need to be evidenced in an LVIA, the scope of which should be set out in consultation with the LPA, Natural England and the Cotswold Conservation Board.

e If under the terms of the NPPF in respect of Green Belt and AONB, development were to be evidenced as being acceptable in principle within the Green Belt or AONB through the demonstration of very special circumstances at St Johns Field, Lime Kiln Field or at the Sulis Club (~~the yellow zone~~), all general design principles will continue to apply in order to achieve good design and mitigate harm. ~~Zonal approach 2 would also become highly applicable.~~

f In all circumstances the design response should be evidenced as contributing positively to a campus wide strategy for green infrastructure, landscape and ecology (particularly in respect of protected species of Bats) **such as the Landscape and Ecological Management Plan**. These matters should be intrinsic to development, which should enable the creation, protection, enhancement and management of networks affecting the campus. If it is necessary to cause harm to a network, this should be minimised and suitable compensatory measures must be made within the campus.

Provide a minimum of a swift brick per 6 m2 of wall, mounted near the roof, in clusters of three or more., within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required

~~g As part of a campus wide strategy and to implement its Travel Plan a~~All development proposals should enable **and encourage** sustainable transport choices to be made travelling to, and from and within the campus. **This should be delivered as part of a campus-wide approach to sustainable travel including the active implementation of an up to date Travel Plan.** This includes retaining ~~but not increasing an~~ **or reducing the current** operational level of car parking (**about 2,200 spaces**) ~~of not more than 2,200 spaces~~ so as not to harm the patronage of sustainable transport modes, their viability, or cause additional car trips to and from the campus.

h Decked parking as part of any reorganisation of parking supply and/or optimising development capacity should meet the design related criteria of this and other policies, **including the B&NES Sustainable Transport SPD. Proposals to provide decked car parking will need to be accompanied by robust justification of the level of parking proposed, including Blue Badge, cycle and ULEV, including demonstration of suitable measures aimed at reducing the demand for campus parking.**

i **Apart from the Area 2 (current Eastern field playing field) which is identified for redevelopment following the rationalisation of the playing pitches,** ~~the~~ loss of publicly accessible playing pitch capacity to other types of development will only be permitted if that capacity is replaced elsewhere within the city or its immediate environs. Any reduction in non-publicly accessible capacity is a matter for the University as it weighs this resource against its overall institutional and campus priorities.

j In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).

Area Specific Development Principles

k Buildings sited between the Chemistry Building, Quarry Road and the West Car Park, or on it, shall be sited and designed to address this area's elevated location on the edge of the escarpment. Further, the design response should not adversely affect the residential amenity of properties to the south on North Road and should positively address the proximity of the Bath skyline walk, by retaining an attractive visual edge to the campus. This is currently an extensive, tranquil, green and pleasant corner of the campus and thus special regard should be had to general principle (f) and the maintenance of GI links between it, the central landscaped area and Sham Castle Field.

l Whilst the green bank opposite the Sports Institute is not unattractive, it contributes to a weak and confined sense of arrival. The Development Framework shows that the northern part of this bank, leading into the eastern end of the core structure of the bus terminus and the east car park has development potential. The potential of this whole area should be optimised and an improved image and sense of arrival/departure created around the optimum location of the bus terminus. In association, to the south of this area (beyond the purple zone) the southern part of the green bank opposite the Sports Institute should be opened up to create views to the University buildings across the central landscaped area to the main structure beyond.

m Between the Chancellor's Building and the areas of student accommodation is an undeveloped area that provides visual relief. This is not a hole in the purple zone but the placement of any structures within it will need to have special regard to general development principle (f) and the need for the campus to provide areas for informal recreation and visual relief from high density development.

n Development on the southern car park should not adversely affect the residential amenity of properties to the south and special design regard should be had to the changing appearance that development in this area could cause to views from The Parade and from outside the campus.

e The Tennis Courts on Norwood Avenue, if redeveloped, are only suitable for development of a height and use that respects and is compatible with the amenity of residential properties on Beech Avenue. That amenity does not include the maintenance of residents' views from Beech Avenue over the AONB as this is not a material planning consideration. The Norwood Avenue approach should remain tree lined.

p Further to the provisions for policy area (2) the design of development on the eastern playing fields should be landscape led given its largely undeveloped nature and location within and potential to affect the qualities of wider AONB. Special attention should be paid to addressing general criteria (d) (f), and (j) and boundary treatments, paying particular regard to the impact of development on SAC bats and views from the wider Cotswold AONB.

Other Matters to be addressed

q Proposals for further first year student accommodation should set out how the University expects the consequent follow-on accommodation needs so-generated will be met and how this is compatible with the overall sustainable development of the city.



- LEGEND
- Campus Boundary
 - Masterplan Building Projects
 - Residential
 - Proposed Residential
 - Academic Core
 - Proposed Academic/Support
 - Sports Buildings
 - Proposed Artificial Pitches/Courts
 - Relocated Tennis Court
 - Decked Car Park
 - Primary Vehicular Access
 - Vehicular Access to Arrival Plaza
 - Arrival Space/Plaza
 - New Focal Space
 - Key Pedestrian Link
 - Existing Public Right of Way
 - Bath Skyline Walk
 - Focal Lake
 - Outdoor Sports Facilities
 - Key Open Space
 - Green Corridor
 - Additional Tree Planting for Bats/Screening

It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to ~~2020/21~~ **2029/30** at a rate which broadly matches the growth of the student population.

New Policy SB26 I/J/L?	<p><u>POLICY SB26: PARK AND RIDE SITES</u></p> <p><u>Development Requirements and Design Principles</u></p> <p><u>Odd Down, Newbridge and Lansdown Park and Ride sites are allocated as Transport Interchanges. As such development proposals at each of the Park and Ride sites will be expected to:</u></p> <ol style="list-style-type: none"><u>1. Deliver multi-modal transport interchanges, the appropriate uses for which are set out in the supporting text for policy ST6 of the Local Plan Partial Update.</u><u>2. Incorporate renewable energy provision that is compatible with the primary function of these sites as multi-modal transport interchanges.</u><u>3. Ensure the continued use of the sites for Park and Ride purposes, as far as is necessary to achieve the aims of the Council's wider transport</u>
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- strategy, with additional facilities provided to enable interchange, complimenting the Park and Ride service.
4. Be contained within the areas of the sites already developed for Park and Ride use and removed from the Green Belt, as specified on the Policies Map.
 5. Provide built form of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development should 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.
 6. Deliver high quality architectural design, informed by the sites' sensitive landscape surroundings.
 7. Be informed by an ecological survey of each site to ensure key habitats and features of ecological value are retained and enhanced. This is an absolute requirement for the Odd Down site which is known to support a colony of Small Blue butterflies. The areas of calcareous grassland shown as Priority Habitat on the Policies Map must be retained and enhanced, and where feasible buffered with supporting habitat.
 8. Protect and enhance existing green infrastructure and habitats within the site, including all trees, hedgerows, and grassland habitats. Flightlines and foraging routes to be protected from light spill.
 9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. At Odd Down the Biodiversity Net Gain focus should be on increasing the area and improving quality of calcareous grassland priority habitat and maintaining suitable conditions for the Small Blue Butterfly (and other invertebrate interest) across the car park.
 10. Facilitate safe walking and cycling routes through the sites, with connections to the surrounding countryside and into the City.

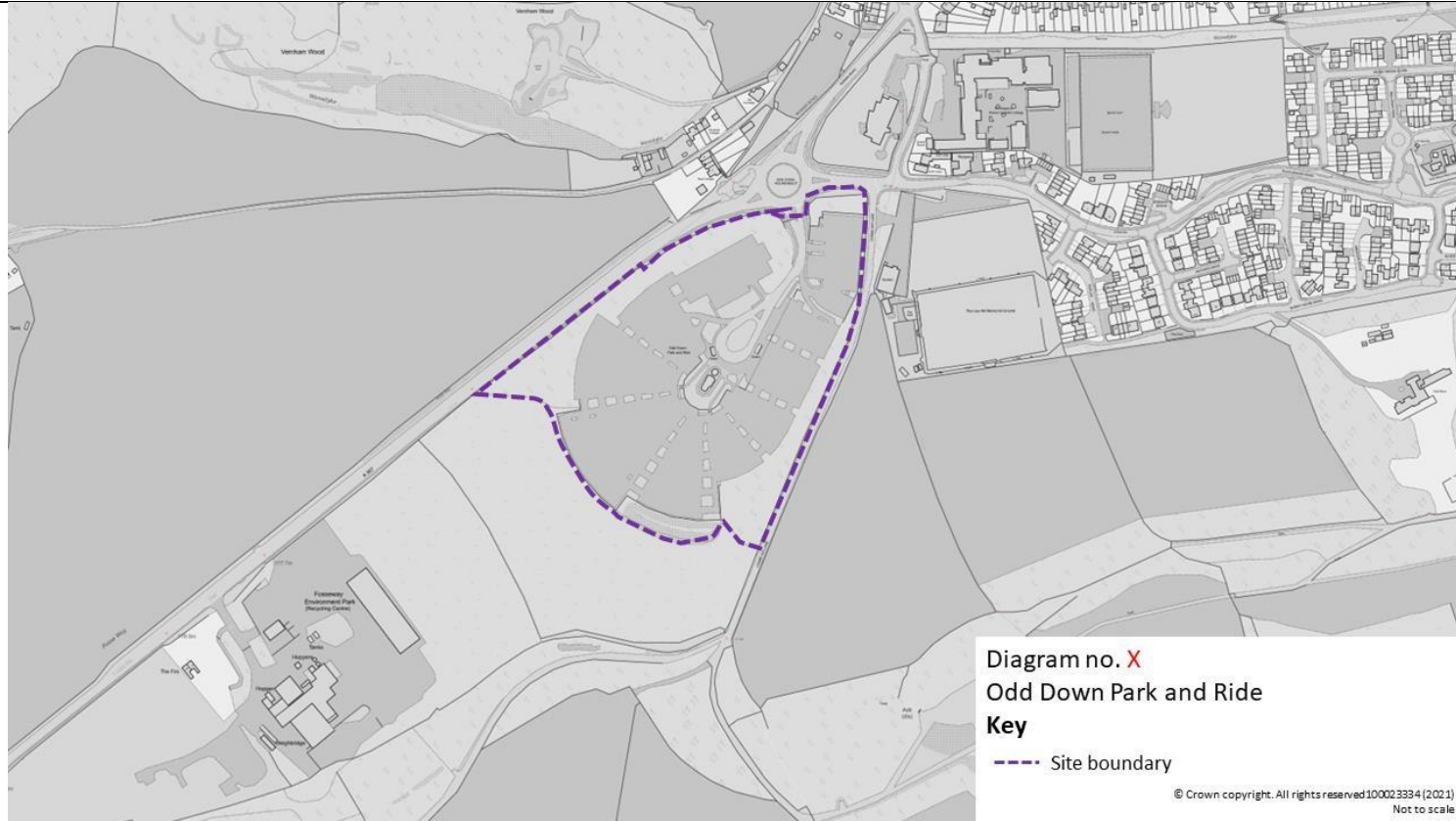
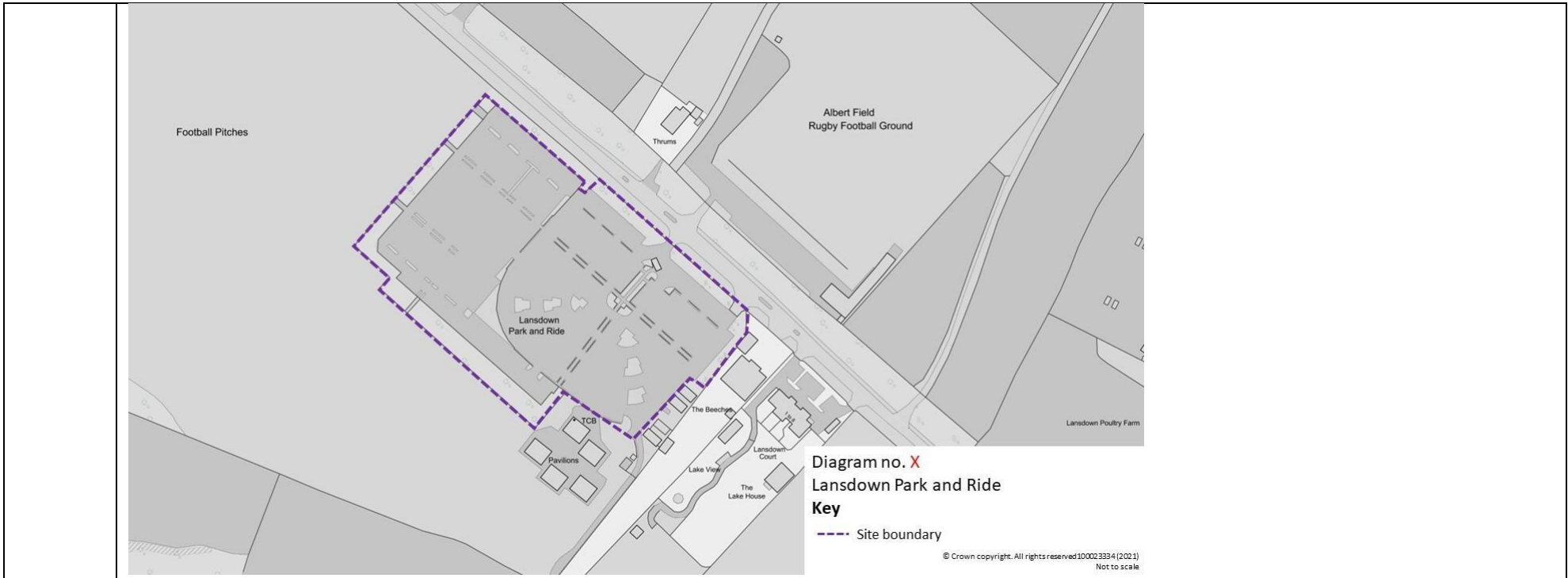


Diagram no. X
Odd Down Park and Ride
Key

--- Site boundary

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Not to scale



Local Plan Partial Update

Note: in the changes below additional text is underlined and deletions are shown as a ~~strike through~~.

Volume 3 (Keynsham)

Page/Para	Amendments
Policy KE1 B	<p>POLICY KE1: KEYNSHAM SPATIAL STRATEGY</p> <p>The Strategy for Keynsham is to:</p> <ol style="list-style-type: none"> 1 Natural and Built Environment <ol style="list-style-type: none"> a Maintain the Green Belt surrounding Keynsham, allowing releases of Green Belt land to the east and south west of Keynsham to accommodate employment and housing growth. b Make better use of the existing green and blue infrastructure (for example parks and rivers) running through and surrounding the town which will be enhanced, made more accessible and linked up. 2 Housing <ol style="list-style-type: none"> a Make provision for around 2,150 new homes (net) between 2011 and 2029. This will include affordable housing, and an appropriate housing mix giving more choice of housing to meet the needs of the local community b Allow for residential development if it is within the housing development boundary defined on the Policies Map or it forms an element of Policies K2, KE2, KE2a, KE3a, <u>KE3c, KE3d</u> and KE4.
New para 80a A	<p><u>80a. In order to help deliver the strategy for Keynsham a number of key sites are allocated for development. For each of the sites allocated for development a policy, supported by a concept plan, is set out which details specific development requirements for that site. For these sites the plan must also be read as a whole as district-wide development management policies also apply, including (but not limited to) policies relating to sustainable construction, biodiversity net gain, affordable housing and sustainable transport.</u></p>
Paragraph 84 – 94 A	<p><u>84. A key redevelopment opportunity within Keynsham town centre is the site currently occupied by the Fire Station, Leisure Centre and Riverside offices. The fire station will be relocating to a new facility at Durley Hill on the western edge of the town and the Leisure Centre is proposed to be redeveloped as part of the Council's Fit for Life Strategy. The Riverside offices have been predominantly vacant following the Council's relocation to the Civic Centre. Therefore, the site will be available for redevelopment during the plan period. The freehold of the site is owned by the Council, but the leasehold of the offices is owned by a private company.</u></p> <p><u>85. The site currently comprises three distinct elements which are the Riverside offices/ground floor retail, Keynsham fire station and Keynsham leisure centre.</u></p>

86. This was historically a residential and commercial area with backland orchards and allotments. Temple Street was until the mid-20th century as active as the High Street, with shops and dwellings along both sides. The site was redeveloped in the 1960s and 70s for the current uses, with the leisure centre completed in the early 1980s. A number of historic buildings were demolished and replaced when this redevelopment occurred. The former fine grain of the east side of Temple Street was replaced by the more coarse grain displayed today, as many of the historic narrow plots were combined to form the large scale Riverside development.

87. It is likely because of the complexity of the site that redevelopment will need to be phased.

88. Evaluation has identified this site as the preferred location for a replacement leisure centre. This would maintain the mixed use offer of the town centre and make efficient use of a brownfield site. Public consultation also revealed a strong preference for providing a new leisure centre here. The exact mix of facilities provided within the new leisure centre will involve further public consultation.

89. The site is located within a 'district heating priority area' as defined by Policy CP4. As such, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to such a system as and when this is available.

90. The fire station site is within the Conservation Area. The remainder of the site falls outside this designation, but redevelopment will have an impact on the setting of the Conservation Area. Taken as a whole, the Riverside complex currently causes harm to the Conservation Area.

91. Current connections between Temple Street and the Memorial Park through the site are poor. To travel between the two currently means traversing a series of poorly designed pedestrian alleys, undercrofts and a narrow metal walkway and staircase. The spaces created feel windswept, stark and unsafe. They do not give inspiration to make the short journey between Temple Street and the park.

92. Views from the park back to the site are dominated by the Riverside complex, which appears incoherent, ungainly and undistinguished, entirely detracting from the appreciation of the tree-studded river valley and park in the foreground.

93. This is a key regeneration site for Keynsham. Redevelopment offers significant opportunities to enhance the town centre with a high quality development. Proposals that do not maximise the potential of the site for a high quality development will be resisted.

Vision

94. Comprehensive redevelopment of a key town centre area with a mixed use development which enhances the Conservation Area and rejuvenates this part of the town centre. A high quality design will improve links between Temple Street and the Memorial Park. The site will have close links with the Civic Centre development, but be subservient to it.

After para 84

A

84a. The redevelopment of Riverside and the Fire station was identified in earlier versions of the Plan as a key redevelopment opportunity within Keynsham town centre (KE2b). The site comprised three distinct elements: the Riverside offices/ground floor retail, Keynsham fire station and Keynsham leisure centre. The conversion of Riverside offices to residential, retaining the ground floor retail, and redevelopment of Keynsham leisure centre are now completed. The last remaining element to be developed is the former Fire Station, which became available for development following the relocation of the fire service to a new facility at Durley Hill on the western edge of the town.

84b. This site is located between the recently completed Civic Centre and Library, and the Riverside development. The former Fire Station fronts onto Temple Street and at the rear of this building are the access and servicing areas for the Keynsham Leisure Centre and the Riverside development. Beyond this, and further to the east, is the Civic Centre Car Park.

84c. The existing site allocation (KE2b) includes all these areas and further extends to encompass parts of the Memorial Park to the banks of the River Chew. It is proposed to retain the geographic scope of this existing site allocation, removing the recently completed Riverside development.

84d. The town centre location of the site, close to local amenities and public transport services, offers significant potential but also complex challenges which will need to be met in terms of the functioning of the area as a whole. The site allocation spans different land ownerships and co-operation and joint working is required to bring forward a scheme that optimises the potential of the site whilst enabling the access, servicing and parking requirements of nearby land uses and other access rights.

84e. There is a pedestrian and cycle route dividing the site and running in front of the Civic Centre, set back from Temple Street, known as “Market Walk”, which acts as both an important connection and contributes to the public realm of the area. The Civic Centre Car Park is accessed to the rear of the site, and there are access and servicing requirements for other land uses, including the Keynsham Leisure Centre. The design of the site, the co-operation of the different landowners and how it interacts with the surrounding land uses will be key to maximising its sustainability without having an unacceptable impact on the operation of the Town Centre.

Vision

84f. The site must integrate positively with the wider urban fabric and incorporate a continuation of the Market Walk public realm route from the north. The site offers significant potential to deliver sustainable town centre development which must be maximised through the design of the scheme.

84g. Given the complexities of land ownership, it is anticipated that different phases of development may come forward at different times. It is essential that earlier phases of development do not prejudice the potential of future phases, and landowners and developers are therefore strongly encouraged to work jointly and collaboratively to identify how their individual elements may come forward and be complementary to each other. It is anticipated that the earliest phase of development likely to come forward will be the Fire Station site. This is assumed to have a development capacity of around 21 residential flats (C3 use class).

Policy KE2b	RIVERSIDE AND FIRE STATION SITE
K/J ?	Development Requirements and Design Principles
Possible river habitat issues / lighting?	Development must: <u>1. Replace existing buildings with a new, high quality mixed use development comprising ground floor retail and/or other town centre uses</u>

~~along Temple Street, mixed residential and a replacement Leisure Centre.~~

~~2. Incorporate infrastructure for district heating in compliance with Policy CP4~~

~~3. Achieve high quality design that enhances the Conservation Area and its setting.~~

~~4. Provide a variation in roof heights. Design of buildings must provide articulation and relief to the elevations.~~

~~5. Construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include materials identified as central to the character of Keynsham from the Conservation Area Appraisal.~~

~~6. Ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. These routes must include the continuation of Market Walk into the site and provide direct pedestrian connection and vistas between the site and the High Street.~~

~~7. Ensure new high quality public rights of way that link the site to Temple Street / Carpenters Lane, and the Memorial Park / River Chew are provided.~~

~~8. Have a positive relationship with all publically accessible routes and the Memorial Park. The frontage to Temple Street must be active.~~

~~9. Ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill within and into the River Chew corridor.~~

~~10. Provide suitable additional car parking that mitigates the transport impact of the development.~~

~~Development should also:~~

~~11. Provide around 2,500sqm of B1 office floorspace in order to provide a mix of uses and contribute to the vitality and viability of the town centre.~~

~~12. Provide a high quality public realm along Temple Street constructed from an appropriate palette of materials referenced from the local context. The suitability for tree planting along Temple Street should be investigated.~~

~~13. Enhance the Memorial Park and provide links with Temple Street to include planting in order to improve links, views and green infrastructure. Opportunities for providing terraced public open space overlooking the park will be encouraged, as will reinstatement of the orchard.~~

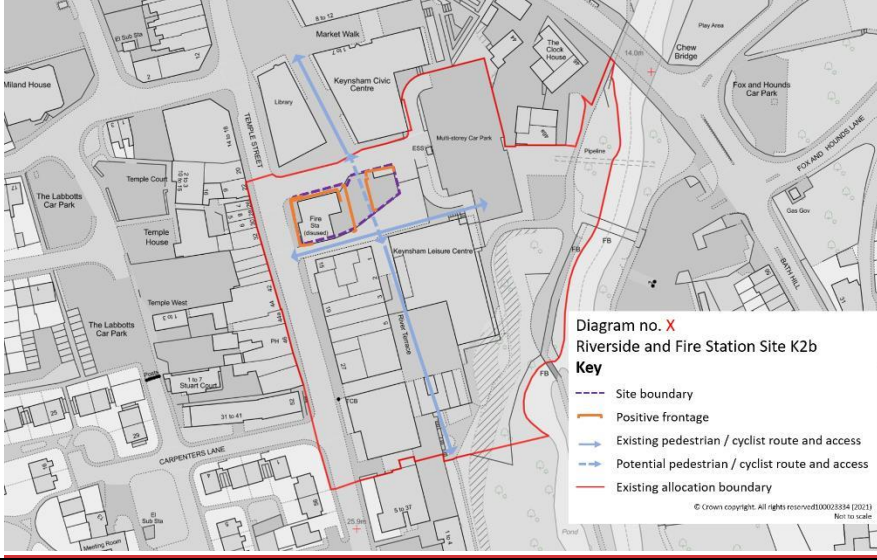
~~14. Provision of SUDS (excluding infiltration techniques) will be supported~~

1. Provide residential development (C3 use class) and around 2,500sqm of B1 office floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre.
2. Provide an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level.
3. Respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it. It is essential that development respects the residential amenity of neighbouring buildings, for example Riverside.
4. Achieve high quality design that enhances the Conservation Area and its setting and which complements the transition between the Civic Centre and Library and the Riverside development. This may require some variation in roof heights and the design of buildings must provide articulation and relief to their elevations.

5. Construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include

materials identified as central to the character of Keynsham from the Conservation Area Appraisal.

6. Optimise the solar energy potential of development by careful design and orientation.
7. Achieve low or zero car parking for non-residential land uses, subject to an appropriate assessment of the effect on wider town centre parking.
8. Ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew.
9. Deliver the 'Market Walk' through the site. Whilst its alignment may be slightly deflected to enable practical development parcels to come forward, there must be a direct visual connection along its route from the Civic Centre to the Riverside development.
10. Ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill within and into the River Chew corridor.
11. The Transport Assessment for the site must include a review of walking and cycling routes likely to be used by occupiers, with proportionate improvements identified and delivered.
12. Provide a high quality public realm along Temple Street and throughout the public spaces of the development, constructed from an appropriate palette of materials referenced from the local context. The suitability for tree planting along Temple Street should be investigated.
13. Enhance the Memorial Park and provide links with Temple Street to include planting in order to improve links, views and green infrastructure. Opportunities for providing terraced public open space overlooking the park will be encouraged, as will reinstatement of the orchard. The provision of SUDS (excluding infiltration techniques) is required.
14. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a . Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.
15. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.
16. Be informed by a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation

	 <p>Diagram no. X Riverside and Fire Station Site K2b</p> <p>Key</p> <ul style="list-style-type: none"> --- Site boundary — Positive frontage → Existing pedestrian / cyclist route and access → Potential pedestrian / cyclist route and access — Existing allocation boundary <p>© Crown copyright. All rights reserved 10003834 (2021) Not to scale</p>	
	Keynsham	
<p>Policy KE3b</p> <p>G</p>	<p><u>POLICY KE3B: SAFEGUARDED LAND AT EAST KEYNSHAM</u></p> <p>Land shown on the Key Diagram and Policies Map is removed from the Green Belt and safeguarded for possible development. The safeguarded land is not allocated for development at the present time and Policy CP8 will apply. Planning permission for development of the safeguarded land will be granted only when it is proposed for development following a review of the Local Plan.</p>	
<p>New paras supporting Policy KE3c</p> <p>A</p>	<p><u>EAST OF KEYNSHAM – Safeguarded Land KE3C</u></p> <p><u>Context</u> <u>The 2017 Placemaking Plan analysed the highways capacity in Keynsham and concluded that mitigation would need to be delivered prior to allocating further housing growth. Hence this land was safeguarded but not allocated for future housing. It has however been removed from the Green Belt.</u></p> <p><u>Mitigation opportunities have been reviewed following the Climate and Ecological Emergency Declarations to ensure that they meet the Council’s requirements to maximise sustainable transport improvements. This has included identifying measures which will also shift some existing car trips to sustainable modes in order to release capacity for additional housing growth in advance of major strategic interventions such as metrobus and Mass Transit. Thus, the Council’s position remains that mitigation is required to deliver growth, but the content of the mitigation package has been updated to meet the requirements of the Climate Emergency, enabling the safeguarded land to be allocated for much needed housing.</u></p>	
<p>New Policy KE3c</p>	<p><u>POLICY KE3C:</u> <u>Development proposals will:</u></p>	

Possible J as no lighting clause?

1. Deliver residential development (Class C3) of around 210 dwellings in the plan period, in the areas as shown on the concept diagram.
2. Complement the housing style, character and density of the adjacent Hygge Park development – incorporating an element of traditional materials including natural lias limestone. Building heights will generally be limited to 2/2.5 storeys, ensuring that development does not interrupt the skyline views from the Cotswolds AONB.
3. Provide a positive relationship with all publicly accessible routes and face outwards towards the open countryside, adopt a perimeter block layout, with a clear distinction between the fronts and backs of properties.
4. Provide an appropriate access from the A4 Bath Road. This is to include pedestrian and cycle crossing facilities over the A4 Bath Road to link the site with facilities and active travel routes on the north side. This needs to include appropriate consideration of the interaction with other junctions on the A4 Bath Road, including Pixash Lane. There must be no possible through-route for general traffic between existing residential areas south of Wellsway School and the A4.
5. Demonstrate that they support metrobus and Mass Transit plans as they emerge, in order to maximise integration between housing development and metrobus and Mass Transit.
6. Prioritise pedestrians and cyclists over private vehicles, and provide an attractive, low-speed environment throughout. The development should integrate well with the surrounding residential areas and provide a comprehensive network of pedestrian and cycle routes, including enabling the creation of a public footpath between K26 A and K26 C, connecting at Manor Road Community Woodland. These routes should utilise existing green corridors where practicable and provide LTN1/20 standard pedestrian and cycle routes which enhance and allow appropriate space for green infrastructure and landscape infrastructure provision.
7. Public space and footpaths should incorporate species-rich verges and grassland habitat and design should be integrated with green infrastructure and landscape design of the site.
8. Be accompanied by a Travel Plan and Transport Assessment, which assesses in detail the mitigation requirements of an individual site. Mitigation proposals for the site must include, but not be limited to, the following:
 - a. Improved frequency of public transport services along the A4;
 - b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;
 - c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and Keynsham Town Centre. This must include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre; and
 - d. New active travel connection between the A4 and the Bristol Bath Railway Path via Clay Bridge, World's End Lane.
9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland.

10. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or

as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.

11. Retain and enhance internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees, ecological functioning of habitat corridors and buffering of the Local Nature Reserve. (The following minimum buffers will be required: 10m from base of hedgerow; 15m from base of hedgerow with ditch; 25m to buffer the woodland LNR).

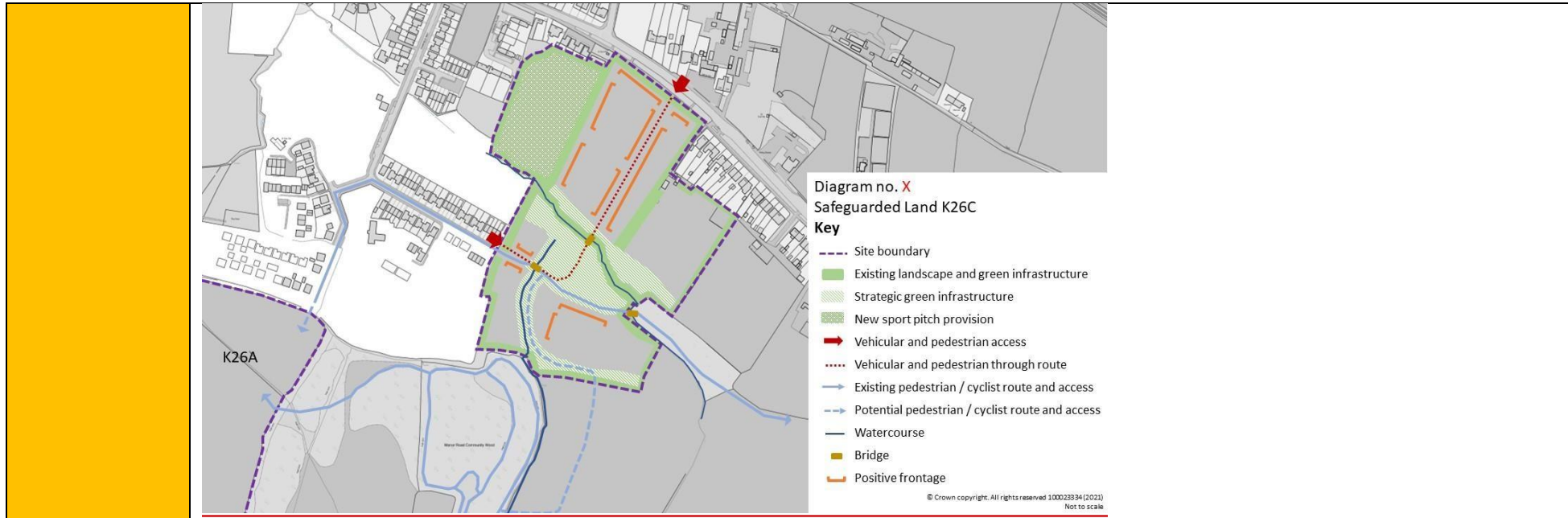
12. Fully incorporate Nature-based SuDS solution as part of the green infrastructure strategy to provide betterment to the existing surface water flood issues and habitat gains.

13. Incorporate green infrastructure, including on-site provision of well-integrated formal and natural green space and play provision, and on or off-site provision allotments.

14. Provide a replacement sports pitch in the north-west corner of K26 C to facilitate the expanded primary school located within the Hygge Park development.

15. Optimise the solar energy potential of development by careful design and orientation.

16. Implement downstream sewer upsizing works and pumping station upgrade.



New Policy
KE3d

J/L?

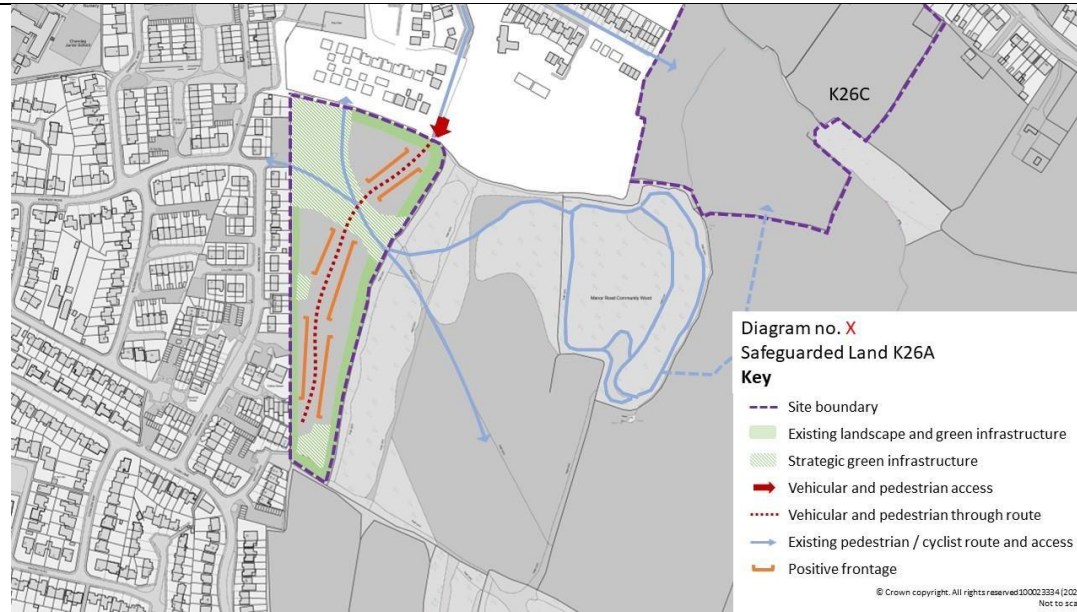
POLICY KE3d: East of Keynsham Safeguarded Land KE3d

Development Requirements and Design Principles

Development proposals will:

- 1. Deliver residential development (Class C3) of around 70 dwellings in the plan period, in the areas shown on the concept diagram.**
- 2. Contemporary housing style, character and density to complement of the adjacent residential areas, incorporating an element of traditional materials including natural lias limestone. Building heights will generally be limited to 2/2.5 storeys, ensuring that development does not interrupt the skyline views from the Cotswolds AONB.**
- 3. Provide a positive relationship with all publicly accessible routes and face outwards towards the open countryside, adopt a perimeter block layout, with a clear distinction between the fronts and backs of properties.**
- 4. Ensure that there is no possible through-route for general traffic between existing residential areas south of Wellsway School and the A4. Access can either be via Hygge Park or via the residential area to the west, with the inclusion of a modal filter at an appropriate location on the street network that allows for pedestrian and cyclist permeability, but does not allow general vehicles to pass through.**
- 5. Prioritise pedestrians and cyclists over private vehicles, and provide an attractive, low-speed environment throughout. The development should integrate well with the surrounding residential areas and extend the network of pedestrian and cycle routes. These should utilise existing and enhanced green corridors where practicable to provide LTN1/20 standard pedestrian and cycle routes. Public space and footpaths should incorporate species-rich verges and grassland habitat.**
- 6. Be accompanied by a Travel Plan and Transport Assessment, which assess in detail the mitigation requirements of an individual site. Mitigation proposals for the site must include, but not be limited to, the following:**

- a. Improved frequency of public transport services along the A4;
- b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;
- c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and Keynsham Town Centre. This must include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre; and
- d. New active travel connection between the A4 and the Bristol Bath Railway Path via Clay Bridge, World's End Lane.
- e. The creation of a public footpath between K26 A and K26 C, connecting at Manor Road Community Woodland.
- f. Upgrade of the footpath connection to Windrush Road to allow cycling – this will entail altering the section of footpath in the existing residential areas to become a Bridleway via a TRO.
7. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland.
8. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.
9. Retain and enhance internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees, ecological functioning of habitat corridors and buffering of the Local Nature Reserve. Lightspill in the retained hedgerow network and habitat buffers should be avoided. (The following minimum buffers will be required: 10m from base of hedgerow; 15m from base of hedgerow with ditch; 25m to buffer the woodland LNR)
10. Fully incorporate Nature-based SuDS solution as part of the green infrastructure strategy to provide betterment to the existing surface water flood issues and habitat gains.
11. Incorporate green infrastructure, including on-site provision of well integrated formal and natural green space and play provision, and on or off-site provision of allotments.
12. Optimise the solar energy potential of development by careful design and orientation.



New Policy KE5

A

KEYNSHAM TREETOPS - Context

This 0.23 ha triangular shaped site lies within the built-up area of Keynsham. The three storey Keynsham Health Centre, including its car park, is situated to the north. The open countryside is to the south and east, with residential areas to the west. The site includes a 1960s one and two storey building that is unoccupied and was previously used as a 30 bedroom nursing home. Overall, this part of Keynsham has a pleasant suburban character.

The site is located within walking and cycling distance of the amenities and facilities in Keynsham Town Centre and the High Street, and in reasonable proximity to Keynsham Rail Station. Bus services to Bristol can be accessed from Albert Road, within walking distance of the site. Thus, by virtue of its location, the site offers the potential for local trips to be made on foot or by cycle, and for longer distance trips to be made by public transport. A planning application for the site would be expected to undertake route reviews of the walking and cycling networks, and ensure that suitable improvements are made to maximise the active travel potential of the site's location.

Vision

Development at this location will be expected to bring forward a high quality design, making use of the sites sustainable location, also achieving well-designed spaces, including good layout, appropriate and effective landscaping, as well as securing a high standard of amenity for future users.

It is expected that the site has the potential to deliver residential development of around 30 dwellings (C3 use class), including at least 30% affordable housing provision. Development of the site should respond positively to the character and appearance of the area, including the setting

	<p><u>of Keynsham Conservation Area, as well as the visual amenity of the Bristol and Bath Green Belt (GB).</u></p>
<p>New allocation Policy KE5 KEYNSHAM TREETOPS K</p>	<p>KE5 Treetops</p> <p>Development Requirements and Design Principles</p> <p>Development proposals will:</p> <ol style="list-style-type: none"> 1. Deliver residential development of around 30 dwellings (C3 use class) 2. <u>Development should respond positively to the character and appearance of the area, including the setting of Keynsham Conservation Area, as well as the visual amenity of the Bristol and Bath Green Belt (GB)</u> 3. Provide a positive relationship with all publicly accessible routes with a clear distinction between the fronts and backs of properties. 4. Optimise the solar energy potential of development by careful design and orientation. 5. Maximise sustainable transport opportunities for future residents, particularly in terms of capitalising on the active travel potential of its location. This will need to be informed by a detailed route review. Improved crossing points over St Clements Road and Albert Road along desire lines will need to be delivered to achieve this, along with a proportionate contribution to improvements to Keynsham Route 3 in the WoE LCWIP. 6. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a . This net gain should be delivered on-site as far as possible, with off-site compensation provided only where the 10% cannot be met on-site 7. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.

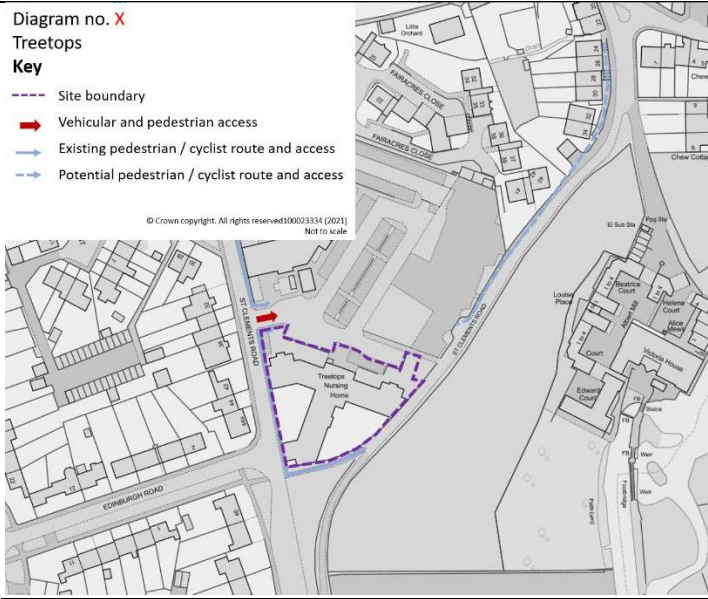
Diagram no. X

Treetops

Key

- - - Site boundary
- ➔ Vehicular and pedestrian access
- ➔ Existing pedestrian / cyclist route and access
- ➔ Potential pedestrian / cyclist route and access

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Not to scale



Local Plan Partial Update

Note: in the changes below additional text is **underlined** and deletions are shown as a ~~strike through~~.

Volume 4 (Somerset Valley)

Page/Para	Amendments
Policy SV2 A	<p>POLICY SV2 MIDSOMER NORTON TOWN CENTRE STRATEGIC POLICY</p> <p>The Strategy for the Midsomer Norton Town Centre is to:</p> <ol style="list-style-type: none"> 1 Key Opportunities/Priorities <ol style="list-style-type: none"> a. Unlock redevelopment sites in the town centre (boundary defined on the Policies Map) to avoid the need for out of centre retail development, particularly in respect of vacant/underused buildings such as the former Palladium cinema and former brewery. b. Enhance the public realm. c. Enhance leisure provision including the Town Park. d. Focus new retail development on the southern end of the High Street as the retail core. <u>public realm and other improvements on the southern end of the High Street and facilitate enhancements to the wider town centre.</u> 2 Scope and Scale of Change <p>Make provision for:</p> <ol style="list-style-type: none"> a. Residential development as part of mixed-use schemes b. Some larger retail units in the core areas of the High Street. c. Modern office space to offset the loss of manufacturing jobs. d. A district heating network. 3 Placemaking Principles <ol style="list-style-type: none"> a. Strengthen the shopping offer in the southern end of the High Street and provide better pedestrian connections from the main car parks to the core retail area, creating a stronger frontage to South Road. b. Enable more intensive use of the South Road car park providing the opportunity to accommodate a modern food store. Any development here should retain public car parking for the town centre. c. Conserve the town centre's heritage and unique townscape character.

	<ul style="list-style-type: none"> d Enhance the positive feature of the River Somer. e Reduce the amount of traffic using the retail core of the High Street and improve the environment for pedestrians. f Improve routes and major entrances into the centre. g Improve access to green infrastructure including the proposed Town Park. h Improve linkage to Sustainable Transport Routes. i Improve the range of leisure and visitor attractions as part of the total town centre offer.
New para 44a A	<u>44a. In order to help deliver the strategy for Midsomer Norton and the other settlements in the Somer Valley a number of key sites are allocated for development. For each of the sites allocated for development a policy, supported by a concept plan, is set out which details specific development requirements for that site. For these sites the plan must also be read as a whole as district-wide development management policies also apply, including (but not limited to) policies relating to sustainable construction, biodiversity net gain, affordable housing and sustainable transport.</u>
Paras 47 -50 Add new paragraph 46a. A	<p>Delete paragraphs 47- 50 Replace with additional text</p> <p><u>46a. An updated car parking survey was undertaken in 2019. This survey looked at the use of the car park in terms of capacity and duration of stay. The survey found that the car park was usually at around 80% capacity. It also found that the duration of stay was 1-2 hours suggesting that the car park is predominantly used by people looking to access that town centre rather than commuters who might stay all day. The survey therefore shows that the car park is important to support the vitality of the High Street. In light of the new evidence from the car parking survey the allocation of South Road car park as a retail store will be removed and policy SSV2 will be deleted.</u></p>
Para 56 A	<p>Vision</p> <p>Redevelopment of South Road Car Park and the Central High Street Core site will help stimulate the delivery of new retail floorspace and facilitate significant public realm improvements. Key to this ---</p>

Policy SSV2 A	Delete policy SSV2 POLICY SSV2: SOUTH ROAD CAR PARK Development Requirements and Design Principles 1. — Retail led mixed use development 2. — Enhance the Conservation Area and its setting. 3. — Provide high standard of pedestrian, cyclists and vehicular access with principal access to the site from South Road. 4. — Create a well designed frontage with the entrance of a new store orientated towards the High Street to help integrate new development and encourage pedestrian connections. The store and parking layout should create an easy and obvious pedestrian route through the site.
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	<p>5. Provide landscape, tree planting and public realm enhancements to ensure a positive relationship with South Road and to enhance the Town's Green Infrastructure, (e.g. Links to Town Park) and ecological networks, with specific consideration for bat flight lines.</p> <p>6. Continue to offer sufficient public car parking for the town centre through the provision of parking spaces on site or off site in locations well related and easily accessible to the town centre.</p> <p>7. Undertake a detailed historic environment assessment and, where necessary, evaluation, in order to identify and implement appropriate mitigation.</p>
<p>Para 61 and new paragraphs</p> <p>A</p>	<p>61. The Retail Study (July 2015) considers this site as a potential retail development site. It is concluded that the site is sequentially inferior to the South Road car park site in delivering new retail floorspace, due to it being an 'edge of centre' location outside the town centre. The issue of suitable pedestrian links between the High Street and this site also make it difficult for retail uses to function as an integral part of the town centre. <u>The retail study in 2021 reviewed the need for a medium size food retail store as well as alternative locations within and adjacent to the town centre. The study found that the town centre would benefit from the provision of a medium size food store which could support the vitality of the town centre. As there are no sites available within the High Street an edge of centre site can be considered. This site is considered to be the next best site to provide a potential site for a retail store of approximately 1,300sqm.</u></p> <p><u>61a. The allocation for retail must be ensure that linked trips to the High Street are encouraged to support the existing retail offer. The site sits to the north of the High Street and is separated from the High Street by a crossroads. Any retail development should be on the southern part of the site and must ensure good pedestrian connections to the High Street. A crossing would be required at the North Road entrance to allow access to the south side of North Road. A further crossing would be required at the northern end of the High Street due to the fact that there is a break in the pavement on the western side of the High Street.</u></p>
<p>Policy SSV4 Former Welton Manufacturing Site</p> <p>K</p>	<p>POLICY SSV4: FORMER WELTON MANUFACTURING SITE</p> <p>Development Requirements and Design Principles</p> <ol style="list-style-type: none"> 1. Comprehensive mixed use redevelopment comprising residential, community facilities and employment uses including small <u>medium</u> scale retail, <u>up to around 1,300sqm</u>, which does not adversely impact on the existing town centre. <p><u>1a. Retail store must be sited on the southern section of the site to provide connections to the High Street</u></p> <p><u>1b. Improved connectivity between the development site and northern end of the High Street including through the provision of additional crossing points at North Road and the High Street to be secured through a legal agreement.</u></p> <ol style="list-style-type: none"> 2. Provide at least 100 dwellings 3. Enhance the Conservation Area and its setting including the retention and reuse of the former brewery building, with a strong presumption in favour of its physical preservation, subject to robust economic viability testing measured against the value of the whole development allocation, and taking full account of the heritage value and wider possible uses of the former brewery building. 4. Provide new streets and spaces through the site that improve pedestrian and cycling connections both north to south and east to west connecting to existing cycle and bridleway for new and neighbouring residential communities.

	<ol style="list-style-type: none"> 5. De-culvert the Wellow Brook to provide continued natural sections through the site, and provide habitat creation/enhancement which will be part of the west-east strategic green infrastructure route. 6. Appropriate ecological mitigation to be included for bats, reptiles and invertebrates. Bat flight lines are to be maintained with no increase to light levels along this boundary. 7. Main vehicular access from Station Road. 8. Land remediation as necessary. 9. Coal Mining Risk Assessment is necessary. 10. The sequential approach to site layout is required informed by a site specific Flood Risk Assessment. 11. Provision of SuDs (excluding infiltration techniques) 12. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.
<p>After para 82 New paragraphs</p> <p>A</p>	<p><u>SILVER STREET</u></p> <p><u>Context</u></p> <p><u>82a.The site is currently an open field that sits to the south of Midsomer Norton town centre outside of the Housing Development Boundary. The site sits on a plateau above the town centre and would be viewed as part of the existing built up area. The current access sits to the north of the north west corner of the site.</u></p> <p><u>82b.The context of the surrounding area has until recently been open fields. However, permission has been granted for the development of the surrounding fields to housing and a primary school. The primary school has been constructed. Highway works have been completed in the surrounding area and pavements have been constructed on some of the surrounding housing sites. The various developments in the area will deliver a safe and suitable pedestrian and cycle access to the town centre, which will be key to supporting local journeys being undertaken by active modes.</u></p> <p><u>Vision</u></p> <p><u>82c.The site is anticipated to deliver up to 12 dwellings of a mix of sizes and heights and in a courtyard type arrangement that respects the wider context and the setting of the nearby undesignated heritage asset. This arrangement will allow for biodiversity net gain on the outer edges of the site, including a hedgerow around the periphery of the site.</u></p>
<p>New policy SSV21 Silver Street</p> <p>K</p>	<p><u>Development Requirements and Design Principles</u></p> <p><u>Development proposals will:</u></p> <ol style="list-style-type: none"> 1. <u>Deliver a residential development of between 10 and 12 dwellings, including on-site affordable housing in compliance with policy CP9</u> 2. <u>Optimise the solar energy potential of development by careful design and orientation.</u>

3. Provide pedestrian/cycle connection to the recently delivered and committed active travel routes on Silver Street to allow for active travel access to existing shops, services, and facilities.
4. Make a financial contribution to the delivery of LCWIP walking and cycling routes between Norton Hill Primary School and Charlton Road.
5. Provide an appropriate buffer between the dwellings and the existing Tree Preservation Orders, and respond appropriately to the setting of the nearby undesignated heritage asset.
6. Retain the existing trees and hedgerows within the site boundaries and with appropriate habitat buffers (10m from base of hedgerow or as defined by hedgerow canopy- whichever is larger).
7. Deliver biodiversity net gain in accordance with policy NE3a, including through the provision of a hedgerow around the full periphery of the site (excluding the access).
8. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.



Paras 146-153

Paragraphs to be amended/updated explaining the proposed changes to the Old Mills Industrial Estate site allocation policy and site boundary. Main changes are incorporation of additional land in northern area of the allocation so that it aligns with SVEZ boundary, incorporation of some higher value (retail/food & drink/hotel) uses and more detail on ecological and transport requirements of development.

PMP:SSV9: Old Mills Industrial Estate

K/J?/L

OLD MILLS INDUSTRIAL ESTATE (Incorporating Somer Valley Enterprise Zone)

Development Requirements and Design Principles for both areas

1. Development of light industrial, heavy industrial, warehousing (classes **E(g)** B4c, B2 **and** B8 **uses**, builders merchants and car show rooms (sui generis)
2. Major landscaping in order to mitigate the impact on the surrounding countryside and nearby residential properties
3. Retention and enhancement of existing hedgerows along perimeter of site (with on-site replacement of any habitat lost in accommodating the access roads. **The substantive retention of internal and boundary hedgerows is expected. Where hedgerow sections will be lost or breached, replacement hedgerows to be provided within or at the periphery of the site to enhance habitat connectivity for mobile species. Provision of 10m habitat buffers is expected for retained and created hedgerows. A protective and complimentary habitat buffer of at least 20m is expected adjacent to the SNCI. A 15m habitat buffer to the River Somer/ Wellow Brook for the southern section of the site is also required**
- 3a. Ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill to retained habitats and protective buffers in accordance with latest best practice guidance.

3b. Bat surveys are to be undertaken in order to inform proposals meeting clauses 3 and 3a above.

4. Protection, diversion or undergrounding of overhead electricity lines
5. ~~Improvements to the transport network to mitigate the impact of the scheme~~ **Improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development**
6. Provision of ~~community~~ **ancillary** facilities to meet the needs of workers
7. Incorporation of SuDS as part of the surface water drainage strategy
- 7a. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation

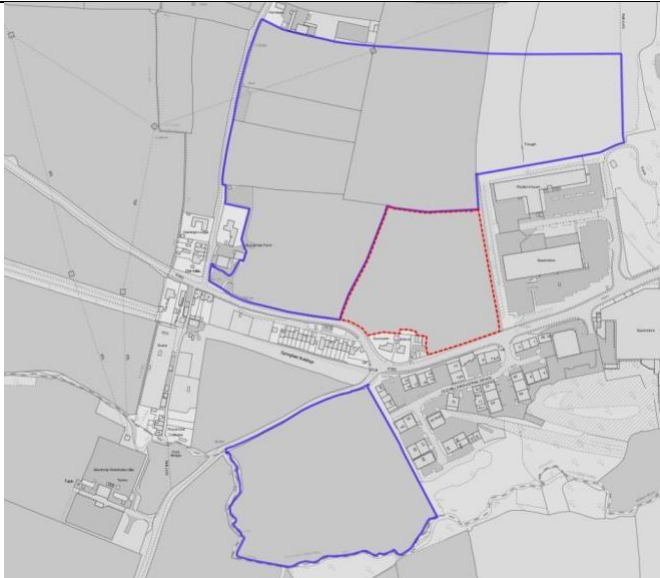
Additional Development Requirements and Design Principles for the Northern area (Somer Valley Enterprise Zone)

7b. Development of some retail, food & drink units (use classes E(a), (b) and a hotel (use class C1) will be supported if of a scale, type and format that does not harm, but complements, nearby town centres and that benefits the attractiveness and operation of the Enterprise Zone.

8. Minimise and mitigate impact on the Batch which is identified as an undesignated heritage asset, a Regionally Important Geological Site and a Site of Nature Conservation Interest
9. ~~Access from the A362 (west of Langley's Lane) and Paulton House / former Focus DIY access road~~ **Provision of new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton**
10. Retention and incorporation of existing public rights of way into the scheme
11. Careful consideration of the appropriate position and scale of development to ensure impact on the surrounding landscape is minimised

Additional Development Requirements and Design Principles for the Southern area

12. Access from existing Old Mills Industrial Estate
13. Flood mitigation measures along the southern and western boundaries of the site, which should also incorporate ecological improvements
14. Appropriate lighting strategy to incorporate dark corridors to mitigate impact on bats **(to be informed by at surveys)**



NB: Blue line shows the adopted Placemaking Plan site allocation boundary and the red line shows the additional land proposed to be included within the allocation.

New Policy SSV22

SSV22 FORMER PAULTON PRINTWORKS

A

Context

153a. The former Paulton Printworks site has been redeveloped in stages over the past 10 years, following the approval of an outline planning permission for the wider area in 2010. The wider site provides a significant number of new homes within the locality.

153b. Five parcels of land within the wider site remain undeveloped. These parcels are referenced on the concept diagram as LP1 – LP5. Some of these land parcels were previously allocated in the 2007 Local Plan for a mix of uses, and an outline planning permission secured all of the sites for various uses including continuing care retirement housing, commercial uses and light industrial floorspace.

153c. Policy SSV22 replaces Saved policy V3 from the Bath & North East Somerset Local Plan 2007 and provides updated development requirements for the remaining parcels of land.

153d. An opportunity has arisen for land parcel 1 to provide development of circa 70 affordable dwellings within the area. In order to bring this forward, an existing deficiency of early years places in Paulton must be addressed. As such, provision of an early years facility is required as part of this allocation, not only to meet the need of occupiers of the new dwellings, but also create provision to meet the existing deficit in the area.

153e. There is also a shortage of good quality open space and green infrastructure in this part of the village, which will also be addressed through this allocation.

Vision

153f. The site will deliver around 80 new dwellings across land parcels 1 and 2. Early years provision shall be provided on land parcel 3, along with good quality public open green space for use by the facility and occupiers of the surrounding housing developments.

Land parcels 4 and 5 shall be allocated for light industrial use.

K

SSV22 FORMER PAULTON PRINTWORKS

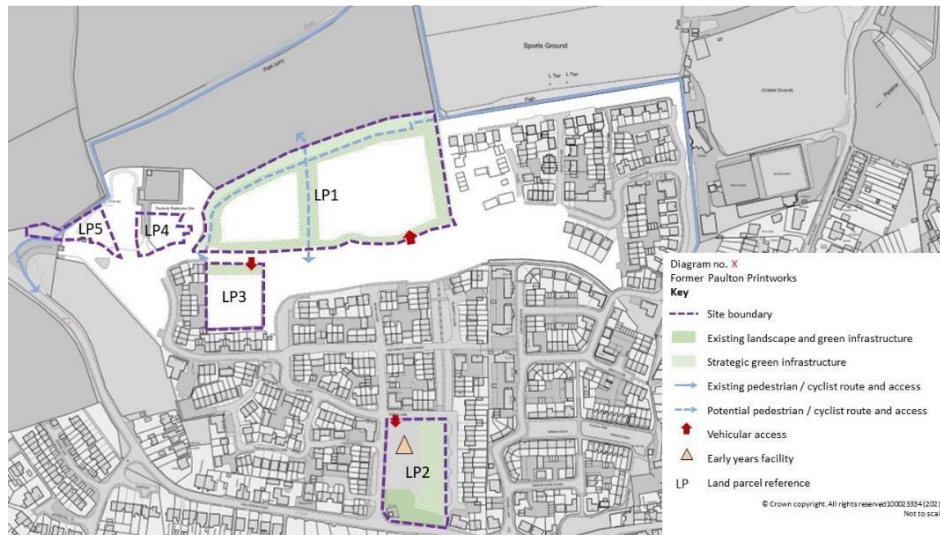
Development Requirements and Design Principles

Development proposals will:

- 1. Deliver a mixed-use development across the five land parcels identified on the concept plan, comprising:**
 - **Residential development of around 80 new homes across land parcels 1 and 2.**
 - **An early years facility on land parcel 3, with provision to meet the existing deficit in the area, plus provision for any additional housing proposed on land parcels 1 and 2. The early years facility must be secured prior to the occupation of any of the dwellings proposed on land parcels 1 and 2.**
 - **Light industrial floorspace on land parcels 4 and 5.**
- 2. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within each of the land parcels should be fully explored and tested before any off-site measures are proposed.**
- 3. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs. Protect all habitats from increased light spill.**
- 4. Retain and enhance existing green infrastructure and habitats along the northern boundary of land parcel 1 and the southern boundary of land parcel 3, including all trees, hedgerows and planting. A 10m buffer to all boundary hedgerows is required, creating an area of grassland within the buffer.**
- 5. Provide rows of large growing trees fronting Oxleaze Way on land parcels 1 and 2, with houses sufficiently set back to allow for future tree growth.**
- 6. Deliver strong street tree infrastructure throughout each of the land parcels, including large growing species with room for future growth.**
- 7. Provide a central north to south green infrastructure link within land parcel 1, with a minimum width of 20m. This should also provide a**

pedestrian link through the site.

8. Provide a positive relationship with all publicly accessible routes and in the case of land parcel 1, face outwards towards the open countryside, adopting a perimeter block layout, with a clear distinction between the fronts and backs of properties.
9. Provide walking and cycling routes through each of the land parcels, allowing access to surrounding homes, and to the countryside to the north.
10. Ensure that development does not detract from views over the site from the countryside to the north, with development designed to sensitively define the site's edge of settlement location, and the transition between town and country.



Local Plan Partial Update

Note: in the changes below additional text is **underlined** and deletions are shown as a ~~strike through~~.

Volume 6 (Appendices)

New Table 7	New Table 7 will be prepared to list the Core Strategy and Placemaking Plan policies that are proposed to be superseded by policies in the Local Plan Partial Update
New Table 8	New Table 8 will be prepared to list Core Strategy/Placemaking Plan and saved B&NES 2007 policies that are proposed to be replaced by policies in the Local Plan Partial Update
Glossary	<p>Add</p> <p><u>Irreplaceable habitat within B&NES includes :</u></p> <ul style="list-style-type: none"> • <u>Ancient woodland - an ancient woodland is a woodland that has existed continuously since 1600 or before in England. Most ancient woodlands are shown on the Natural England Open Data Source for Ancient woodlands</u> • <u>Ancient tree - They have passed maturity, are very old in comparison to other trees of the same species and are actually in the third and final stage of their life.</u> • <u>Veteran tree - The term veteran tree is one that is not capable of precise definition but it encompasses trees defined by three guiding principles:</u> <ul style="list-style-type: none"> • <u>trees of interest biologically, aesthetically or culturally because of their age;</u> • <u>trees in the ancient stage of their life;</u> • <u>trees that are old relative to others of the same species.</u> <p>http://publications.naturalengland.org.uk/publication/75035#:~:text=This%20record%20was%20published%20by.and%20archived%20guidance%20Veteran%20trees</p> <ul style="list-style-type: none"> • <u>Ancient hedgerows - defined as those which were in existence before the Enclosure Acts of 1720 to 1840.</u> • <u>Ancient grasslands - a semi-natural plant community maintained as grassland since 1840, Redhead et Al 2013</u> (https://onlinelibrary.wiley.com/doi/abs/10.1111/avsc.12076) • <u>Tufa spring habitat –</u> • <u>SAC bat foraging habitat within the SAC bat juvenile sustenance zones</u>
Glossary	<p>Add</p> <p><u>Priority Species & Habitats –</u> <u>Reference to “priority” species and habitats refers to those species and habitats identified as being of principal importance in England, Section 41 of the Natural Environment and Rural Communities Act 2006</u></p>

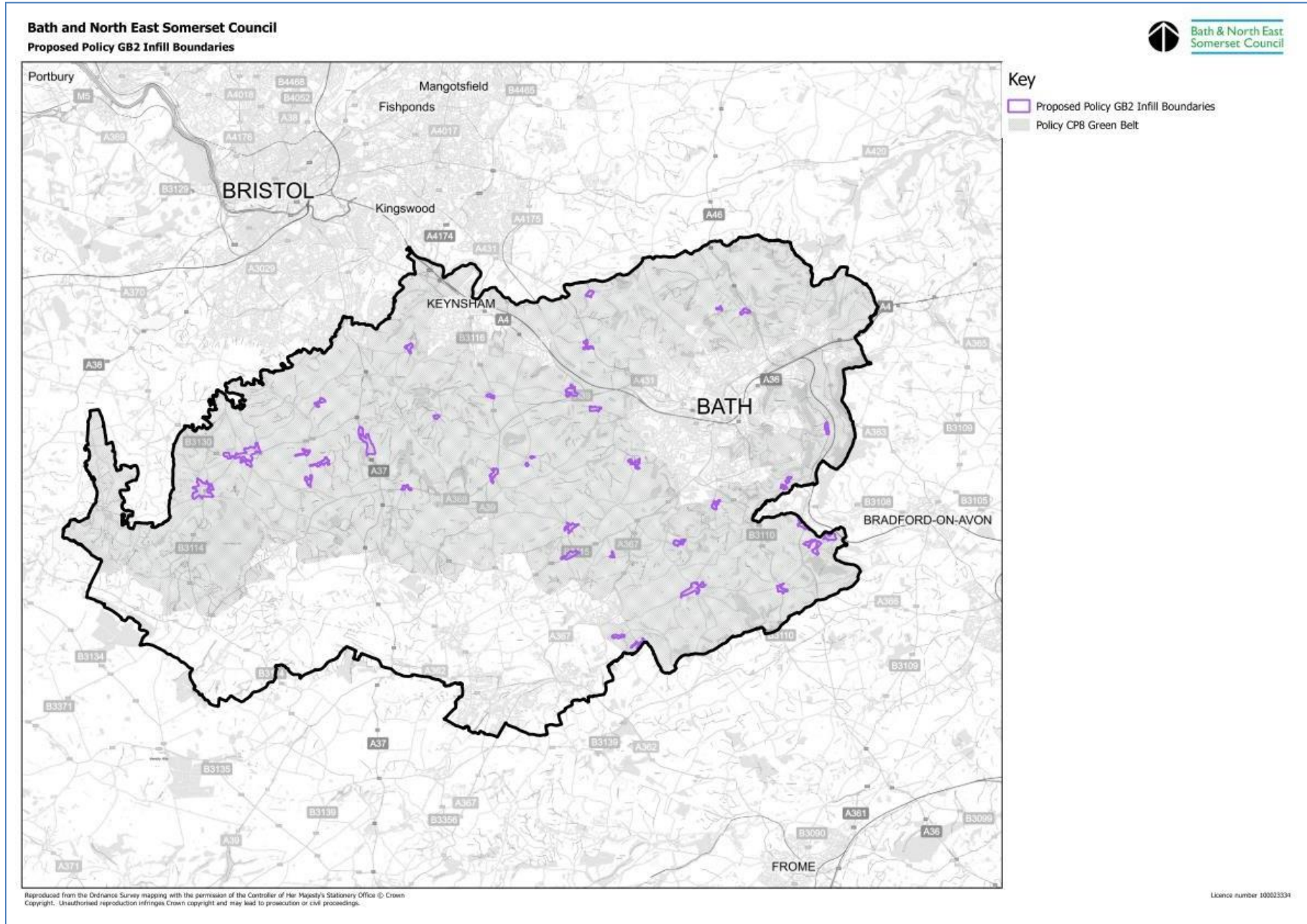
Glossary	<p>Active Ground Floor Use (within designated centres) as Active ground floor uses within designated centres (defined in Policy CP12) are generally considered those falling within Use Classes A1 to A5E Class E(a) and E(b) (former A1 -A3) and No Use Class Sui Generis (p,q,r) (former A4 Drinking establishments and A5 Hot food takeaways) but can also include other town centre uses which are visited by large numbers of people. Residential uses and offices (Use Class B4 E (g)(i)) would not normally be considered as active uses for ground floors in this context (but could contribute to the active frontage by having a front door to a residential or office use on upper floors).</p>

Schedule of Policies Map Changes (Appendix 2)

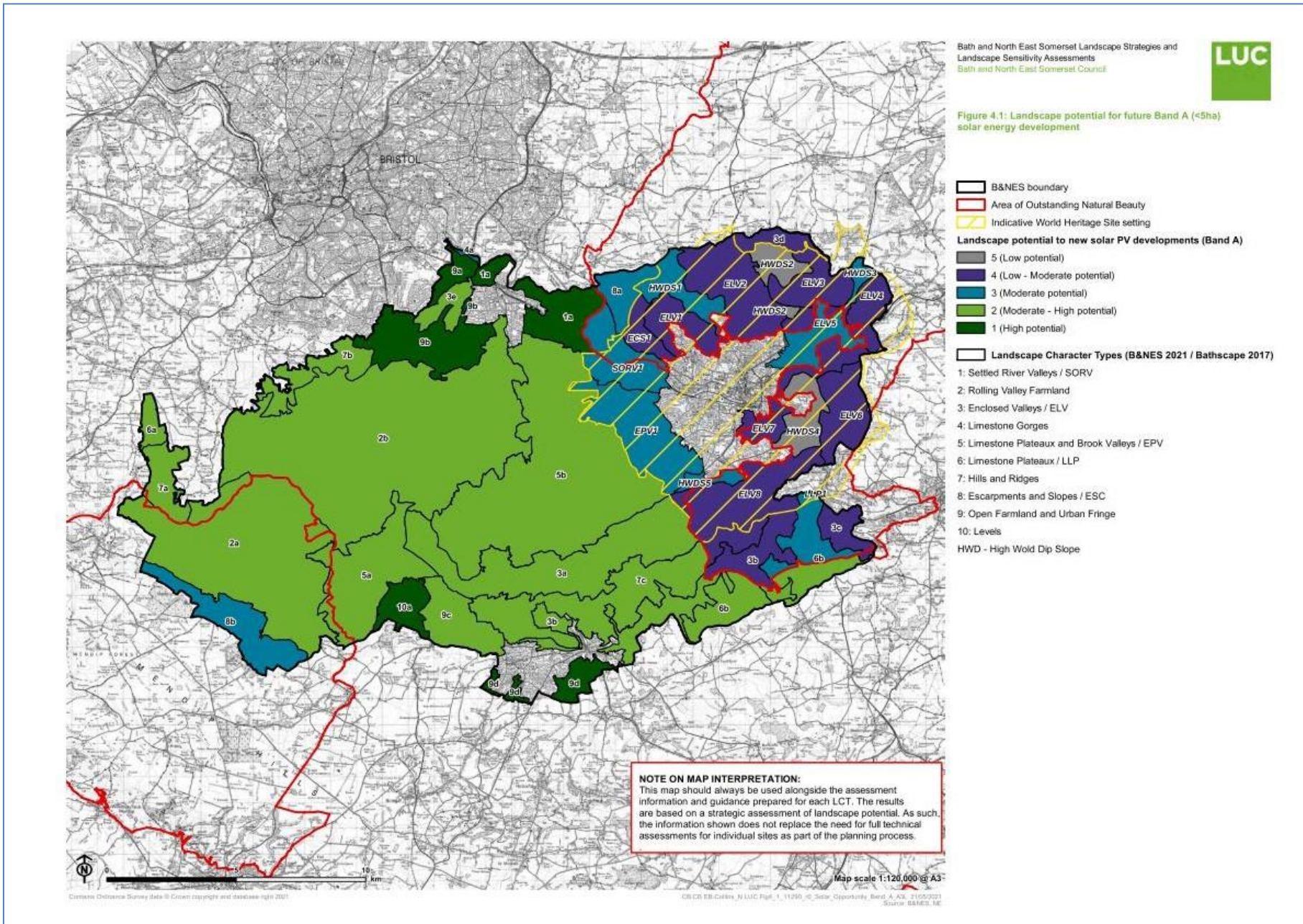
New Table 4: Proposed amended and new allocations and designations in the Local Plan Partial Update (see Maps in Annex 1)

Policy Reference	Summary of Change
<u>GB2</u>	<u>All GB2 Housing Development Boundaries to change to ‘Infill Boundaries’ and to include new infill boundaries (redefined and new villages)</u>
CP3	Landscape Sensitivity maps for Wind and Solar Energy. New mapping to support policy approach
NE3, CP3	UK Priority Habitats. New mapping to support policy approach
NE5	Nature Recovery Network. Supersedes Ecological Networks
LCR 5	Remove safeguarded playing pitch within University of Bath campus (area 2)
Allocations	Summary of Change
SB1	Amended Concept Diagram
<u>SB22 Locksbrook Creative Hub</u>	<u>New allocation</u>
SB23 Weston Island	New allocation
SB24 Sion Hill	New allocation
SB25 St Martins Hospital	New allocation
SB19 University of Bath	New development framework map
<u>Policy GB8 and SB26: Park and Ride Sites</u>	<u>Amended Green Belt boundary (following site allocation boundary) and new allocation</u>
KE3c East Of Keynsham	New allocation
<u>KE3d East of Safeguarded Land</u>	<u>New allocation</u>
KE5 Treetops	New allocation
<u>SSV9 Old Mills Industrial Estate</u>	<u>Amended allocation boundary</u>
SSV21 Silver Street	New allocation
<u>SSV22 Former Paulton Printworks</u>	<u>New allocation</u>
SSV2 South Road Car Park	<u>Remove SSV2 South Road Car Park allocation</u>

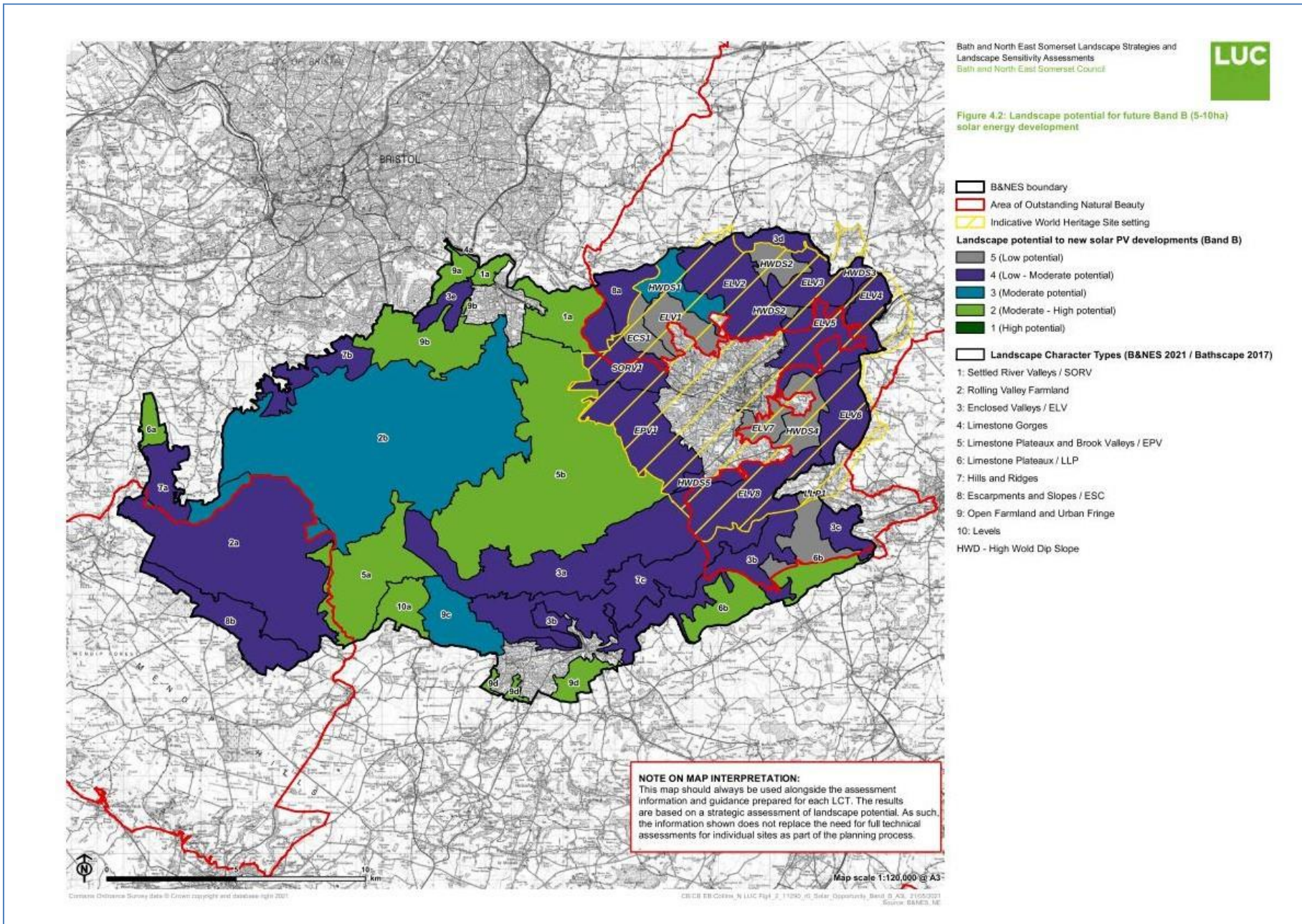
Annex 1 – GB2



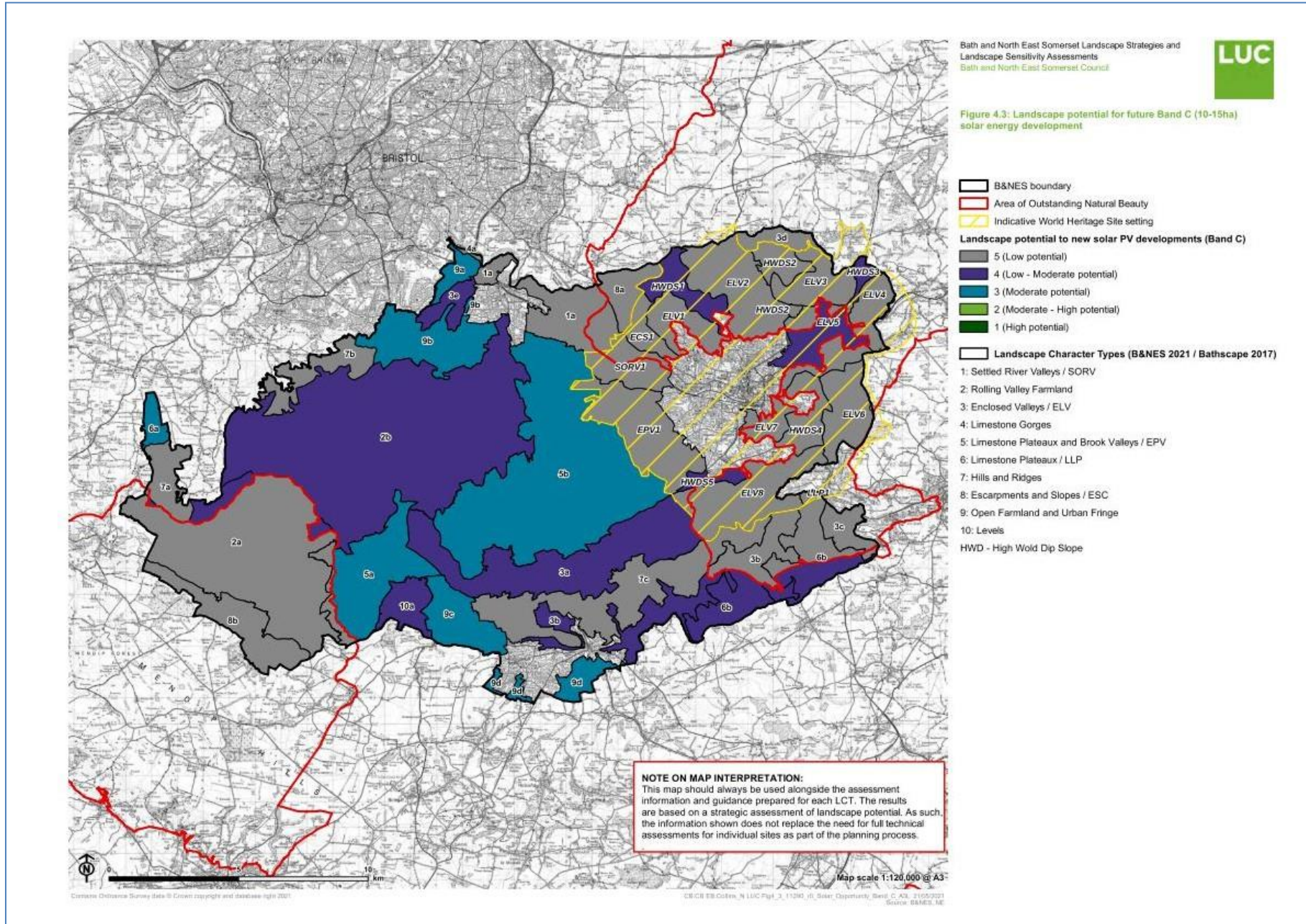
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Solar Band A)



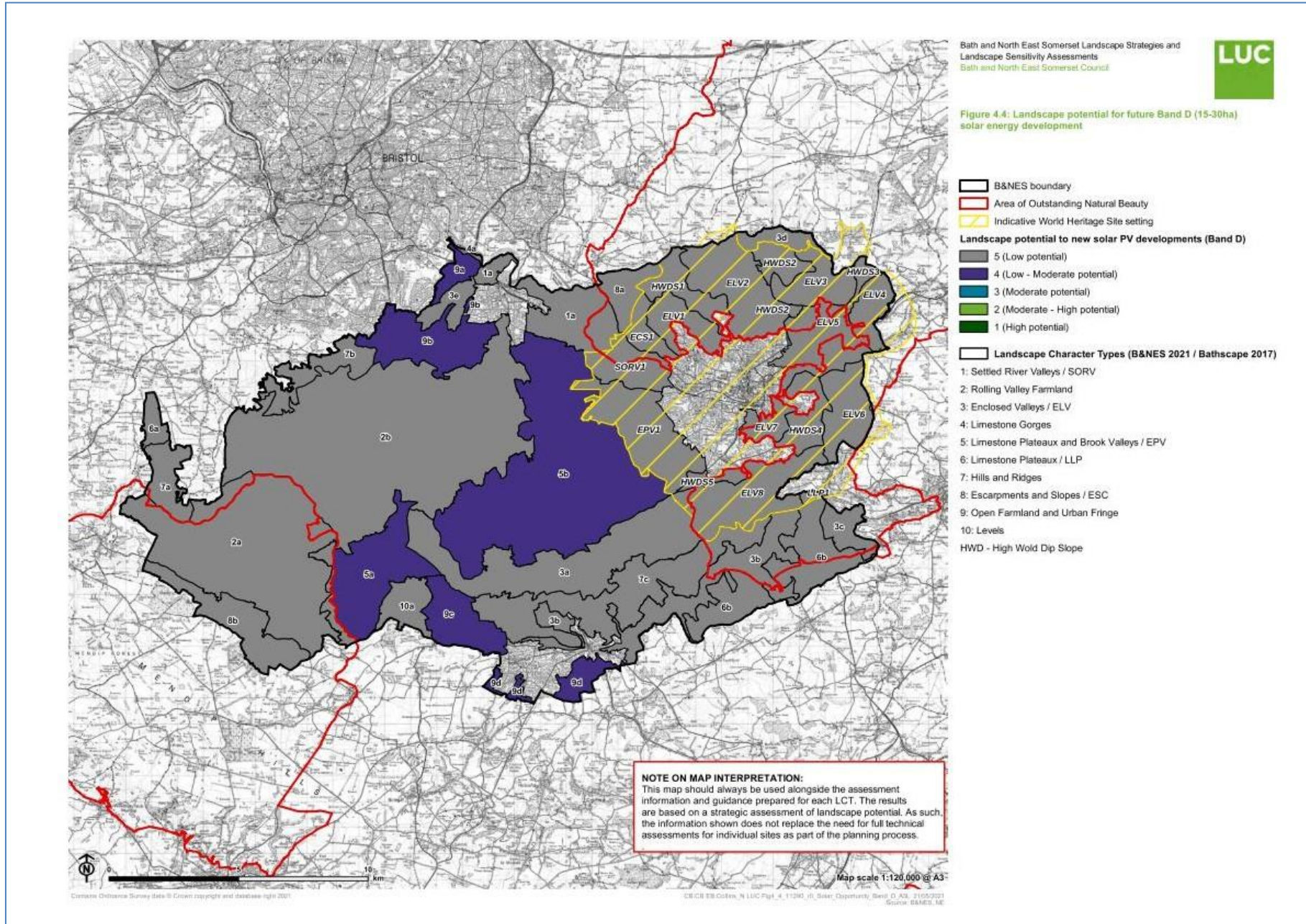
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Solar Band B)



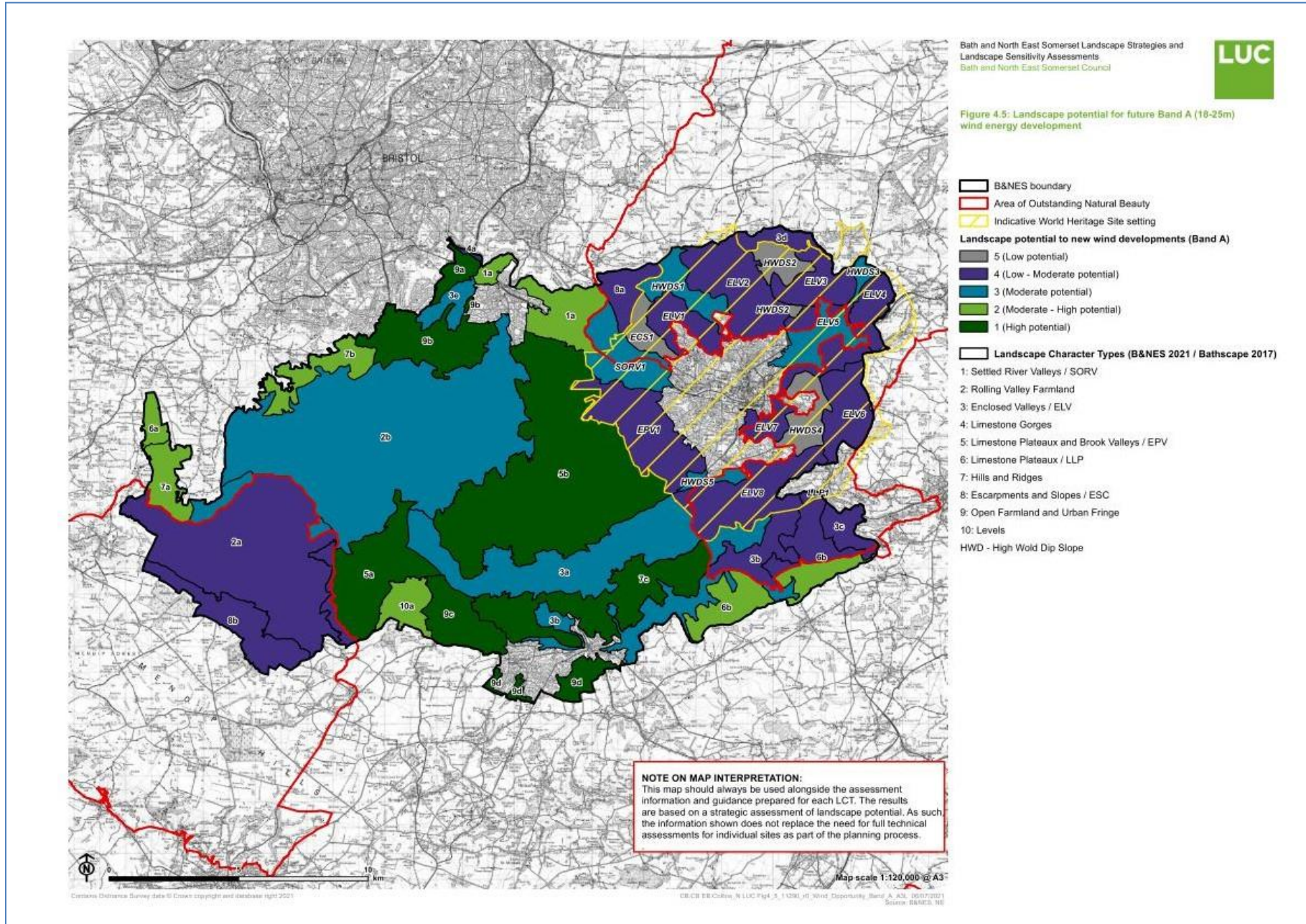
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Solar Band C)



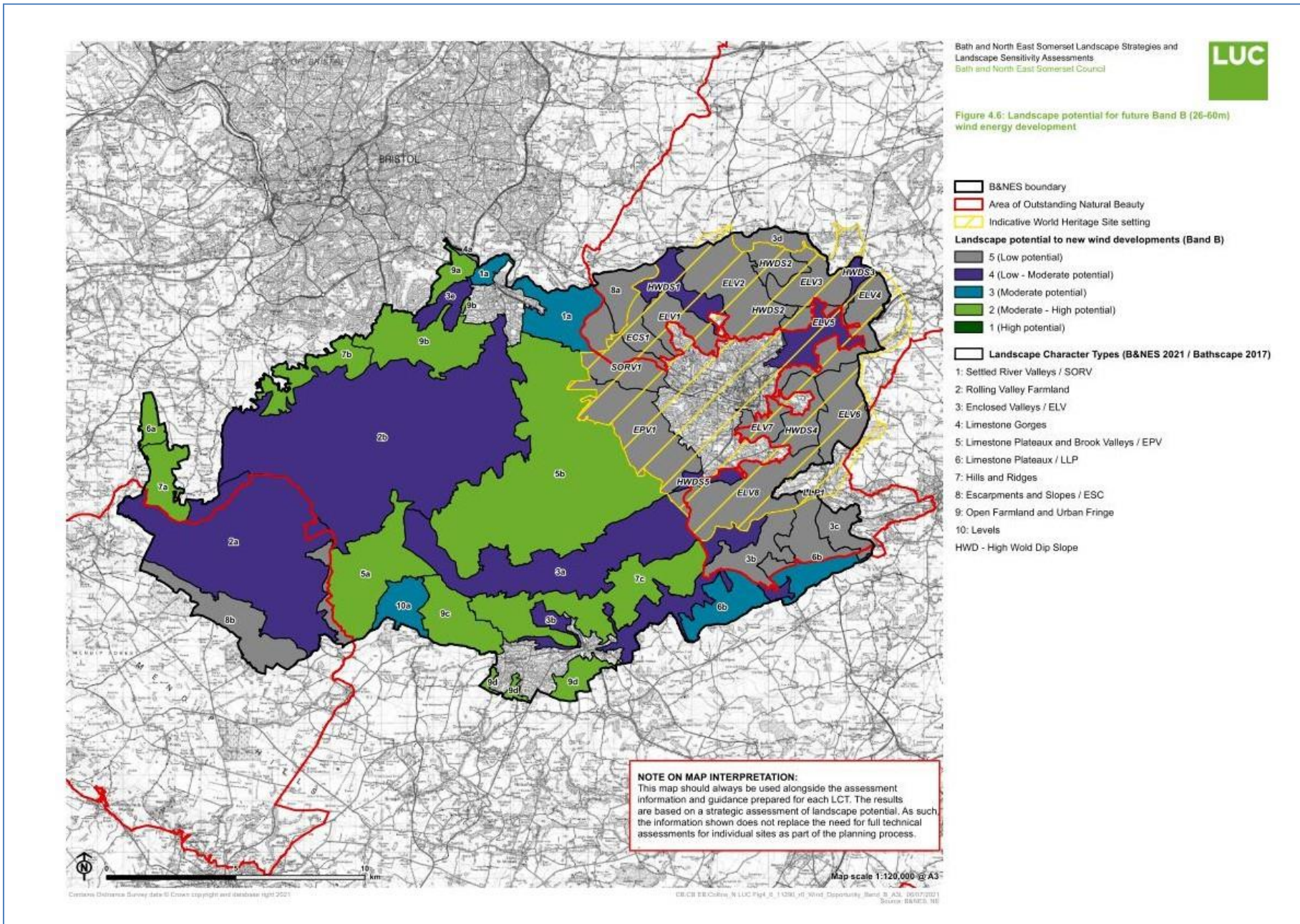
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Solar Band D)



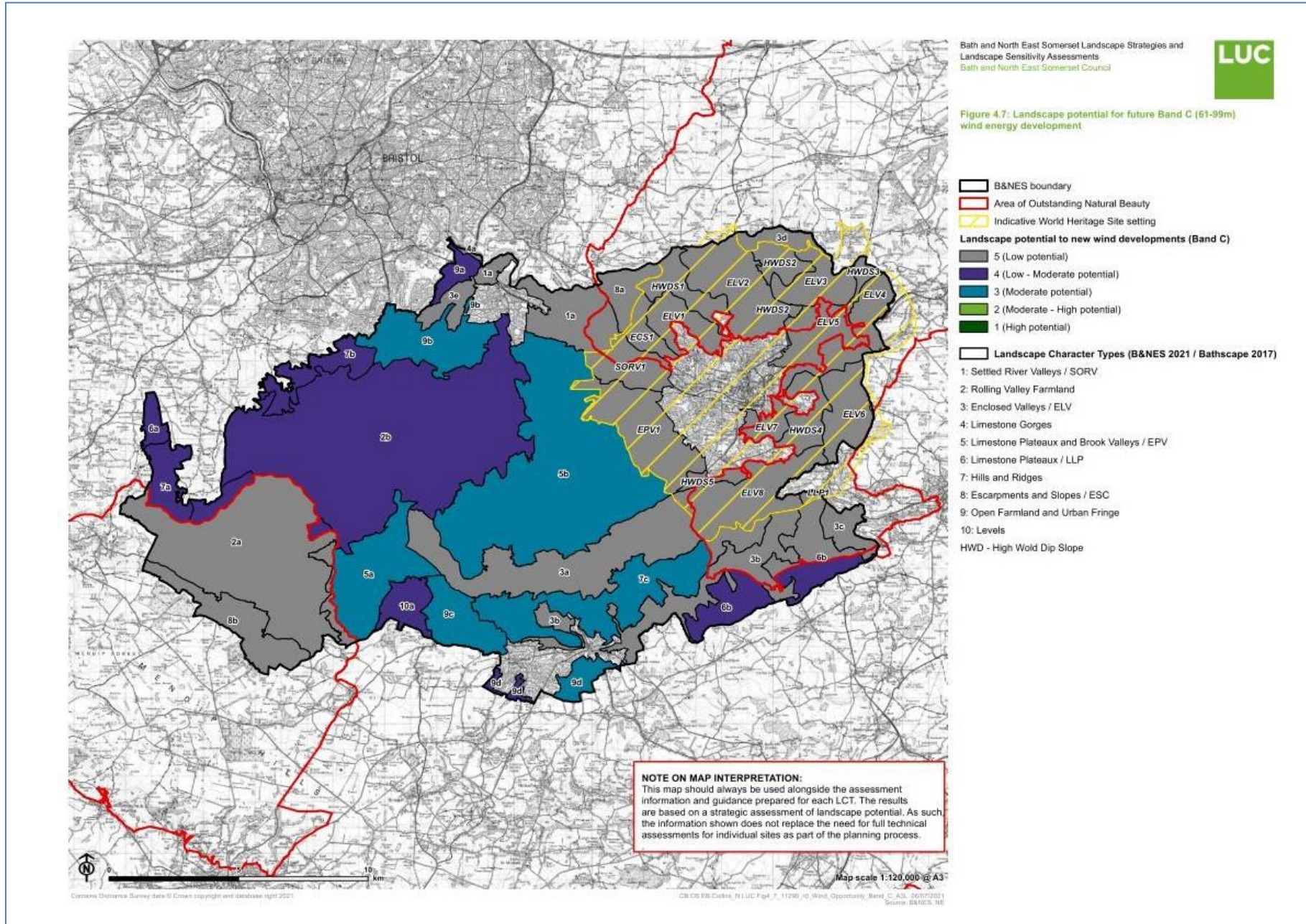
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Wind Band A)



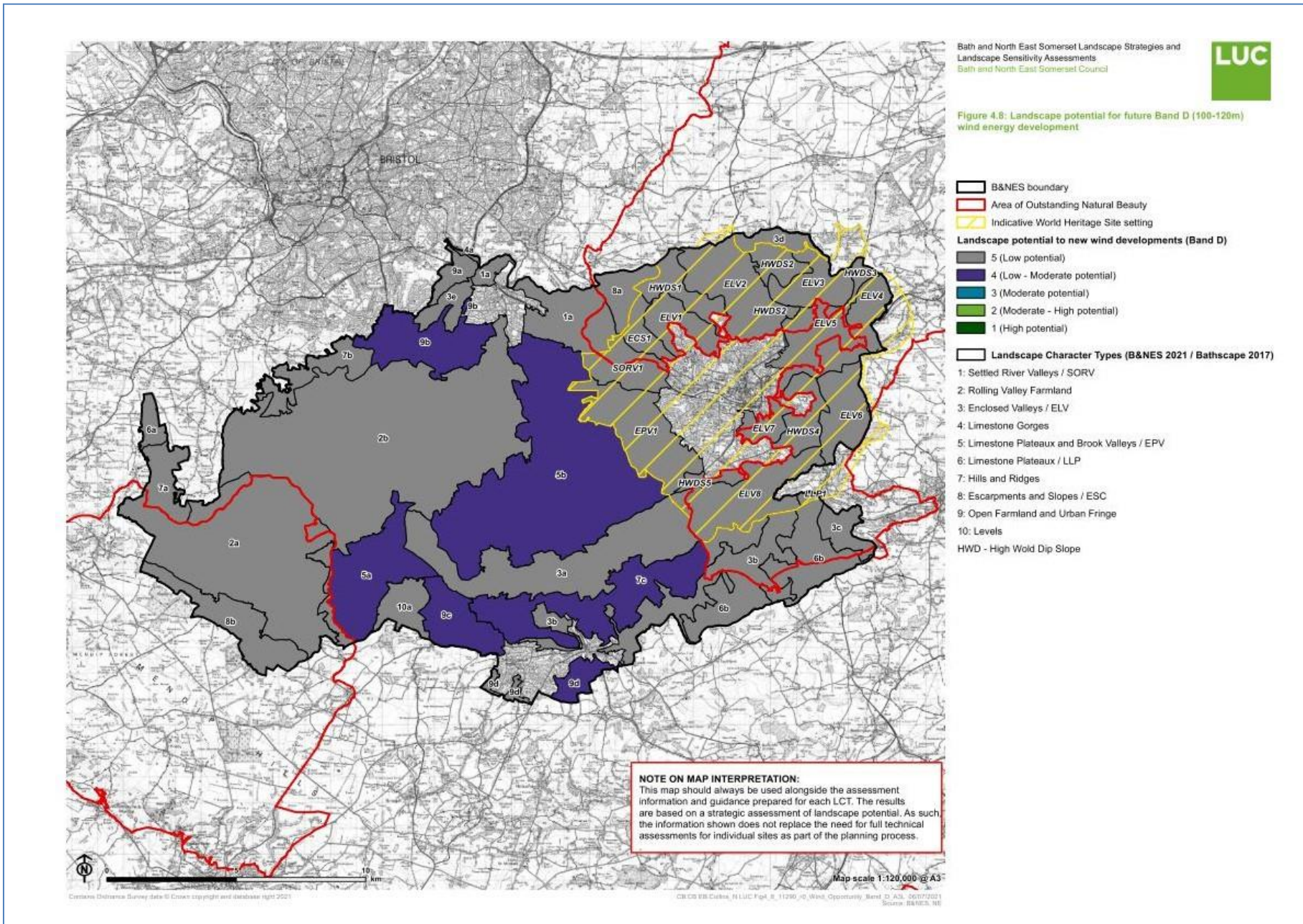
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Wind Band B)



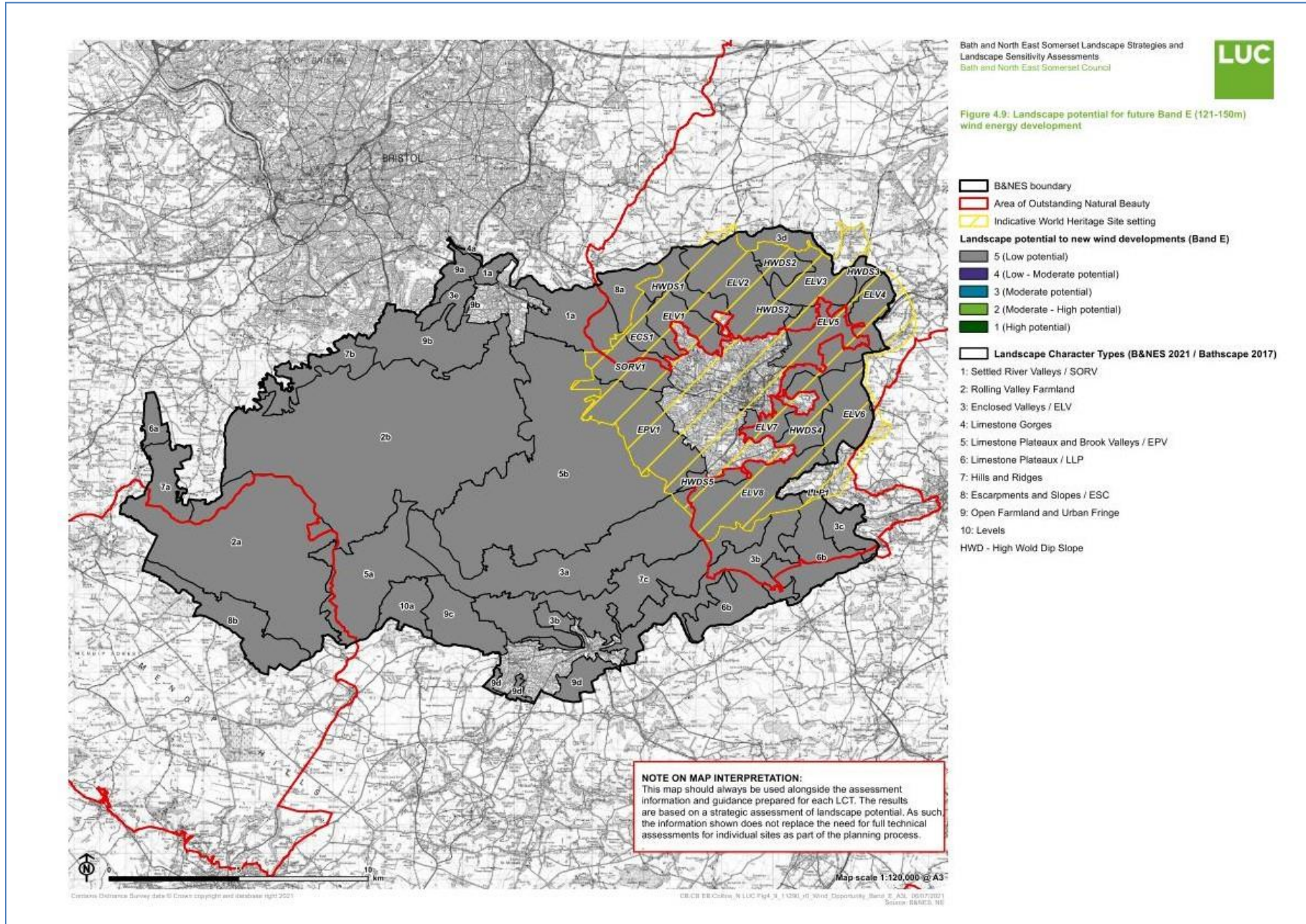
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Wind Band C)



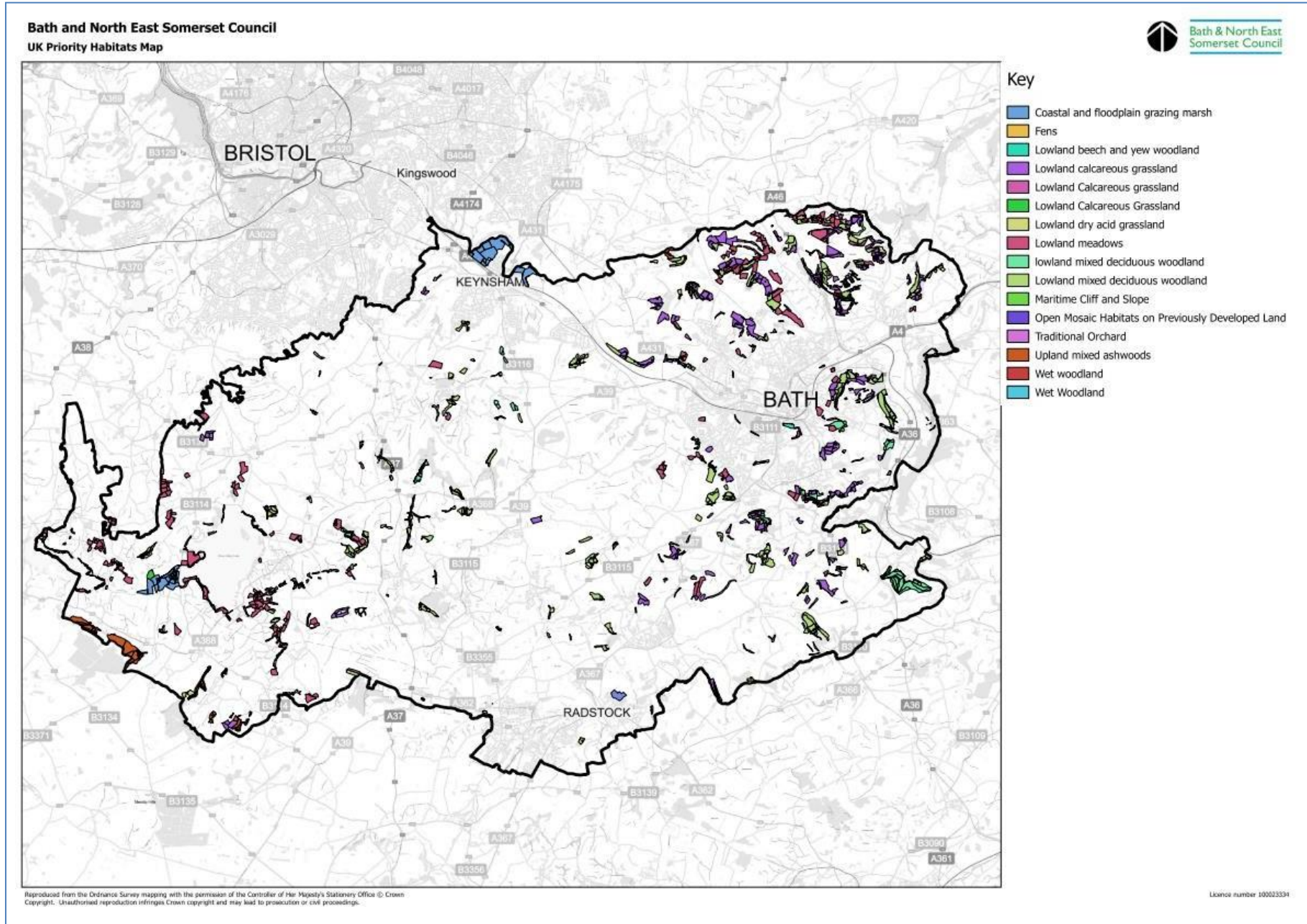
Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Wind Band D)



Annex 1 - CP3 Landscape Sensitivity for wind and solar energy (Wind Band E)

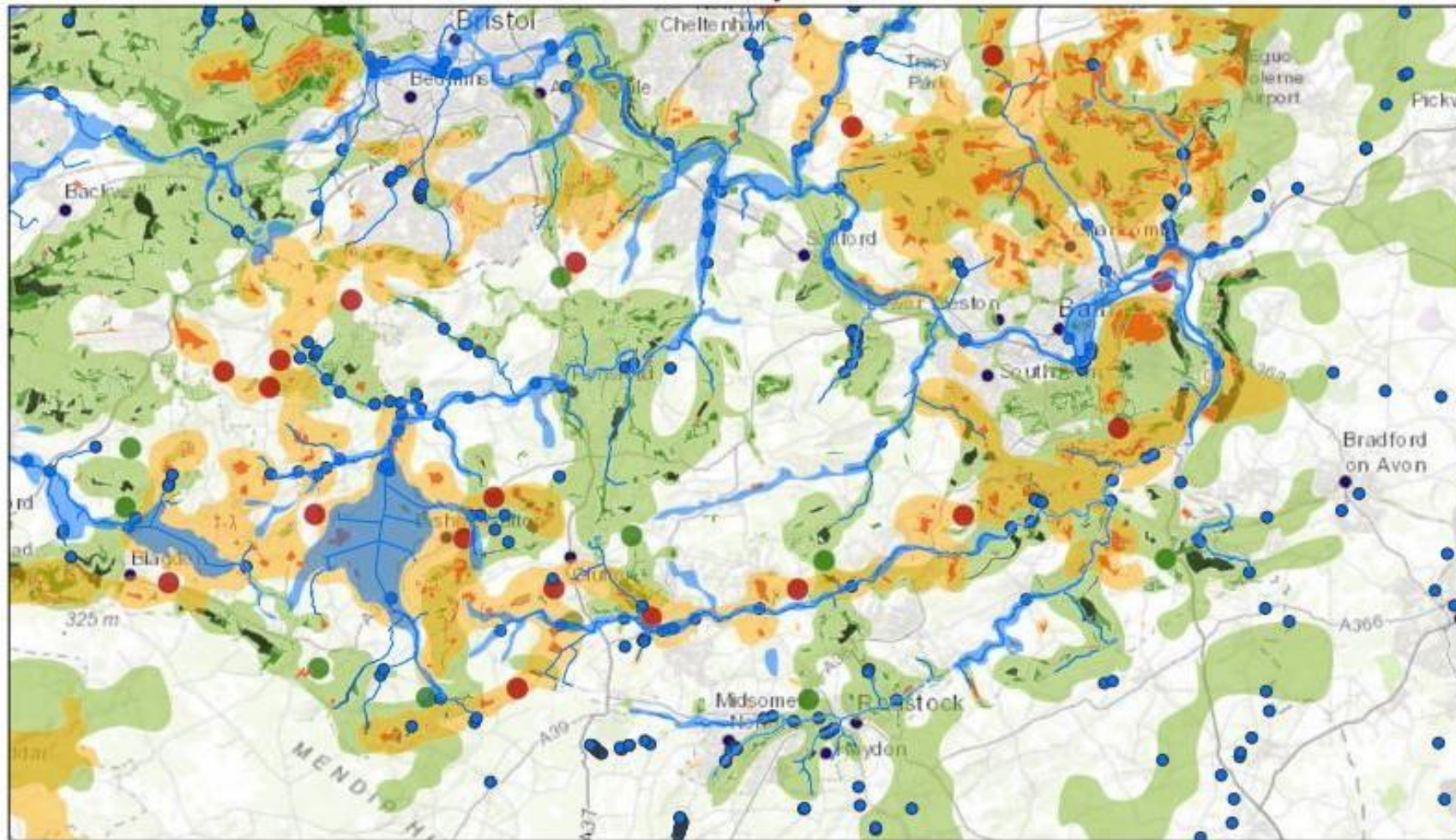


Annex 1 – NE3 UK Priority Habitats



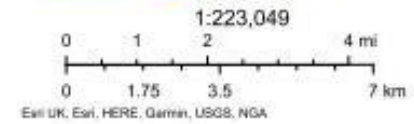
Annex 1 – NE5 Nature Recovery Networks

Nature Recovery Network



12/07/2021, 17:12:08

- | | | |
|---------------------------|-----------------------------|----------------------------|
| Existing Grassland | Water strategic network | Existing ancient woodland |
| Grassland connection opp. | Rivers & streams | Woodland strategic network |
| Existing Woodland | River Barriers | |
| Woodland connection opp. | Grassland strategic network | |

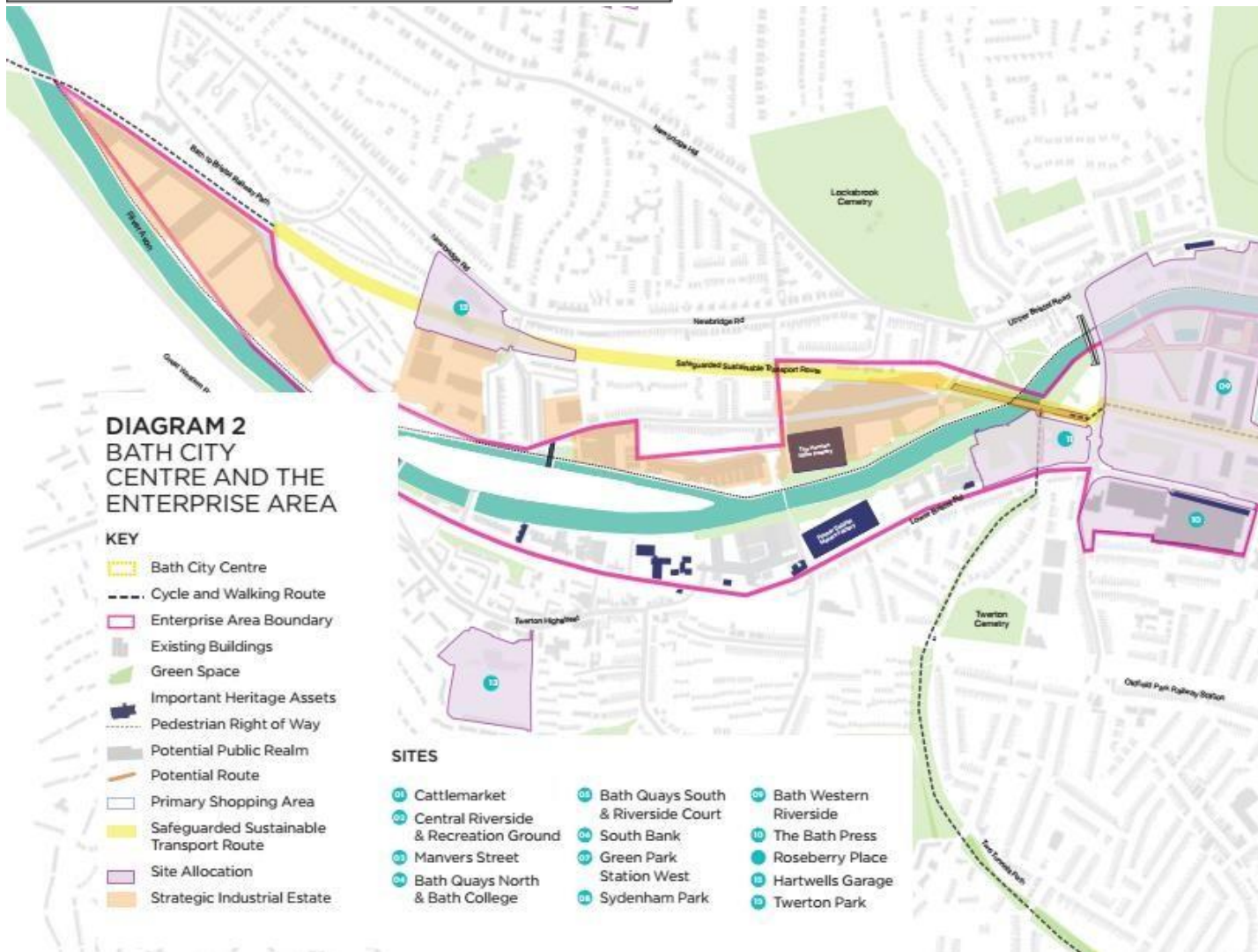


Bath and North-East Somerset Council
Esri UK, Esri, HERE, Garmin, USGS, NGA

Annex 1 – Diagram 2 Bath City Centre and the Enterprise area

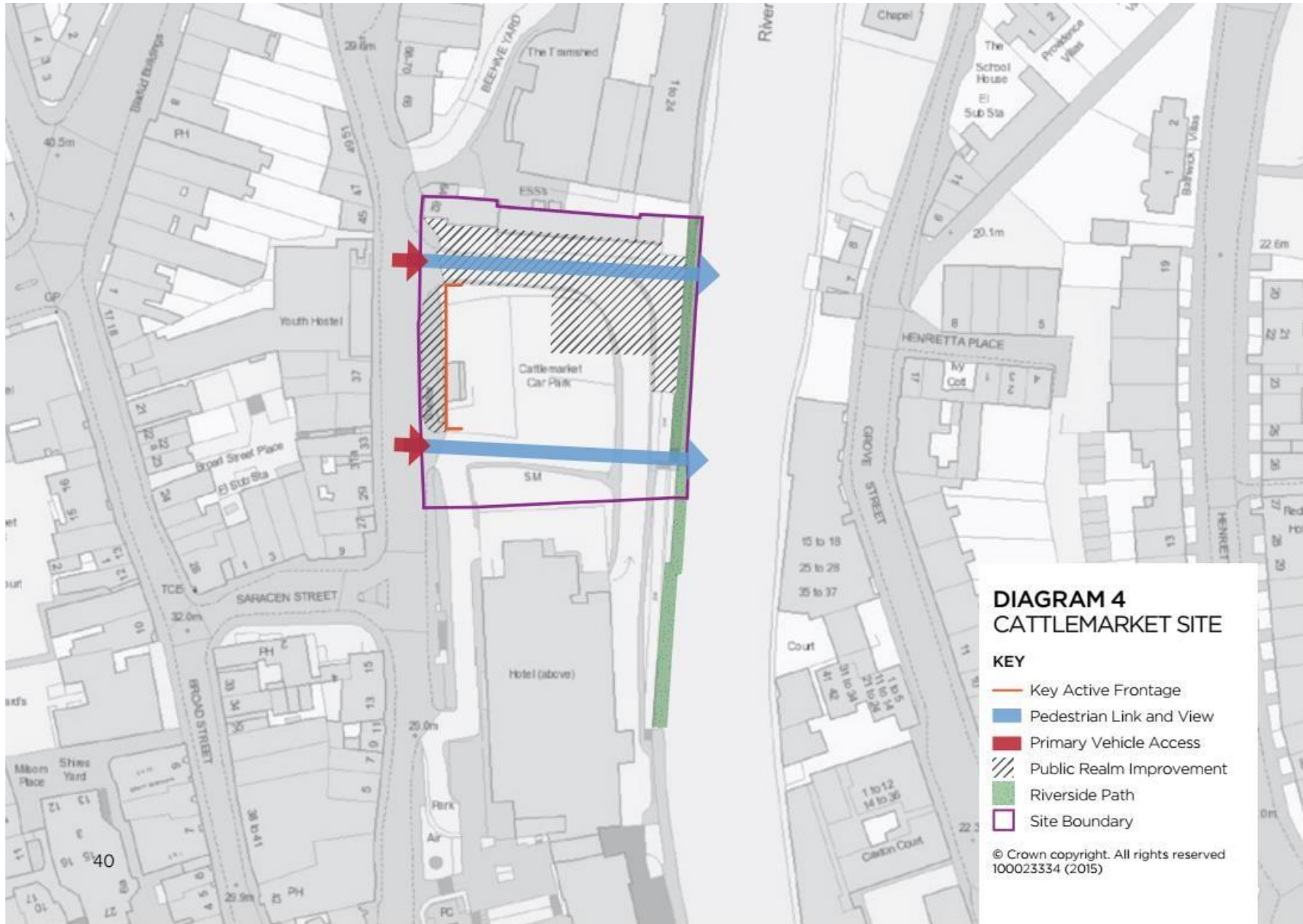
Add Milsom Quarter and Locksbrook Creative Hub

EZWrong boundary

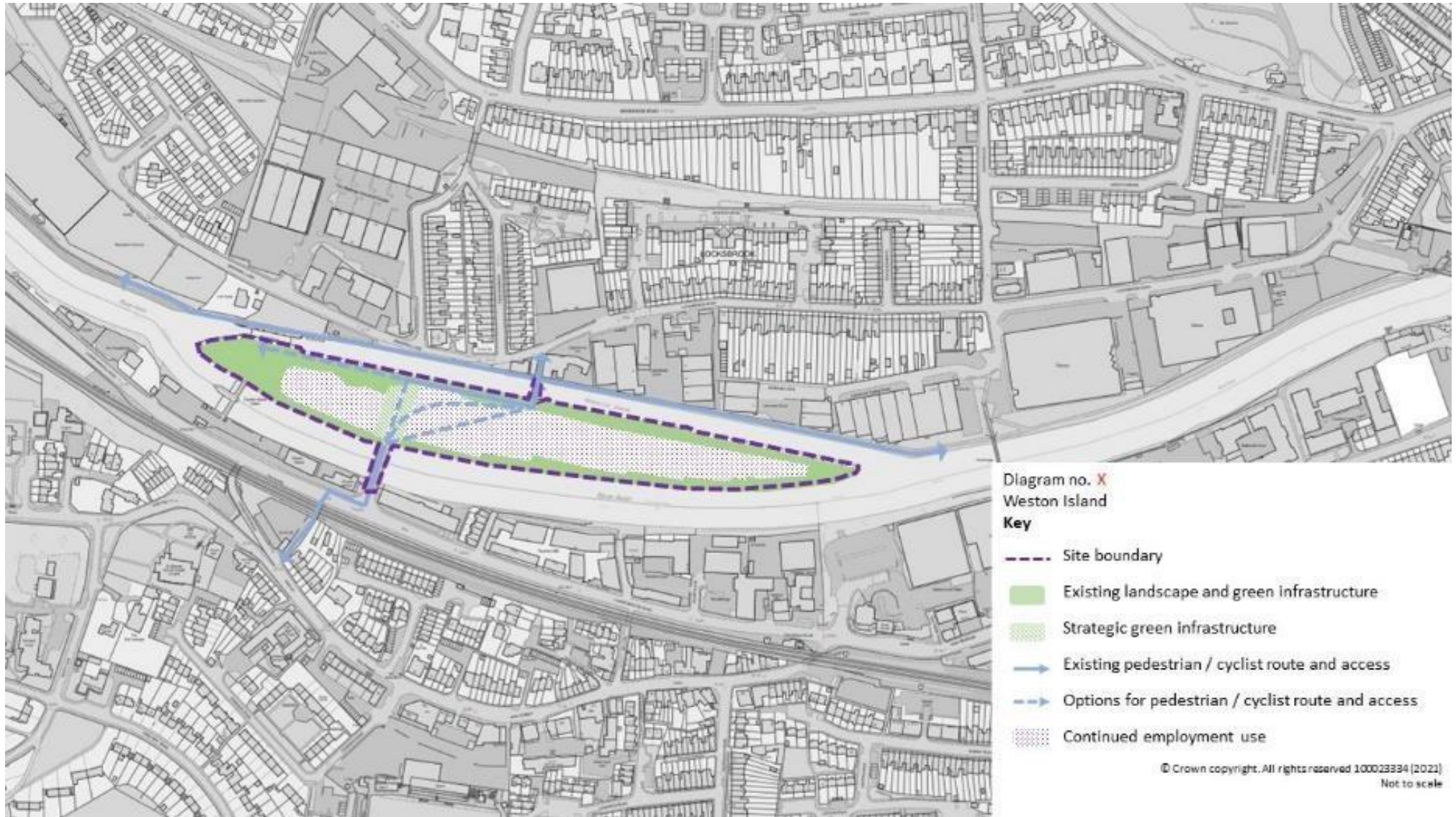


Annex 1 — SB1 Cattlemarket Site

*Remove key active frontage, primary vehicle access and pedestrian link



Annex 1 – SB23 Weston Island



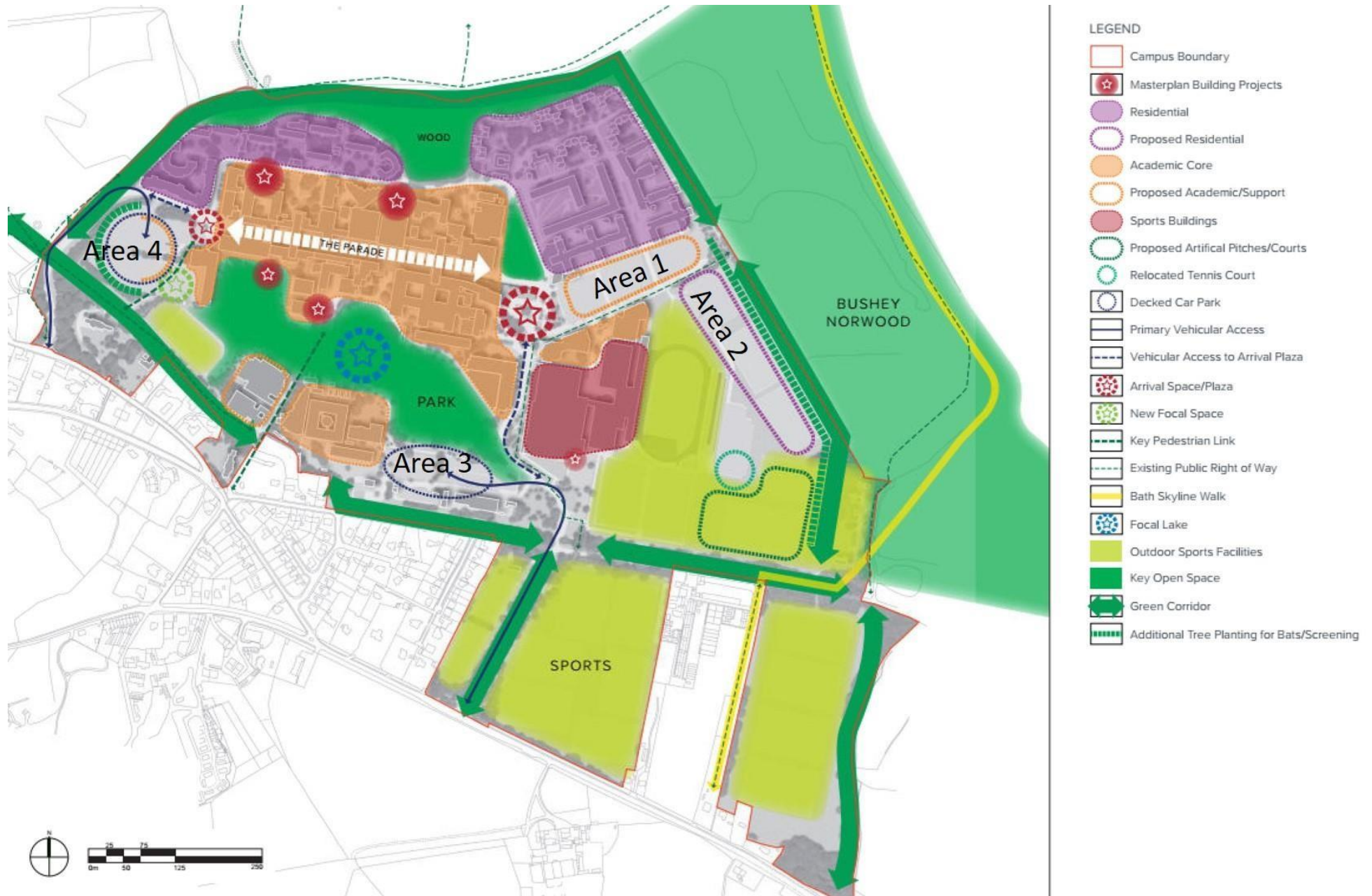
Annex 1 – SB24 – Sion Hill



Annex 1 – SB25 St Martins Hospital



Annex 1 – SB19 University of Bath Development Framework



Annex 1 – SB26 – Park and Ride Sites (site allocation boundaries and new Green Belt boundary to be shown)





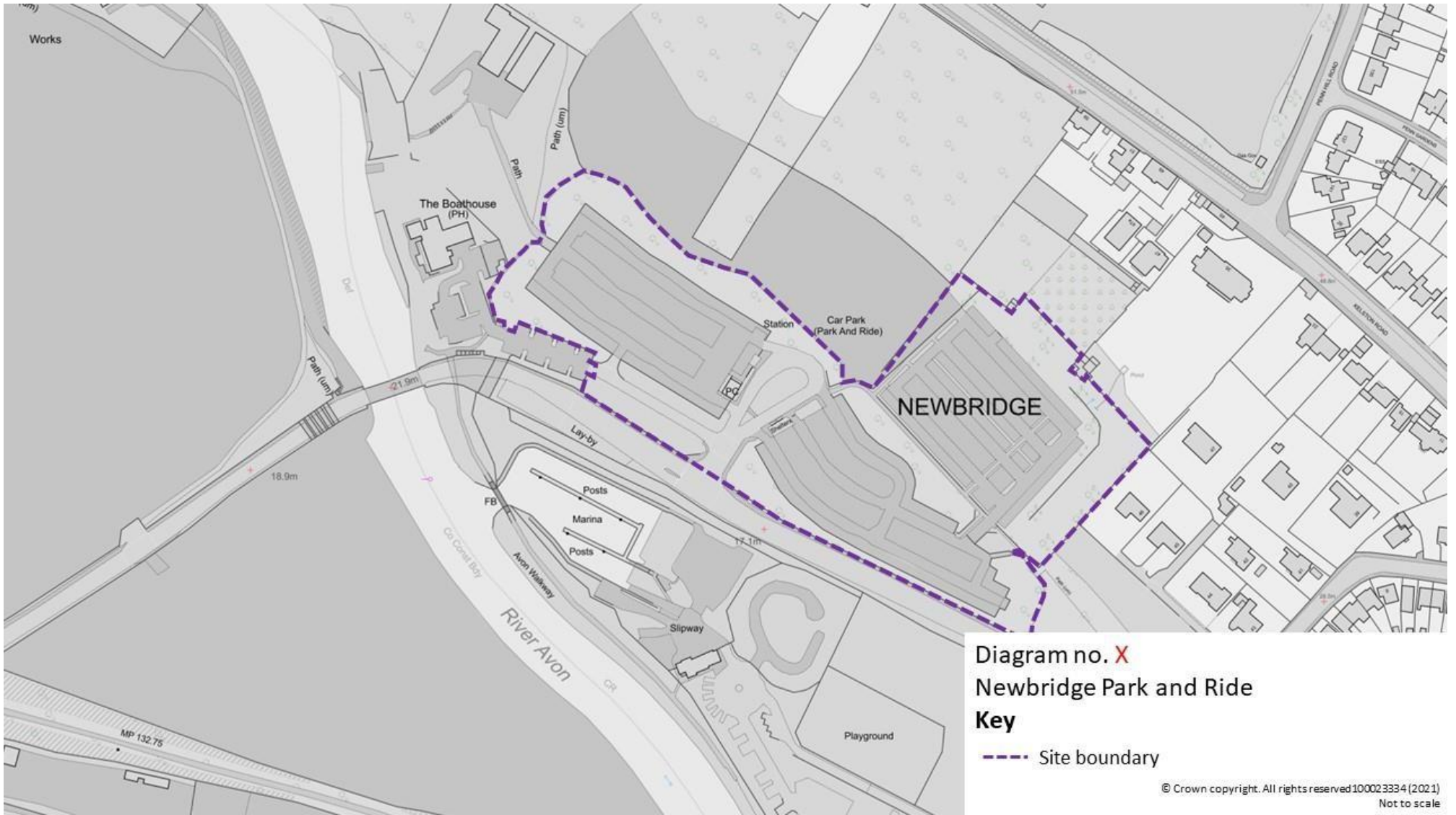
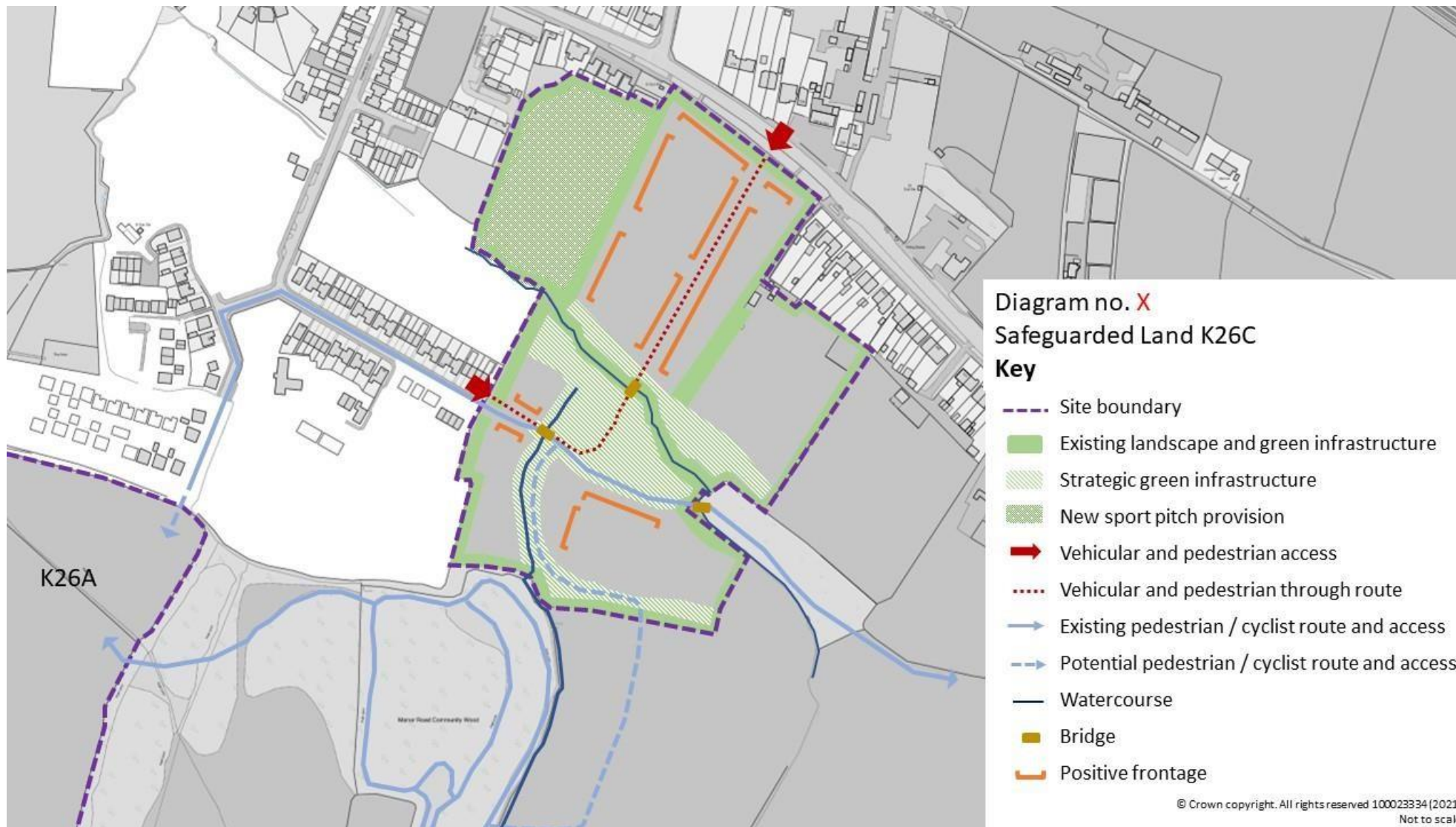


Diagram no. X
 Newbridge Park and Ride

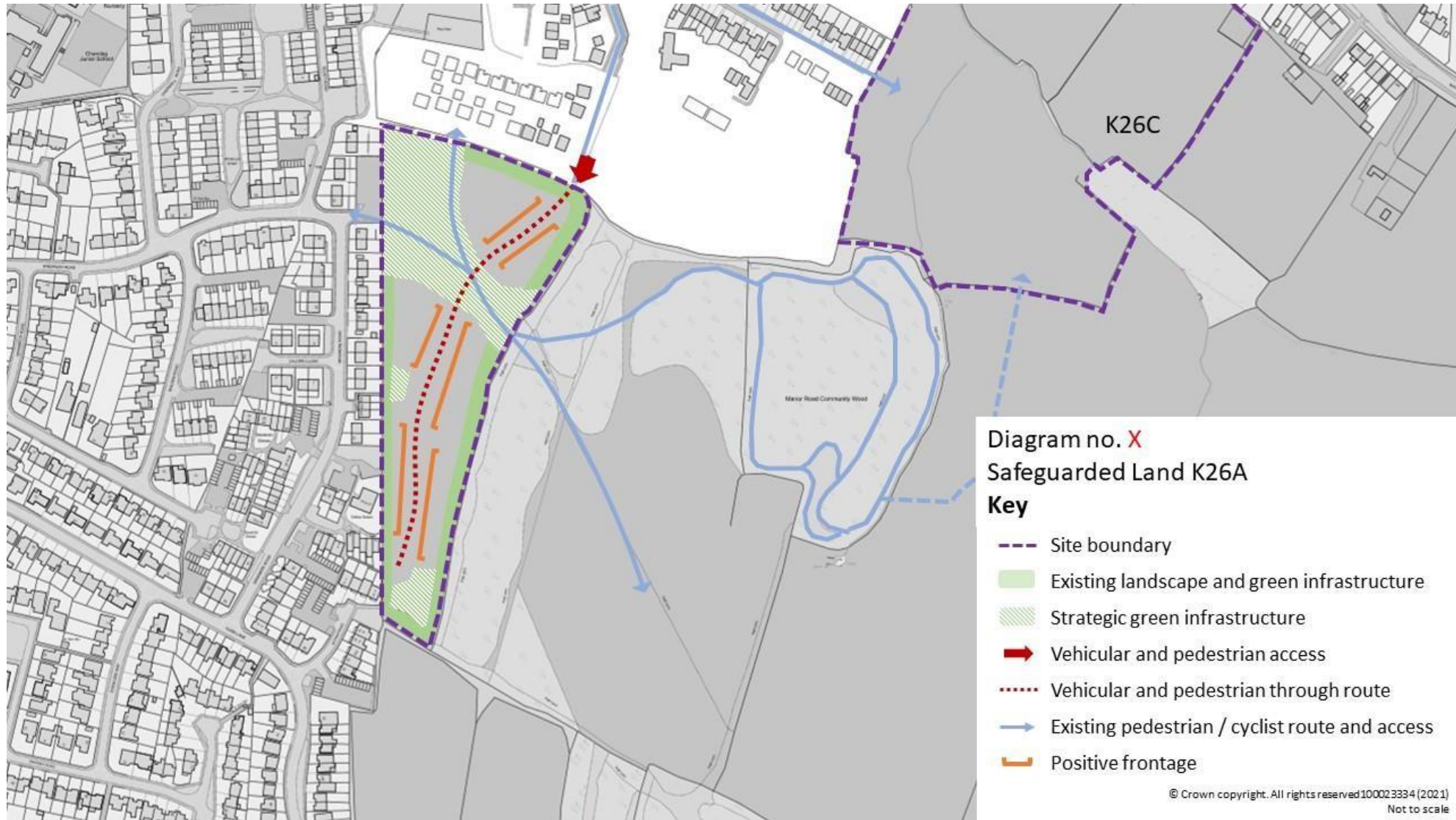
Key
 - - - Site boundary

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 Not to scale

Annex 1 – KE3c – East of Keynsham (new allocation site boundary)



Annex 1 – KE3d – Safeguarded land (new allocation – site boundary)



Annex 1 – KE5 – Treetops – new allocation site boundary

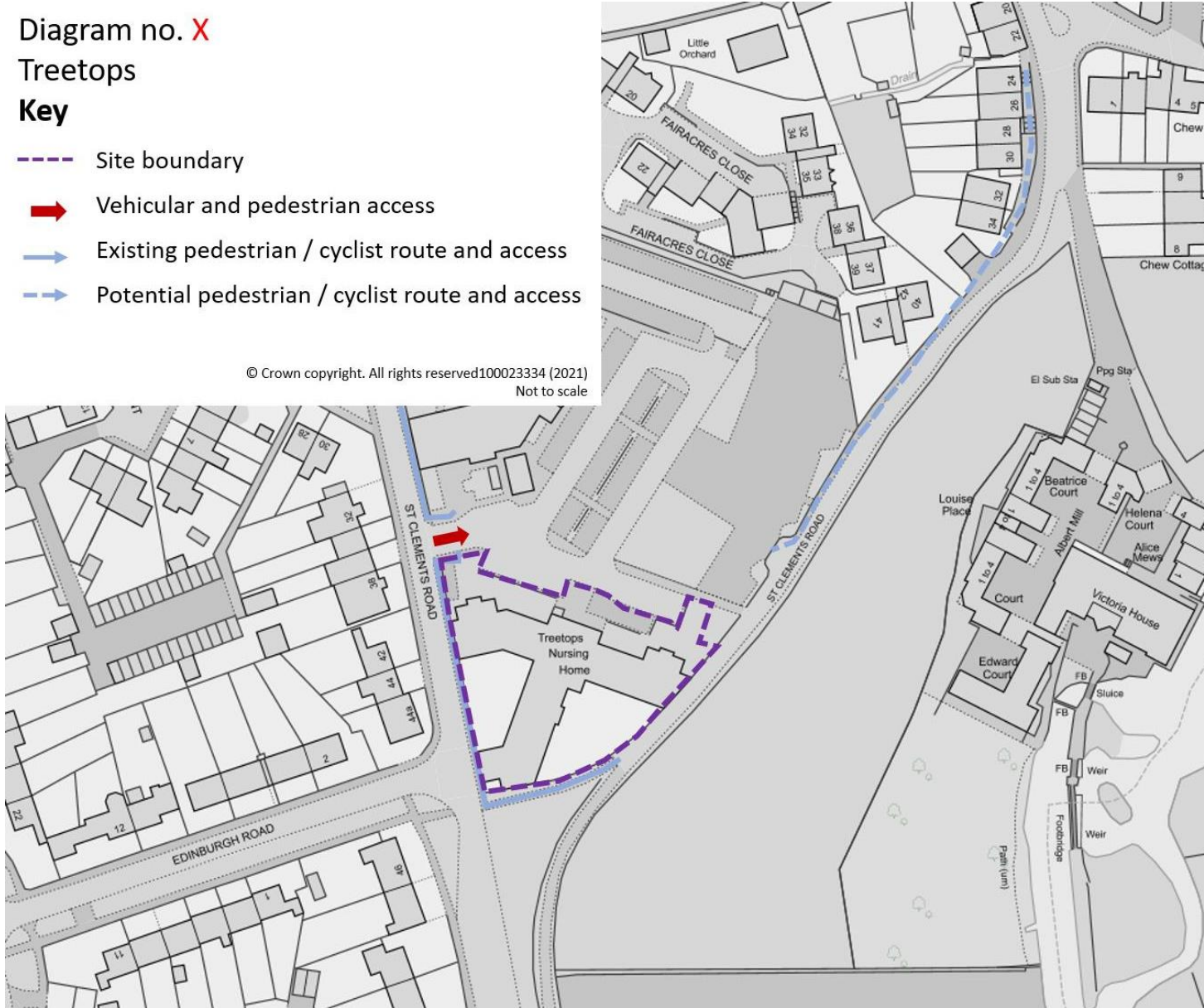
Diagram no. X

Treetops

Key

- Site boundary
- ➔ Vehicular and pedestrian access
- ➔ Existing pedestrian / cyclist route and access
- ➔ Potential pedestrian / cyclist route and access

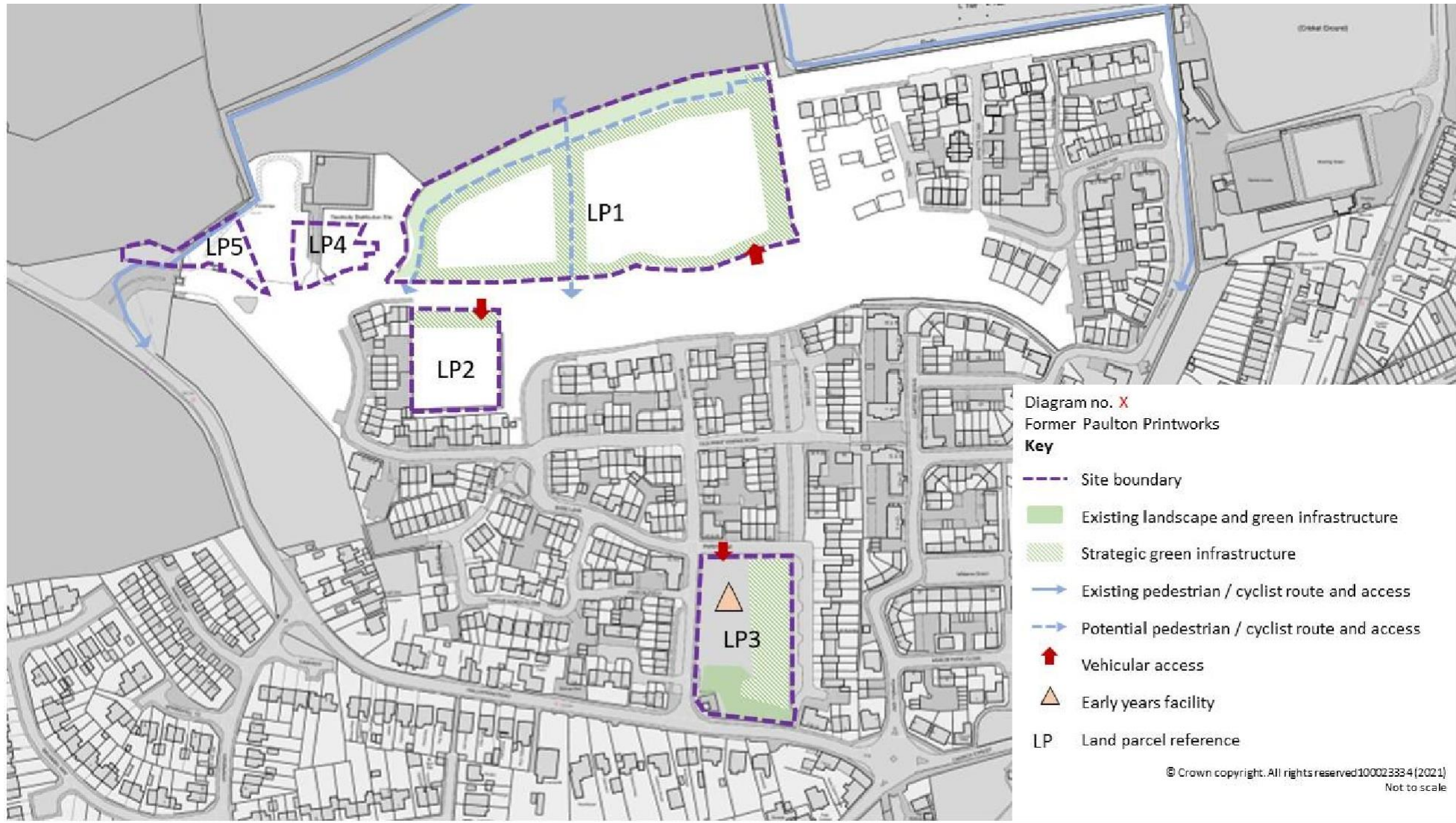
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Not to scale



Annex 1 – SSV21 Silver Street



Annex 1 – SSV22 – Former Paulton Printworks



APPENDIX H: Table 4.3- Local Plan changes assessed as having potential for likely significant effects on a European Site/s within or adjacent to B&NES

Policy Number & initial screening outcome	Policy Description	Likely activities (operations) to result as a consequence of the proposal	Likely effect if proposal is implemented	European site/s potentially affected	Could the proposal have likely significant effect	Mitigation provided
<p>Policy CP3</p> <p>I</p>	<p>POLICY CP3 RENEWABLE ENERGY</p> <p>The amendments are substantial and seek to secure proposals for wind energy; ground mounted solar energy & includes provision for Energy Balancing Plants</p>	<p>Land take for solar farms & associated development; loss of grazing; disruption of flight paths from wind turbines</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Yes – with out mitigation</p>	<p>Yes</p>
<p>New Policy H2A for Purpose Built Student Accommodation</p> <p>A/I/J</p> <p>Any allocations will have considered mitigation requirements. & Include protective clause for Nature Conservation</p> <p>Windfalls must comply with NE & GI policies</p>	<p><u>POLICY H2A: PURPOSE BUILT STUDENT ACCOMMODATION</u></p> <p><u>This is a new policy that seeks to control purpose built student accommodation to specifically allocated sites and other locations where need is demonstrated.</u></p>	<p>Land take for new or redeveloped buildings.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Possibly, for any windfall sites in Bath close to the river corridor - but should be controlled by other NE protective policies</p>	<p>Yes? The policy clarifies that any new build HMO must be consistent with other relevant Local Plan policies and guidance and specifically references nature conservation</p>

APPENDIX H: Table 4.3- Local Plan changes assessed as having potential for likely significant effects on a European Site/s within or adjacent to B&NES

<p><u>Policy RE1</u></p> <p>previously developed land can have high biodiversity value – reliant on other policies to safeguard biodiversity – not a significant HRA issue though, but unsure?</p>	<p>POLICY RE1: EMPLOYMENT USES IN THE COUNTRYSIDE</p> <p>The change adds “previously developed land” to the policy;</p>	<p>Change of form and function of derelict / previously developed land that could be valued bat habitat</p>	<p>Potential for off-site physical damage/ loss through loss of foraging habitat and disruption to flight paths, and non-physical disturbance through additional light spill</p>	<p>Bath and Bradford-on Avon Bats SAC North Somerset and Mendip Bats SAC</p>	<p>Can't be ruled out, but should be controlled by other NE protective policies</p>	<p>no</p>
<p>Policy ST6</p> <p>K/I/J</p> <p>Changes reasonably substantive & could result in development within new sites that have impacts</p> <p>Includes clause to protect European sites...and any other special designations and protections</p>	<p>POLICY ST6: Transport Interchange</p> <p>This involves substantive change to the existing Park & Ride policy to allow development of facilities within the existing sites & potentially new sites to accommodate facilities needed to support a transport interchange</p>	<p>This could involve land take and habitat loss or fragmentation where new sites are provided, and potential increase in light spill at existing sites.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Potentially – without mitigation</p>	<p>yes</p>

APPENDIX H: Table 4.3- Local Plan changes assessed as having potential for likely significant effects on a European Site/s within or adjacent to B&NES

<p>B/D/K/I/J</p> <p>Includes clause to protect natural environment</p>	<p>POLICY ST7 TRANSPORT REQUIREMENTS FOR MANAGING DEVELOPMENT</p> <p>The changes are quite substantive requiring various additional measures that need to be addressed when managing new development</p>	<p>The new requirements could result in additional land take, creation of new barriers to wildlife and new lighting</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC Chew Valley Lake SPA North Somerset and Mendip Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>yes</p>
<p>SB8</p>	<p>Delete all development requirements for policy SB8 and replace with new development requirements to deliver 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.</p>	<p>The new housing numbers & change to site development requirements could result in loss and disturbance to the riverside habitat and impacts to habitat functionally linked to the Bath & Bradford on Avon SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>yes</p>
<p>SB22 New Policy for Locksbrook Creative Hub</p> <p>I/J/L</p>	<p>POLICY SB 22: DEVELOPMENT REQUIREMENTS AND DESIGN PRINCIPLES</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitats and disturbance/loss to land functionally linked to SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>No</p>

APPENDIX H: Table 4.3- Local Plan changes assessed as having potential for likely significant effects on a European Site/s within or adjacent to B&NES

<p>SB23 New Policy I/J/L</p>	<p>SB23 Weston Island – the proposal is to accommodate builders merchants or similar depot type development within the existing hard-standing within the site, and subject to various development requirements</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitats and disturbance/loss to land functionally linked to SAC</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>Yes</p>
<p>SB18 RUH</p>	<p>Policy SB18 for RUH – this policy has been changed to increase the development requirements needed, and to increase the housing units delivered.</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitat features, particularly loss of mature trees.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>No – lighting issues possible, dev requirements don't require tree retention? Could each dev requirement used for Sion Hill?</p>
<p>New Policy SB 24 I/J/L</p>	<p>Policy SB24 New allocation for Sion Hill</p>	<p>The new development could result in land take and habitat loss or disturbance to key habitat features, particularly loss of mature trees.</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>yes</p>

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<p>New allocation SB25 J?</p>	<p>SB25 St Martin's Hospital POLICY APPROACH – new site allocation to deliver 50 dwellings</p>	<p>The new development could result in habitat loss or disturbance to key habitat features..</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>Yes – existing landscape and habitat infrastructure to be protected and enhanced.</p>
<p>Policy SB19 J/K/L ?</p>	<p>Development Framework Plan The strategy seeks the development of around 870 study bedrooms and 48,000 sq.m. of academic, research and support space at the Claverton Campus to address the potential long-term development needs of the University of Bath.</p>	<p>The changes provide greater clarification for how the site should be developed including detailed development requirements,</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>yes</p>
<p>New Policy SB26 I/J/L?</p>	<p>POLICY SB26: PARK AND RIDE SITES -this new policy specifies what the existing park and ride sites should deliver.</p>	<p>The changes will result in more development and some change in function of the existing sites, and could result in some loss of existing habitats and landscape and an increase in lighting</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Yes- without mitigation</p>	<p>yes</p>

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<p>Policy KE2b K/J ? Possible river habitat issues / lighting?</p>	<p>RIVERSIDE AND FIRE STATION SITE – the changes alter development expectations and development requirements for the site</p>	<p>The changes could result in increased light spill to the river</p>	<p>Potential for non-physical disturbance through disruption to flight paths and access to foraging areas through noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>yes</p>
<p>New Policy KE3c</p>	<p>The new policy requires Delivery of residential development (Class C3) of around 210 dwellings in the plan period, in the areas as shown on the concept diagram, and also set out a number of development requirements.</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>Yes,</p>
<p>New Policy KE3d J/L?</p>	<p>The new policy requires Delivery of residential development (Class C3) of around 70 dwellings in the plan period, in the areas as shown on the concept diagram, and also set out a number of development requirements.</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>yes</p>

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<p>PMP:SSV9: Old Mills Industrial Estate</p>	<p>OLD MILLS INDUSTRIAL ESTATE <u>(Incorporating Somer Valley Enterprise Zone)</u></p> <p>The changes include various new development requirements designed to safeguard the environment, but also allows some new development</p>	<p>The policy could result in the loss of key habitats of importance for foraging or access</p>	<p>Potential for off-site physical damage/ loss and non-physical disturbance through loss of foraging habitat and disruption to flight paths, and noise and light disturbance</p>	<p>Bath and Bradford-on Avon Bats SAC</p>	<p>Potentially- without mitigation</p>	<p>yes</p>
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APPENDIX H: Table 4.3- Local Plan changes assessed as having potential for likely significant effects on a European Site/s within or adjacent to B&NES

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