

Bath and North East Somerset Council

Local Plan 2022 – 2042

Options Consultation

February 2024

**Topic Paper: Natural Environment /
Ecosystem Services**

**Bath & North East
Somerset Council**

Improving People's Lives

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1 Background

- 1.1 In October 2022 the Bath & North East Somerset (B&NES) Local Plan 2022 to 2042: Launch Document consultation set out the central aims for the Local Plan. This included ‘establishing a transformational approach to protecting and enhancing nature’.
- 1.2 The Document also highlighted that we would work with our communities and stakeholders to help identify the key challenges in Bath and North East Somerset, and the objectives and policies we need in place to address these.
- 1.3 Other issues covered by the Local Plan include: protecting and enhancing the beauty of our environment; ensuring new development provides community facilities and green infrastructure (GI), which is aligned with strategic ambitions and networks; and defining a positive strategy for the conservation and enjoyment of the historic environment.
- 1.4 This document covers each of these aspects in turn.

Transformational Approach

- 1.5 The council declared an [Ecological Emergency](#) in July 2020, recognising the severity of the continued degradation of the natural environment and loss of wildlife.
- 1.6 Evidence suggests that biodiversity is in significant decline. The local plan must deliver a more robust and transformational approach to the protection and enhancement of biodiversity it must deliver outcomes that genuinely contribute to nature recovery, whilst enabling new development.
- 1.7 The new local plan aims to tackle some of the following issues:
 - **Achieving better outcomes for nature and people.** Despite having strong natural environment policies, “as built” schemes often deliver poorly designed and implemented external landscapes both hard and soft. These are poor for biodiversity, for nature recovery, and for people. It is often hard to recognise the original intentions and plans which were first approved. The development process from policy, through to scheme approval and through to “as built” is complex and appears to have this deterioration of the quality and expectation built in and even accepted as inevitable. This should be addressed through a new or modified policy approach and through a determination to tackle the flaws in the system by means beyond policy making, so that we see developments which deliver exactly what has been approved or even better.
 - **Increasing biodiversity net gain requirements for some or all schemes,** above the mandatory requirements, to help deliver genuine nature recovery. The 10% mandatory requirement is likely at best to deliver the status quo and not necessarily deliver true biodiversity gains.

- **Delivering green spaces for people that function well for nature and deliver multiple benefits for society** – this may need a new policy approach that seeks to integrate some existing and some new policy requirements.
- 1.8 These considerations need to build on the changes already introduced through the Local Plan Partial Update (LPPU).
- 1.9 The LPPU was the first step to new policy making designed to help achieve nature recovery through the planning process following the declaration of the Ecological Emergency. This was achieved through updating biodiversity and green infrastructure policies to support nature’s recovery, including the adoption of a new Biodiversity Net Gain policy.
- 1.10 The new Local Plan will need to build on the progress implemented through the LPPU and respond to new and emerging guidance for the nature’s recovery and the provision of green infrastructure.
- 1.11 The National Planning Policy Framework (NPPF) sets out the approach to national policy concerning the natural environment under Section 15 - Conserving and enhancing the natural environment. In addition, new legislation and guidance is expected soon to implement mandatory biodiversity net gain and will also set out the planning role of local nature recovery strategies which are required through the Environment Act.
- 1.12 Existing local policies are set out within the Core Strategy (adopted 2014), Placemaking Plan (adopted 2017) and Local Plan Partial Update (adopted 2023).
- 1.13 The council has also declared a Climate Emergency, with an ambitious goal to be carbon neutral by 2030. While the climate and ecological emergencies are not the same, they are linked. For instance:
- They share some of the same causes, such as over-consumption of resources and changes in land use;
 - Many of the solutions to tackling the Ecological Emergency will also help us to mitigate climate change;
 - Nature-based solutions, such as well-placed woodland and wetland creation, can be important tools in adapting to the effects of climate change while contributing to nature’s recovery and sequestering carbon; and
 - Tackling climate change will also help reduce the pressure on nature.
- 1.14 Matters regarding the climate emergency will be covered further within the climate topic paper.

2 Launch Document Consultation and Engagement Responses

- 2.1 The Local Plan 2022-2042 Launch Consultation – Finding Report included responses to the primary ambitions identified in the scope of the Local Plan. Many respondents highlighted the importance of protecting and conserving the local environment, including green spaces, wildlife habitats, and heritage sites. Primary ambitions identified included ‘Establishing a transformational approach to protecting and enhancing nature.’
- 2.2 Responses included to ‘Provide green open recreational spaces and habitats.’ And to ‘Protect and enhance access to nature.’
- 2.3 Other issues included ‘Protecting and enhancing the beauty of our environment.’ ‘Provision of green spaces, habitats, and protection of the Green Belt.’ And ‘Access to nature and biodiverse green spaces.’
- 2.4 During the Launch consultation responses had also been received regarding the evidence base. This is specifically regarding updated Habitats, ecology and Biodiversity Net Gain, Flood Risk, Landscape, Green Infrastructure, Air, Soil, and water quality. Additional other evidence areas raised in responses included access to high-quality open spaces for sports and physical activity, assessment of open space and recreation needs, River cleanliness, and Transport and green infrastructure before housing.
- 2.5 A range of workshops were held around key issues and priorities for the Local Plan in addition to the Launch Document consultation. Workshops took place around Bath and its Environs, Keynsham and Salford, Whitchurch Village, Somer Valley, rural areas of the district. Seldom heard groups were also involved in the consultation process.
- 2.6 Feedback was as follows:

Bath and its Environs

- There is an opportunity to link green spaces in the city centre to green fingers reaching out into the countryside.
- Public spaces and parks are seen as important for bringing different communities and age groups together; and for providing for children and young people.
- Communities could be involved in the rewilding of underused council owned spaces to allow them to interact with nature.

- More community gardens, fruit orchards and allotments should be created. Food growing, peri urban market gardens and urban agriculture should be encouraged.

Keynsham and Saltford

- Within Keynsham, it is said that there is a considerable lack of green space. Residents and Councillors are “desperate” to hang on to what green space remains. The enhancement and maintenance of natural and biodiverse spaces were identified as a top priority.
- The gap between Keynsham and Saltford could be used to create a wildlife corridor between the two towns. Walkways and nature trails could be incorporated within this, providing an active travel connection between the two towns, something which they currently do not have.
- The rivers Chew and Avon attract “wonderful” wildlife and the riverbanks are said to have “tremendous” potential for leisure activities.
- There has been a lot of development taking place and developers need to provide green space. This was highlighted as a priority.
- Development often increases footfall through existing green spaces and ends up ‘spoiling’ them. Manor Road Woodland received several mentions. New development has been constructed nearby, but the nature reserve was not expanded and has now become “overcrowded”. The easement zone surrounding the gas pipeline which travels through the area cannot be built on and an opportunity was identified to expand the woodland.
- Much of Keynsham is located within proximity to water. Wetland habitats were proposed on the plains surrounding the Avon and the canal. This would further improve biodiversity and stop empty land going to waste.

Whitchurch Village

- The village is at risk of flooding and the amount of new development that is being constructed without the inclusion of green space and adequate sustainable drainage heightens this risk.
- Whitchurch Village has almost doubled in size in recent years due to the amount of new development it has accommodated. As with development all over the country, many housebuilders do not want to include significant amounts of green space in their developments. It was suggested by attendees that the council would have to pay developers if they want to retain any green space in developments.

- Attendees do not support Biodiversity Net Gain (BNG) offsetting and highlighted the BNG offsetting proposed by Bristol Airport.
- Developers should take steps to include green space and BNG to the best of their ability, without having to be paid by the council.
- The village is close to Maes Knoll, the Dundry plateau, which is regarded as a significant landscape feature visible from the Chew Valley and overlooking Whitchurch Village. These views must be protected. Residents of Whitchurch Village take a pride in their village and like the fact that, although being so close, they are not part of Bristol. The stakeholders were clear in their desire to keep the green buffer between the city and the village as that. It must be protected from development and offer a clear boundary between the two settlements.
- The green space surrounding the village is abundant and there could be many opportunities to improve the amenity value of these spaces. The railway path above Saltwell Avenue was provided as an example.
- The enhancement of local woodland was popular. Land has recently been bought between Pensford and Whitchurch villages to plant trees, and this idea could be mirrored in other local areas.

Somer Valley

- Access to the countryside was considered one of the key issues in the Somer Valley, as people are not aware of the public rights of ways. There are numerous public rights of way, but people still drive to go for a walk elsewhere or use the Midsomer Norton to Radstock Greenway. Working with farmers and locals, B&NES could create a network of linked waymarked routes.
- The quality of the footpath network is variable, and the topography of the area does not help with access to the wider countryside. A lot of the settlements are situated along the Wellow Brook/ the River Somer Valley and are on steep gradients. There is also limited tree cover in the Somer Valley.
- Camerton Batch Nature Reserve requires upgraded facilities, including better access and car parking. Local Nature Action Plans are being developed with Parish Councils and local groups with the possibility for community wardens and parish rangers to encourage access to the countryside.
- The Limestone Link between the Mendip Hills and Cotswold AONBs could be enhanced to access a wider corridor of landscape and biodiversity. This is part of the Big Chalk programme which is a national initiative. This could also link into another initiative, the Nature Recovery Network of West of England with proposals in Mendip District and with proposals in AONBs.

- There are several initiatives planned to encourage access to existing facilities and improve health outcomes. This includes a pilot active travel initiative in Radstock, Somer Valley Rediscovered, Woodland Valley Social Prescribing in Pensford, and Great Avon Wood (Avon Needs Trees) in the west.
- Training hubs are being utilised to build green skills. Hubs include Radstock College and Chew Valley Community farm, where individuals are interested in community food growing.

Rural Areas

- Widen access to PROWS for people and wildlife in combination - make a comprehensive plan to improve access and link green spaces and active travel.
- More guidance for agricultural businesses - to see better management of hedgerows and more joined up approaches to place and nature.
- Improve access to community growing spaces and allotments.
- Important to see nature protected and mitigation for loss - value water and river quality as well as greenspaces and dark skies.

Seldom Heard Groups

2.7 Seldom heard groups were represented by B&NES Youth Climate Conference, Bath Ethnic Minority Senior Citizens Association, Twerton Sheltered Housing Lunch Club, Bath Wheelchair Basketball Club, Somer Valley Family Food and Play Hub, Bath Young Professionals, Chew Valley School and Interactive Poster Engagement).

2.8 Feedback was as follows:

- Existing green spaces and parks in Bath are crucial for the mental well-being of residents. Green space near the river was considered particularly valuable. Feel there have been some good improvements in Bath e.g. 'The Urban Garden' and Alice Park
- Rewilding efforts also need to 'look nice'. The groups did not support allowing grass to grow tall without a wildflower mix, as it looks unkempt.
- It is important that trees do not Designate areas for dogs to control dog fouling and the bags of dog foul which are left behind.
- Increase dedicated natural areas.

3 Current position

- 3.1 Natural Environment policies are currently set out within the B&NES Core Strategy (Adopted 2014), B&NES Placemaking Plan (Adopted 2017), and the Local Plan Partial Update (LPPU) (Adopted in January 2023). Several natural environment policies listed within the Core Strategy and Placemaking Plan were updated as part of the LPPU.

4 Proposed Natural Environment Policies Options

- 4.1 The following proposed policy areas are addressed in this topic paper. For each of these, further detail is provided on the national, regional and local policy context, current evidence, further work and proposed approaches/ options.

N/SHS and N/BNG - NATURE CONSERVATION

- **N/SHS - Sites, Habitats and Species** (NE3 Placemaking Plan Policy updated as part of the LPPU)
- **N/BNG - Biodiversity Net Gain** (NE3a LPPU Policy)

N/GI - GREEN INFRASTRUCTURE

- **Green Infrastructure** (CP7 Core Strategy policy updated as part of the LPPU)
- **Development and Green Infrastructure** (NE1 Placemaking Plan Policy updated as part of the LPPU)

N/OS - OPEN SPACES

- **New and Replacement Sports and Facilities** (LCR6 Placemaking Plan Policy updated as part of the LPPU)
- **Local Green Spaces** (LCR6A Placemaking Plan Policy) (See Topic Paper – Local Green Space Assessment)

N/TWC - TREES

- **N/TWC - Trees and Woodland Conservation** (NE6 Placemaking Plan Policy updated as part of the LPPU)

N/CELLC - LANDSCAPE

- **Conserving and Enhancing the Landscape and Landscape Character** (NE2 Placemaking Plan Policy)
- **Landscape Setting of Settlements** (NE2A Placemaking Plan Policy)
- **Extension of residential curtilages in the countryside** (NE2B Placemaking Plan Policy)

N/FRSD - FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE

- **Flood Risk Management** (CP5 Core Strategy Policy)
- **Sustainable Drainage** (SU1 Placemaking Plan Policy)

N/ES and N/EN - DELIVERY OF ECOSYSTEM SERVICES

- **Ecosystem Services** (NE4 Placemaking Plan Policy)
- **Ecological Networks and Nature Recovery** (NE5 Placemaking Plan Policy updated as part of the LPPU)

- 4.2 The intention of the new local plan will be to update local natural environment policies in line with national policy changes incorporated within the National Planning Policy Framework (NPPF). In addition, the proposed policy framework in the new Local Plan needs to address the complex nature of existing policies and reduce overlap/duplication where possible by establishing a set of clear and more concise policies. This will ensure that landscape, green infrastructure provision and nature recovery associated with development is better enabled through the Local Plan. We also need a transformational approach.
- 4.3 In addition to NPPF changes it should be noted that during January 2023 Natural England introduced the Natural England Green Infrastructure Framework (NE GI Framework). The framework is a commitment set out within the Government's 25 Year Environment Plan.
- 4.4 The framework aims to support the greening of towns and cities and improve connections with the surrounding landscape as part of the Nature Recovery Network.
- 4.5 The NE GI Framework aims to aid local planning authorities and developers meet requirements in the NPPF, to better consider GI in local plans and in new development.
- 4.6 The NE GI Framework is underpinned by 15 GI Principles covering Why, What and How to provide good green infrastructure. The Framework also includes five headline standards. These headline standards are a key component of the NE GI Framework. They define what good green infrastructure 'looks like' and when used together, the Green Infrastructure Standards aim to deliver the 15 Green Infrastructure Principles.
- 4.7 A review of the existing policy Framework for B&NES against the NE GI Framework has been carried out to determine what elements are already covered, and what could be introduced as an option/ approach for the new local plan.
- 4.8 The proposed approach to natural environment policies will seek to deliver the five NE GI Framework headline standards where appropriate.

5 N/SHS - Sites Habitats and Species

NE3 - Sites Habitats and Species

National Context - Current Policy Framework

- 5.1 The National Planning Policy Framework (NPPF) expects local planning authorities to include criteria-based policies in their Local Plan against which the impact of development proposals on or affecting protected biodiversity and geodiversity can be considered. It also requires distinctions to be made between the hierarchy of international, national and locally designated sites. This is so that protection is commensurate with their status and appropriate weight is given to their importance and the contribution that they make to wider ecological networks. It also should plan for biodiversity at a landscape-scale across local authority boundaries.
- 5.2 In addition to the requirement for mapping Ecological Networks as required by the NPPF within the Environment Act 2022 the Government have set out a 'a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits', the system being named Local Nature Recovery Strategies (LNRS). LNRSs are covered further under the Ecological Networks & Nature Recovery – Local Nature Recovery Strategies section of the topic paper.
- 5.3 Placemaking Plan policy NE3 Sites Habitats and Species 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. Policy aims:
- Conserve, enhance and restore the diversity and resilience of the wildlife and species and habitats in both urban and rural areas
 - Provide for the appropriate management of the District's biodiversity and geodiversity assets through the planning process and partnership initiatives
 - Ensure that a coherent network of wildlife corridors is retained and enhanced to facilitate migration through the landscape and built environment which can be incorporated into a broader Green Infrastructure network.

Evidence Base

- 5.4 Key evidence as relating to this policy can be found via the following documents:
- o Bath & North East Somerset Strategic Evidence Base
 - o Natural England - Green Infrastructure Framework - Principles and Standards for England
 - o Green Infrastructure Strategy (Update)
 - o West of England (WoE) Joint Green Infrastructure Strategy 2020-2030 (JGIS)
 - o B&NES Green Space Strategy 2015-2029 (Update)
 - o Bath & North East Somerset Ecological Emergency Action Plan 2023-2030

Further Work Required

- 5.5 The Local Plan should help to address biodiversity issues including addressing loss of species and habitats through species protection and recovery measures, measures to ensure adherence to the mitigation hierarchy in site selection and scheme design and including use of habitat buffers; the delivery of Biodiversity Net Gain, the need to increase habitat connectivity through sensitive site selection and scheme design; the need to deliver better outcomes for nature through scheme design and on-site implementation
- 5.6 Further work is required regarding B&NES Bat Special Area of Conservation (SAC) guidance. Such guidance has never been formalised due initially to potential cross-over with BNG.

Policy Approach

- 5.7 The B&NES Ecological Emergency Action Plan (EEAP) sets out the Vision to be Nature Positive by 2030. The EEAP sets out three guiding priorities consisting of:
- Increase the extent of land and waterways managed positively for nature across B&NES;
 - Increase the abundance and distribution of key species across B&NES; and
 - Enable more people to access and engage with nature.

5.8 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement. Including measures to help increase the abundance and distribution of key species, and in general meeting the three guiding priorities of the EEAP.

- Approach - Retain policy NE3 with amendments as set out above.
 - o Advantages – Adopted policy tested recently at LPPU examination. No evidence to suggest major changes are required.
 - o Disadvantages – None identified.

6 N/BNG - Biodiversity Net Gain (BNG)

Background Definition of Biodiversity Net Gain (BNG)

6.1 Biodiversity Net Gain (BNG) is a process designed for the planning system to make sure new development delivers a net positive impact on the natural environment.

6.2 The Construction Industry Research & Information Association provide a useful description of the BNG process:

“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).

6.3 This clarifies a key aspect of the BNG approach which is to first avoid and then minimise biodiversity loss before considering and then calculating BNG values pre and post development. The approach therefore requires continued use of the mitigation hierarchy and existing and updated Natural Environment Policies. The policy is therefore additional and complimentary and does not replace existing policies for the natural environment.

National Context

6.4 The National Planning Policy Framework (NPPF) sets out that ‘Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on, and providing net gains for, biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

6.5 The NPPF goes on to state plans should: “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

6.6 The delivery of measurable BNG is set to become a mandatory requirement of the planning system from 12th February 2024 for major development (unless otherwise exempt). This will apply to small sites following an extended transition period and will apply from April 2024. For Nationally Significant Infrastructure Projects implementation is planned for 2025.

- 6.7 BNG will also have links to Local Nature Recovery Strategies (LNRS). Local Nature Recovery Strategies (LNRS) are ‘a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature’s recovery and provide wider environmental benefits’, as set out by Government in the Environment Act 2022.
- 6.8 Development projects that create, enhance or recover habitat in locations which are mapped in a local nature recovery strategy will get a higher biodiversity value in the biodiversity metric than they would in other locations. This is because they are in a more strategic location for nature recovery, and so are more highly valued. Similarly, development projects that cause habitat loss in such locations will score a higher baseline BNG value and so will elicit a higher BNG off-set requirement as the habitats lost are deemed of a higher value.

Local Context

- 6.9 The council declared an Ecological Emergency in July 2020, recognising the severity of the degradation of the natural environment and loss of wildlife, and the urgent need to act to restore nature.
- 6.10 B&NES committed to bringing forward BNG requirements for local planning applications, through our Local Plan Partial Update (LPPU). Policy NE3a (Biodiversity Net Gain) reflects the government's approach and gained full statutory weight when we adopted the LPPU on 19 January 2023.
- 6.11 Policy NE3a sets out development will only be permitted for major developments where a Biodiversity Net Gain of a minimum of 10% is demonstrated and secured in perpetuity (at least 30 years) subject to meeting the criteria listed within the policy. 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. Opportunities to secure Biodiversity Net Gain on householder developments and exempted brownfield sites will be supported.
- 6.12 The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan. This reflects a growing awareness that the mandatory 10% BNG requirement will rarely be sufficient to achieve actual/substantive biodiversity gains. Within the context of the Ecological Emergency this needs to be addressed.

- 6.13 There has been feedback from Cllrs that any off-site BNG should be in very close proximity to the location of the development causing the off-set requirement. The mandatory requirements set out very specific spatial controls within the mandatory BNG metric. However, these do not require off-sets to be very close to their associated development. This means to meet mandatory requirements a BNG off-set could be located at a significant distance from the development it is linked to, and in some cases could be delivered outside of the LPA boundary without any penalty. The LPA boundary and National Character Area zones are the determinants of whether a spatial risk multiplier would apply. To address this the existing policy could be amended to address localised spatial requirements.

Evidence Base

- 6.14 Key evidence as relating to this policy can be found via the following documents:
- UK State of Nature Report (2019)
 - UK State of Nature Report (2023) - https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf
 - Cotswolds National Landscape Management Plan Policy CE7 – Requirement for development situated within the Cotswolds National Landscape to provide a net-gain in biodiversity of at least 20% particularly regarding the species and habitats listed within this document.
 - Natural England - Green Infrastructure Framework - Principles and Standards for England
 - Bath & North East Somerset Strategic Evidence Base
 - Green Infrastructure Strategy (Update)
 - West of England (WoE) Joint Green Infrastructure Strategy 2020-2030 (JGIS)
 - B&NES Green Space Strategy 2015-2029 (Update)

- Other Local Planning Authorities with adopted BNG greater than 10% net gain
- CIRIA – Biodiversity Net Gain Good Practice Principles for Development A practical Guide (CIRIA, C776a)

Further Work Required

- 6.15 Further consideration is required regarding seeking more than 10% BNG. Further consideration is also required regarding adding localised off-setting requirements, in addition to standard of significance.
- 6.16 Conversations with Development Management officers have indicated the policy approach should focus on practical measures that need to be incorporated into developments with clear triggers or requirements. There should be more of a distinction between the requirements on greenfield sites and brownfield sites as constraints and available approaches on these sites differ. Further issues raised revolve around how development schemes requiring BNG will be implemented, monitored and enforced.
- 6.17 Noted that some Local Planning Authorities are using section 106 agreements and not conditions for on-site net gains of significance. Significant on-site gains are the only on-site gains where a 30-year management plan and monitoring will be required through BNG. A section 106 agreement is the only way to secure payments for monitoring of the management plan.
- 6.18 Relying on a 10% minimum BNG requirement could result in uncertainty such as recording habitats incorrectly. There is a narrow scope for undertaking measurements due to the metric being simplified. This may result in a risk of habitat degradation before application submission (i.e., baseline alteration) and the risk of undervaluation of habitats.

Proposed Approach Options

- 6.19 National Guidance sets out that plans should: “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. As such, the following options are proposed:

	Option	Advantages	Disadvantages
1	<p>Rely on the existing policy approach and emerging national legislation.</p>	<p>Approach is already in place and has recently been tested as part of the LPPU examination.</p> <p>The approach responds to the Council's declared Ecological Emergency in July 2020.</p>	<p>Existing approach is limited concerning a distinction between the requirements on greenfield sites and brownfield sites.</p> <p>Further issues raised revolve around how development schemes requiring BNG will be implemented, monitored and enforced.</p> <p>Relying on a 10% minimum BNG requirement may not deliver sufficient habitat gains.</p> <p>Existing policy approach will be out of kilter with mandatory requirements for small sites after March 2024 and so will need updating to require at least 10% net gain for minors.</p>

2	<p>Require a minimum 20% biodiversity net gain on:</p> <ul style="list-style-type: none"> • Previously developed land (Major Applications) • Strategic housing sites (can then be a development requirement for allocated sites) • All major development within protected landscapes • Ground array solar farms • For all council developments. 	<p>The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan.</p> <p>The approach will increase a development's contribution to nature recovery, and as a result help to better address the ecological emergency.</p>	<p>Potential viability concerns may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>Having sufficient evidence to justify the approach.</p>
3	<p>A staggered/ graded approach to BNG requirements for different schemes i.e., Require a minimum 20% biodiversity net gain on all major developments, down to 10% on minor applications.</p>	<p>The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan.</p>	<p>Potential viability concerns may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>Having sufficient evidence to justify the approach.</p>

7 N/GI - Green Infrastructure

National Context

- 7.1 The National Planning Policy Framework (NPPF) defines Green Infrastructure (GI) as the following:

'A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.'

- 7.2 The 2023 NPPF does not have a specific paragraph in relation to GI. However, GI is mentioned in respect of various aspects of plan making. For instance, noting that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats - for wildlife - and green infrastructure – for people, recognising the wide range of benefits that such green spaces can provide. Fundamentally GI is nature and nature-based solutions which include peoples' health & well-being amongst other things. Matters relating to peoples' health & well-being will be covered in detail within the Healthy Vibrant Communities Topic Paper.
- 7.3 In January 2023 Natural England introduced The Green Infrastructure Framework (GI Framework). This is a commitment in the Government's 25 Year Environment Plan. It supports the greening of towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The GI Framework will help local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development.
- 7.4 The GI Framework is underpinned by 15 GI Principles. The Principles are intended to provide a baseline for to develop stronger green infrastructure policy and delivery. The principles cover the Why, What and How to do good green infrastructure:

Why

- o 1. Nature rich beautiful places
- o 2. Active and healthy places
- o 3. Thriving and prospering communities
- o 4. Improved water management
- o 5. Resilient and climate positive places

What

- o 1. Multifunctional
- o 2. Varied

- o 3. Connected
- o 4. Accessible
- o 5. Character

How

- o 1. Partnership and Vision
- o 2. Evidence
- o 3. Plan Strategically
- o 4. Design
- o 5. Managed, valued, monitored, and evaluated

- 7.5 Other topic papers will cover elements of the principles. For example, this can be seen with 'Why – Principle 2. Active and healthy places' addressed in part within the Topic Paper Healthy Vibrant Communities, 'Why - Principle 5. Resilient and climate positive places' addressed under the climate change topic paper, and 'How – Principle 4. Design' addressed in part within the Topic Paper for Heritage and Design
- 7.6 The Green Infrastructure Standards are a key component of the Green Infrastructure Framework. They define what good green infrastructure 'looks like' for local planners, developers, parks and greenspace managers and communities, and how to plan it strategically to deliver multiple benefits for people and nature. When used together, these Green Infrastructure Standards will help stakeholders to deliver the 15 Green Infrastructure Principles and enable everyone to benefit from good green infrastructure provision.
- 7.7 Five headline standards are as follows:
- o S1: Green Infrastructure Strategy Standard
 - o S2: Accessible Greenspace Standard
 - o S3: Urban Nature Recovery Standard
 - o S4: Urban Greening Factor Standard
 - o S5: Urban Tree Canopy Cover Standard
- 7.8 In relation to Green Infrastructure Standards the local plan and associated strategies should seek to address their requirements. Work is ongoing as to how the GI Framework principles and standards will be incorporated into the local plan. B&NES council and Bristol City Council will be working alongside Natural England and LUC to embed the GI Framework into our Local Plan and GI Strategy.

Regional / Local Context

Regional Policy

- 7.9 The Environment Bill requires the identification of Nature Recovery Networks at a regional level. This ambition is reflected by the West of England Combined Authority (WECA).
- 7.10 B&NES Council has adopted the West of England (WoE) 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. West of England JGIS sets out several outcomes which are sought as part of an integrated approach to GI in the West of England. Those being:
- o Improved and better-connected ecological networks;
 - o Greater resilience to climate change;
 - o Sustainable water management;
 - o Health and wellbeing for all;
 - o Create and maintain sustainable places;
 - o Create and maintain valued healthy landscapes;
 - o Support sustainable and local food production; and
 - o Build a resilient economy.
- 7.11 To implement the JGIS and achieve the Outcomes B&NES alongside the other West of England authorities will apply the following principles: educate, embed, collaborate, communicate, evidence, and invest.
- 7.12 The Council's adopted Green Infrastructure Strategy was developed within the sub-regional context now covered by the WoE JGIS, to ensure that cross-boundary 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.

Local Policy

- 7.13 In July 2020, B&NES Council declared an Ecological Emergency, recognising the severity of the degradation of the natural environment and loss of wildlife, and the urgency of action needed to restore nature.
- 7.14 The Ecological Emergency is linked to but distinct from the climate emergency: put simply, tackling climate change is not sufficient to restore nature. To address this the council has an ambition to become nature positive by 2030.

- 7.15 The wider benefits of GI for B&NES are set out in the council's Green Infrastructure Strategy which is due to be updated. The B&NES Green Infrastructure Strategy (2013) identifies the benefits of well-planned and managed green infrastructure and set out the current assets and opportunities in B&NES. This Strategy has led to the development of several strategic green infrastructure projects which are delivering actions to addressing the nature emergency, benefitting people, place and nature. These projects include Bathscape; WaterSpace Reconnected; Chew valley reconnected and Somer Valley Rediscovered.
- 7.16 The B&NES Green Space Strategy 2015-2029 is also being updated. This document includes green spaces within Bath and North East Somerset and set out standards for quantity, quality, and access to green spaces.
- 7.17 B&NES local policy addresses GI through policy CP7 (adopted as part of the Core Strategy and policy NE1 (adopted as part of the Placemaking Plan).
- 7.18 Policy CP7 as existing requires 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. Policy further notes the impact of new development on GI will be assessed through the Development Management process. The WoE JGIS and B&NES 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.
- 7.19 Policy NE1 requires amongst other things for major development proposals to provide a plan of the existing green infrastructure assets within and around the development site. The policy also seeks to address GI in any submitted site Masterplan.
- 7.20 As noted, the local plan will seek to address The NE GI Framework five headline Standards and 15 Principles via policy options/ approaches.
- 7.21 B&NES GI policy present opportunities to incorporate headline standard One (Green Infrastructure Strategy Standard) and standard four (Urban Greening Factor Standard).
- 7.22 The B&NES review of the Green Infrastructure Strategy will also assist in meeting the principles and standards of the NE GI Framework. When considering policy this should require a plan to be submitted and require GI to be managed, maintained & monitored for at least 30 years. This would align with BNG requirements. Options/ approaches concerning Urban Greening will seek integration within a new consolidated GI policy, or as a new Urban Greening policy.

Key Issues

- 7.23 Existing green infrastructure policy CP7 and NE1 are rarely used, and present confusion in their implementation when determining planning applications. The policies as existing require for the submission of GI plans however, the policies are limited in requiring for GI outlined within plans to be managed, maintained & monitored.
- 7.24 Another identified issue is the long-term success of tree planting – often the wrong species are planted, and pits are incorrect. Watering of trees during establishment phase – replacement. These issues are to be addressed further under the section on trees covered by Policy NE6.

Evidence Base

- 7.25 Key evidence as relating to this policy can be found via the following documents:
- o Bath & North East Somerset Strategic Evidence Base
 - o Natural England - Green Infrastructure Framework - Principles and Standards for England
 - o Green Infrastructure Strategy (Update)
 - o West of England (WoE) Joint Green Infrastructure Strategy 2020-2030 (JGIS)
 - o B&NES Green Space Strategy 2015-2029 (Update)

Further Work Required

- 7.26 Natural England Guidance sets out ‘Green Infrastructure Strategies provide a key mechanism for developing an evidence base and establishing specific needs for urban greening that can then be used to inform, develop, and justify the use of an UGF tool.’ A revised Green Infrastructure Strategy will support an UGF policy approach.
- 7.27 The UGF enables planning authorities and developers to have informed discussions about the appropriate level of green infrastructure that should be provided to deliver locally relevant outcomes, such as climate resilience or active travel, benchmarked against target scores for different types of development. (Source: London Wildlife Trust Urban Greening for Biodiversity Net Gain: A Design Guide)
- 7.28 Green Infrastructure Strategies and Plans, alongside emerging Local Nature Recovery Strategies, will provide a particularly important evidence base for setting UGF target scores and prioritising investment where it is needed the most.
- 7.29 It will be important to take account of prevailing UGF policies that may be established by adjacent local planning authorities and current practice to ensure there is relative continuity in the setting of target scores.

7.30 Work concerning future tree disease management of trees in perpetuity will also need to be explored.

Policy Approach Options

7.31 Regarding the NE GI Framework Principles and Standards, the UGF is not covered under the existing policy framework for B&NES, whilst other parts of the GI Framework are covered to some extent. The B&NES GI Strategy (2013) is being reviewed and will be guided by the GI Framework. Targets and requirements will need to be supported by a robust evidence base. As such, the following options are proposed:

	Option	Advantages	Disadvantages
1	Leave the policy as existing.	<p>Limited issues from a development management perspective.</p> <p>The policy as it is written provides flexibility and scope for Development Management Officers to negotiate.</p>	<p>There would be limited requirement for the management and monitoring of implementation of GI.</p> <p>Would be out of date with respect to government guidance NE GI Framework.</p> <p>Not well integrated with other policies i.e., BNG, landscaping, open spaces and sustainable drainage.</p> <p>Does not reference the GI Strategy – which is being updated alongside the Local Plan in line with the NE GI Framework. This document will set targets and identify the strategic GI network and priorities for GI enhancement.</p> <p>Does not reference accessible greenspace standard, urban nature recovery standard, urban greening standard and urban tree canopy cover standard (as per NE GI Framework)</p> <p>Will not meet the spatial priorities set out within the local plan.</p>

2	<p>New GI policy consolidating NE1 and CP7 and to include Natural England GI Framework standards. Key requirements will be to seek a GI plan, with 30-year management and monitoring for major applications. Detail to be guided by the forthcoming revised B&NES GI Strategy.</p>	<p>The approach will allow for the management and monitoring of GI, which can align with BNG, and will enable GI to contribute and support other policy objectives. This could/ should provide scope to simplify the Local Plan.</p> <p>Provides support for the delivery of the B&NES GI Strategy ambitions and targets.</p> <p>Will provide a more concise and stronger policy and presents benefits for a more concise plan.</p> <p>The option will assist in delivering greater benefits to residents, communities, and to wider society.</p>	<p>The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared. A risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>Having sufficient evidence to justify the approach.</p> <p>Question as to whether there are resources in place for monitoring GI – whether there is overlap with BNG i.e., will this approach be covered in the BNG Plan.</p>
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3	<p>New GI policy consolidating NE1 and CP7 which presents Natural England GI Framework. With a separate policy for the GI Framework Urban Greening Factor (UGF) i.e., all major commercial/residential development to provide a locally agreed UGF Score.</p>	<p>Will help to address the council's Corporate priorities.</p> <p>The approach will require the management and monitoring of GI.</p> <p>Allows for consistency between the local plan and revised GI Strategy.</p> <p>Having an UGF will assist in securing no loss of green infrastructure.</p> <p>A separate UGF policy will give more focus to this Standard than the other 4 headline standards.</p> <p>An UGF policy can be used alongside Biodiversity Net Gain to help set the quantity and functionality of Green Infrastructure that should be delivered on-site.</p> <p>The option will assist in delivering greater benefits to residents, communities, and to wider society.</p>	<p>The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared as noted for option 2.</p> <p>Having sufficient evidence to justify the approach.</p> <p>Requiring submission of UGF assessment may be considered an additional administrative burden.</p> <p>A GI policy and a separate UGF Policy will present similar issues as existing i.e., two GI related policies. Will not meet the aim of having a more concise plan.</p> <p>Would bring into question why Standard One of the GI Framework does not have a separate policy - for developers to provide a GI Plan that sets out management and monitoring of GI.</p> <p>Resourcing concerns and overlap with BNG as noted above for option 2.</p>
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8 N/OS - Open spaces

National Context

- 8.1 The NPPF highlights the importance of having access to high quality open spaces and opportunities for sport and physical activity. Paragraph 102 of the NPPF notes the following:

‘Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.’

- 8.2 With respect to access, to Natural England (NE) have updated their Accessible Natural Greenspace Standards (ANGSt) to broaden their scope and have re-named them Accessible Greenspace Standards. Within the NE GI Framework, Headline Standard Two relates to Accessible Greenspace Standards. The Green Infrastructure Headline Standard states everyone should have access to good quality green and blue spaces close to home for health and wellbeing and to have contact with nature, to meet the Accessible Greenspace Standards, with an initial focus on access to green and blue spaces within 15 minutes’ walk from home.
- 8.3 A traditional and commonly used way to set standards for greenspace is to set capacity standards for accessible greenspace. This is advocated by Fields in Trust (Fields in Trust, 2015) and included in the National Model Design Code (DLUHC 2021a). A Capacity standard of at least 3 hectares (ha) accessible greenspace per 1,000 population, is required to ensure that sufficient greenspace is provided across a local authority area.

Local Context

- 8.4 The Green Space Strategy (GSS) provides a robust assessment of green space provision, needs and deficiencies and is used to support the implementation of planning policy when assessing proposals for development. This Strategy enables the council to take a consistent policy approach for open space planning and investment across the district. As a strategic open space framework, this document can, by setting out local open space intentions, provide a single point of reference to evidence conformity with existing and emerging national policies.
- 8.5 Placemaking Plan Policy LCR6 sets out the parameters within which proposals for new or replacement sport or recreational facilities will be acceptable and to ensure that a satisfactory level of new facilities or contributions towards the upgrade of existing facilities, including open space, allotments, parks and recreation grounds and play space (youth and children) is secured.
- 8.6 Further text sets out that all new residential development will be required to contribute to the provision of additional sport and recreational facilities to a level at least commensurate with the additional population generated by that development (in accordance with the Green Space Strategy). Policy LCR9 deals with the level of provision for allotments required for new development (See Healthy Vibrant Communities Topic Paper).
- 8.7 The policy also sets out requirements for where new development generates a need for additional recreational open space and facilities which cannot be met on-site or by existing provision. In such cases the developer will be required to either provide for, or to contribute to the provision of accessible sport and recreational open space and/or facilities to meet the need arising from the new development in accordance with the standards set out in the Green Space Strategy, and Planning Obligations SPD or successor documents.
- 8.8 As set out above NE GI Framework standard two sets out requirements for accessible greenspace. When considering a capacity standard of at least 3 hectares (ha) accessible greenspace per 1,000 population B&NES current standards amounts to 3.28 hectares.

Key Issues

- 8.9 The open space standards are not set within the policy wording and reference is made to the Green Space Strategy, Planning Obligations SPD or successor documents. The Green Space Strategy produced in 2015 no longer provides an up-to-date assessment. The Strategy is also difficult to interpret.

- 8.10 While the council has adopted standards for quantity and access for green spaces, it has not defined quality standards for the identified typologies of green space. This can make it difficult to define what green space in new developments should include and means that there is an absence of green space improvement projects which development can help support.
- 8.11 The local plan at present does not incorporate new green space standards set by Natural England. The local plan will need to ensure new B&NES policy requirements do not to fall below 3.28 ha per 1000.
- 8.12 There are several other issues which need to be addressed as follows:
- o The current approach to open spaces needs to make spaces safe for women and girls.
 - o Open spaces need to be accessible for all people.
 - o There is recreational pressure on green space which is not accessible and is sometimes privately owned.
 - o Interplay with BNG – seeing more Natural Green Space coming forward and areas of long grass / wildflowers in the place of modified grass used for amenity.
 - o Attenuation ponds (a form of sustainable urban drainage systems (SuDs)) are assessed on a case-by-case basis. These are often provided in areas of public open space and can sometimes dominate these spaces. These ponds can also give rise to safety concerns, especially the safety of young children.
 - o Species of plants (especially trees) planted in unsuitable locations.

Amenity Green Space

- 8.13 Amenity green space is often provided on the periphery of the site or in odd spaces between houses and parking arrangements. These spaces are often smaller than the standards set within the Green Space Strategy and in this case only provide visual amenity value. In this instance, officers request that they are subtracted from the overall provision. Amenity green spaces should provide spaces where people can kick a football or have a picnic.

Park & Recreation

- 8.14 Confusion whether play space should be included in the quantity standard.

Play Space Youth

- 8.15 The existing policy framework for play / recreational space is covered under policy LCR6. However, this form of space will likely have crossover with the Healthy Vibrant Communities Topic Paper.

- 8.16 Very rarely provided on site – risk of people being put off buying properties if youth congregate there. If provided, the provision is better suited to males and design of spaces needs to consider best practice recommendations for designing spaces which are attractive to women, girls, and for all people with protected characteristics.

Allotments

- 8.17 The existing policy framework for allotments are covered under policy LCR9. This policy is covered under the Healthy Vibrant Communities Topic Paper. However, noted that some issues stemming from this land use has cross overs with open space/ accessible green space.
- o Long waiting lists for allotments
 - o For small scale development the quantity of allotments required represents a small number of plots. In these cases, we often request that the developer provides an orchard in the place of formal allotments.
 - o Public opposition to new allotments being constructed on former green field or open space land close to where they live.
 - o There is usually a piecemeal approach to provision of sheds and allotments can look unsightly. Need to provide well designed storage facilities with water harvesting provision and cycle storage. Allotment design guide is a good resource but isn't well used.
 - o Contributions received are very rarely enough to provide allotments, and usually results in piecemeal amounts for specific towns and villages unless there are contribution from a major development.
 - o Development of a mechanism to request S106 money. Very often issues occur with identifying allotment projects – a process is required to identify sites for large scale community orchards.

Evidence Base

- 8.18 Key evidence as relating to this policy can be found via the following documents:
- o B&NES Green Space Strategy
 - o Fields in Trust - Guidance for Outdoor Sport and Play Beyond the Six Acre Standard England - <https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf>
 - o Green Flag Award Standard (Ellicott 2016) - <https://www.greenflagaward.org/media/1019/green-flag-award-guidelines.pdf>

- o By All Reasonable Means: Least restrictive access to the outdoors (The Sensory Trust, 2020) - <https://www.sensorytrust.org.uk/uploads/documents/ByAllReasonableMeansEnglandAug2020.pdf>
- o Safer Parks: Improving Access for Women and Girls: <https://www.greenflagaward.org/resources-research/safer-parks-for-women-and-girls/safer-parks-for-women-and-girls/>
- o Natural England - Green Infrastructure Framework - Principles and Standards for England

Further Work Required

- 8.19 The development of quality standards for green spaces and a Green Space Strategy Action Plan are required.
- 8.20 The Local Plan should help to provide access to greenspace close to where people live, this includes accessible greenspace and accessible natural greenspace. For instance, having access to green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from people's homes. At the same time, mechanisms should be sought to reduce recreational pressure on accessible natural greenspace which is in proximity to new developments.
- 8.21 The local plan should also seek to provide spaces for people that function well for nature and deliver multiple benefits for society. The central aim is for these spaces to be well designed with mechanisms in place to ensure that these spaces are maintained.
- 8.22 Going forward funding for improvement / enhancement projects maintenance for green space improvement / enhancement projects and green space adoption in line with BNG timescales should be explored.

Proposed Approach Options

- 8.23 In line with NPPF paragraph 102 and NE GI Framework Standards the following options are proposed:

	Option	Advantages	Disadvantages
1	Continue with the existing approach, that being open space requirements are achieved through the implementation of policy LCR6. This will require consultation with the B&NES parks team on applications, with open space requirements set within the Green Space Strategy and Planning Obligations SPD.	The existing approach allows for flexibility, as standards are not set within policy.	As standards and requirements are set within separate documents the current approach can result in inconsistency in terms of open space provided through the planning application process.
2	Incorporate Natural England Space standards within planning policy.	Will take account of most current and up to date guidance. Setting standards within policy will allow for stronger weighting in determining applications.	Will limit flexibility should standards change.
3	Remove policy (accessible green space to be covered under consolidated GI policy).	Allows for a more concise plan overall, ensuring GI and provision of green space are covered together. The revised GI Strategy will include accessible green space standard as part of NE GI Framework approach.	May reduce scope of flexibility for achieving certain forms of open space or GI should they be considered collectively.

9 N/TWC - Trees and Woodland Conservation

National Context

9.1 The National Planning Policy Framework (NPPF) highlights trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.

9.2 Trees are an important part of our natural life support system: they have a vital role to play not just in the sustainability of our urban and rural areas, but as an important component of green infrastructure networks.

9.3 National planning policy and guidance recognises the many benefits provided by trees, including encouraging walking and enhanced physical and mental health; contributing to local environmental character and distinctiveness; providing habitats for wildlife; supporting sustainable drainage; mitigating climate change by storing carbon dioxide; and reducing noise and excessive heat in urban areas.

9.4 Paragraph 136 of the NPPF notes the following regarding trees:

'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'

9.5 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. B&NES have published the B&NES Tree and Woodland 5 Year Delivery Plan in August 2022. A B&NES Tree and Woodland Strategy is currently being prepared.

- 9.6 Natural England (NE) have released a tool to help towns and cities turn greener. The tool is aimed at helping increase the amount of green cover to 40% in urban residential areas. The Headline Green Infrastructure Standards are set out under five approaches. These distinguish the recommended levels of achievement for the Green Infrastructure Standards for major new developments and for area wide application.
- 9.7 Standard five of the NE Framework relates to Urban Tree Canopy Cover.
- 9.8 Tree canopy cover is “the layer of leaves, branches, and tree stems that cover the ground when viewed from above” The principal aim of a canopy cover assessment is to help decision makers understand the urban forest resource, particularly the amount of tree canopy that currently exists and the potential amount that could exist. (Treeconomics, 2017). It is measured as a percentage of the total area. Large-canopied tree species provide a wider range of benefits because of the larger surface area of their canopy.
- 9.9 The NE GI Framework Standard Five sets out recommended levels of achievement for urban tree canopy cover for major new developments and for area wide application.
- 9.10 When considering Area-wide application Urban Tree Canopy Cover is increased by an agreed percentage based on a locally defined baseline and considering local needs, opportunities and constraints.
- 9.11 When considering Major Development (i.e., Major residential and commercial development) New and existing trees are incorporated into new developments and new streets are tree lined (in line with NPPF requirements).

Local Context

- 9.12 Placemaking Plan Policy NE6 seeks to protect the District's trees and woodland from the adverse impact of development by setting out criteria against which proposals will be assessed. The policy had been updated as part of the Local Plan Partial Update to cover when development proposals may directly or indirectly affect veteran trees.
- 9.13 Placemaking Plan policy D4 requires amongst other things for development to be well connected and when proposed, street trees and green spaces should contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. Further details on this policy are covered under the Heritage and Design Topic Paper.
- 9.14 To address NE Framework Five an option will be put forward to update policy NE6. This is in terms of protecting and increasing the amount and distribution of tree canopy cover.

Key Issues

- 9.15 Much of the tree cover in the urban areas is in a critical condition and there is little or no replacement planting for over-mature trees in decline. Infill development has often reduced the space available for planting large tree species. In addition, new tree planting takes many years to mature. The management and retention of significant trees is therefore pressing.
- 9.16 Bath & North East Somerset has a duty under the Town and Country Planning Act 1990 to ensure tree and woodland preservation wherever it is appropriate.

Evidence Base

- 9.17 Key evidence as relating to this policy can be found via the following documents:
- o Forest Research – Tree Canopy Cover Leaflet - England’s Urban Forests Using tree canopy cover data to secure the benefits of the urban forest
 - o Urban Tree Cover - <https://urbantreecover.org/urban-forest-cover/>
 - o Woodland Opportunity Mapping for Bath and North East Somerset - <https://storymaps.arcgis.com/stories/afafb2517d16499b8efd534d52bed4b8> Our Woodland Opportunity Mapping Tool is both a helpful tool to find the right type of landscape location for woodland of different scales from small to large. It is also an important evidence base which underpins our aspirations for doubling woodland cover by 2050 using the key principle of “Right tree/woodland, right place”.
 - o B&NES Tree and Woodland Delivery Plan - <https://beta.bathnes.gov.uk/sites/default/files/Tree%20%26%20Woodland%20Delivery%20Plan%202022.pdf>
 - o ‘Urban Tree Manual’ developed by the Forest Research Policy & Advice Team

Further Work Required

- 9.18 Should the local plan proceed in protecting and increasing the amount and distribution of urban tree canopy cover, a locally agreed target will need to be set. This is being worked on through an update of the B&NES Trees and Woodland Strategy. A target for street trees in new roads and existing roads where practicable may also be required.
- 9.19 In addition to the above an approach could be sought as to how woodland opportunity mapping can be integrated into policy.

- 9.20 For example, mapping for rural areas of B&NES, including smaller villages but not larger urban areas. Such mapping would not help with urban trees and development. However, as an important tool for ensuring "right tree/woodland right place", such a tool would be used where there is development in the countryside, where housing allocations are made in Green Belt locations, and in conjunction with offsetting arrangements relating to woodland planting. There is crossover here with both Green Infrastructure and ecology policy.

Proposed Approach Options

- 9.21 Trees are an important part of our natural life support system: they have a vital role to play not just in the sustainability of our urban and rural areas, but as an important component of green infrastructure networks. The NPPF requires authorities to make new streets tree lined.
- 9.22 Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes an increase in tree canopy cover in urban environments. In addition to these requirements emphasis should also be placed on the need to apply the 'right tree, right place' principle as set out within the 'Urban Tree Manual' developed by the Forest Research Policy & Advice Team. The following options are proposed in relation to policy NE6:

	Option	Advantages	Disadvantages
1	Rely on the existing policy approach supplemented by national planning policy.	As identified changes to the NPPF are not currently addressed by existing policy there would be limited benefit to keeping local policy in its current form.	Will not take account of most current up to date local requirements.
2	Amend the existing policy to avoid crossover with other policy, to include a requirement for new street lined trees, a locally agreed tree canopy cover target, and incorporate the 'right tree, right place' principle.	<p>Will take account of most current and up to date guidance set out within the NPPF and NE GI Framework. A target for the GI Framework Standard 5: Urban tree canopy cover will be identified in the revised GI Strategy.</p> <p>The option will assist in developments becoming climate-resilient, improve residents' wellbeing, and benefit nature.</p>	<p>The approach taken forward will be subject to viability testing as the Draft Local Plan is prepared. A risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site.</p> <p>The NE Urban Tree Canopy Cover Standard does not cover the establishment of new trees. There is a need to ensure trees are successfully established through an initial maintenance period once planted.</p>

10 N/CELLC - Conserving and Enhancing the Landscape and Landscape Character

National Context

10.1 The National Planning Policy Framework (NPPF) requires local authorities to take a criteria-based approach to protecting the landscape. This approach requires an understanding of landscapes that are valued and an understanding of the significance of landscapes and their components rather than just carrying out a crude check whether the landscape is designated or not. The established process of landscape character assessment is the key tool for guiding decisions. Paragraph 180 of the NPPF notes the following:

'a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;'

10.2 The delivery of landscapes is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives, paragraph 8 b) which sets out the 'Social objective' notes the following:

'To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.'

10.3 The NPPF further stresses that great weight should be given to conserving the landscape and scenic beauty of the two Areas of Outstanding Natural Beauty (AONBs – National Landscapes) and that major development in these nationally designated areas will be refused except in exceptional circumstances. Outside of these designated areas the impact of development on the landscape can be an important material consideration.

10.4 In addition, the Countryside and Rights of Way Act 2000 Section 85, places a duty on any relevant authority, in exercising or performing any functions in relation to, or so as to affect, land in an AONB, to have regard to the purpose of conserving and enhancing the natural beauty of the AONB.

- 10.5 The NPPF also states that allocations of land should favour land of lesser environmental value and that the planning system should protect and enhance valued landscapes. Decisions affecting the landscape and views will therefore be judged not only on its designation but also on the value and the significance of the landscape and its features and the degree of harm caused by the proposed development.
- 10.6 When considering extensions of residential curtilages in the countryside many existing dwellings in the countryside outside Bath and settlements with a defined Housing Development Boundary provide attractive homes for people seeking a rural location. Proposals to alter or extend dwellings and carry out minor domestic development will be assessed within the terms of design policies and in the case of existing dwellings in the Green Belt, NPPF paragraph 154 would apply.

Local Context

- 10.7 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the District.
- 10.8 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements. Areas which make a significant contribution to the landscape setting of Bath, Radstock, Westfield, Midsomer Norton, Keynsham and RA1 villages are shown on the Policies Map.
- 10.9 Policy NE2B provides specific control over the enlargement of residential curtilages. Such enlargement can, depending on the circumstances, have a detrimental effect on the special landscape qualities and character of the area and lead to 'suburbanisation' of the countryside. In the Green Belt such schemes can conflict with the purposes of this national designation.

Key Issues

- 10.10 Issues arising regarding the quality of landscape schemes being brought forward.
- 10.11 Current policy NE2 combines the general protection, conservation and enhancement of landscape character and quality with a paragraph specific to the requirement in relation to "Great weight" and AONBs. These designations of national significance should be given greater prominence in the policy and include reference to the Duty of Regard as required in The Countryside and Rights of Way Act 2000. In addition, consideration needs to be given to the setting of the AONBs and how development within them should be considered.

Evidence Base

10.12 Key evidence as relating to this policy can be found via the following documents:

- o Mendip Hills AONB State of the AONB Report 2022
- o Cotswolds National Landscape Management Plan
- o DEFRA - Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads Guidance Note

Further Work Required

10.13 Alongside a review of policy consideration will also need to be given to the use/ implementation of planning conditions. This is to strengthen the quality of landscape schemes being delivered. In addition to tackling issues which may arise at detailed design level.

10.14 There is currently considerable overlap between GI, Landscape, Design, Ecology and climate/ adaption/ mitigation. Moving forward an integrated approach to all these factors is required. This is to ensure there are no conflicts or confusion moving forward. The introduction of an urban greening factor could be an opportunity to provide integration.

10.15 Introduction of legally binding agreements to ensure that changes to developer/owner delivering development, especially when phased, as well as applications for variations over the course of development implementation will aim to ensure adherence to the original proposals or to achieve demonstrably better outcomes for people, nature and climate.

10.16 Going forward reference to position statements and how they should be used will need to be highlighted within policy supporting text. At present the approach/ attitude to such position statements is unclear. An example of a position statement to consider can be seen with the Cotswold National Landscape position statement on Development.

10.17 Consideration will also need to be given to the duties relevant authorities have regarding the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs). This requires relevant authorities such as B&NES to demonstrate how they are fulfilling the duty of regard in relation to the purposes of AONBs. This relates to any activity which might affect the purposes of an AONB including plans, strategies, projects and determination of planning applications.

Policy Approach - Proposed Options Policy NE2

10.18 Policy NE2 remains fit for purpose. The current policy accords with national policy and local strategies, however, changes could be incorporated to ensure the policy has clear links to wider natural environment policy, including reference to non-designated landscapes. The policy remains fit for purpose.

- Approach - Retain policy NE2 with amendments to reference non-designated landscapes.
 - o Advantages – Adopted policy tested recently at LPPU examination. No evidence to suggest major changes are required.
 - o Disadvantages – None identified.

Policy Approach - Proposed Options Policy NE2A

10.19 Policy NE2A remains fit for purpose and appears effective in use. The current policy accords with national and local strategies. The policy seeks to ensure that only development which conserves and enhances the landscape setting of a settlement takes place and that development which would adversely affect the setting is not permitted. The currently defined landscape setting of individual settlements is also considered to be effective and justified. However, through this consultation there is an opportunity to identify whether the boundaries of any existing landscape settings identified on the policies map should be amended. [Link to the policies map](#).

10.20 Regarding landscape setting the following questions are proposed:

Question: Are the existing landscape Settings identified on the policies map effective/ justified?

Question: Are any of the existing Landscape Setting Boundaries ineffective? If so, are there any recommended changes to Landscape Setting Boundaries?

Question: Are there any Landscape Settings not identified on the policies map which should be?

- Approach - Retain policy NE2A with amendments to reference non-designated landscapes.
 - o Advantages – Adopted policy is well used by Development Management in determining planning applications. No evidence to suggest major changes are required.
 - o Disadvantages – None identified.

Policy Approach Policy NE2B

10.21 Policy NE2B (extension of residential gardens in the countryside) remains fit for purpose. The current policy accords with national and local strategies. The policy is therefore, being retained without any changes.

11 N/FRSD - Flood Risk Management and Sustainable Drainage

National Context

11.1 The NPPF requires for new development to be in sustainable locations, at the least risk of flooding, considering vulnerability to flooding. Appropriate mitigation should be provided where necessary to ensure that development remains safe, resilient to the impacts of flooding, and does not increase the risk of flooding elsewhere.

11.2 The NPPF section 14 sets out the national requirements for flood risk management and sustainable drainage. Regarding flood risk amongst other things paragraph 165 of the NPPF notes the following:

'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.'

11.3 With regards to sustainable drainage paragraph 175 of the NPPF notes the following:

'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

a) take account of advice from the lead local flood authority;

b) have appropriate proposed minimum operational standards;

c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

d) where possible, provide multifunctional benefits.'

Local Context

11.4 A Strategic Flood Risk Assessment (SFRA) has been prepared which identifies areas that may flood from all sources including rivers, surface water, groundwater, sewers and reservoirs. It also shows the potential impact of climate change on these areas of flood risk. The SFRA has been used to inform the selection of sites for allocation for development.

11.5 Existing Policy CP5 in line with Government policy NPPF seeks to avoid inappropriate development in areas at risk of flooding and directing development away from areas at highest risk.

- 11.6 Policy is needed to supplement national policy with local considerations, and to ensure that water is managed sustainably. The measures used will vary depending upon the scale of the development.
- 11.7 A key component of managing surface water is Sustainable Urban Drainage Systems (SuDS). SuDS re-create the benefits of natural drainage systems and collect, store, slow and treat the quality of surface water to mitigate the impacts of development on run-off rates, volumes and quality. SuDS also have multiple benefits, such as enhancing biodiversity and creating amenity space with health and well-being benefits. Any water collected should be re-used wherever possible, which will provide additional water supply and will be key to achieving a high level of water efficiency in developments (see Placemaking Plan Policy SCR5). Within B&NES SuDS are covered under local planning Policy SU1.
- 11.8 This policy sets out the following:
- High level principles for drainage designs incorporating SuDS features and the SuDS hierarchy that will be used in B&NES.
 - To provide a basis for the incorporation of SuDS in development schemes through the planning system, ensuring that SuDS features are considered at an early stage and incorporated into a scheme design.
 - To identify key considerations and requirements for developers which should be addressed via development management.

Key Issues

- 11.9 The WECA guidance and B&NES current policy, deals with the flooding and water management technical engineering side of SuDS. However, they do not cover requirements regarding design to ensure SuDS are an integrated part of the landscape of a development. Furthermore, existing policy and guidance does not cover the design of ponds and swales which should be naturalistic in terms of both landform and planting. This should aid in delivering nature-based solutions as part of the requirements for the urban greening factor and biodiversity.
- 11.10 Wessex Water have highlighted issues primarily relating to the approach to property-level rainwater management through a requirement for local capture, re-use and discharge back to the environment.
- 11.11 Correspondence with Wessex Water highlights the carbon cost of water supply (collecting, treating and distributing it) and combined sewerage systems (collecting, transporting and treating it) and the role that new development has in protecting the environment from:
- Increasing water demands from a growing population.

- Rainwater discharge management issues such as storm overflow operation.
- 11.12 Schedule 3 of the Flood and Water Management Act 2010 (which is 'soon-to-be-enacted') will make Sustainable Drainage Systems (SuDS) mandatory, its application does not remove the 'Right to Connect' surface water to combined sewers (S106 of the Water Industry Act) nor is Schedule 3 applicable to single properties.
- 11.13 The management of rainwater has not been considered holistically due to the fragmented ownership of its management. The new evidence from storm overflow discharge numbers and the persistent effort to reduce per capita consumption are evidence of this.
- 11.14 The up take in natural/open water SuDS is limited as it is often achieved in underground infrastructure with small ponds implemented. The local plan should seek to encourage the use of natural/open water SuDS.
- 11.15 There is an opportunity to link the implementation of SuDS with Green/ Blue Infrastructure and BNG within wider site design. Options for Urban Greening which are being explored can provide links to better SuDS design.

Evidence Base

- 11.16 Key evidence as relating to this policy can be found via the following documents:
- Flood and Water Management Act 2010 - <https://www.legislation.gov.uk/ukpga/2010/29/contents>
 - Good rainwater management principles, as laid out by Defra in the [Storm Overflows Discharge Reduction Plan](#) are:
 - o Rainwater should be treated first and foremost as a resource to be valued for the benefit of people and the environment.
 - o Rainwater should be discharged back to the environment as close as possible to where it lands or channelled to a close watercourse and not combined with sewage.
 - [Building Regulations Approved Document G](#) covers sanitation, hot water safety and water efficiency.
 - [Building Regulations Approved Document H](#) covers rainwater drainage provision.
 - West of England sustainable drainage - developer guide - <https://beta.bathnes.gov.uk/policy-and-documents-library/west-england-sustainable-drainage-developer-guide>

- DEFRA - Sustainable drainage systems: non-statutory technical standards - <https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards>
- CIRIA SuDS Guidance - <https://www.susdrain.org/resources/ciria-guidance.html#cgsuds>

Further Work Required

- 11.17 There is a need to ensure large SuDS are better designed than mechanisms currently provided. There are opportunities to better integrate SUDs with BNG. This is in addition to displaying clear links to the council's climate and ecological emergency priorities.
- 11.18 Going further there are opportunities to present robust links with GI policy and landscape. The use of open water/ natural SuDS will present key links with nature-based solutions a target set out under the Natural England Green Infrastructure Principles and Standards. This matter is covered further under the approaches and options sought for policy NE4.
- 11.19 The development of guidance for best practice may be able to assist in bringing forward better SuDS schemes. The London guidance is a good example of a document displaying how SuDS presents opportunities for urban greening.

Policy Approach Options

- 11.20 National Guidance and associated Technical Guidance provides the national requirements in terms of the Sequential and Exception Test, the need for planning applications to be supported by a Flood Risk Assessment, and the priority given to utilising sustainable drainage techniques in new development.
- 11.21 Going further there are opportunities to present robust links with GI policy and landscape. The use of open water/ natural SuDS will present key links with nature-based solutions a target set out under the Natural England Green Infrastructure Principles and Standards. This matter is covered further under the approaches and options sought for policy NE4. In addition exploring how minor applications can efficiently manage property-level rainwater management through a requirement for local capture, re-use and discharge back to the environment.
- 11.22 As such, the following options are proposed:

	Option	Advantages	Disadvantages
1	<p>Rely on the existing policy approach supplemented by national planning policy.</p>	<p>The existing approach is well understood and implemented by Development Management in determining planning applications.</p>	<p>Increased local concern relating to surface water runoff presented by developments when using the existing policy.</p> <p>Regarding major schemes the up take in natural/open water SuDS is limited as it is often achieved in underground infrastructure with small ponds implemented.</p> <p>The management of rainwater has not been considered holistically due to the fragmented ownership of its management.</p>

2	<p>Requiring that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers.</p>	<p>Opportunity to link the implementation of SuDS with Green/ Blue Infrastructure and BNG within wider site design. Options for Urban Greening which are being explored can provide links to better SuDS design.</p> <p>The revised GI Strategy will evidence where new or enhanced GI is required to address water management. The GI Policy if revised will reference the NE Green Infrastructure Framework standards including the Urban Greening Factor that seeks to retain and ideally increase more permeable surfaces.</p> <p>Will ensure that developments are not worsening water quality and thereby not increasing pressure on in-river ecology.</p>	<p>Whether there is sufficient evidence for justification regardless of the size of new developments.</p>
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12 N/ES - Delivery of Ecosystem Services

National Context

- 12.1 The NPPF paragraph 180 b) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:

'Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'

- 12.2 Natural England (NE) have released a tool to help towns and cities turn greener (NE GI Framework). The tool is aimed at helping increase the amount of green cover to 40% in urban residential areas. The Headline Green Infrastructure Standards are set out under five approaches. These distinguish the recommended levels of achievement for the Green Infrastructure Standards for major new developments and for area wide application.

- 12.3 The NE GI Framework Standard Three sets out the approach for Urban Nature Recovery for major new developments and for area wide application.

- 12.4 When considering Area-wide application Urban Nature Recovery is sought via the following means:

'In urban and urban fringe areas, the proportion of green infrastructure that is designed and managed for nature recovery is increased by an agreed percentage based on a locally defined baseline and taking into account local needs, opportunities and constraints. This includes the creation and restoration of wildlife rich habitats, which can contribute to the delivery of local nature recovery objectives.'

- 12.5 When considering Major Development (i.e., Major residential and commercial development) Urban Nature Recovery is sought via the following means:

'The developer identifies in the Green Infrastructure Plan for the development (or in the Design and Access Statement, as appropriate), its contribution to nature recovery and the creation and restoration of 22 wildlife rich habitats, which can contribute to the delivery of local nature recovery objectives, including the potential for creation or enhancement of Local Nature Reserves or Local Wildlife Sites.'

Local Context

12.6 Placemaking Plan Policy NE4 seeks to protect and enhance supporting services, provisioning services, regulatory services and cultural services. The Millennium Ecosystem Assessment (2001 - 2005) summarises ecosystem services classification as follow:

- *Supporting services: The services that are necessary for the production of all other ecosystem services including soil formation, photosynthesis, primary production, nutrient cycling and water cycling.*
- *Provisioning services: The products obtained from ecosystems, including food, fibre, fuel, genetic resources, biochemicals, natural medicines, pharmaceuticals, ornamental resources and fresh water.*
- *Regulating services: The benefits obtained from the regulation of ecosystem processes, including air quality regulation, climate regulation, water regulation, erosion regulation, water purification, disease regulation, pest regulation, pollination, natural hazard regulation.*
- *Cultural services: The non-material benefits people obtain from ecosystems through spiritual enrichment, cognitive development, reflection, recreation and aesthetic experiences – thereby taking account of landscape values.*

12.7 To address NE GI Framework Three an option will be put forward to update policy NE4. This is with an aim of boosting nature recovery, creating and restoring rich wildlife habitats and building resilience to climate change, while incorporating nature-based solutions, including trees and wildflowers, into design of schemes.

Key Issues

12.8 Current issues revolve around the scope and use of existing policy NE4. The existing policy is currently underused and general in its approach.

Evidence Base

12.9 Key evidence as relating to this policy can be found via the following documents:

- o Bath & North East Somerset Strategic Evidence Base
- o Natural England - Green Infrastructure Framework - Principles and Standards for England
- o Green Infrastructure Strategy (Update)
- o West of England (WoE) Joint Green Infrastructure Strategy 2020-2030 (JGIS)

Further Work Required

- 12.10 As noted, the policy is underutilised in its current form. There are opportunities to update the policy to incorporate NE GI Framework headline standard three - Urban Nature Recovery Standard.
- 12.11 This standard aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change, while incorporating nature-based solutions, including trees and wildflowers, into the design of towns and cities will increase carbon capture, prevent flooding and reduce temperatures during heatwaves.
- 12.12 If this approach is pursued clarity on targets will be required. Sufficient evidence for justification will also be required.

Policy Approach Options

- 12.13 Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes urban nature recovery. This standard aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change, while incorporating nature-based solutions, including trees and wildflowers, into the design of towns and cities will increase carbon capture, prevent flooding and reduce temperatures during heatwaves. As such, the following options are proposed:

	Option	Advantages	Disadvantages
1	Leave policy as existing.	Limited issues from a development management perspective.	The existing policy is currently underused and general in its approach.
2	Adapt policy NE4 to better address/require a nature-based solutions approach as set out within NE GI Framework – Principles and Standards.	<p>Will take account of most current and up to date guidance set out within NE GI Framework, particularly promoting the need to manage and enhance natural assets.</p> <p>Will ensure that developments are maximising benefits for people and nature and are contributing to nature's recovery.</p>	Need to provide sufficient evidence for justification.

13 N/EN - Ecological Networks & Nature Recovery – Local Nature Recovery Strategies

National Context

- 13.1 The NPPF paragraph 180 d) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:

‘Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’

- 13.2 The NPPF further sets out under paragraph 185 a) to protect and enhance biodiversity and geodiversity, plans should:

‘Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.’

- 13.3 In addition to the requirement in the NPPF for mapping Ecological Networks, within the Environment Act 2022 the Government have set out a ‘a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature’s recovery and provide wider environmental benefits’, the system being named Local Nature Recovery Strategies (LNRS). A LNRS is currently being prepared covering the West of England (Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire).

- 13.4 LNRSs will inform the delivery of ‘nature-based solutions’ for outcomes such as flood management, carbon sequestration and improvements in water quality.

- 13.5 LNRS are designed as tools to encourage more coordinated practical and focused action and investment in nature.

- 13.6 There are expected to be 48 LNRS based at a county level which will cover the whole of England. These strategies will assist in mapping the Nature Recovery Network (NRN) locally and nationally. The intention of the LNRS amongst other things can be seen to assist in the preservation/ management of the landscape.

Regional/ Local Context

- 13.7 There will be a single LNRS for the West of England which will cover the unitary authority areas of Bath and North East Somerset (B&NES), Bristol, North Somerset and South Gloucestershire. In total, there will be around 50 LNRSs, covering the whole of England; joined together, the aim is that they will support delivery of a national Nature Recovery Network.
- 13.8 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 currently the B&NES Ecological Networks (expected to be replaced by LNRS).
- 13.9 The West of England LNRS will also have a role in Biodiversity Net Gain by defining areas of strategic importance and providing a 'strategic multiplier' of 15% to BNG Units.
- 13.10 Placemaking Plan Policy NE5 (updated as part of the LPPU) seeks to ensure development proposals demonstrate a positive contribution will be made to regional Nature Recovery Networks. The policy also seeks the maintenance or creation of local ecological networks through habitat creation, protection, enhancement, restoration and/or management. Noted that existing mapped networks are displayed on the councils Policies Map.

Key Issues

- 13.11 Full national guidance on LNRS delivery is not currently available.
- 13.12 Regarding local policy current issues revolve around its scope and use. Existing policy can currently be seen as underused and general in its approach.

Evidence Base

- 13.13 Key evidence as relating to this policy can be found via the following documents:
- o Bath & North East Somerset Strategic Evidence Base
 - o DEFRA - Local nature recovery strategies – Policy Paper - Published 30 June 2023
 - o Natural England - Green Infrastructure Framework - Principles and Standards for England
 - o Green Infrastructure Strategy (Update)
 - o West of England (WoE) Joint Green Infrastructure Strategy 2020-2030 (JGIS)
 - o B&NES Green Space Strategy 2015-2029 (Update)

Further Work Required

- 13.14 Guidance on how the LNRSs will be incorporated into the planning system has not yet been published. However, LNRSs should provide a more “strategic overview” in terms of nature priorities. The new system is also intended to help applicants avoid the most valuable habitats. LNRSs could be used to secure off-site provision of biodiversity net gains on schemes.
- 13.15 From January (2024) developers unable to meet the requirement for a ten per cent net gain in biodiversity on their development sites must secure compensation elsewhere, by buying credits on a new or restored habitat site. If they use a site prioritised in an LNRS, they will secure a 15 per cent uplift on these credits.
- 13.16 As with other natural environment policies an integrated approach will be required. For example, linkages between LNRS and BNG. Particularly defining strategic significance. Further guidance is required from government on the role of the LNRS.

Policy Approach

- 13.17 Once the LNRS is published it will be necessary for local plans to ‘take account’ of them and recognise their significance. Policy NE5 will need to be updated to take account of these forthcoming changes. As such, the following approach is proposed:
- Approach - Adapt policy NE5 to address the forthcoming Local Nature Recovery Strategy as it relates to B&NES and the wider West of England area.
 - o Advantages – Will take account of most current and up to date/ emerging priority networks. Will ensure alignment of the Local Plan with legislation.
 - o Disadvantages – Full national guidance on LNRS delivery is not currently available.