

**Bath and North East Somerset Council**

**Local Plan 2022 – 2042**

**Options Consultation**

**February 2024**

## **Topic Paper: Pollution, Contamination and Safety**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

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# 1 Background

- 1.1 The National Planning Policy Framework (NPPF) clarifies the specific responsibilities of the planning system; that it has a role to play in preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution. This is set out under Section 15 - Conserving and enhancing the natural environment.
- 1.2 Existing local policies are set out within the Core Strategy (adopted 2014), Placemaking Plan (adopted 2017) and Local Plan Partial Update (adopted 2023).
- 1.3 The Overarching policy aims within these documents sets out the following:
  - Minimise use of non-renewable resources and promote the reuse of existing structures and materials;
  - Minimise land contamination and soil degradation;
  - Minimise/mitigate against effects of pollution (e.g. Air quality, noise, land contamination, light, groundwater); and
  - Protect and enhance the quality of the underlying groundwater or surface water.

## 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.
  - Biodiversity – increasing abundance and diversity of species by creating and improving habitats including woodlands.
  - Air - improving air quality Climate- area and council-wide scope 1 and 2 emissions neutrality by 2030, including through increased renewable energy capacity across the district and a reduction in the carbon footprint of the area’s housing stock.
  - Water – improving the quantity and quality of water resources.
  - Soil – retaining soil and improving soil health.

### 3 Current position

- 3.1 The pollution, contamination and safety policies area currently set out within B&NES Placemaking Plan (Adopted 2017), and the Local Plan Partial Update (LPPU) (Adopted in January 2023). At the time of the LPPU being adopted contamination policies listed within the Placemaking Plan had been updated.

### 4 Proposed Policy Areas

- 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 Options.

- **PCS/PN - POLLUTION AND NUISANCE** (Policy PCS1: Placemaking Plan Policy)
- **PCS/NV - NOISE AND VIBRATION** (Policy PCS2: Placemaking Plan Policy)
- **PCS/AQ - AIR QUALITY** (Policy PCS3: Placemaking Plan Policy)
- **PCS/HS - HAZARDOUS SUBSTANCES** (Policy PCS4: Placemaking Plan Policy)
- **PCS/C - CONTAMINATION** (Policy PCS5: Placemaking Plan Policy updated as part of the LPPU)
- **PCS/UL - UNSTABLE LAND** (Policy PCS6: Placemaking Plan Policy)
- **PCS/WSPZ - WATER SOURCE PROTECTION ZONES** (Policy PCS7: Placemaking Plan Policy)
- **PCS/FSI - FOUL SEWAGE INFRASTRUCTURE** (Policy PCS7A: Placemaking Plan Policy)
- **PCS/BHS - BATH HOT SPRINGS** (Policy PCS8: Placemaking Plan Policy)

## 5 PCS/PN: POLLUTION AND NUISANCE

### National Context

- 5.1 The control of pollution is governed by the Environmental Protection Act 1990 and related legislation. Several regulatory authorities have a role in pollution control, principally the Environment Agency and Local Planning Authorities.
- 5.2 The National Planning Policy Framework (NPPF) sets out the following, amongst other things in relation to pollution:

*‘Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.’*

### Local Context

- 5.3 Policy PCS1 embodies the 'precautionary principle'. This requires that where there is significant risk of damage to the environment, pollution controls will consider the need to prevent or limit harm, even where scientific knowledge is not conclusive.

### Evidence Base

- 5.4 Key evidence as relating to this policy can be found via the following documents:
- Bath & North East Somerset Strategic Evidence Base

### Further Work Required

- 5.5 The current policy remains fit for purpose.

### Policy Approach

- 5.6 Retain policy PCS1 the policy remains fit for purpose. The current policy accords with national and local strategies.
- Advantages - Adopted policy presents no issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.
  - Disadvantages - None identified.

## 6 PCS/NV: NOISE AND VIBRATION

### National Context

- 6.1 The 2010 Noise Policy Statement for England sets out the following in relation to noise:

Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

- 6.2 The above is further reflected within the National Planning Policy Framework (NPPF) which sets out the following in relation to noise:

*‘Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

*a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

*b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.’*

- 6.3 In reference to the above planning policies and decisions should take account of the acoustic environment and in doing so consider:

- whether or not a significant adverse effect is occurring or likely to occur;
- whether or not an adverse effect is occurring or likely to occur; and
- whether or not a good standard of amenity can be achieved.

6.4 Planning Practice Guidance (PPG) provides further detail on dealing with noise related development. Further information is set out within the 'Explanatory Note to the Noise Policy Statement for England.' This document sets out noise policy aims through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

## **Local Context**

6.5 Placemaking Plan Policy PCS2 highlights the Planning system as having a role in seeking to ensure that new noise sensitive development such as housing and schools is not located close to existing sources of noise, including industrial uses and noise generated by vehicles and other forms of transport that would lead to nuisance. Also, it should ensure that potentially noise creating uses such as some industrial processes or some recreational activities are not located where they would be likely to cause nuisance.

## **Evidence Base**

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

- Bath & North East Somerset Strategic Evidence Base
- Noise Policy Statement for England (NPSE) March 2010
- Planning Practice Guidance - Noise

## **Further work Required**

6.7 The policy to be updated to better reflect the aims as set out within the NPPF and the 2010 Noise Policy Statement for England. Particularly, the aim of seeking to improve health and quality of life, which can be used to protect quiet areas.

## **Policy Approach**

6.8 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.

6.9 It is proposed to amend the policy to better reflect the aims as set out within the NPPF and the 2010 Noise Policy Statement for England. Particularly, the aim of seeking to improve health and quality of life, which can be used to protect quiet areas.

- Advantages - Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendment will improve clarity.
- Disadvantages - None identified.



## 7 PCS/AQ: AIR QUALITY

### National Context

- 7.1 National planning policy requires plans to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 7.2 The National Planning Policy Framework (NPPF) sets out the following, amongst other things in relation to air quality:

*'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*

### Regional / Local Context

- 7.3 There are 5 Air Quality Management Areas (AQMAs) in B&NES where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre ( $\mu\text{g}/\text{m}^3$ ). Those areas consist of the following:
- Bath
  - Keynsham
  - Saltford
  - Temple Cloud
  - Farrington Gurney
- 7.4 Placemaking Plan Policy PCS3 seeks to ensure that the effects of a development on the local air quality are properly considered. Local policy, latest Government regulations and guidelines are used to determine the suitability of any proposal as it relates to local air quality.

#### Key Issues

- 7.5 Local Authorities are required under Part IV of the Environment Act 1995 to periodically review and assess the air quality in their area. Although the control of pollution is governed by other legislation, planning has a role to play in separating potentially polluting land uses from other existing or proposed land uses and in ensuring that new development is not allowed where it would exacerbate already poor air quality conditions.

## **Evidence Base**

- 7.6 Key evidence as relating to this policy can be found via the following documents:
- Bath & North East Somerset Strategic Evidence Base
  - Bath & North East Somerset Council (June 2023), 2022 Air Quality Annual Status Report (ASR)
  - B&NES Council (2020), Air Pollution and Your Health
  - Public Health England (2017) Air Quality: A Briefing for Directors of Public Health
  - Defra (2006) Air quality and social deprivation in the UK
  - Defra (2023), Air quality appraisal: damage cost guidance
  - Public Health England (2018), Estimation of costs to the NHS and social care due to the health impacts of air pollution: summary report

## **Further Work Required**

- 7.7 Amendments to the policy could be incorporated to ensure it is clearer particularly regarding planning balance and judgement and strengthening the approach with regards to air quality.

## **Policy Approach**

- 7.8 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 and strengthening the approach with regards to air quality.
- Advantages – Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendments improve clarity.
  - Disadvantages - None identified.

## 8 PCS/HS: HAZARDOUS SUBSTANCES

### National Context

- 8.1 The Planning (Hazardous Substances) Act, 1990 and National Planning Policy Guidance describe the role of the planning system in controlling the location and use of substances and processes which are potential hazards to public safety such as some industrial processes, gas pipelines and the storage of explosives.
- 8.2 The National Planning Policy Framework (NPPF) Section 15 Paragraph 189 a) sets out the following, amongst other things in relation to hazardous substances:

*'Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).'*

### Local Policy

- 8.3 Placemaking Plan Policy PCS4 sets out criteria for assessing applications in controlling the location and use of substances and processes which have the potential to negatively impact the interests of public safety and amenity. It outlines the key issues to be considered concerning applications for hazardous substances consent and developments involving the use of hazardous substances.

### Key Issues

- 8.4 National planning policy requires local planning authorities to have regard to the prevention of major accidents and limiting their consequences when preparing a Local Plan.
- 8.5 Applicants are expected to indicate as part of any application whether hazardous substances will be used, stored or manufactured on the site. HSE is a statutory consultee on planning applications for Hazardous Substances Consent (HSC) and developments near major hazard installations and pipelines. The applicant will be expected to demonstrate to the satisfaction of the Council and the HSE that adequate safety precautions have been taken. The HSE apply risk criteria to the operation concerned to determine if a development proposal would be likely to be put at unacceptable risk because of proximity to a hazard. In the District there are several gas pipelines which are defined as hazards.

## Evidence Base

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

- [The Planning \(Hazardous Substances\) Act 1990](#)
- [The Planning \(Hazardous Substances\) \(Amendment\) \(England\) Regulations 2009](#)
- [HSE's land use planning methodology](#)
- The Town and Country Planning (Local Planning) (England) Regulations 2012 - Regulation 10
- Bath & North East Somerset Strategic Evidence Base

## Further Work Required

8.7 The current policy remains fit for purpose.

## Policy Approach

8.8 Retain policy PCS4 the policy remains fit for purpose. The current policy accords with national and local strategies.

- Advantages - The current policy PCS4 accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.
- Disadvantages - None identified.

## 9 PCS/C: CONTAMINATION

### National Context

- 9.1 The National Planning Policy Framework (NPPF) (Section 15 Paragraph 180 f) sets out Planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things:

*‘Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

- 9.2 The NPPF further sets out the following under paragraph 190:

*‘Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.’*

### Local Policy

- 9.3 Placemaking Plan Policy PCS5 updated via the Local Plan Partial Update provides the framework for considering planning applications where land contamination issues are involved. The policy aims to ensure the implications of contamination for a new development not addressed by other regimes are properly considered through the planning system.

### Key Issues

- 9.4 Should a risk assessment of land potentially affected by contamination be required all investigations are to be undertaken in accordance with established practices such as BS10175 (2001) ‘Code of Practice for the Investigation of Potentially Contaminated Sites’.
- 9.5 Part 2A of the Environmental Protection Act 1990 provides a risk-based approach to the identification and remediation of land where contamination poses an unacceptable risk to human health or the environment.

### Evidence Base

- 9.6 Key evidence as relating to this policy can be found via the following documents:
- Bath & North East Somerset Strategic Evidence Base
  - BS10175 (2001) ‘Code of Practice for the Investigation of Potentially Contaminated Sites’
  - [Part 2A of the Environmental Protection Act 1990](#)
  - [Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance](#)

## **Further Work Required**

9.7 The current policy remains fit for purpose.

## **Policy Approach**

9.8 The current policy accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.

- Advantages - The current policy PCS5 accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.
- Disadvantages - None identified.

## 10 PCS/UL: UNSTABLE LAND

### National Context

- 10.1 The National Planning Policy Framework (NPPF) (Section 15 Paragraph 174 f) sets out Planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things:

*‘Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

- 10.2 The NPPF further sets out the following under paragraph 184:

*‘Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.’*

- 10.3 National policy requires a risk assessment of land potentially affected by land instability and that site investigation and surveys need to be carried out before land in these areas is developed.
- 10.4 Again, the onus is on developers to carry out investigative work to assess whether a proposed development would be affected by land instability and to set out any necessary stabilisation measures.
- 10.5 The Planning Practice Guidance on the issue of land stability, points to where sources of information are held such as with the British Geological Survey (BGS) and the role the Coal Authority plays in matters of land instability.

### Local Policy

- 10.6 The geology of Bath and North East Somerset and its history of surface and underground mineral extraction mean that land in certain areas may be unstable, for example, at Combe Down in Bath and locations within the former Somerset coalfield.
- 10.7 Placemaking Plan Policy PCS6 seeks to ensure that sites are suitable for the new use taking account of ground conditions and land instability and the need for remediation as appropriate.

### Key Issues

- 10.8 With the District’s history of coal mining, it is particularly important that mining legacy matters including entries are properly evaluated to ensure proposals not lead to future public safety hazards. The ‘Development High Risk Area’ in respect of the coal mining legacy is defined on the Policies Map within which submission of a Coal Mining Risk Assessment would be necessary to support a development proposal.

## **Evidence Base**

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

- Bath & North East Somerset Strategic Evidence Base
- Planning Practice Guidance Land Stability
- British Geological Survey

## **Further Work Required**

10.10 The current policy remains fit for purpose.

## **Policy Approach**

10.11 Retain policy PCS6 the policy remains fit for purpose. The current policy accords with national and local strategies.

- Advantages - The current policy PCS6 accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.
- Disadvantages - None identified.



# 11 PCS/WSPZ: WATER SOURCE PROTECTION ZONES

## National Context

- 11.1 The National Planning Policy Framework (NPPF) Paragraph 20 b) sets out strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for, amongst other things:

*'Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).'*

- 11.2 As set out above the adequacy of existing water supply is a key factor in determining the location and timing of development. New developments should be located in ways that minimise or eliminate the environmental impact of additional demand for water. The NPPF places emphasis on ensuring an adequate water supply is in place.
- 11.3 The Environment Agency holds all up-to-date information on Source Protection Zones (SPZs) and divides groundwater source catchments into three zones: Inner Zone, Outer Zone, and Total Catchment.

## Local Policy

- 11.4 In Bath and North East Somerset water source protection zones are concentrated in the Chew Valley and the northern edge of the Mendip Hills and in areas to the north and south of Bath. These areas feed springs and watercourses used for public drinking water supply. The polluting of these catchment areas could pose a serious risk to public health.
- 11.5 Placemaking Plan Policy PCS7 seeks to help ensure the protection of Groundwater Source Protection Zones from the adverse impacts of development and refers applicants to the Environment Agency's website as SPZ's are altered and updated on a regular basis.

## Key Issues

- 11.6 Groundwater Source Protection Areas have been defined by the Environment Agency to prevent contamination of groundwater. These areas feed springs and watercourses from where water is collected for public supply and agriculture. The polluting of these catchment areas could pose a serious risk to public health.

## Evidence Base

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

- Bath & North East Somerset Strategic Evidence Base
- Planning Practice Guidance - Water supply, wastewater and water quality - <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>
- Planning Practice Guidance - Groundwater source protection zones (SPZs) - <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs#defined>

## **Further Work Required**

11.8 The current policy remains fit for purpose.

## **Policy Approach**

11.9 Retain policy PCS7 the policy remains fit for purpose. The current policy accords with national and local strategies.

- Advantages - The current policy PCS7 accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.
- Disadvantages - None identified.

## 12 PCS/FSI: FOUL SEWAGE INFRASTRUCTURE

### National Context

- 12.1 The National Planning Policy Framework (NPPF) Paragraph 20 b) sets out strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for, amongst other things:

*'Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).'*

- 12.2 As set out above the adequacy of sufficient provision of wastewater is a key factor in determining the location and timing of development. Where proposals could have an adverse impact on sensitive watercourses developers should incorporate adequate mitigation measures in discussion with local water supply and sewerage utility company and the Environment Agency/Natural England. This is to ensure compliance with the requirements of the EU Water Framework and Habitats Directives.

### Local Policy

- 12.3 Wessex Water Plc is the water company which provides these services to the District and their advice should be sought before development proposals are submitted. New development can create additional demands for sewage disposal. Some villages are not served by mains sewerage, others require improvements. In the case of non-mains villages new developments may have to be served by cess pits or septic tanks which are potential sources of pollution.
- 12.4 Placemaking Plan Policy PCS7A seeks to ensure development is only permitted where there is adequate foul sewage provision. This approach complements Policy CP13 in requiring the timely provision of required infrastructure. Where proposals could have an adverse impact on sensitive watercourses developers should incorporate adequate mitigation measures in discussion with Wessex Water and the Environment Agency/Natural England. This is to ensure compliance with the requirements of the EU Water Framework and Habitats Directives.

### Key Issues

- 12.5 New development can create additional demands for sewage disposal. Some villages are not served by mains sewerage, others require improvements. In the case of non-mains villages new developments may have to be served by cess pits or septic tanks which are potential sources of pollution.

## **Evidence Base**

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

- Bath & North East Somerset Strategic Evidence Base
- Sewage treatment and disposal where there is no foul sewer, PPG4, Environment Agency (2006)
- Guidance notes and procedures on the Wessex Water website:  
<https://www.wessexwater.co.uk/>

## **Further Work Required**

12.7 The current policy remains fit for purpose.

## **Policy Approach**

12.8 The current policy accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.

- Advantages - The current policy PCS7A accords with national and local strategies and there are no plans to alter the wording. The policy remains fit for purpose.
- Disadvantages - None identified.

## 13 PCS/BHS: BATH HOT SPRINGS

### Context

- 13.1 The Hot Springs are one of the six key attributes of the City of Bath World Heritage Site. Since Roman times with the development of 'Aquae Sulis' as a retreat for health therapy, worship and relaxation, Bath's Hot Springs have been the centre of social, economic and cultural developments in Bath. Settlement grew up around this resource which has culminated in the modern City of Bath. The Springs now attract many visitors annually with the opening of the Thermae Bath Spa.
- 13.2 There are three Hot Springs in the centre of Bath: the Kings Springs within the Roman Bath complex, the Cross Bath Spring, and the Hetling Spring in Hot Bath Street. Together they produce around 1.3 million litres of mineral-rich thermal water per day with a temperature of between 41 and 46°C. These thermal waters arise from the Carboniferous Limestone via fissures in the overlying layers (a layer of alluvium, successive layers of Lias Clay and limestone and Triassic Mercia mudstone) and appear as springs on the surface.
- 13.3 These springs have been, and continue to be, at the centre of economic, social and cultural developments in the City. As such, their protection is of paramount importance locally and nationally.

### Local Policy

- 13.4 Bath was, charged with responsibility for the Hot Springs in a Royal Charter of 1591 granted by Elizabeth I – this duty passed to Bath & North East Somerset Council who are responsible for the protection of the Hot Springs in Bath. The Springs are protected by Section 33 of the County of Avon Act 1982 which specifies three control zones within which the depths of excavations is controlled.
- 13.5 As the Bath Hot Springs are inextricably linked with the World Heritage Site, Core Strategy Policy B4 applies to their general protection. Policy PCS8 seeks to ensure that both the quality and quantity of the groundwater source is protected from development that is likely to have any adverse effect on this resource. It is also important to have this policy in place should the Council receive any planning applications energy mineral exploration and extraction which may impact on Hot Springs and their sources (see Policy M5).

### Key Issues

- 13.6 The current policy accords with national and local strategies, however, amendments could be incorporated to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. Inscribed on the World Heritage List on the 24<sup>th</sup> July 2021.

## **Evidence Base**

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

- Bath & North East Somerset Strategic Evidence Base
- County of Avon Act 1982 - section 33

## **Further Work Required**

- 13.8 As set out above amendments required to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing.

## **Policy Approach**

- 13.9 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to take account of the second UNESCO World Heritage Site inscription.

- Advantages – Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Proposed amendments update it in respect World Heritage Site inscription.
- Disadvantages – None identified.