

BATH AND NORTHEAST SOMERSET COUNCIL LOCAL PLAN PARTIAL UPDATE OPTIONS CONSULTATION – 12 FEBRUARY 2021

RESPONSE BY EAST HARPTREE PARISH COUNCIL TO POLICIES RESPONDING TO C&NE

CONSULTATION REFERENCE	CORE AND DEVELOPMENT MANAGEMENT POLICY OPTIONS	EAST HARPTREE PARISH COUNCIL RESPONSE	COMMENTS
<p>DM1 Amending and updating/replacing Policy CP2 and SCR1 Residential Development - Net Zero Carbon Construction Policy</p>	<p>New Build Option 1 – If the Future Homes Standard is not implemented</p> <ul style="list-style-type: none"> • A minimum operational CO2 emissions reduction of 10% through fabric performance from a baseline of Building Regulations Part L 2013 • A minimum operational CO2 reduction of 35% through on-site renewable energy • Then offset remaining operational emissions that can't be mitigated on site through a financial contribution. <p>Option 2 – If the Future Homes Standard is implemented as proposed If the Future Homes Standard is brought forward, then it is proposed that the new Part L requirements are used as a starting point delivering net zero carbon construction.</p> <p>The policy would require the higher fabric standards set out in the Future Homes Standard 2025, with the remainder of the carbon emissions mitigated through renewable energy. Any remaining emissions that cannot be mitigated onsite could be offset through financial</p>	<p>SUPPORT <u>OPTION 2</u></p>	<ol style="list-style-type: none"> 1. Regardless of whether the Future Homes Standard is adopted during progress of Local Plan Partial review, the policy can and should require regulated carbon emissions to be reduced by 20% from a baseline of Part L (ref: January 2021 government response to the Future Homes Standard consultation, to allow LPAs to set higher than Building Regulations Standards – details to be confirmed). 2. This requirement would help to set the direction of travel for all new residential development in the District to achieve higher fabric standards from the proposed date of Partially Revised Local Plan adoption in 2022, rather than delay compliance until adoption of the new Local Plan later in the 2020s. 3. Urge the Council to use its influence to press government to: <ul style="list-style-type: none"> • bring forward delivery of the Future Homes Standard to 2023 (rather than 2025); and • set a requirement for embedded 100% reduction in carbon emissions (rather than 75 – 80%). These changes would enable the next Local Plan to embed realistic targets to achieve zero carbon from all new residential development in accordance of the Council's declaration of a Climate and Nature Emergency.

	<p>contributions, to achieve net zero carbon in operation.</p> <p>For both options, the <i>Passivhaus Plus</i> standard will be considered as an alternative route to policy compliance.</p>		
<p>DM2 New Build Non-Residential Development Amending and updating/replacing Policy CP2 and SCR1 Non-residential development</p>	<p>Proposed policy would use an energy hierarchy to achieve zero carbon as follows:</p> <ul style="list-style-type: none"> • A minimum reduction of 15% through fabric performance • A minimum reduction of 35% through on-site renewable energy • Then offset what can't be mitigated on site through a financial contribution <p>A policy to require major development with 1,000m2 or more non-residential floorspace to achieve BREEAM Excellent Standard is being considered.</p> <p>Heat and cooling hierarchy</p> <p>For both residential and non-domestic buildings, a heat and cooling hierarchy policy will be considered, as follows:</p> <ol style="list-style-type: none"> 1. Development will be expected to minimise demand for heating, cooling, hot water, lighting and power through building and site-level measures. 2. Residual heat and cooling demand is expected to be met using renewable heat sources whilst complying with District Heating Policy CP4. 	<p>SUPPORT PROPOSED POLICY</p>	<ol style="list-style-type: none"> 1. Policy proposals under DM2 are welcomed as a first step to set a trajectory to decarbonise new build non-residential development. 2. Planning policies that are currently in preparation will be core to meeting net zero emissions by 2050, so policies to promote and support the clean energy transition need to be as ambitious as possible now, rather than delay refinement until adoption of the next Local Plan. 3. Urge the Council to use its influence to seek highest possible standards in its response to the current Government Consultation on the Future Buildings Standard (ref: MHCLG, 2nd stage of two-part consultation January 2021). 4. Notwithstanding lack of certainty about future national standards, the Partial Review process should aim to achieve best possible future proofing policy content now, using supporting text and/or SPD to promote development of efficient non-domestic buildings which use low-carbon heat.

<p>DM3 Amendments to Policy CP1 Retrofitting Existing Buildings</p>	<p>POLICY CP1: Retrofitting Existing Buildings <u>Option 1</u> - Introduce a requirement that regulated carbon emissions are reduced by 10% from a baseline of Part L <u>through use of renewable energy</u>. <u>Option 2</u> - Introduce a requirement that regulated carbon emissions are reduced by 20% from a baseline of Part L <u>through use of renewable energy</u>.</p> <p>The above policies could continue to apply to proposals for existing buildings, and the scale and type of proposal covered by the policy is being considered. Currently it is for development of a medium scale or higher (5 dwellings or 500m2).</p>	<p>SUPPORT OPTION 2</p>	<ol style="list-style-type: none"> 1. To future proof all buildings to perform to a net-zero standard, the highest possible requirement (20%) should be set for regulated carbon emissions from existing buildings. 2. It is unclear whether the requirement to reduce CO2 emissions by use of renewable energy means on-site renewables, or alternative purchase or networked opportunities? 3. To encourage a steady shift of consumer choice towards zero carbon emissions, and to avoid market inequality, the scope of the policy should include smaller, medium and higher scale development.
<p>DM4 New Policy Whole Life Cycle Carbon Assessment</p>	<p>The use of a performance threshold to demonstrate reduction in the Whole Life Cycle carbon emissions of new buildings is being considered.</p> <p>Option 1: For all large scale major developments. Large scale major developments are defined as more than 50 dwellings, or 5,000m2 or more of floor space.</p> <p>Option 2: For all major development defined as 10 dwelling units, or 1000m2 or more of non-residential floor space.</p> <p>Measures that can be taken by smaller scales of development are also being considered.</p>	<p>SUPPORT PROPOSED POLICY</p>	<ol style="list-style-type: none"> 1. Welcome the new policy on addressing embodied carbon emissions throughout the entire life of a building, from construction through operation through to potential conversion/refurbishment and demolition. 2. Pending better understanding of building life cycle carbon emissions, no preference can be offered for options 1 or 2. 3. The primacy of capital costs in project viability assessment means that whole life carbon cost performance benefits fail to score equitably against standard costs, and this may compromise the Council’s ability to deliver this policy. 4. Therefore, as well as setting out the viability rationale for the new policy in supporting text to the policy, we urge the Council to engage Government and stakeholders in updating national FVA guidance to address embodied/whole life carbon reduction in the built environment.

<p>DM5 Amendments to Policy CP3: Renewable Energy</p>	<p>Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2029</p> <ul style="list-style-type: none"> • 110 MWe Electricity • 165 MWe (MW Thermal) <p>Development should also contribute to the need to balance electricity demand and supply in order to assist the transition to 100% renewable electricity. Proposals for grid balancing plant will be expected to follow the hierarchy below:</p> <ol style="list-style-type: none"> 1. Energy storage plant co-located with renewable energy generation plant 2. Freestanding energy storage plant <p>Balancing plant that increases the district's carbon emissions, for example those that burn fossil fuels such as gas will not be acceptable.</p>	<p>SUPPORT PROPOSED AMENDMENTS</p>	<ol style="list-style-type: none"> 1. Welcome the amended policy, the requirement for all development to contribute to demand and supply balancing, and the specific ban on fossil fuel generators. 2. Inclusion of supporting text stating the intention for the next Local Plan to increase required generation of renewable energy and heat to accord with the most up-to-date evidence base would help to prepare the market/raise ambition in the development sector.
<p>DM6 New Policy Emerging policy approach for harnessing wind energy</p>	<p>It is proposed that the policy framework for wind energy development should cover and address the following considerations:</p> <ul style="list-style-type: none"> • Proposals for wind energy development must lie within an area identified as being potentially suitable for this type of development (see options below)* • Community support for the scheme can be demonstrated and the material planning impacts identified by affected local communities can be adequately addressed • The proposal satisfactorily addresses impact on: <ul style="list-style-type: none"> • Residential amenity resulting from noise, vibrations, shadow flicker or visual dominance 	<p>SUPPORT</p>	<p>Welcome the setting out of process and considerations to be addressed by wind energy development in the District.</p> <p>In view of the fundamental need for onshore wind to be harnessed as part of the mix of renewable energy technologies that are/will be capable of supporting the transition to clean energy, and that social barriers to deployment are driven in part by lack of knowledge of technical considerations, clarification in Local Plan policy of the planning context for new and re-powered wind energy generation schemes is very helpful.</p>

	<ul style="list-style-type: none"> • Landscape character and visual impact including cumulative impacts • Landscape and scenic beauty of the Cotswolds and Mendip Hills AONBs • Historic environment including Bath World Heritage Site and its setting • Biodiversity and ecology • Highway safety and aviation • Wider environmental benefits outweigh any significant demonstrable harm to amenity • Applications for the replacement and re-powering of existing wind turbines within the district will be considered, in line with the guidance in the NPPF. 		
<p>DM7 New Policy Harnessing wind energy</p>	<p>Option 1: Subject to assessment against the criteria set out in policy approach DM5 above allow wind turbines in moderate and less sensitive landscape areas: The study shows that by allowing turbines in landscape areas up to moderate impact would give the technical capacity for 209 MW of wind generated power (based on the analysis for medium size wind turbines).</p> <p>Option 2: Subject to assessment against the criteria set out in policy approach DM5 above allow wind turbines in Moderate-high and less sensitive landscape areas: This allows increase in land available for wind energy projects and therefore an increased technical capacity/potential level of power generation allowing turbines up to Moderate-High areas would increase the technical potential capacity for 584 MW (based on the analysis for medium size wind turbines).</p>	<p><u>SUPPORT OPTION 2</u></p>	<p>Deployment of wind energy generation is critical to national and local transition to clean energy and, therefore, to achievement of a decarbonised economy and resilience to the effects of the Climate and Nature Emergency.</p> <p>Option 2 is supported because it offers the optimum quantum of wind energy generating capacity in the District, with minimal unacceptable impact on landscape sensitivity.</p> <p>Additional points:</p> <ol style="list-style-type: none"> 1. It would be helpful to add, at least, supporting text to the new policy to outline key technical/operational considerations governing site selection for wind turbines, and preferably a fresh renewable energy generation SPD. Both need to explain that the greater aerodynamic efficiency of taller wind turbines means that fewer medium to larger size turbines are needed to deliver significantly more output than can be achieved by deployment of many smaller turbines.

	<p>In both options individual schemes/applications would need to be assessed and determined against a criteria-based policy as set out (ref DM5).</p>		<p>2. It is understood that the current update of the Landscape Sensitivity Analysis for Wind Energy Development in B&NES is likely to demonstrate no compelling reason why the current categories of landscape sensitivity to (Low, Moderate-low, Moderate, Moderate-high, High) have materially changed since the original LUC study. To ensure transparency and inspire public confidence, the updated report should be made public as soon as possible, and ideally before Examination of the Plan.</p>
<p>DM8 New Policy Electric Vehicle</p>	<p>Residential Development: Minor Residential Development</p> <p>Option 1a: For all dwellings with one or more dedicated parking space or garage passive infrastructure shall be installed to allow for the charging of electric vehicles.</p> <p>Option 1b: For all dwellings with one or more dedicated parking space or garage an active charger for the charging of electric vehicles will be installed.</p> <p>Residential Development: Major Residential Development</p> <p>Option 2a: For major residential development at least 20% of parking spaces shall have active charging facilities, and passive provision for all remaining parking spaces with the layout of the car park ensuring that all spaces can be easily activated with minimal disruption as demand increases.</p>	<p>SUPPORT OPTIONS 1a, 2a and 3a</p>	<p>1. It is recognised that transition of all powered modes of transport to use clean energy requires significant change in planning for placemaking.</p> <p>2. The new proactive policy for Electric Vehicles is welcomed as setting the baseline for a cultural shift and to flag to the development sector the imperative to deliver capacity for residents and users to adopt clean personal transport.</p> <p>3. The tension between framing the policy around technologies available now, and those yet to come to market, is recognised, and options 1a, 2a and 3a are supported as pragmatic approaches to uncertainty. This approach needs to be carried forward to the next Local Plan and supporting text is needed to set out how the policy will be kept under review to stay abreast of technological developments.</p> <p>4. Clarity is needed on how development management will deal with uncertainty of grid availability, particularly when information on future grid infrastructure deployment by WPD is absent, or when proposed development comes forward within the Plan period, but ahead of committed local grid investment.</p>

	<p>Option 2b: For major residential development 100% active charging shall be installed.</p> <p>Where off street parking is not provided and parking is provided on street within a development proposal, the design and layout of the development should incorporate infrastructure to enable the on street charging of electric vehicles.</p> <p>Non-residential Development</p> <p>In all non-residential developments providing 1 or more car parking bays, passive infrastructure shall be installed to enable provision of charging facilities for electric vehicles.</p> <p>Option 3a: Where 10 or more car parking bays are provided, at least 20% of those bays to provide active charging facilities for electric vehicles, and passive provision for all remaining bays.</p> <p>Option 3b: In non-residential development where parking bays are provided, 100% active charging shall be installed.</p> <p>Grid Capacity</p> <p>Where an applicant is seeking to argue that local grid infrastructure cannot accommodate additional charging the applicant must submit evidence from Western Power Distribution to demonstrate that this is the case.</p>		
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<p>DM9 Amendments to Policy NE3: Sites, Species and Habitats</p>	<p>1 Development that would adversely affect, directly or indirectly, internationally or nationally protected species and/or their habitats <u>irreplaceable habitats</u>, will not be permitted.</p> <p>2 Development that would adversely affect, directly or indirectly, <u>Internationally or Nationally Important Sites or Species and/or their habitats</u> will not be permitted except in exceptional circumstances where:</p> <p>a there is no alternative solution; and,</p> <p>b there are imperative reasons of overriding public interest for the development; and,</p> <p>c mitigation measures can be secured to prevent any significant adverse effect on the site, <u>including retention of existing habitat and vegetation in situ; replacement habitat creation and bespoke measures.</u></p> <p>3 Development which that would adversely affect, directly or indirectly, other species, habitats or features of biodiversity/ geodiversity importance or value <u>will not be permitted unless only be permitted in the following cases:</u></p> <p>a for Sites of Special Scientific Interest, where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the</p>	<p>SUPPORT PROPOSED AMENDMENTS</p>	<ol style="list-style-type: none"> 1. Welcome the clarity provided by the amended wording of Policy NE3, the specific requirements for evidence-based development impacts assessment, for intelligent, relevant and bespoke mitigation and compensation, and the promotion of Biodiversity Net Gain. 2. Further definition of the meaning and context of the term 'irreplaceable habitats' is needed to avoid risk of confusion and/or challenge of evidence base, particularly as sites listed under clause 2 are, by definition, irreplaceable. 3. It will be helpful to both development and nature conservation sectors if the anticipated supporting SPD on Biodiversity Net Gain includes guidance on how sites, species and habitats policy can be coordinated in the practical development context with supporting biodiversity links across the wider countryside eg. via Ecological Networks and Green Infrastructure. (ref: Policies NE1, NE5 & CP7). 4. There is often a gap between the scope and quality of ecological impact avoidance, mitigation and enhancement strategies promised by planning applications, and what is actually delivered on the ground. An additional to clause 4 of the policy, to where appropriate require supervision of implementation of mitigation/compensation/enhancement works by an appropriately qualified or experienced Ecological Clerk of Works, would help to drive effective delivery of the revised policy. This comment also applies to Consultation Ref DM10, amendments to Policy NE5: <u>Ecological Networks and Nature Recovery</u>
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	<p>national network of Sites of Special Scientific Interest;</p> <p>b a for Sites of Nature Conservation Importance; Local Nature Reserves, Regionally Important Geological/ Geomorphological Sites and other sites of equivalent nature conservation value, <u>where material considerations are sufficient to outweigh the local biological geological / geomorphological and community/amenity value of the site; where impacts have been minimised; where there are opportunities to replace and/or offset the loss; and where the test of 'No Satisfactory Alternative (including do-nothing) have been met;</u></p> <p>e b for UK Priority Species and UK Priority Habitats, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat <u>and where impacts have been minimised; where it can be demonstrated that it is possible to replace and/or offset the loss to at least equivalent or greater ecological value; and where the test of No Satisfactory Alternative (including do-nothing) have been met;</u></p> <p>e c for locally important species and habitats, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat;</p> <p>e d for features of the landscape such as trees, copses, woodlands, grasslands, batches, ponds, roadside <u>and grass verges</u>, veteran trees,</p>		
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	<p>hedgerows, walls, orchards, and watercourses and their corridors if they are of amenity, wildlife, or landscape value, or if they contribute to a wider network of habitats, where such features are retained and enhanced unless the loss of such features is unavoidable and material considerations outweigh the need to retain the features.</p> <p>4 In all cases:</p> <p>a Firstly, any harm to the nature conservation value of the site is minimised; and</p> <p>b secondly, compensatory provision of at least equal nature conservation value is made for any outstanding harm, and</p> <p>c Thirdly, ecological enhancements are made <u>Biodiversity Net Gain will be delivered and managed in perpetuity (minimum of 30 years) through the appropriate means, for example legal agreement.</u></p> <p>d Then, as appropriate:</p> <p>i Measures for the protection and recovery of priority species are made.</p> <p>ii Provision is made for the management of retained and created habitat features.</p> <p>iii Site lighting details are designed to avoid harm to nature conservation interests; including habitat</p>		
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	connectivity and function as part of an ecological corridor.		
DM10 amendments to Policy NE5: Ecological Networks and Nature Recovery	<p>Development proposals will be expected to demonstrate that a positive contribution will be made to ecological networks Nature Recovery Networks as shown on the Policies Map <u>and for maintaining or creating local ecological networks</u> through habitat creation, protection, enhancement, restoration and/or management.</p> <p>The planning policies and Policies Map will be updated to reflect nature recovery networks which will replace ecological networks mapping.</p>	SUPPORT PROPOSED AMENDMENTS	<p>Welcome the explicit requirement for development to support local ecological networks and Nature Recovery Networks.</p> <p>We understand that the Council intends to support the partial update of the Local Plan with an SPD on Biodiversity Net Gain.</p> <p>In recognition of the reliance on the Development Management process for robust delivery, the SPD needs to give clear technical guidance for developers, their agents, and communities on required practice to safeguard and enhance ecological networks through the development process and the lifetime of the development.</p> <p>See also comment on Minor Amendment to Policy CP6, Environmental Quality, below.</p>
DM11 New Policy for Biodiversity Net Gain	<p>It is proposed to introduce a new policy requiring biodiversity net gain within development. It is proposed to consult on the policy options set out below (subject to viability testing). The application of these requirement options to different types of development (e.g. major and minor development proposals, brownfield sites etc) will be considered further in preparing the Draft Plan in light of government guidance.</p> <p>Option 1: Development will only be permitted where a Biodiversity Net Gain of at least 10% is demonstrated and secured in perpetuity (at least 30 years) subject to other requirements as set out below.</p>	SUPPORT OPTION 2 PENDING FURTHER INFORMATION ON POTENTIAL FOR AND IMPLICATIONS OF OPTION 3.	<p>Welcome inclusion of a specific policy to address delivery of mandatory Biodiversity Net Gain via the development process, and the detailed scope of the policy which will help to secure delivery of robust evidence to inform decisions on proposed development.</p> <ul style="list-style-type: none"> • Support improving the consistency of delivery and the scope of Biodiversity Net Gain by increasing the quantum to 15%, ie beyond the minimum 10% likely to be required by the new Environment Bill. • Support the flexibility to use either the DEFRA or other agreed equivalent (eg Natural England) metric. • Strongly support requirement that a suitably qualified and/or experienced ecologist undertakes the assessment. • Support the requirement for a 30-year management plan. <ul style="list-style-type: none"> • Given the potential for dynamic change and local alterations in land management to influence site ecology,

	<p>Option 2: Development will only be permitted where a Biodiversity Net Gain of 15% is demonstrated and secured in perpetuity (at least 30 years) subject to other requirements as set out below.</p> <p>Further policy requirements applying to both options for consultation under this policy are proposed as follows:</p> <p>a) The latest DEFRA metric or agreed equivalent is used to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation</p> <p>b) That the assessment be undertaken by a suitably qualified and/or experienced ecologist and is submitted together with baseline and proposed habitat mapping in a digital format with the application</p> <p>c) A 30 year management plan is submitted detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved</p> <p>d) Any off-site habitats created are well located to maximise opportunities for local nature recovery</p> <p>Option 3: Subject to government guidance consider bespoke local Biodiversity Net Gain requirements for brownfield sites and householder applications.</p>		<p>the policy should include provision for monitoring delivery of the Management Plan, for applying remedial actions, and allocating sources of expertise and funds as required to ensure delivery.</p>
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<p>DM12 Amendments to Policy CP7 Green Infrastructure</p>	<p>Green Infrastructure policy to include a designation as relates to the Bath River Line project. Work has been progressing on the Bath River Line: the project is to create a high quality, continuous 10km walking and cycling connection from Newbridge to Batheaston/Bathampton and to improve and better connect the green spaces along the route and manage it as one. The purpose of the designation would be to protect/safeguard the area from built development; to ensure opportunities are taken within development proposals coming forward in the area to plan for green infrastructure and connectivity; and to help identify & facilitate opportunities for the wider network (of GI corridors, footpath/cycle paths etc) to connect into it.</p> <p>View the Bath River Line on a map</p> <p>Also amend the policy to emphasise the benefits of green spaces for health and well-being.</p>	<p>SUPPORT PROPOSED AMENDMENTS</p>	<ol style="list-style-type: none"> 1. While welcoming the proposed amendments to policy CP7, it is important that biodiversity considerations in Green Infrastructure planning are not subsumed by demands for recreation and travel corridors. 2. Suitably qualified and/or experienced ecologist should be involved in drafting plans for and monitoring delivery of Green Infrastructure schemes, in and outside the context of site development, and priority given to the enhancement and creation of linear habitats based on ecological assessments.
<p>DM13 Amendments to Policy NE1 Development and Green Infrastructure</p>	<p>It is proposed to amend Policy NE1 to ensure that new development in making a positive contribution to the GI network ensures that links are made with active travel routes to help improve accessibility and to require that major development proposals are accompanied by a proposed network of GI that can be used for walking and cycling and other forms of formal or informal physical activity.</p>	<p>SUPPORT PROPOSED AMENDMENTS</p>	<p>Comments 1 and 2 above (Ref DM12) also apply to DM13.</p>
<p>DM29 Amendments to Policy ST1</p>	<p>It is proposed to strengthen this policy by adding the elements outlined below:</p>	<p>SUPPORT PROPOSED AMENDMENTS</p>	<ol style="list-style-type: none"> 1. Welcome that amended policy ST1 is closely aligned with Plan policy to decarbonise the built environment.

<p>Promoting Sustainable Travel</p>	<ul style="list-style-type: none"> • Requirement for development to be located where there are opportunities to travel by alternatives to private car usage, and with opportunities to reduce travel distance • Requirement for development design to support sustainable travel. This aims to enable schemes to be refused on the basis of poor transport design creating car dependency, rather than just not meeting highways design standards. • Sustainable transport opportunities to be available for first occupiers – early delivery. • Mitigation must maximise opportunities for mode shift before increasing traffic capacity. • Opportunities for low-carbon, last mile goods deliveries – dependent on scale/location of development. 		<p>2. Taken together, the proposed additional policy elements offer a robust framework for development to deliver genuine sustainable travel options.</p>
<p>DM31 Amendment to Policy ST2A Recreational Routes</p>	<p>The policy currently refers to former railway land being safeguarded for sustainable travel routes. It is proposed that the wording is amended to widen the scope to include other land to be safeguarded for this purpose and for the relevant land/routes to be shown on the Policies Map. E.g. North Keynsham multi-modal corridor.</p>	<p>SUPPORT PROPOSED AMENDMENT</p>	<ol style="list-style-type: none"> 1. Welcome the proposed widening of scope to include opportunities for linear and other recreational routes. 2. It is important that biodiversity considerations in route planning are not subsumed by demands for recreation and travel corridors. 3. Suitably qualified and/or experienced ecologist should be involved in drafting plans for Green Infrastructure schemes, to link with existing habitat networks both in and outside the development site, and priority given to the enhancement and creation of linear habitats based on ecological assessments.

<p>DM32 Amendment to Policy ST3: Transport Infrastructure</p>	<p>It is proposed to strengthen this policy by adding the elements outlined below:</p> <ul style="list-style-type: none"> • Infrastructure to be planned and designed promoting mode shift to sustainable transport as a priority over traffic capacity. • Schemes which increase traffic capacity must demonstrate that opportunities to achieve mode shift as an alternative solution have been exhausted. Such schemes must incorporate commensurate sustainable transport improvements. • Add LTN1/20 into the list of design guidance with which proposals should comply. 	<p>SUPPORT PROPOSED AMENDMENTS</p>	<p>Comments 1 and 2 above (Ref DM29) also apply to DM32.</p>
<p>DM33 Amendment to Policy ST5 Traffic Management Proposals</p>	<p>It is proposed that this policy should be amended by adding requirements that reflect the Council's Liveable Neighbourhoods Strategy. These additional requirements will:</p> <ul style="list-style-type: none"> • Create attractive places to enhance sense of community, health and wellbeing through re-balancing space towards people and away from vehicles. • Achieve mode shift through discouraging short car journeys and prioritising walking and cycling. • Support people with restricted mobility. • Reduce on-street non-residential parking and provide opportunities for EV charging, car clubs, social spaces and improved walking and cycling routes. • Retain vehicular access for residents and businesses, and 	<p>SUPPORT PROPOSED AMENDMENT</p>	<p>Comments 1 and 2 above (Ref DM29/DM32) also apply to DM33.</p>

	<ul style="list-style-type: none"> Be implemented on a trial basis to enable changes to be made in consultation with the council and community. 		
DM34 Amendment to Policy ST6: Park & Ride	<p>It is proposed to change the policy to:</p> <ul style="list-style-type: none"> Change the emphasis from ‘traditional’ park and ride to develop a new model of “interchange” a multi modal connection with opportunities for e-car hire, e-bike hire, access to the countryside, community gain such as solar canopy, alternative uses for social gain outside of peak usage e.g. farmers markets, cafés, pop up venues and festivals all to be explored. A multi modal site, not just car to bus. Add the requirement to demonstrate that the most suitable and sustainable available site(s) has been selected. To expand the requirement to assess traffic impact in order that it also includes assessment of transport benefits. 	SUPPORT PROPOSED AMENDMENT	<ol style="list-style-type: none"> Comments 1 and 2 above (Ref DM29/DM32/33) also apply to DM33. As a rural community East Harptree is very poorly served by reliable and affordable public transport. The policy SR6 amendments seem to apply mainly to users accessing the countryside, rather than rural residents trying to make essential journeys into service centre towns (Bath, Keynsham, Midsomer Norton, Radstock, Bristol) and larger villages. Urge the Council to engage with government and public transport stakeholders to interrogate ways of addressing this imbalance. While this is not a material consideration for the Local Plan process (the partial update and future new Plan preparation), lack of public transport in the southern area of B&NES District is a major barrier to reducing reliance on carbon emitting travel modes, and therefore tackling the Climate and Nature Emergency, particularly for those who are unable to invest in EV and other clean energy travel options.
DM35 Amendment to Policy ST7 Transport Requirements for Managing Development	<p>It is proposed to change the policy by:</p> <ul style="list-style-type: none"> Strengthening the requirement for development to offer genuine travel choice through opportunities to travel sustainably Requiring that transport improvements and/or mitigation maximise sustainable travel opportunities 	SUPPORT PROPOSED AMENDMENT	<p>Welcome that amended policy ST7 supports Plan policy to decarbonise travel. Removal of Parking Standards from the policy, and defining them in a new SPD, will add clarity and weight to plan policy.</p>

	<ul style="list-style-type: none"> Removing Parking standards from the Policy and defining them in a new Parking SPD (which will be referred to in the policy) 		
MINOR AMENDMENTS			
POLICY CP5: Flood Risk Management	Minor amendment should cross refer to and ensure that Green Infrastructure benefits are delivered through flood risk management approach.	SUPPORT PROPOSED AMENDMENT	<ol style="list-style-type: none"> Welcome the broadening of purpose required of the flood risk management approach to include Green Infrastructure benefits. The current SPD that supports Policy SU1 is very dated and includes minimal reference to Green Infrastructure. It would therefore be helpful to include reference within supporting text to amended policy CP5 and to note ways that FRAs can steer GI benefit into development.
POLICY SU1: Sustainable Drainage	Amendment to require provision of multi-functional SUDS (sustainable urban drainage systems), also acting as Green Infrastructure (multiple benefits)	SUPPORT PROPOSED AMENDMENT	<ol style="list-style-type: none"> Welcome the broadening of purpose required of SUDS, moving from traditional drainage engineering function to include Green Infrastructure benefits. The current SPD that supports Policy SU1 is very dated and includes little technical guidance on goals for biodiversity gain. It would therefore be helpful to include reference within supporting text to amended policy SU1 to how to integrate nature-based solutions, ecological gain and Green Infrastructure within SUDS, as opportunities to set site development in the functional context of the local GI network. It is regrettable that the proposed amendment does not include any mechanisms for monitoring the effectiveness of SUDS development delivery.
POLICY CP6: Environmental Quality	Amend section 4: Nature Conservation: Update to policy to reference measurable	SUPPORT PROPOSED UPDATE	<ol style="list-style-type: none"> We understand that the Council intends to support the partial update of the Local Plan with an SPD on Biodiversity Net Gain.

	biodiversity net gain requirements and nature recovery networks	(see also comments on DM10, above)	<p>2. It is hoped that this SPD will:</p> <ul style="list-style-type: none"> include a presumption in favour of development which safeguards and enhances natural assets and Green Infrastructure networks across the District; and commits B&NES Council to proactively work with partners in the development of a new co-ordinated Ecological Networks Map (Nature Recovery Network) for the District that covers at least 30% of its terrestrial environment; and note the intention that the new network will be adopted and implemented throughout West of England and other adjacent authorities Development Plans and LEP Plans; and include clear technical guidance for developers, their agents and parish and town councils on best practice to safeguard and enhance ecological networks through the development process.
POLICY D4: Streets and Spaces	<p>Development proposals must be well connected, in particular section h:</p> <p>Street trees and green spaces should contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. <u>All new streets should be lined with trees, wherever possible.</u></p>	SUPPORT PROPOSED AMENDMENT	<p>Welcome the explicit requirement to line new streets with trees.</p> <p>Notwithstanding that there may be particular circumstances when it is genuinely not possible to line streets with trees, it is hoped that appropriate guidance will be prepared via SPDs to ensure that every reasonable effort is made by developers to reduce technical constraints to tree planting in new streets and green spaces to an absolute minimum.</p>
POLICY D8: Lighting	<p>Development will be expected to reduce or at best maintain existing light levels to protect <u>retain or improve the darkness of rivers, watercourse or other ecological corridors in particular to protect or provide a functional dark route for European protected species. New lighting facilities with light spill to these features must be dimmable.</u> <u>Lighting must be designed in relation to protection of wildlife habitats, including B&NES 2018</u></p>	SUPPORT PROPOSED AMENDMENT	<p>Welcome that the amended policy explicitly requires positive effort to retain or improve lighting design and management within the development process to safeguard habitats and species integrity.</p> <p>Given the importance to nature recovery of robust implementation of amended policy D8, it is regrettable that the proposed amendment does not include any mechanisms for monitoring and reporting the effectiveness of delivery of</p>

	<u>Waterspace Design Guidance and Bats and Lighting in the UK (ILP, 2018).</u>		development in compliance with the policy. Systematic reporting would also enable sharing of experience and knowledge useful to inform future development.
POLICY NE2: Conserving and Enhancing the Landscape and Landscape Character	Add new section 4: <u>Great weight will be afforded to conserving and enhancing landscape and scenic beauty within nationally designated Areas of Outstanding Natural Beauty (AONBs) and their setting, with particular reference to their special qualities.</u>	SUPPORT PROPOSED AMENDMENT	Welcome new section 4, which will support the local community's confidence that planning applications will be carefully tested against the purpose of the Mendip Hills AONB designation, all the same as addressing the national policy presumption in favour of sustainable development.
POLICY NE6: Trees and Woodland Conservation	Amend section 3 as follows: Development proposals directly or indirectly affecting ancient woodland and ancient trees or veteran trees will not be permitted.	SUPPORT PROPOSED AMENDMENT	Delighted that Policy NE6 has been brought into the scope of the Partial Review of the Local Plan. The proposed amendment to section 3 text adds clarity that veteran trees must be protected against development impacts, wherever they are located. Given the importance of hedgerows to nature recovery and habitat connectivity at landscape scale, and the devastating impact of Ash Dieback on the Mendip landscape and ecology, it is regrettable that the proposed amendment does not include measures to specifically safeguard hedgerow trees of ecological importance if they are not ancient/veteran.
POLICY CP7: Green infrastructure	It is proposed to amend the policy to provide clarity on policy implementation to support green infrastructure delivery.	SUPPORT PROPOSED AMENDMENT	Welcome the proposal to provide clarity on policy implementation to support green infrastructure delivery. Whether this is achieved via supporting text in the revised local plan, or via SPD, it is hoped that it will include: <ol style="list-style-type: none"> 1. revision and updating of the out-of-date 2013 Green Infrastructure Strategy; and 2. coordination with the Local Plan Policies Map to coordinate relevant features and habitats that provide ecological connectivity at countryside scale (i.e Ecological Networks Map, GI Network Plan and Strategic Infrastructure Corridor through Rural Areas Plan); and

			<p>3. in the parish of East Harptree, addition to the Plans of protected ancient woodlands (The Grove & Buckley Wood) form part of the Ecological network in the south of the parish.</p>
ADDITIONAL COMMENTS			
Policies which will be unchanged			
<p>POLICY D5: Building Design</p>	<p>Building Design Development proposals must be well detailed, in particular:</p> <p>a Building facades, reveals and entrances must be well designed, all elevations must be well articulated and an appropriate building line and/or boundary treatment should be maintained</p> <p>b Building frontages should face and relate to the public realm, and should define the street</p> <p>c Extensions must complement and enhance the host building</p> <p>d Good modern, innovative design is supported. Historical styles are likely to be considered appropriate where the development is re-unifying lost compositions</p> <p>e Buildings and spaces should be designed to provide new or improved wildlife habitats and features (e.g. spaces for swifts and swallows; bat bricks; new hedgerows and other green infrastructure)</p>	<p>REGRET OMISSION FROM PARTIAL REVIEW</p>	<ol style="list-style-type: none"> 1. It is regrettable that the opportunity offered by the Partial Review of the Local Plan has not been used to revise Policy D5 to accord explicitly with the overall Plan Strategy to decarbonise development. 2. Development Management professionals have considerable experience of dealing with planning applications that are ‘not quite bad enough’ to recommend refusal. Planning policy is a vital tool for driving up ambition and standards to secure development that is designed to be resilient to the impacts of climate change. 3. Whilst the policies of the partially revised Local Plan must be taken as a whole, omission of Policy D5 from the Partial Review allows developers to continue to construct new homes and buildings that fall below anticipated standards, encouraging persistence of a ‘business as usual’ approach to design in new development. This will delay delivery of higher sustainability standards in placemaking until adoption of the next Local Plan (potentially the mid-2020s). 4. As such, it would be helpful for Policy D5, and its successor policy in the new Local Plan, to include a specific requirement for design, from the outset, to consider building scale, design and materials in the context of future proofing for climate change resilience.