

Inspector’s Matters, Issues and Questions Matter 4

1. Introduction

1.1 At day 2 and 4 of the Examination hearings the Inspector requested dialogue between the Council and relevant participants with regards to the Council’s proposed modifications to policies SB8 (BWR), SB18(RUH), SB24 (Sion Hill), SB25 (St Martin’s Hospital) KE3C(Keynsham East) and KE3D(Keynsham East), to provide the final position on the areas of agreement and disagreement. The participants with whom the Council has corresponded comprise:

- St Williams -Policy SB8(Bath Western Riverside)
- RUH Trust – Policy SB18(RUH)
- Lansdown Crescent Residents Association – Policy SB24 (Sion Hill)
- Bath Spa University and Lansdown Crescent Residents Association – Policy SB24 (Sion Hill)
- HS Property Services - Policy SB25 (St Martin’s Hospital)
- Rocke Associates – Policy KE3C (Keynsham East)
- Boyer Planning – Policy KE3D (Keynsham East)

1.2 The modifications proposed by the Council are included in the Council’s schedule of proposed main modifications. The table below sets out areas of agreement and disagreement with relevant participants.

• **Additional and new text** proposed to the submitted Plan in **Bold** and underlined
 • ~~Deleted text~~ proposed to the submitted Plan in **Bold**, underlined and ~~strike through~~
 (Submitted LPPU changes are shown in **Bold**, text)

Policy SB8 and supporting text

Council’s amendments	Response by St Williams (identifying areas of agreement/disagreement)
<p>152d. The second phase of the Bath Riverside development offers great potential to further deliver sustainable connections through the site and with the wider area to the benefit of the city. The route of the former railway line that runs through the site and westwards through the Newbridge Riverside Policy area to connect to the Bristol Bath Railway Path (BBRP) is safeguarded as a Sustainable Transport Route. The delivery of this route through this site is a key requirement. It is</p>	<p>Disagree.</p> <p>St Williams: Our position on this matter remains unchanged. We do not support the inclusion of any reference to a grade separated crossing. It is unevidenced, unjustified, and therefore unsound.</p>

<p>also a requirement to provide a direct, well-aligned and high quality crossing over Windsor Bridge Road and to deliver an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists and to link the site with the BBRP. <u>The Council considers that the optimal solution for encouraging cycling and active travel is likely to be a grade separated crossing of Windsor Bridge Road, but recognises that further work is required on the feasibility of both at grade and grade separated options. Given the significant potential strategic active travel benefits of a grade separated option, it is important that this is fully investigated at the Development Management stage, including ensuring availability of land required on the Bath Gasland for the preferred option.</u></p>	
<p><u>Collectively, across the entire SB8 area, development proposals will:</u></p>	<p>Agree</p>
<p>1 Deliver <u>high density</u> residential development of around 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.</p>	<p>Agree</p>
<p>2. Deliver <u>a Primary School</u>, an early years facility and a new community hub with communal facilities to promote healthy lifestyles and community cohesion.</p>	<p>Agree</p>
<p>4 Ensure that new streets and spaces throughout the area are implemented by the developer/s and are to be in accordance with the relevant typology as set out in the Bath Pattern Book.</p>	<p>Agree</p>
<p>5 Be required to provide a comprehensive Transport Assessment to assess the transport requirements of development proposals. This will need to include a traffic impact assessment modelling the effects of additional transport demand on the Upper Bristol Road and Lower Bristol Road corridors and additional locations to be agreed with the Local Highways Authority. Development is to provide comprehensive on and off site transport infrastructure including, but not limited to:</p> <p>c. Low car development will be supported and must be accompanied by high quality sustainable transport alternatives to car usage and ownership, including <u>integrating with emerging Metrobus /</u></p>	<p>Agree</p>

<p>Mass Transit proposals and providing access to electric car club vehicles.</p> <p>d. Provide a level of car parking consistent with that has regard to the standards set out in the Council’s Transport & Development SPD, with any departure from these standards robustly justified on the basis that proposals are an exemplar for sustainable travel.</p> <p>g. Deliver the Sustainable Transport Route from east to west across the site. This is required to:</p> <p>iii. Ensure the delivery of deliver a direct, well-aligned and high-quality pedestrian and cycle crossing over of Windsor Bridge Road to that connects to the former railway bridge over the river and to the Bath Riverside Site. <u>This must include provision of a grade separated solution if feasible, and the dedication of any land to safeguard its future implementation. Development proposals must demonstrate that they do not preclude the delivery of a grade separated solution. Development must provide contributions to the delivery of local connections and at-grade crossings improvements.</u> Modelling will be required to demonstrate the effects of interaction with existing junctions.</p> <p>v. Integrate with emerging Metrobus / Mass Transit proposals. Design of the route should support Mass Transit proposals as they emerge, which may involve direct usage of the route by the Mass Transit scheme.</p>	<p>Agree</p> <p>Disagree</p> <p>St Williams: Our position on this matter remains unchanged. We do not support the inclusion of any reference to a grade separated crossing. It is unevidenced, unjustified, and therefore unsound.</p> <p>Disagree</p>
<p>6 Retain and enhance green infrastructure and habitats along the riverside edge <u>where possible</u>, providing a biodiversity led approach towards the treatment of this area. Built form shall be set back from the existing retained riverside habitat infrastructure by a buffer of at least 10 metres <u>where feasible</u>. This buffer could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes <u>where feasible</u>. Built form must respond appropriately to this habitat buffer.</p>	<p>Agree</p>
<p>8 Provide and implement a bird and bat enhancement strategy to deliver a minimum of 20 nest or roost site per apartment block, in the form of integrated bird and bat boxes within new</p>	<p>Agree</p>

<p>buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.</p>	
<p>13 Not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints as set out in the WHS Setting SPD; and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response and to influence the height, massing and design of buildings. The Bath Building Heights Strategy (BBHS) should be used as part of the evidence base and the starting point for this analysis which must also include a detailed Landscape and Visual Impact Assessment (LVIA). The BBHS identifies this site as being within zone 3 – the Valley Floor and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.</p>	<p>Agree</p>

Policy SB18 (RUH)

Council’s amendments	Response by RUH Property Services (identifying areas of agreement/disagreement)
<p>214. The Trust’s ongoing priorities in updating the Estate Strategy are to provide fit for purpose accommodation to meet the clinical and operational needs, demolishing unsuitable and outdated buildings, improving the sustainability of the Estate, and co-locating functions to cluster complementary uses. delivering a parking strategy that will improve on-site parking, improving wayfinding throughout the site, reducing off-site parking impacts and encouraging the use of sustainable modes of travel. B&NES will work collaboratively with the Trust on this Estates Strategy with a view to achieving a mutually agreeable outcome and including reference to it in the new Local Plan.</p>	<p>The Trust supports the change in wording to reflect Criteria 1 of SB18.</p>
<p>214a. To complement the Estates Strategy, the Trust will also develop a Sustainable Transport Strategy for the whole site that will reflect its commitment to being a sustainable organisation</p>	<p>The Trust supports the changes in wording from Sustainable Transport Masterplan to Sustainable Transport Strategy as proposed by the RUH. Further discussions with the Trust required in</p>

<p><u>that is fit for the future. In addition, and complementary to measures to reduce travel demand and travel planning, this will support the transition to the use of more sustainable modes of travel by identifying measures that improve safe and suitable active travel routes, and supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces. B&NES will also commit to working collaboratively with the Trust on this document.</u></p>	<p>respect of the scope of the Sustainable Transport Strategy as part of the Estate Strategy update.</p> <p>There is too much focus on physical schemes and interventions. This text needs to be re-focused to recognise the considerable opportunities offered by RUH organisational changes that <u>reduce the need to travel</u> to the Hospital e.g. reducing patient attendance through digital improvements, ‘health on the High Street’, patient triage, and online treatment and care; and reducing staff attendance through staff homeworking.</p>
<p>215. Central to delivering the Trust’s long term vision and objectives, <u>and complementary to the Sustainable Transport Strategy, is an approach that seeks to improve integrated parking solutions and car park management across the site and maximises the efficient use of land. It will also</u> <small>is an overarching car park strategy for the campus that improves the current parking, site efficiency and circulation arrangements across the site (numbers, rationalisation of car parks and sign posting) and supports the vision as set out in the 2014 Estate Strategy.</small> <u>Potential off-site parking impacts on adjoining residential areas should be analysed and addressed if appropriate, potentially through contributions to a Residents Parking Zone (RPZ). Parking for bicycles and cars should be provided with reference to the Transport and Developments SPD, for both residential and clinical uses.</u></p>	<p>Agree to insert ‘Strategy’ to Sustainable Transport Strategy.</p> <p>The Trust objects to the inclusion of RPZs within the text. These text changes proposed by B&NES simply add the previous Criterion 9 (objected to by RUH and now proposed to be deleted by B&NES) to the supporting text for para. 215. The Trust does not accept it is its role to fund, contribute or deliver RPZs (refer to Callidus Hearing Statement for our reservations about the effectiveness of RPZs). Also reference taken out in respect of the SPD which is not currently adopted.</p>
<p>215a Much has been achieved with the new visitor car park opening in 2016 and wider Trust initiatives including the Travel Plan encouraging changes to staff travel behaviour and modal shift. However, increases in staff, patient numbers, forecast population growth and associated healthcare service demands requires the site wide parking strategy, including the potential for decked car parking, to be reviewed as part of the Estate Strategy update Sustainable Transport Strategy. The Trust is continually assessing how best to improve access to site and implementing improvements, its ability to deliver significant modal shift is tied in significantly to the council strategy and approach. This is acknowledged by the council and a collaborative approach is to be taken.</p>	<p>The Trust agrees with this change of wording as proposed by the RUH.</p>

<p>1. The Council supports the improvement of this essential healthcare facility, including the principles and proposed building programme and proposals for car parking as set out in its Estate Strategy 2014. <u>The Council will work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal.</u></p>	<p>The Trust supports the proposed change in wording as proposed by the RUH to reflect supporting text and also Policy SB18 to be positively prepared demonstrating mutual objectives of the local planning authority and RUH (NPPF tests of soundness).</p>
<p><u>3a Development proposals will be required to align with the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&NES, and introduce measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriately.</u></p>	<p>Accept the first part of criteria 3a so there is a simple statement that development proposals should have regard to the STS and remove any details that presuppose the outcome of that work or are over-prescriptive in terms of details. Detailed requirements should be in the STS not the Policy Criteria. Both parties need to agree the content of the STS before it becomes a policy requirement.</p>
<p><u>Development proposals in the vicinity of the Manor House must:</u></p> <p>4. Be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area. The Grade II* Manor House and its setting will require an especially sensitive approach to ensure that its significance is taken into account and both enhanced and better revealed. A heritage-led and contextual approach is therefore required.</p>	<p>Agree</p>
<p><u>Add below to clause 5.</u></p> <p><u>5a. Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</u></p>	<p>Agree</p>
<p><u>7. Set out a sustainable transport master plan for the whole of the RUH site.</u></p>	<p>Agree</p>
<p>8. Examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate enhancements to ensure that the</p>	<p>Delete Criteria 8 entirely. The Trust maintains there is a lack of suitable justification for including the transport requirements set out in criterion 8.</p>

<p>walking and cycling are the natural choices for local trips. <u>Specific opportunities for investigation and delivery as necessary to support safe and suitable access to the proposed development should include, but are not be limited to, the following:</u></p> <p>a. Pedestrian improvements at the Weston Lane/Crown Road/High Street junction;</p> <p>b. Pedestrian crossing facilities at the Weston Lane/Combe Park junction;</p> <p>c. Cycle linkages with recently delivered LCWIP improvements through Weston Village; and</p> <p>d. Active travel linkages between the site and the Riverside Path to the south.</p>	<p>These are sustainable transport improvement that benefit the whole community in NW Bath, not just the RUH, and as such these are broadly supported by the Trust. What is lacking is an appropriate evidence base that directly links these schemes to the hospital and demonstrates they are necessary to make future development at the RUH acceptable in planning terms.</p> <p>On-site staff accommodation helps to retain staff at the RUH, and the Trust still needs to support staff with finding affordable key worker accommodation locally.</p> <p>The transport requirements set out in criterion 8 should be aimed at mitigating any identified traffic impacts with appropriate, proportionate and effective solutions. However, the RUH’s future development programme is yet to be determined and given this, we don’t see how impacts can be establish at this stage in the planning process. Therefore, it is the Trust’s view that the transportation requirements set out in criterion 8 are not effective and will not mitigate a recognised traffic impact directly linked to the RUH. Hence, they fail the tests for planning obligations set out in para. 57 of the NPPF.</p> <p>The Trust considers that criterion 8 is unnecessary because B&NES LPPU policies ST1, ST2A, ST3, ST7 and the Council’s Transport and Development Supplementary Planning Document (SPD) already provide suitable mechanisms for the assessment of active travel and sustainable transport requirements at the planning application stage.</p> <p>The Trust also challenges the effectiveness of seeking to deliver these schemes via the RUH site allocation. We would expect NHSEI, and other funding partners, to question the inclusion of transport infrastructure not directly related to the Hospital’s development proposals within any future funding bid. Indeed, their inclusion could negatively affect the Trust’s ability to secure new funding opportunities.</p> <p>At the Hearing the Inspector considered that criteria 8 was not justified and there was not a robust evidence base to support this highly prescriptive list of off-site works (refer to the Callidus Hearing Statement). The supporting</p>
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	<p>evidence base, the associated impact of development proposals and proposed mitigation would be agreed at the Development Management process through a planning application.</p> <p>The wording of criteria 8 therefore fails the test of soundness – not justified, not effective or consistent with national planning policy (i.e. NPPF, para 57 and tests for planning obligations).</p>
<p>9. Provide parking for bicycles and cars in line with the parking standards in the Transport and Developments SPD, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land. Contributions to a Residents Parking Zone (RPZ) may be required as part of parking solutions for the site.</p>	<p>Agree</p>

Policy SB24 Sion Hill

Council's amendments	Response by Lansdown Crescent Residents Association and Bath Spa University (identifying areas of agreement/disagreement)
<p>Amendments to supporting text at paragraph 220g.</p> <p>220g. The site is located in a highly sensitive hillside location, within the <u>City of Bath World Heritage Site, the Great Spa Towns of Europe World Heritage Site</u>, and Bath Conservation Area. The site has many layers of history prior to its development by Bath Spa University. There are known archaeological deposits in the area including Romano-British burials, an Iron Age site and the former site of St Winifred's Chapel and Well, the exact locations of which are not known. The site is the former ornamental landscaped garden of St Winifred's, a 19th century house built in 1803. There may be below ground remains of the property on site, and historic walls and railings survive in places around its perimeter. <u>Various Multiple Grade I, Grade II* and Grade II listed buildings are located in the immediate area neighbourhood surrounding the site. including Grade I listed buildings Somerset Place and Lansdown Crescent are located to the east.</u></p>	<p>Lansdown Crescent Residents Association agree with this modification.</p> <p>Bath Spa University does not have any specific comments regarding this modification.</p>

<p><u>Lansdown Crescent is identified in the Bath World Heritage Site Statement of Outstanding Universal Value as an important example of a site which unifies urban and natural landscapes. Grade I listed Sion Hill Place is located to the north. Grade II* listed building Summerhill is located to the north of the site, and Grade II* listed Doric House is located to the south. In addition to this site allocation policy, proposals for development will be considered against other relevant policies in the Plan, including Policy HE1 (Historic Environment).</u></p>	
<p>Add new paragraph after 220k.</p> <p><u>220l. The area sits within an area of Bath which is currently undergoing consultation relating to Liveable Neighbourhoods. The aim of the scheme is to reduce the dominance of vehicles in residential areas while maintaining vehicle access to homes and businesses. It seeks to reduce traffic flows overall by making walking and cycling easier and more attractive than undertaking short trips by car. Liveable Neighbourhoods will look at the area as a whole, including through co-design with the local community, when considering the effects of changing routes available to traffic. The proposed development will have a role to play in facilitating, enabling and contributing to the Liveable Neighbourhood scheme for the Lower Lansdown area, and should not prejudice the Liveable Neighbourhood process or its objectives.</u></p>	<p>Lansdown Crescent Residents Association agree with this modification.</p> <p>Bath Spa University does not have any specific comments regarding this modification.</p>
<p>Amendment to policy SB24, criterion 9:</p> <p>9. Provide a comprehensive network of walking and cycling public access routes through the landscaped gardens as broadly illustrated on the concept diagram. These will need to be designed to respect the landscape and historic sensitivity of the site. Vehicle and active travel access will need to be segregated. Development proposals will be expected to enhance the pedestrian and cycle environment for north-south movements, broadly along the alignment of Winifred’s Lane at the eastern side of the site. This is likely to be through providing a route within the site, which is likely to require the relocation of the existing telecommunications unit at the junction of Sion Hill and Winifred’s Lane, but options to reduce traffic flows and speeds along Winifred’s Lane to make</p>	<p>Lansdown Crescent Residents Association agree with this modification.</p> <p>Bath Spa University do not agree with this modification, and consider that in order to be effective, the criterion should be worded as follows:</p> <p>9. Provide a comprehensive network of walking and cycling public access routes through the landscaped gardens as broadly illustrated on the concept diagram. These will need to be designed to respect the landscape and historic sensitivity of the site. Vehicle and active travel access will need to be segregated. Development proposals will be expected to enhance the pedestrian and cycle environment for north-south movements.</p>

<p>the route safe and suitable for pedestrians and cyclists should also be investigated, <u>within the context of the objectives of the Liveable Neighbourhood Project</u>. Routes through the site must include appropriate connections to the wider walking and cycling network, including safe crossings where necessary.</p>	<p>broadly along the alignment of Winifred's Lane at the eastern side of the site. This is likely to be through providing a route within the site, which is likely to require the relocation of the existing telecommunications unit at the junction of Sion Hill and Winifred's Lane, but options to reduce traffic flows and speeds along Winifred's Lane to make the route safe and suitable for pedestrians and cyclists should also be investigated. Routes through the site must include appropriate connections to the wider walking and cycling network, including safe crossings where necessary.</p> <p>Bath Spa University consider that this proposed amendment will ensure the objective of the policy is clear and achievable without pre-empting the outcome of detailed assessment work and the Liveable Neighbourhood work.</p>
<p>10. Development proposals must ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road. A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose and deliver solutions as appropriate. Measures for investigation and delivery <u>where necessary</u> should include, but not be limited to:</p> <ul style="list-style-type: none"> a. Pedestrian crossing facilities over Lansdown Road in the vicinity of the junction with Sion Road; b. Traffic speed reduction measures on Cavendish Road and/or Winifred's Lane; and c. Improvements to cycle routes to the city centre, including options using alternatives to Lansdown Road. 	<p>Bath Spa University do not agree with this modification, and consider the criterion should be worded as follows:</p> <p>10. Development proposals must ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road. A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose and deliver solutions as appropriate. Measures for investigation and delivery should include, but not be limited to:</p> <ul style="list-style-type: none"> a. Pedestrian crossing facilities over Lansdown Road in the vicinity of the junction with Sion Road; b. Traffic speed reduction measures on Cavendish Road and/or Winifred's Lane; and c. Improvements to cycle routes to the city centre, including options using alternatives to Lansdown Road. <p>The reasoning for this has been provided by Bath Spa University as follow:</p> <p><i>"My reading of the policy is that the sentence 'A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose and deliver solutions as</i></p>

	<p><i>appropriate' is clear on the requirement that solutions are to be delivered. A Transport Assessment supporting an planning application is directed by the policy 'Measures for investigation should include, but not be limited to: ...' The use of 'delivery as necessary' confuses the policy and is repetition of the delivery point."</i></p> <p>The Council consider that the main modification as proposed sufficiently deals with the issue relating to the repetition of the delivery point. However, Bath Spa University has asked that the proposed modification is presented to the Inspector within the context of the reasoning above.</p>
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Policy SB25 St Martin's Hospital

Council's amendments	Response by NHS Property Services (identifying areas of agreement/disagreement)
<p>1. Ensure a comprehensive mix of uses across the site, comprising the delivery of around 50 residential dwellings, <u>and the continued use of the south-eastern section of the site for clinical health services, and use of the Chapel of St Martin for a use which conserves the heritage significance of the building.</u> Any application for the conversion or redevelopment of buildings within the site to non-clinical uses shall be supported by evidence to show that they have been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.</p>	<p>NHS Property Services agree with this modification.</p>
<p>8. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers, <u>subject to provision of these features ensuring the conservation of the heritage significance of the heritage assets within the site.</u> Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.</p>	<p>NHS Property Services agree with this modification.</p>

<p>The Council are not proposing a main modification to criterion 11, in relation to removing the specified transport requirements from the policy. The Council awaits the Inspector’s consideration on this point.</p>	<p>NHS Property Services consider that the specific measures set out in criterion 11 should be removed from the text.</p>
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Policy KE3C Keynsham East

Council’s amendments	Response by Roche Associates (identifying areas of agreement/disagreement)
<p>8. Be accompanied by a Travel Plan and Transport Assessment, which assesses in detail the mitigation requirements of an individual site <u>in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact.</u> Prior to first occupation in Mitigation proposals for the site must <u>investigate and provide as necessary deliver, but not be limited to</u>, the following:</p> <p>a. Improved frequency of public transport services along the A4;</p> <p>b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;</p> <p>c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and Keynsham Town Centre. This could must include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre; and</p> <p>d. New active travel connection between the A4 and the Bristol Bath Railway Path via Clay Bridge, World’s End Lane.</p>	<p>Disagree. The Inspector made it clear that he was not convinced by the evidence that the requirements are necessary, that the criteria should be much more generic, and that they should identify measures for consideration through Transport Assessment and Travel Plans and <u>not</u> be set as policy ‘requirements’. I consider that they remain too pre-judgemental and prescriptive, and would therefore suggest the following alternative wording:</p> <p><i>8. Through a Transport Assessment and Travel Plan, consider the traffic impacts of the proposed development and the extent to which off-site mitigation, if any, is required having regard to the existing accessibility of the location by sustainable transport modes, including whether contributions to the following are necessary and justified by the development proposed:</i></p> <p><i>a). Enhancements to public transport between the site and Keynsham town centre;</i></p> <p><i>b). Enhancements to footways / cycleways along the A4 between the site entrance and the Broadmead Roundabout and along Bath Hill towards Keynsham town centre and Keynsham Railway Station;</i></p> <p><i>c). A new Active Travel Route to the north of the site between the A4 and the Bristol-Bath Railway Path via Clay Bridge, World’s End Lane</i></p>
<p>9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary</p>	<p>Disagree. Suggested alternative wording below:</p> <p><i>9. Informed by appropriate ecological assessment of the site, pursue opportunities for securing measurable net gains for</i></p>

<p>hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland <u>unless it can be clearly demonstrated by the applicant that a reduced buffer would adequately protect the woodland.</u></p>	<p><i>biodiversity. As far as is compatible with the objective to optimise the efficient use of suitable land for housing, Internal and boundary hedgerows should be retained, and an appropriate buffer incorporated between the proposed development and the LNR Manor Road Community Woodland.</i></p> <p>My clients' position in relation to all of the policy clauses remains as set out in Appendix 4 to the Hearing Statement submitted on their behalf in respect of Matter 4.</p>
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Policy KE3D Keynsham East

Council's amendments	Response by Boyer Planning (identifying areas of agreement/disagreement)
<p>6. Be accompanied by a Travel Plan and Transport Assessment, which assesses in detail the mitigation requirements of an individual site <u>in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. Prior to first occupation Mitigation proposals for the site must investigate and provide as necessary deliver, but not be limited to,</u> the following:</p>	<p>Agree</p>
<p>b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;</p>	<p>Disagree</p> <p>In relation to Point 6, we have also provided amendments in red to parts (b) and (f) to reflect the latest agreed position with the Highway Authority. (For reference, we have copied you colleague Tom, who has been liaising on these matters with Taylor Wimpey's transport consultant TPA).</p> <p><u>b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services; The potential to enhance local town centre bus services connecting the development site with the town more widely;</u></p>
<p>c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and</p>	<p>agree</p>

<p>Keynsham Town Centre. This could must include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre;</p>	
<p>f. Upgrade of the footpath connection to Windrush Road to allow cycling – this will entail altering the section of footpath in the existing residential areas to become a Bridleway via a TRO. A contribution to improve the existing footpath connection to Windrush Road, including to enable cycle access.</p>	<p>Agree</p>
<p>9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland <u>unless it can be clearly demonstrated by the applicant that a reduced buffer would adequately protect the woodland.</u></p>	<p>Disagree.</p> <p>We believe the Inspector was clear at the Examination session that Policy KE3d (point 9) should not prescribe a precise width of buffer (25m) at this stage, where the Council has not submitted any supporting ecological evidence to the Examination. The Inspector’s direction was that for the policy to be sound it need only require that a buffer is provided that is sufficient to adequately protect the LNR woodland. It would then be for the Development Management process to determine the width of the future buffer through the determination of a planning application. To this end, we have suggested some amendments in red to your policy wording.</p> <p>9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. <u>A protective buffers is required of at least 25m are expected</u> around the LNR woodland. <u>The width of the buffer shall be sufficient to</u> unless it can be clearly demonstrated by the applicant that a reduced buffer would adequately protect the woodland.</p>