



## **HIF Banwell Bypass and Highways Improvements Project**

# **Planning, Design and Access Update**

BNWLBP-ARP-GEN-XXXX-RP-ZL-000001

P01 | S8  
11/01/23

# Document Verification

<b>Project Title</b>	HIF Banwell Bypass and Highways Improvements Project
<b>Document Title</b>	Planning, Designing and Access Update Report
<b>Document Reference</b>	BNWLBP-ARP-GEN-XXXX-RP-ZL-000001
<b>Project Stage</b>	2
<b>Document Status</b>	<b>P01   S8 - FOR PLANNING APPLICATION</b>

## Approvals

Revision	Status	Role	Name	Date
P01	S8	Author	Matt Lai	06/01/23
		Checker	Allan Pitt	06/01/23
		Approver	Tom Edwards	11/01/23
		Authoriser	Roger Walker	12/01/23

## Revision History

[illegible]

# Contents

---

	Page
<b>1 Introduction</b>	<b>1</b>
1.1 Background and purpose	1
1.2 Planning framework	12
1.3 Proposed development and updated description	12
<b>2 Planning, Design and Access Update</b>	<b>18</b>
2.1 Overview	18
2.2 Assessment of additional bat mitigation	19
2.3 Assessment of additional speed control measures and revised extents of speed limit changes	24
2.4 Assessment of additional replacement playing fields for Banwell Football Club	30
2.5 Other planning and environmental considerations	34
2.6 Assessment conclusions of other submission documents in support of the application	50
2.7 Case for the Scheme	51
2.8 National and local planning policy assessment	51
<b>3 Conclusion</b>	<b>53</b>

# 1 Introduction

---

## 1.1 Background and purpose

- 1.1.1 The applicant submitted the Banwell Bypass and Highway Improvement Scheme (the Scheme, as defined further below) planning application on 18 July 2022 (ref: 22/P/1768/R3EIA). During the Local Planning Authority (LPA) consultation on the application, comments and submissions were received from statutory consultees and the public and considered by the applicant accordingly.
- 1.1.2 In response, the applicant has prepared and submitted written responses and supporting information to the LPA. A list of responses to stakeholder comments received on the planning application is provided in Table 1 for convenience. Additional information submitted by the applicant to the LPA following the submission of the planning application is listed in Table 2.
- 1.1.3 The applicant considers it appropriate to undertake, with the agreement of the LPA, a supplementary consultation during the application determination period. This would provide a minimum 30-day (in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017) consultation period, allowing any individual or organisation an opportunity to comment on the proposed changes to the Scheme
- 1.1.4 In considering and responding to comments, some changes have been made to the Scheme. In summary the key changes to the planning application are:
- a) Additional bat mitigation
- The changes have been discussed and agreed with Natural England and the North Somerset Council Ecologist, taking into account relevant submissions on bat mitigation. This involves increasing the land required for the Scheme to provide additional essential bat mitigation.

b) Additional speed control measures and revised speed limit extents

The changes have been discussed with the Highways and Transport Development Management department of North Somerset Council, taking into account relevant submissions from them on highway safety and access. This involves providing additional speed control interventions and reducing the extents of speed limit changes as part of the proposed wider mitigation measures.

c) Additional replacement playing fields for Banwell Football Club

The changes have been discussed and agreed with Banwell Football Club, taking into account relevant submissions from the club, Sport England, and others on the matter of replacement playing fields and associated impacts.

This involves increasing the land required for the Scheme and helping ensure the replacement playing fields are as usable as the existing arrangement.

Further clarification has also been provided about the proposed mitigation during construction, involving temporary alternative off-site provision.

- 1.1.5 The applicant considers it appropriate to undertake, with the agreement of the LPA, a supplementary consultation during the application determination period. This would provide a minimum 30-day (in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017) consultation period, allowing any individual or organisation an opportunity to comment on the proposed changes to the Scheme.

Table 1: Responses to the comments received on the Planning Application

Stakeholder	Date	Response
Avon Bat Group	26/08/2022	<p>The applicant provided written responses to the LPA on 13/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Concerns of car lighting at the eastern junction, shining into the Banwell wood.</li> <li>Opposition to construction of any infrastructure that negatively impacts on the survival of bat species.</li> </ul>
Banwell Football Club	26/08/2022	<p>The applicant provided written responses to the LPA on 07/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Like-for-like replacement and reprovision.</li> <li>How the Scheme includes provision for replacement playing fields and is supporting Association Football.</li> <li>Open Space Assessment and policy tests.</li> </ul>
Bristol Water	10/10/2022	<p>The applicant provided written responses to the LPA on 14/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>A hydrogeological impact assessment is required to gain a full understanding of the proposed scheme on the Banwell Spring. The assessment should assess the impacts in two flow scenarios, 1 in 500 dry year annual average and normal year annual average.</li> <li>In the event that the Banwell Bypass is constructed, ongoing monitoring will also be required to ensure there is no detrimental effect on either the groundwater yield or water quality.</li> <li>Bristol Water requires NSC to reimburse Bristol Water for all reasonable expenses associated with: Bristol Water time to assess, and respond to, the planning application; Engaging hydrogeological consultants; Data collection; Data Analysis; and any other assessments necessary to assess the impact or mitigation.</li> <li>Bristol Water requests that NSC provide Bristol Water an indemnity that will cover a fair proportion of the costs Bristol Water will incur to cover the cost replacing the volume lost because of the scheme, increased costs to treat the water abstracted from the Banwell Schemes, or costs incurred to compensate the reduce resiliency of the Banwell Spring.</li> </ul>
Environmental Agency	15/09/2022	<p>The applicant provided written responses to the LPA on 18/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Impacts on third-party land.</li> <li>Flood risk during construction.</li> <li>Moor Road–Riverside link road and bridge crossing.</li> </ul>
Historic England	13/09/2022	<p>The applicant provided written responses to the LPA on 02/12/2022 addressing the following matters:</p>

Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>Archaeological Impact.</li> <li>Impacts on designated Heritage Assets.</li> <li>Position Statement.</li> </ul>
Mendip Hills AONB	27/09/2022	<ul style="list-style-type: none"> <li>No response required to statement of support</li> </ul>
National Highways	25/08/2022 13/10/2022 23/11/2022	<p>The applicant provided written responses to the LPA on 30/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The Impact of the Banwell Bypass on M5 Junction 21 Transport Assessment.</li> <li>Forecast performance of M5 Junction 21 in the 'without Banwell Bypass' scenarios Appendix G – Junction 21 Southbound Diverge Traffic Assessment.</li> <li>Structures.</li> </ul>
Natural England	04/09/2022	<p>The applicant provided written responses to the LPA on 13/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Concerns raised that the evidence has not been fully reflected in the strategy for mitigation of effects on the North Somerset and Mendip Bats SAC.</li> <li>Concerns raised that the mitigation for the potential impacts on the bat SAC are not sufficiently precautionary.</li> <li>Comments on Chapter 8 of the Environmental Statement. – It does not fully reflected the importance of Moor Road and Eastermead Lane as areas of extremely high bat activity.</li> <li>HRA - There is insufficient evidence to undertake a HRA assessment of the Scheme.</li> <li>Air Quality – No objection.</li> <li>Protected Landscapes – Observations regarding the Mendip Hills AONB.</li> </ul>
	10/11/22	<p>The applicant provided written responses on 25/11/22 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Updates to minutes from site visit – 21/10/22</li> <li>Queries on response dated 04/10/22</li> <li>Crossing Point and Transect Survey Technical Note</li> </ul>
	01/12/22	<p>The applicant provided written responses on 05/12/22 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Updated Habitat Evaluation Procedure (HEP) calculations</li> <li>Environmental master plan revisions</li> </ul>
North Somerset Council climate consultant (AECOM)	30/09/2022	<p>The applicant provided written responses to the LPA on 07/10/22 addressing a Greenhouse Gas Emission Review and suggested sensitivity test.</p>

Stakeholder	Date	Response
North Somerset Council Conservation and Heritage Officer	30/08/2022	<p>The applicant provided written responses to the LPA on 02/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Concerns on visibility of the Scheme from higher levels of the Conservation Area (CA) and from heritage assets.</li> <li>How the Scheme will be perceived in the setting of the Conservation Area or St Andrew's Church.</li> <li>Maintenance of planting – ensuring long term screening.</li> <li>The Southern Link impact on the Conservation Area and heritage assets – to include the acoustic fence.</li> <li>Impact on setting and character of assets and place making.</li> <li>Policy and planning matters.</li> </ul>
North Somerset Council Ecology	17/10/2022 10/11/2022	<p>The applicant provided written responses to the LPA on 13/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Designated Sites, North Somerset and Mendip Bats Special Area of Conservation.</li> <li>Designated Sites Other.</li> <li>Protected Species.</li> <li>Biodiversity Net Gain.</li> </ul>
North Somerset Council Environmental Protection Officer	26/08/2022	<p>The applicant provided written responses to the LPA on 11/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The undertaking of a further intrusive ground investigation, a piling works risk assessment, and a verification plan to assess the suitability of imported and site-won soils.</li> <li>The inclusion of further information detailing the effects of the Scheme on private water supplies within the proximity of the Scheme.</li> <li>The inclusion of points (i-xi) within the Construction Management Plan (CEMP), outlined within incoming correspondence dated 26 August 2022.</li> <li>Scheme lighting approval from the Local Planning Authority prior works.</li> </ul>
North Somerset Council Flood Risk Management	05/09/2022	<p>The applicant provided written responses to the LPA on 18/10/2022 addressing the draft conditions. This was submitted alongside the Environmental Agency and NSC Internal Drainage Board responses as supporting documents.</p>
North Somerset Council Senior Archaeologist	19/08/2022	<p>The applicant provided written responses to the LPA on 02/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Archaeological potential and investigation.</li> <li>Impact on designated archaeological sites (Scheduled Monuments).</li> <li>Impact on non-designated heritage assets.</li> <li>Mitigation.</li> </ul>



Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>Place making.</li> <li>Dissemination of findings.</li> </ul>
North Somerset Council Tree Officer	03/10/2022	<p>The applicant provided written responses to the LPA on 20/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Monitoring.</li> <li>Tree Protection for the Southern link.</li> <li>Tree protection for the Scheme.</li> </ul>
North Somerset Levels Internal Drainage Board	14/09/2022 22/11/2022	<p>The applicant provided written responses to the LPA on 18/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Queries regarding Model Report, Flood Risk Assessment, Surface Water, Environmental Assessment - Maintenance of fish and otter habitats and passages, Environmental Assessment - Concerns regarding Pennywort; Watercourses; and, Culvert Structures.</li> <li>The requirement of Land Drainage Consent from NSLIDB prior the commencement of works within 9m of any watercourse.</li> <li>The provision of maintenance to the land bordering the Viewed Rhyne corridors during and post construction.</li> <li>Concerns regarding maintenance access to existing rhynes.</li> <li>Concerns over three of the attenuation ponds being located within the flood zone and the risk of tide locking.</li> </ul>
Neighbourhood Policing Support Team	12/10/2022	<p>The applicant provided written responses to the LPA on 27/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The provision of natural surveillance, and appropriate landscaping and signage, along the length of the proposed 3m shared use path.</li> <li>Further information regarding boundary treatments, gated access points to the proposed 3m shared use path, and the consideration of appropriate barriers at potential areas of pedestrian congregation in the vicinity of vehicular traffic, within the wider mitigation plans.</li> <li>The provision of the Riverside Overbridge devoid of hiding places to accommodate security concerns.</li> <li>The provision of safe pedestrian routes subject to the area of land, west of the Southern Link, becoming available for future public use.</li> <li>The provision that all Scheme lighting proposals aligns to British Standard 5489-1:2000.</li> <li>Further information regarding the provision of cycle storage as part of the Scheme.</li> </ul>
Parish Councils	22/09/2022	<p>The applicant provided written responses to the LPA on 13/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Mitigation.</li> </ul>

Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>• Data Requests and Errors in Data.</li> <li>• Response Time.</li> <li>• Parking.</li> <li>• Local Communities.</li> <li>• Roundabout Signage.</li> <li>• Speed Limits.</li> <li>• Sustainable Travel (Safety) and Public Transport.</li> <li>• Effects Scheme on Congestion.</li> <li>• Rat runs.</li> </ul>
The Old Police House	21/09/2022	<p>The applicant provided written responses to the LPA on 21/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>• Concerns regarding access to The Old Police House property, during and post construction, from the proposed Southern Link side road.</li> <li>• The removal of sycamore tree (referenced T59 in the Arboricultural Impact Assessment and Method Statement) south-west of The Old Police House property.</li> <li>• The loss of privacy, overlooking and, right of family life at The Old Police House property.</li> <li>• Concerns regarding the impact of construction works on the financial income of the business operated at The Old Police House property.</li> </ul>
Public Comments (where appropriate)	07/08/2022 13/10/2022	<p>The applicant provided written responses to the LPA on 09/12/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>• General.</li> <li>• Alternatives.</li> <li>• Noise.</li> <li>• Traffic speeds.</li> <li>• Landscaping.</li> <li>• Banwell Football Club.</li> </ul>
Rockfield Homes	27/09/2022	<p>The applicant provided written responses to the LPA on 21/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>• Authority records should be updated to include the new ownership of land titles ST186722, ST243362 and ST261549 (Knightcott, Banwell BS29 6HT) to Rockfield Homes – the Developer (Legal entity 1093 Ltd).</li> <li>• Landowner Interest Questionnaire (LIQ).</li> <li>• Approved plans for construction of ten residential dwellings at Rockfield Homes Ltd.</li> <li>• The preservation of vehicular access for residents and users, and construction activities, to Rockfield Homes throughout the construction of the Scheme.</li> <li>• Utility connection points on the highway alignment and associated resurfacing works.</li> </ul>

Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>Construction programme for the Scheme works, in particular for the length of proposed carriageway in the vicinity of Knightcott.</li> <li>Footway link associated with Section 278 redevelopment works of the Western Trade Centre, and the proposed Scheme side road.</li> </ul>
Savills on behalf of: Mugford Perks & Ball Pring Ware Webber	02/09/2022	<p>The applicant provided written responses to the LPA on 04/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The provision of an open gateway safely off-road and hardstanding handling pen area for livestock to access to land from Towerhead Road.</li> <li>Agricultural land-take due to proposed access track earthworks.</li> <li>Inclusion of stock proof fencing and new hedge line along the length of the boundary of proposed land take.</li> </ul>
	25/08/2022	<p>The applicant provided written responses to the LPA on 04/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The alignment of the proposed shared use path between the bypass and A368 Towerhead Road and consequential security concerns to Towerhead Farm.</li> <li>Concerns of fly-tipping, squatter encampments, unauthorized parking, and vandalism along the private road known as Catworthy Lane.</li> <li>Concerns towards the health and safety of the public using the proposed shared use path between the bypass and A368 Towerhead Road, due to the proximity of high voltage electrical equipment.</li> <li>Concerns of damage to Solar Park equipment from hand-thrown objects.</li> <li>Disruption to agricultural vehicular access to Eastermead Lane.</li> </ul>
	02/09/2022	<p>The applicant provided written responses to the LPA on 04/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Concern to the private sewer pipe utility connection within the extents of the proposed Main Site Compound.</li> <li>Concern of noise and visual disruption to caravan site residents from the proposed Main Site Compound during the construction of the Scheme.</li> <li>Additional information regarding the post-construction strategy for the land formally occupied by the proposed Main Site Compound.</li> <li>The provision of good access visibility, and appropriate pull-in area, for agricultural vehicles navigating the proposed access to the field, west of the Banwell West Junction roundabout, from the proposed Public Highway.</li> </ul>

Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>Further information regarding the proposed post-construction drainage strategy within the vicinity of the Summer Lane Caravan Park.</li> </ul>
	30/08/2022	<p>The applicant provided written responses to the LPA on 04/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The provision of a vehicular turning area, suitable for HGV's, at the proposed stopped up end of Moor Road, adjacent to "The Workshop" property.</li> <li>The provision of additional security measures at "The Workshop" property.</li> <li>Concerns of fly tipping and traveller encampment following the stopping up of Moor Road.</li> <li>Additional detail regarding the design of the Vehicle Restraint System (VRS) on the proposed mainline highway.</li> <li>Concerns of disruption and obstruction to "The Workshop" business during the construction and operational phases of the Scheme.</li> </ul>
	05/09/2022	<p>The applicant provided written responses to the LPA on 07/10/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Like-for-like replacement and reprovision.</li> <li>How the Scheme includes provision for replacement playing fields and is supporting Association Football.</li> <li>Open Space Assessment and policy tests.</li> </ul>
Sport England	11/08/2022 25/10/2022	<p>The applicant provided written responses to the LPA on 07/10/2022 and 09/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>Like-for-like replacement and reprovision.</li> <li>How the Scheme includes provision for replacement playing fields and is supporting Association Football.</li> <li>Open Space Assessment and policy tests</li> <li>Planning condition(s).</li> </ul>
Tetlow King Planning on behalf of Terra Strategic	25/10/2022	<p>The applicant provided written responses to the LPA on 30/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The proposed Scheme should assist with the delivery of attractive, safe, and direct walking and cycling routes between Banwell and the proposed Wolvershill community, which is sought by the emerging Local Plan Policy LP1.</li> <li>The proposed Scheme should help facilitate the delivery of the strategic housing site at Wolvershill and to avoid the requirement to reconstruct and retrofit the completed Scheme to accommodate the emerging local plan allocation and good placemaking aspects of the allocation.</li> <li>Interface with landowners need for Compulsory Purchase Order (CPO).</li> </ul>

Stakeholder	Date	Response
		<ul style="list-style-type: none"> <li>Comments regarding the traffic assessment, notably the scenarios tested and proposed mitigation.</li> </ul>
Turley on behalf of Bloor Homes	11/10/2022	<p>The applicant provided written responses to the LPA on 10/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The requirement of further active travel connections from the proposed Scheme towards the village of Banwell.</li> <li>Concerns regarding the considerations within the Saturn Modelling Scenarios for 2039, and further clarification of model processes undertaken and subsequent results in the proposed context of the housing development.</li> <li>In addition, as a third and final matter, the Council would like to reconfirm its position on the relationship between the application and the emerging Local Plan development, which Bloor Homes intend to help deliver. This serves to address land being available for an additional junction/access to the east of Wolvershill Road.</li> </ul>
Vistry	05/10/2022	<p>The applicant provided written responses to the LPA on 10/11/2022 addressing the following matters:</p> <ul style="list-style-type: none"> <li>The interactions between the Scheme, Wolvershill strategic housing allocation, and the Local Plan.</li> <li>Comments in relation to the North Somerset Council (Banwell Bypass and Southern Link) Compulsory Purchase Order 2022.</li> </ul>

Table 2 Additional information provided to the LPA

Ref	Additional Information provided to the LPA	Date
1	Information to address Banwell Parish Council suggested alternative at/to Moor Road	03/08/2022
2	Environmental Statement Appendix 7-D	03/08/2022
3	Hydraulic Modelling Report	05/08/2022
4	Wider mitigation noise monitoring file note	19/08/2022
	Outcome of Black poplar tree genetic testing	19/08/2022
6	Information to address Environmental Protection Officer queries	22/08/2022
7	Applicant's reply to LPA pre-application advice, including initial Highways and Transport Development Management (HDM) department comments	02/09/2022
8	Wider Mitigation Air Quality Monitoring Results	22/09/2022
9	Air Quality sensitivity test report	22/09/2022
	Noise sensitivity test report	22/09/2022
11	Noise modelling and survey response including Strategic Model Forecasting Report and results	23/09/2022
12	Bat activity surveys, including Crossing Point and Transect Survey Technical Note; and Aug/Sept 2022 summary results	04/10/2022
13	Response to matters associated with Banwell Football Club	07/10/2022
14	Archaeological Evaluation Report	26/10/2022
	Badger monitoring report	31/10/2022
16	Information to address Sport England comments	09/11/2022
17	Information to address further query from Environmental Protection Officer regarding monitoring for particulate matter	09/11/2022
18	Archaeological geophysical survey results	10/11/2022
19	Information to address Western Power Distribution comments	06/09/2022
	Information to address queries about noise, including 3D views	19/10/2022
21	Information to address Mr J Hector comments	09/09/2022
22	Artesian Ground Water Ground Investigation results and interpretation	17/11/2022
23	Habitat Evaluation Procedure (HEP) and Biodiversity Net Gain (BNG) Mitigation Technical note	13/12/2022
24	Conservation Grazing Review of Feasibility technical note	13/12/2022
25	Junction Modelling Report update	13/12/2022
26	Wider Network Mitigation Additional Speed Survey	13/12/2022
27	ES Chapter 6 Addendum 1 - Hydrology	02/12/2022
28	ES Chapter 6 Addendum 2 - Evaluation Trenching Summary	02/12/2022
29	ES Chapter 6 Addendum 3 - Bone caves	02/12/2022
	ES Chapter 6 Addendum 4 - Proposed demolition of part of a boundary wall at 25 Castle Hill and likely impact on the Banwell Conservation Area	02/12/2022
31	ES Chapter 6 Addendum 5 - Geoarchaeological Results Report	13/12/2022
32	Geo-evaluation Report	02/12/2022
33	J21 modelling file note	30/11/2022
34	Draft Planning Conditions	16/11/2022
	Draft Planning Conditions Rev. A	07/12/2022

## 1.2 Planning framework

- 1.2.1 There are no changes to the planning framework presented in Section 2 of the Planning Statement.

## 1.3 Proposed development and updated description

- 1.3.1 Following the design changes, an updated Scheme description is provided below, which is reflected in Chapter 2 of the Environmental Statement Update Report – Scheme Description.
- 1.3.2 Changes have been underlined to identify them for convenience.

*Construction of a 3.3km single carriageway road from the A371 Summer Lane to A368 Towerhead Road, including a 3m shared use path to Sandford, one bridge, ten culverts, associated infrastructure, and landscaping. Construction of a 0.63km (including junction link to Banwell Bypass) single carriageway Southern Link Road, including associated infrastructure and landscaping. Mitigation and enhancement measures, which consist of environmental mitigation and enhancement measures in connection with the Banwell Bypass and the Southern Link including flood compensation areas, planting and habitat creation, attenuation basins, replacement playing fields at Banwell Football Club, associated infrastructure and landscaping. Placemaking improvements within Banwell, comprising mitigation and enhancement measures to the public realm. Active travel routes including works to footpaths, cycleways, and bridleways. Improvements to the wider local road network in Sandford, Churchill, Winscombe, and Locking<sup>1</sup> and creation of shared use paths between Sandford and Churchill and Langford and Churchill.*

---

<sup>1</sup> This featured in the original planning application form description but was erroneously omitted from the other application documents

### 1.3.3 The Scheme comprises the following distinct elements:

- a) a bypass of the village of Banwell (referred to as the “Banwell Bypass”);
- b) a route connecting the A371 at Castle Hill and the A368 at East Street (referred to as the “Southern Link”); and
- c) Mitigation and enhancement measures, which broadly consist of the following:
  - Environmental mitigation and enhancement measures in connection with the Banwell Bypass and the Southern Link, examples of which include (but are not limited to) flood compensation areas, planting and habitat creation including for but not limited to bat mitigation, attenuation basins, replacement playing fields;
  - Placemaking improvements within Banwell, comprising mitigation and enhancement measures to the public realm; and
  - Traffic mitigation in connection with the Banwell Bypass and the Southern Link, including improvements to the wider local road network.

### 1.3.4 Together, these elements comprise the “Scheme”. Each element as listed is described in more detail below.



## Banwell Bypass

- 1.3.5 The Banwell Bypass would be located within the administrative area of North Somerset. The village of Banwell is located approximately 8km east of Weston-super-Mare. The Bypass would primarily consist of:
- a) Signalisation and capacity improvements to the Summer Lane/Wells Lane junctions on the A371);
  - b) A 40mph single carriageway bypass, connecting the existing A371 (Knightcott Road, east of Summer Lane) to A368 (east of Towerhead Farm
  - c) A 3 metre wide walking and cycling route provided along the majority of the Banwell Bypass providing a link from Weston-Super-Mare and to Sandford;
  - d) Banwell Bypass West Junction - a three arm roundabout located east of Knightcott Industrial Estate at the western end of Banwell;
  - e) Wolvershill Road Junction – a traffic signalised junction, providing access for all users to the west, east, and north. Access to the south would be restricted to public transport and walking, cycling and horse-riders, and limited agricultural access only;
  - f) Riverside Crossing – an overbridge across Riverside and the River Banwell. There would not be a direct connection between Riverside and the Bypass;
  - g) A side road connection between Riverside and Moor Road; and
  - h) Banwell Bypass East Junction - A three-arm traffic signalised junction, with dedicated turning lanes from the bypass towards the Southern Link.

## Southern Link Road

- 1.3.6 The Southern Link would be located within the administrative area of North Somerset and within the Mendip Hills Area of Outstanding Natural Beauty (AONB). The Southern Link would be a 30mph single carriageway, connecting the A368 (East Street) to the A371 at Castle Hill. The Southern Link would link into the Bypass at the Banwell Bypass East Junction. A T-junction located along the Southern Link would provide access into the east of Banwell (at East Street).

## Reclassification of Highways

- 1.3.7 Changes to the highway network and road classification are proposed to take place as a result of the Banwell Bypass. Appendix B to the Design and Access Statement shows and lists the Banwell Bypass proposed route classifications.
- 1.3.8 Traffic Regulation Order(s) (TRO) will be required to authorise NSC to set and amend speed limits, and any other vehicular restrictions (e.g., weight limits). As part of the Scheme's delivery, the following would likely be included in the TRO(s);
- a) Changes to speed limits, including speed reductions in Banwell and the surrounding villages.
  - b) Weight and width restrictions to replace/relocate the current restrictions on Castle Hill.
  - c) Prohibition of stopping or waiting or loading.
  - d) Creating a rural clearway.
  - e) Prohibition of traffic with an exemption for buses, bicycles at some agricultural traffic turning onto Wolvershill Road southbound.
  - f) Prohibition of traffic with an exemption for bicycles (this may be required for active travel routes depending upon designation as part of the detailed design).
- 1.3.9 The TRO process would be undertaken during detailed design.

## Mitigation Measures

### **Environmental mitigation and enhancement measures in connection with the Banwell Bypass and the Southern Link.**

- 1.3.10 The Scheme would include mitigation measures which are provided to offset the impact of the Banwell Bypass proposal. These include (but are not limited to):
- a) flood mitigation to ensure that the Banwell Bypass does not increase flood risk for third-party properties;
  - b) land for essential mitigation, such as ecology and landscape mitigation, including but not limited to additional areas of mitigation for bats;
  - c) sustainable urban drainage systems (e.g. attenuation basins and swales), and additional groundwater mitigation, to prevent adverse water quality impacts (including the Source Protection Zone (SPZ)), and;
  - d) replacement playing fields to mitigate the impact of the scheme on Banwell Football Club.

### **Placemaking improvements within Banwell**

- 1.3.11 As a result of the Banwell Bypass, there would be a reduction in traffic through Banwell. The reduction in traffic (and resulting reduction in congestion) through the village could result in higher traffic speeds without mitigation.
- 1.3.12 A reduced 20mph speed limit through Banwell would discourage vehicles from travelling at higher speeds, whilst also discouraging the use of the road as a through route (instead of the Banwell Bypass).
- 1.3.13 The reduction of traffic through Banwell due to the provision of the Banwell Bypass provides the opportunity to make improvements to the existing road and public spaces within Banwell to enhance the historic and urban setting of the village. These improvements would include, but are not limited to:
- a) Alteration to the road and footways including resurfacing, widening, and narrowing (which would encourage drivers to comply with the posted 20mph speed limit);

- b) Incorporation of active travel measures;
- c) Soft landscaping and ecological improvements; and
- d) Street signage improvements.

### **Improvements to the wider local road network**

1.3.14 Improvements to the local road network and junctions including the surrounding villages of Churchill, Sandford and Winscombe are proposed to mitigate increases in traffic as a result of the Banwell Bypass and Southern Link. These mitigation measures would consist of:

- a) Lowered speed limits:
  - 20mph: A368 through Churchill, A368 through Sandford, A371 through Winscombe.
  - 30mph for part of the A368 between Churchill and Sandford Villages.
- b) Gateway Features when entering and exiting the villages of Sandford, Churchill and Winscombe;
- c) Non-physical and physical traffic calming measures through and between villages (e.g. road markings and speed signage, road narrowings and raised tables);
- d) Capacity improvements to the Churchill Junction (A38/A371) and Banwell Road Junction (A371);
- e) Provision of new / improvements to existing pedestrian and cycling crossings;
- f) Active travel measures along the A368, with improved footway/cycleway access from Churchill and Langford to Churchill Academy and a link between Sandford (A368 and Churchill Green);
- g) Improvements to footways, shared pedestrian, and cycleway; and
- h) Soft landscaping, native planting, rewilding, and ecological enhancements.

## 2 Planning, Design and Access Update

---

### 2.1 Overview

- 2.1.1 This update report provides supplementary information to that already submitted as part of the Planning Statement and the Design and Access Statement documents, in support of the revised application.
- 2.1.2 This update does not seek to revisit the need for intervention or the case for the scheme but focuses on the design changes and any impact of the revised Scheme considering the assessment against national and local policy.
- 2.1.3 The revised Scheme is described in section 1.2 of this report. A revised planning application form and certificates is submitted the LPA separately.
- 2.1.4 Acknowledging the additional information and application documents listed in Table 1 and Table 2, this update describes and provides a summary of the key design changes and their likely impacts, with cross references to other application documents where appropriate.
- 2.1.5 The applicant considers it appropriate to undertake, with the agreement of the LPA, a supplementary consultation during the application determination period. This would provide a minimum 30-day (in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017) consultation period, allowing any individual or organisation an opportunity to comment on the proposed changes to the Scheme
- 2.1.6 The separate but supporting Environmental Statement Update Report provides an updated assessment of the revised Scheme on the environment and relevant environmental legislation and policy.
- 2.1.7 The separate but supporting Plans and Drawings Update report provides a schedule and description of the design changes alongside the relevant revised plans and drawings in support of this revised application.

- 2.1.8 As such this document has sought to reduce or avoid unnecessary duplication where possible and as appropriate.
- 2.1.9 The remainder of this update report describes, considers and assesses the design changes in turn.

## 2.2 Assessment of additional bat mitigation

- 2.2.1 Following consultation with Natural England and the North Somerset Council Ecologist, additional mitigation measures have been agreed to provide further opportunities for bats associated the North Somerset and Mendip Hills Bat Special Area of Conservation (SAC).
- 2.2.2 The change involves increasing the land required for the Scheme to provide additional essential bat mitigation, as requested by Natural England and the North Somerset Council Ecologist. In summary, the following changes have been made to the Scheme, which are shown on the updated plans as described and appended to the separate supporting Plans and Drawings Update document.
- 2.2.3 The application is being revised to provide an additional 7.7ha land for bat mitigation, as follows:
- Court Farm = 2.6ha
  - Traditional Orchard = 1.1ha
  - North of A368 = 0.4ha,
  - Eastermead Farm = 3.6ha
- 2.2.4 These additional land parcels would reinforce the wider approach to mitigation requested by Natural England. As such they would reduce the linearity of mitigation proposed along the Scheme, provide enhanced connectivity and permeability for bat species across the wider landscape, especially to the north and east of the Scheme and follow a precautionary approach to assessing the effect on the SAC.

2.2.5 Additional mitigation is proposed at key locations, as described below and shown on the revised Environmental Masterplans (sheets 1 – 5). The following amendments are considered to be the key changes, described in relation to the revised Environmental Masterplans for convenience:

- Sheet 1: Along the A371 on Knightcott Road and where several hedgerows converge to the east of Summer Lane Park Homes. Two additional bat hop overs are proposed over the A371, east of Summer Lane signalised junction and north of the Western Trade Centre. An additional bat hop over is proposed on the bypass carriageway at Ch: 0+300 and would extend the proposed LE2.1 woodland. The proposed scattered tree planting, north and north-west of Banwell West Junction has been revised to scrub due to water main easements. In addition, a proposed tree, on the A371 northern verge, east of the proposed field access to Plot 1/5f, has been moved due to water main easements.
- Sheet 2: In the vicinity of the Wallymead Rhyne culvert at Stonebridge Farm and to the east and west of Wolvershill Road, to mitigate for the street lighting at Wolvershill Junction. Four additional bat hop overs have been proposed over the bypass carriageway at Ch: 0+300, Ch:0+550, and Ch:0+925. At Ch: 0+925, additional woodland shall be added. A note has been included regarding the alignment of the shared use path at Ch:0+600. The proposed landscaping in the south-west corner of Wolvershill Junction and areas both the north and south of the bypass carriageway (at Ch:0+820) has been revised to scrub due to utility asset easements. The additional land will be planted with scattered trees, creating copses of orchard and retaining hedge lines during construction. At the westerly end of the Mammal Culvert (at Ch:1+115), scrub and woodland edge have been added to bulk up the hedgerow.

- Sheet 3: A native hedgerow with trees is proposed along the length of the northern verge of the Moor Road to Riverside Link. Further native hedgerows and trees are proposed along the application boundary, north of proposed attenuation basin no. 2. An area of landscaping, south of the Old Yeo rhyne culvert, has been revised to scrub due to utility asset easements. The Traditional Orchard shall be managed for bats and benefit from further orchard planting.
- Sheet 4: The new hedgerow around the replacement football club land will be planted with individual trees and will be managed. Where the hedgerow along Eastermead Lane is intersected by the Scheme and at the Eastern Junction of the A368, where the land would be built up using site won material. The elevation of the land, southeast of the Banwell East Junction (and associated bat hop over locations on the bypass carriageway and A368), have been increased to promote a bat hop over. The additional land, north of the bypass carriageway, would be planted with trees and shrubs. The height of the hop over would be increased to tie in with the tree canopy of Banwell Wood. Heavy standard trees have been added to enhance connectivity at the western and eastern end of the proposed culvert 6. North of the location that the shared use path joins the bypass carriageway alignment, trees have been moved due to utility asset easement. The proposed planting in the vicinity of the overhead cables (Ch:2+800) has been revised to scrub due to the cable easements.



- Sheet 5: Field at Eastermead farm, added to the Scheme to provide further forging and commuting opportunities. The increased elevations in the vicinity of Banwell East Junction, are shown on Sheet 5. Three additional bat hop overs are proposed on the Southern Link, east of Police House, and west and east of Southern Link Banwell Village Junction. Proposed woodland shall be extended to facilitate the bat hop over west of Southern Link Banwell Village Junction. Three landscaped areas, two east of the Southern Link (south of Attenuation Basin 7 and east of Castle Hill turning head, respectively), and one south-west of Southern Link Banwell Village Junction, have been revised to scrub due to water main easements. Proposed tree planting, southwest of proposed attenuation basin no. 7, has been revised due to water main easements. The extents of the location for the proposed main site compound will be managed for bat mitigation during operation.

- 2.2.6 Permeability is being delivered through the new hedgerow planting and enhancement / bulking out of hedges already present within the land take of the Scheme. Where appropriate, some landscape planting would be undertaken during the early stages of construction. Scheme wide, bat hop over opportunities would be added where there were gaps in vegetation planting. Woodland and hedgerow planting also act as a feature for commuting for bats.
- 2.2.7 The revised Environmental Masterplans show the connections between the retained and new linear features within and outside of the revised application boundary.
- 2.2.8 The Red Line Boundary Plan Sheets 2, 3 and 4 of 9 have been amended accordingly.

- 2.2.9 The changes seek to ensure that an appropriate level of bat mitigation is provided as part of the Scheme to address the impacts identified and assessed in the Environmental Statement. The applicant has set out its latest position in detail in its response to Natural England, North Somerset Council Ecologist, and the Avon Bat Group. The Environmental Statement Update Report updates the environmental impact assessment and in summary concludes no changes to the Environmental Statement assessment and conclusions.
- 2.2.10 The change to the application has been made following discussion and agreement with Natural England and North Somerset Council ecologists, further to comments received on the application and subsequent meetings and site visit. This led to requests, that have been addressed, for additional bat mitigation as essential mitigation as part of the Scheme.
- 2.2.11 The approach to revising the application has been collaborative and the applicant considers the change sufficiently addresses the concerns previously expressed on this matter.
- 2.2.12 As such, the applicant considers the environmental case for the Scheme is strengthened as a result.

## 2.3 Assessment of additional speed control measures and revised extents of speed limit changes

- 2.3.1 The applicant has carefully considered and seeks to address, through this change to the application, concerns expressed by North Somerset Council Highways and Transport Development Management department about the proposed measures required to achieve vehicle speed compliance and the extents of 20mph speed restrictions. The feedback from the Parish Councils and other relevant comments received on the application have also informed the changes to the application where appropriate.
- 2.3.2 Further consideration has been given to the level of information required to demonstrate that vehicle speed compliance can be achieved, including the commissioning of additional traffic surveys to provide updated speed survey data. The results of these surveys have been provided to the LPA with a Wider Network Mitigation Additional Speed Survey Data technical note.
- 2.3.3 The changes to the proposed wider mitigation measures primarily involves providing additional speed control interventions throughout village extents and reducing the proposed extents of speed limit changes. Further details are also provided relating to proposed associated sustainable travel measures. In summary, the following changes have been made to the Scheme, which are shown on the updated plans as described below and appended to the separate supporting Plans and Drawings Update document.

### **Speed Control Measures**

- 2.3.4 Speed survey data demonstrates the need to provide additional physical measures to support a reduction in vehicle speeds within Sandford, Churchill and Winscombe. These measures will support compliance with the proposed reduced speed limits, and in some areas where the existing speed limits are proposed to be retained.

2.3.5 Additional traffic calming features in the form of carriageway narrowing, build-outs, chicanes, raised tables, give-way alternating priority sections and additional road markings are proposed and shown on Wider Network Mitigation General Arrangement Drawing sheets 2-5, 7-9 and 11 of 13. Details include:

- Sheet 2: Raised crossing suitable for buses and heavy goods vehicles (HGVs) to be provided at existing Toucan crossing of the Strawberry Line across the A368, in addition to previously proposed widening of crossing and narrowing of carriageway. Localised footway widening to provide raised bus boarders has been introduced at the Railway Inn bus stop, acting as carriageway narrowing. Puffin crossing (previously proposed) to now be provided as raised crossing suitable for buses and HGVs.
- Sheet 3: Road markings introduced along Greenhill Road between Humphry Motor and Sandford Primary School to reduce effective carriageway width. A typical cross section inset has been introduced to show lining changes. Two existing signalised pedestrian crossings east and west of Sandford Primary School to be enhanced with raised crossings suitable for buses and HGVs.
- Sheet 4: Refuge island with reduced lane widths introduced east of Sandford at entrance to upgraded Public Right of Way (PRoW) AX15/21. Traffic calming build-outs have been introduced on Churchill Green and Church Lane. Additional gateway feature proposed on Hillier's Lane.
- Sheet 5: Two raised tables (suitable for buses and HGVs) to be provided between The Drive and Front Street, and Puffin crossing (previously proposed) between Front Street and Skinners Lane to now be provided as a raised crossing.
- Sheet 7: Traffic calming build-outs with give-way alternating priority have been introduced along Church Road. Zebra crossing (previously proposed) between Church Road and Knapps Drive to now be provided as raised crossing.
- Sheet 8: Zebra crossing (previously proposed) west of The Chestnuts to now be provided as raised crossing. Road markings introduced along Sidcot Lane between The Chestnuts junction and A38 crossroads to reduce effective carriageway width. Two raised table features are proposed are proposed east and west of Belmont Road.
- Sheet 9: Further traffic calming build-outs have been introduced along Church Road.

- Sheet 11: Traffic calming build-outs have been introduced along Church Lane south of St John's Baptist Church. The carriageway has been narrowed to one lane along Church Lane at the proposed uncontrolled crossing, which is to include a raised crossing.

### **Speed Limit Extents**

2.3.6 The proposed extents of speed limits have been amended, with consideration given to additional speed survey data and discussions with the North Somerset Council Highways and Transport Development Management department regarding the application of relevant local and national standards and guidance across the local area. Wider Network Mitigation General Arrangement Drawing sheets 1, 2, 3, 4, 5, 6, 10 of 13 have been revised and further associated sheet-specific changes are described below in relation to the revised Wider Network Mitigation General Arrangement Drawings for convenience:

- Sheet 1: 30mph eastbound and 40mph westbound speed restrictions commencing at Towerhead House have been relocated east to Towerhead Brook with 20mph roundel road markings amended to 30mph. The existing 30mph section of Towerhead Road is therefore to be retained, rather than reduced to 20mph.
- Sheet 2: 20mph eastbound and 30mph westbound speed restrictions commencing at Towerhead Brook (sheet 1) have been relocated east to Orchard Drive with 20mph roundel road markings have been introduced. 20mph speed limit signs west of Orchard Drive no longer proposed, as existing 30mph speed to be retained.
- Sheet 3: 30mph eastbound and 20mph westbound speed restrictions commencing at GJ Virgo & Sons have been relocated west to Greenhill Croft. 40mph eastbound and 30mph westbound speed restrictions commencing at GJ Virgo & Sons have been introduced. The existing 30mph section of Greenhill Road between Greenhill Lane and Greenhill Croft is to be retained.

- Sheet 4: The existing 40mph speed limit would be retained to the east of GJ Virgo & Sons along the A368 (rather than being reduced to 30mph), with a short section to the west reduced to 30mph (rather than 20mph), thereby extending the existing extents of 30mph into Sandford. The majority of Hillier's Lane to the south of the existing dwellings has been retained as 30mph, with only the northern end of the road now reduced to 20mph. The Churchill Green speed limit has been reduced from the existing National Speed to 40mph west of Duck Street, with a reduced speed limit of 20mph to the east.
- Sheet 5: The extents of the proposed 20mph on Dinghurst Road have been reduced, with the existing 30mph retained east of Skinners Lane. A reduced 20mph speed limit is now proposed between Skinners Lane to west of The Drive.
- Sheet 6: As per sheet 5, the existing 30mph speed limit on the A68 Dinghurst Road between Skinners Lane and Churchill Gate junction is now proposed to be retained.
- Sheet 7: The transition of speeds limits between existing national speed limit on A371 towards Banwell and the proposed 20mph reduced speed limit through Winscombe have been revised. A transitional 40mph buffer is now proposed west of Church Road, with the transition to/from national speed limit relocated further west.
- Sheet 9: 20mph speed restrictions commencing on both Barton Road and Parsons Way have been relocated east to the intersections with Church Road. Existing speed limits on Barton Road and Parsons Way west of this transition point are proposed to be retained.
- Sheet 10: 30mph southbound and 20mph northbound speed restrictions commencing east of King's Wood Lane on Winscombe Hill have been relocated north to Winscombe Court/St James' Church. The existing 30mph speed limit on this section of Winscombe Hill is therefore proposed to be retained.
- Sheet 11: The transition of speeds limits between existing national speed limit on Church Lane and the proposed 20mph reduced speed limit have been revised. A transitional 40mph buffer (rather than 30mph) is now proposed north of Church Road.

## Sustainable Travel Proposals

- 2.3.7 Minor works are proposed at Nye Road at its junction with the A368, to improve the existing uncontrolled pedestrian crossing. This includes the relocation of the tactile paving and surface treatment, to improve the crossing for pedestrians. This is indicated on Wider Network Mitigation General Arrangement Drawing sheet 2 of 13.
- 2.3.8 Minor works are now proposed Hillier's lane at its junction with the A368, to provide an improved uncontrolled pedestrian crossing to serve the westbound bus stop opposite Hiller's Lane. This is indicated on Wider Network Mitigation General Arrangement Drawing sheet 5 of 13.
- 2.3.9 The proposed distance between the westbound and eastbound bus stop road markings outside Sandford Primary School has been increased to enable vehicles to undertake overtaking manoeuvres. This is shown on Wider Network Mitigation General Arrangement Drawing sheet 3 of 13.
- 2.3.10 The applicant has been asked to ensure that the gate, guardrail and steps on A368 Greenhill Road and the gate and steps at north terminus of Public Right of Way (PRoW) AX15/21 (leading into Churchill Green) be removed. Drawing notes have been added to state that steps at Greenhill Road are to be removed. An additional inset details the proposed entry/exit of cyclists from the A368 carriageway onto the proposed upgraded path, including the proposed refuge island to facilitate crossing of the A368. These amendments are shown on Wider Network Mitigation General Arrangement Drawing sheets 3 and 4 of 13.
- 2.3.11 As requested, the applicant has introduced a proposed 100m long 'ghost' footway along the length of Churchill Green between the intersection of PRoW AX14/21/20 with Churchill Green, and Churchill Academy. This is supported with associated builds-outs, an uncontrolled pedestrian crossing and footway warning signs, to provide a clearly demarcated and safe route for pedestrians. These amendments are shown on Wider Network Mitigation General Arrangement Drawing sheet 4 of 13.

- 2.3.12 As also requested, the applicant has produced and submits as part of this revised application two additional Wider Mitigation Drawings, which provide standard details for the proposed raised Zebra crossings and raised signalised crossings (pedestrian only, and Toucan) respectively. The Wider Mitigation General Arrangement Drawings Sheets 1 to 13 have been revised to provide information regarding the type of existing and proposed pedestrian crossings as part of the Scheme.

### **Summary**

- 2.3.13 The change to the application has been made following engagement with the Highways and Transport Development Management department of North Somerset Council, whilst considering the feedback from the Parish Councils and other relevant comments received on the application. The approach to revising the application has been collaborative and the applicant has sought to balance the concerns and needs expressed by different stakeholders.
- 2.3.14 The applicant has agreed with the North Somerset Council Highways and Transport Development Management department that no changes are required to the wider Transport Assessment, including in response to the updated wider mitigation proposals, however further commentary and analysis was requested for the Junction Modelling Report (Appendix F of the Transport Assessment). This is on the basis that:
- Junction modelling has previously been undertaken using traffic flows from two different strategic traffic model scenarios for the Scheme, both with and without the reduced speed limits associated included within the wider mitigation measures (full details of which are provided in the Junction Modelling Report). The minor reductions to the extents of the 20mph sections are not expected to have a material impact on traffic flows or journey times and because of this, an additional strategic model sensitivity test capturing them and associated additional junction modelling has not been undertaken. The results presented in an updated Junction Modelling Report provided to the LPA are considered to be suitably robust based on a conservative assessment.



- The impacts on road safety, severance and pedestrian amenity will not change materially as a result of the updated proposals. The additional traffic calming features proposed will improve compliance with the proposed reduced speed limits. The reduced extents of 20mph speed limits still support the overall Scheme objectives, as intended by the original wider mitigation proposals.

2.3.15 The detailed design and associated technical approvals of the Scheme will be agreed with the LPA, to be secured through an appropriate planning condition.

2.3.16 In summary, the applicant considers the impacts of the change are acceptable. Overall, the applicant considers the revised Scheme presents an appropriate balance considering safety, access and amenity matters. As such, the applicant considers the transport case for the Scheme is strengthened as a result.

## **2.4 Assessment of additional replacement playing fields for Banwell Football Club**

2.4.1 The change involves increasing the land required for the Scheme and helping ensure the replacement playing fields are as usable as the existing arrangement. In summary, the following changes have been made to the Scheme, which are shown on the updated plans as described and appended to the separate supporting Plans and Drawings Update document.

2.4.2 As part of the original planning application, the Open Space Assessment set out that the area of land to be acquired by the Scheme from Banwell Football Club was 25,680 square metres. Development Management Policy DM68 which applies to the application requires that alternative provision must be made which, in terms of quantity, must be at least equivalent in terms of size. It was therefore intended that 25,708 square metres of replacement land would be provided (via 'Option 1, land east of Banwell Football Club', as described in the Open Space Assessment).

- 2.4.3 However, since the application was made it has been necessary (in response to consideration of ongoing engagement and consultation responses) to create an easement strip for the existing landowner along the southern boundary of the replacement land. This will avoid the remainder of the landowner's field being 'land locked'. A separate easement is also proposed to maintain environmental fencing in the future. Furthermore, engagement with Banwell Football Club has involved discussions around the land to be taken as part of the scheme and the requirement to ensure that the replacement provision is as useful in terms of playing pitch provision.
- 2.4.4 As the easements impact on the replacement land, it is proposed that additional land is acquired in order to ensure that the Banwell Football Club receives an area equivalent to what is being taken by the scheme (which is not impacted by the easements).
- 2.4.5 As such, an additional 2,464 square meters of replacement land is now proposed to be acquired along the eastern boundary of the replacement land, to accommodate the easements.
- 2.4.6 In addition, an easement area of 508 square metres is being deducted from the replacement land area, which represents a change to ensure access from the Eastermead Lane to adjacent agricultural land to the east. For clarity, by virtue of this change, the area of replacement land for 'Option 1, land east of Banwell Football Club' as was initially set out in the Open Space Assessment, will now comprise 28,680 square metres.
- 2.4.7 The Scheme also now proposes the inclusion of an additional 4,884 square metres of land, south-west of Banwell Football Club, in order to accommodate an equivalent number of playing fields. This change is in response to further discussions with Banwell Football Club about the scope of their existing land (to be acquired by the scheme) to accommodate pitches. This change is considered acceptable in order to ensure the replacement land is of the same or greater usefulness, as well as size. That aligns positively with Development Management Policy DM68.

- 2.4.8 For clarity, by virtue of these changes, the total area of replacement land is now 33,564 square metres. The planning application is being amended accordingly to reflect this.
- 2.4.9 The change is illustrated on updated Red Line Boundary Plan Sheets 3 and 4 of 9.
- 2.4.10 Comments on the planning application have also been made pertinent to the planning status and assessment of relevant policy tests, also taking into account Sport England guidance.
- 2.4.11 Notwithstanding the planning status of the existing arrangement, the applicant considers that Local Plan Policy DM68 applies and is committed to providing replacement land (in the temporary construction and permanent operation phases) that is at least equivalent in terms of size, usefulness, attractiveness and quality, as summarised in the Open Space Assessment.
- 2.4.12 A question has been raised as to whether the protective provisions of policy DM68 apply because the route of the bypass was safeguarded. However, safeguarding (under policy DM20) is not the same as allocating the land for a particular use or development and therefore, so far as the land at Banwell Football Club is concerned, there are no allocation which would result in disapplication of this policy. Policy DM68, which seeks to protect sporting and community uses, therefore applies.
- 2.4.13 With regard to Policy DM68, DM69 and the policies of the Draft Local Plan 2038 (DP52 and DP57), the applicant can confirm it has considered the policies and associated principles, but focus has necessarily been had on DM68 / DP52. Whilst accepting the replacement land will change the use of land, the nature of the proposal in this area seeks to ensure acceptable alternative provision of sporting and community facilities. Arguably, the focus of DM69 / DP57 is ensuring that new proposals are acceptable.

- 2.4.14 Limited weight should be given to policies in the Draft Local Plan 2038, however, the applicant considers it is important to consider the interpretation of DM69 / DP57 (when considering whether the replacement land would be appropriate taking into account the policy principles), in the context of the nature of the proposals, in that those proposals primarily seek to achieve the policy principles of DM68 / DP52 (and associated tests outlined in the Open Space Assessment pertinent to relevant North Somerset Council and Sport England guidance on reprovion.
- 2.4.15 For example, when seeking to ensure that the replacement land “is at least as accessible” and “is at least equivalent in terms of... usefulness”, there could be policy tensions when then seeking to ensure the site “is in a sustainable location”, etc. The application isn’t seeking to relocate the entire facility, which arguably would mean policy DM69 / DP57 would carry greater weight in the consideration of the application.
- 2.4.16 Instead, the application seeks to replace a small part of the existing operation at Banwell Football Club (as required by Policy DM68) and it would not be appropriate to consider the merits of the whole site in its relation to the community it serves.
- 2.4.17 Even so, by working collaboratively with the football club, the applicant is reassured that the club itself considers an appropriate solution is being put forward by the applicant, which would allow it to continue to serve its community without detriment.
- 2.4.18 The key thrust of the objection received on this matter appears to be on whether the replacement land would prejudice the living conditions of neighbouring properties. The nature of the adjacent land is agricultural and as such it is not considered that the applicant has failed to consider this policy principle. The proposal has been appropriately considered and assessed as part of the Environmental Statement and Planning Statement. Furthermore, engagement with the relevant landowner is ongoing, and the replacement land is subject to the Compulsory Purchase Order.

- 2.4.19 Further clarification has been provided about the proposed mitigation during construction, involving temporary alternative off-site provision. The approach has been agreed with Banwell Football Club and details will be agreed subject to an appropriate planning condition.
- 2.4.20 The change has been made following engagement with Banwell Football Club and further to considering comments received on the application including but not limited to those submitted by Sport England and Savills (regarding Mr and Mrs Webber's land).
- 2.4.21 The applicant has set out its latest position in detail in its Response to matters associated with Banwell Football Club document, and its responses to Banwell Football Club, Sport England, Savills, and to a public comment submitted 13 October 2022.
- 2.4.22 The approach to revising the application has been collaborative and the applicant has sought to balance the concerns and needs expressed by different stakeholders.
- 2.4.23 Overall, the applicant considers the revised Scheme presents an appropriate balance considering the needs of the football club, impact of the Scheme and alignment with the relevant policies and guidance. As such, the applicant considers the environmental case for the Scheme is strengthened as a result.

## 2.5 Other planning and environmental considerations

- 2.5.1 Taking into account comments received on the planning application, the following matters have also been carefully considered with responses summarised below.

### **Assessment of alternatives**

- 2.5.2 For clarity, the applicant has provided written responses to comments received on the application where concerns or suggestions have been made in relation to alternatives. This is considered to provide points of clarification in support of the assessment of alternatives, which remains valid and accurate.

Changes to the design are not considered to have changed the assessment conclusions in Chapter 3 of the Environmental Statement. Considering the design evolution of the Scheme, the following matters are considered and clarified in turn:

- a) Replacement playing fields / Open Space Assessment
- b) Traffic Lights within Banwell Village
- c) 'Rat Running' along Riverside
- d) Optioneering process of potential routes and junction arrangements
- e) Western End Bypass alignment
- f) National Grid haul route / Southern Link Alignment
- g) Carbon Assessment

*Banwell Football Club*

2.5.3 Where concerns were expressed about the alternatives considered in relation to the proposed replacement playing fields and associated Open Space Assessment, a full response was provided by the application to the LPA: Response to matters associated with Banwell Football Club. A summary is presented below.

2.5.4 Section 4.4 of the Open Space Assessment clarifies that based on information supplied by Banwell Football Club and considering the policy test set out in Table 1 of the same document, a high-level appraisal was undertaken of seven different land parcels in the local vicinity. Those were arrived at taking into account the need to address the relevant policy tests set out in the Open Space Assessment and meet the needs of the football club. Of those seven land parcels, four were discounted, and three were carried forward as shortlisted options for more detailed assessment against the open space policy criteria.

- 2.5.5 North Somerset Council can clarify that it considered three options as reasonable alternatives only, namely the three shortlisted options subject to the Open Space Assessment. For completeness, the Open Space Assessment provides the contextual background to option identification, considering a longer list by virtue of the options put forward by Banwell Football Club as part of discussions around land acquisition and replacement land, including receipt of their “This is who we are...” report.
- 2.5.6 Section 2.2.1 of the Open Space Assessment explains that there is one preferred relocation site for replacement pitches (the proposed solution), two alternative potential sites (all three are assessed in detail in the Open Space Assessment) and four options not considered appropriate as set out in the “This is who we are...” report.
- 2.5.7 For clarity, the “This is who we are...” report details one preferred option (which ultimately the Open Space Assessment agrees is the preferred option for the purposes of replacement land) and four different alternatives, which were disregarded by North Somerset Council.
- 2.5.8 The reasons for discounting the four Banwell Football Club suggested options that didn’t make the shortlist, which was subject to the Open Space Assessment, are detailed in the “This is who we are...” report. An extract of the appraisal table is provided in the applicant’s ‘Response to matters associated with Banwell Football club’. In summary, reasons spanned a range of size, land type, car parking, need for welfare facilities, freehold/leasehold and severance issues.
- 2.5.9 North Somerset Council has satisfied itself that the Banwell Football Club appraisal information was sufficient to inform its decision making in discounting those options in light of the Open Space Assessment. For example, it considered quality, quantity, location and access issues associated with replacement land as required by relevant planning policy.

- 2.5.10 Further work by North Somerset Council following receipt and careful consideration of the “This is who we are...” report led to the identification of an additional two alternative options (not put forward in the “This is who we are...” report), which formed the shortlisted options alongside the preferred option in the Open Space Assessment. Those were identified through internal workshops held for the purpose of helping ensure all reasonable steps were taken to identify and consider possible and appropriate options including but not limited to those suggested by Banwell Football Club.

#### *Traffic Lights within Banwell Village*

- 2.5.11 The introduction of the proposed Scheme would largely reduce the volume of vehicular traffic within Banwell village. The reduction of traffic through Banwell due to the provision of the Banwell Bypass and Southern Link introduces the opportunity to make improvements to the existing road and public spaces within Banwell to enhance the historic and urban setting of the village. Please refer to the Placemaking Drawings 1-9 for more information.
- 2.5.12 Traffic lights have been considered in addition to the bypass proposals. The traffic modelling assessment determined that, from a traffic flow perspective, it is unnecessary to formalise the traffic arrangement in Banwell through the introduction of traffic lighting. This is due to the reduction in traffic volume in Banwell village as a result of the bypass and the stopping up of Castle Hill to motorised traffic. As noted within the incoming consultation responses, the informal ‘give and take regulation’ is generally well observed by vehicular users.
- 2.5.13 Traffic lights in Banwell to manage the flow of traffic at the junction of West Street, East Street, Castle Hill, High Street and Church Road have been considered as an option at Public Consultation but this has not been taken forward as part of this application. This is because any system of traffic lights at the junction would need to allow traffic from each of the five roads (West Street, East Street, Castle Hill, High Street and Church Road) to move one at a time and in sequence.



- 2.5.14 An initial assessment of the traffic light sequencing suggests that traffic queues on each of the five roads would build due to the delay in waiting for the traffic lights to turn green. The impacts from the traffic queuing at each of the five arms would potentially be worse than the existing situation and as such would not meet the scheme objectives.
- 2.5.15 Banwell village is within a conservation area, and the introduction of traffic lighting was determined as unnecessary street furniture that would impact the character and appearance of the conservation area.
- 2.5.16 The inclusion of traffic lights would have a negative impact on the setting, placemaking and the appreciation of the historic core of Banwell and the associated Listed Buildings. Additional clutter from the traffic lights and queuing traffic would degrade the visual appearance and overall aesthetic of the village.
- 2.5.17 The stop / start of traffic associated with traffic lights could also be less safe for pedestrians and school children.

*‘Rat Running’ along Riverside*

- 2.5.18 The concern of ‘rat running’ along Riverside was considered during design development work and this contributed towards the decision to bridge the bypass carriageway over Riverside, instead of an at-grade junction, which was discounted following disadvantages that were identified including the likelihood of ‘rat running’.
- 2.5.19 The provision of a free flowing bypass will dissuade ‘rat running’ to the M5 along Riverside. The introduction of reduced traffic speeds, from 30mph to 20mph, along the length of Church Street in the vicinity of the Crescent will also dissuade ‘rat running’ to the M5 along Riverside Road. The 20mph speed limit proposals in the village of Banwell have been assessed within the traffic modelling and combined with the existing and proposed placemaking making works, are sufficient to dissuade ‘rat running’, without the need for traffic lights in Banwell village. In addition, the placemaking measures as part of the Scheme will complement the existing traffic calming measures within Banwell village.

- 2.5.20 The forecast traffic model shows some reductions and no significant increases in traffic flows along Riverside as a result of the Scheme.

*Optioneering process of potential routes and junction arrangements*

- 2.5.21 Options identification and appraisal has been an iterative process throughout design development work, culminating in the preliminary design subject to this application. TAG outlines the transport appraisal process and associated requirements for transport interventions. Options appraisal has followed the assessment methodology outlined within the WebTAG 'Transport Appraisal Guidance' (TAG), as is appropriate.
- 2.5.22 TAG provides guidance on identifying the need for intervention and developing options through an objective-led and evidence-based approach.
- 2.5.23 The TAG process is separated into three stages: Stage 1 – Option Development; Stage 2 – Further Appraisal; and Stage 3 – Implementation, Monitoring and Evaluation. The optioneering process states that at Stage 1 analysts should start with a wide range of options, if possible, and these are narrowed down following an initial sifting that discounts options which do not represent reasonable solutions.
- 2.5.24 Options can be discarded if they would clearly fail to meet the key objectives identified for intervention; do not fit within existing local, regional, and national programmes, and would be unlikely to pass key viability and acceptability criteria.
- 2.5.25 TAG states that “for Stage 1, where there are a large number of options, it would be impractical and costly to undertake detailed design and specification. Instead, the design should be sufficient to identify the intervention’s location, and key features and characteristics ”<sup>2</sup>.

---

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/938766/tag-transport-appraisal-process.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf)

- 2.5.26 A long list of options was identified and assessed at a high level against the WebTAG criteria and Scheme objectives. Please refer to the Environmental Statement Appendix 3.A – Options Appraisal Report for the list of initial options. This included the National Grid Haul route, which is raised in the comments on the application.
- 2.5.27 Following the assessments undertaken on the long list of options, the worst performing / lowest scoring options were discarded. Three Northern Bypass options were shortlisted for further optioneering and appraisal, being the options that performed / scored the best. This aligned with the outcome of the Options Appraisal Study conducted in 2018 and the results of the Banwell Transport Area Study commissioned in 2000 by North Somerset Council, helping validate earlier decision making.
- 2.5.28 A more detailed WebTAG appraisal Stage 2 was then undertaken to obtain sufficient information to inform decision making when considering Northern Option 1, Option 2, and Option 3. This considered further survey information and traffic modelling of the highway network scenarios.
- 2.5.29 The design and associated options appraisal process has also been subject to public consultation, with feedback helping inform the preliminary design.
- 2.5.30 The three shortlisted and assessed options were proposed to a six-week public non-statutory consultation between 5 July to 16 August 2021. This helped enable the public and other stakeholders to provide feedback on the Scheme proposals, as well as suggest alternatives. All consultation responses received were analysed and considered carefully. In summary, 46% selected northern route Option 2 as the option that best achieved the scheme objectives, and ultimately was determined as the preferred route subject to further environmental and traffic assessments.
- 2.5.31 In summary, the applicant has undertaken a balanced WebTAG study where positive and negative issues have been identified and considered, with the outcomes summarised in Table 5 of the Options Appraisal report (Environmental Statement Volume 3 Chapter 3 Appendix 3.A Options Appraisal Report).

- 2.5.32 Option 2 was the option that best achieved the scheme objectives, and ultimately was determined as the preferred route subject to further environmental and traffic assessments.

*Western End Bypass alignment*

- 2.5.33 At the options appraisal stage, it was appreciated that the final route of the Common Route Alignment (CRA) (the western end of the bypass) may be amended from that shown in Image 3 of the Options Appraisal Report (Environmental Statement Volume 3 Chapter 3 Appendix 3.A Options Appraisal Report). However, due to the minor alternative alignment opportunities, the impacts and constraints of any differing alignments were the same as or similar to the CRA. Therefore, the impacts and constraints of the alternative alignments were not discussed further within the Options Appraisal Report.
- 2.5.34 During design development work, the CRA was reviewed and amended, however, a suitable alternative alignment was not identified other than the initially proposed bypass alignment.
- 2.5.35 A comparison of the proposed bypass submitted as part of this planning application, to the safeguarded route alignment, shows how alterations have been made to the western end of the proposed bypass. In particular, the horizontal alignment at the western roundabout has been relocated along the A371 to reduce the impact on Summer Lane Caravan Park, and Summer Lane and Well junctions to the west.
- 2.5.36 Alterations to the western end of the bypass alignment have been limited to realignments further north, however, this is restricted by the location of Summer Lane Caravan Park. This was considered within the junction selection work.
- 2.5.37 A signalised junction was discounted as it would have resulted in the bypass being much closer to Summer Lane Caravan Park, resulting in greater environmental impacts, mainly noise, air quality and landscape / visual effects, at Summer Lane Caravan Park. A roundabout solution offered the opportunity to change the horizontal alignment of the bypass over a shorter distance and therefore enabled the bypass to be moved further away from Summer Lane Caravan Park.

*National Grid haul route / Southern Link Alignment*

- 2.5.38 The consideration of the National Grid haul route in the long list of options of the appraisal included the continued vehicular accessibility to Dark Lane and Castle Hill for traffic between Banwell and Winscombe. The objector's suggested proposal to the stopping up of Dark Lane and Castle Hill would excessively increase the travel time for Banwell residents to access the alternative route and create a 'dead' route along the A371 between the Castle Hill and the National Grid tie-in.
- 2.5.39 Following an initial optioneering assessment and WebTAG assessment, the National Grid Haul route was discounted for reasons including the adverse impacts on the environment if the haul route was made a permanent solution.
- 2.5.40 Compared to the proposed Southern Link, the haul route would involve a greater adverse effect on more land holdings, would result in only a limited reduction in traffic volume through Banwell village, have a much larger ecological loss within an Area of Outstanding Beauty (AONB), and would perform worse against the Scheme objectives. Further information can be found in ES Volume 1 Chapter 3 – Alternatives Considered. It should be noted that the permanent proposal of the National Grid route would require an additional planning consent to that already in place for the temporary solution, thus not offering any efficiencies to the programme etc.
- 2.5.41 Due to the strategic nature of the route in the local area, and the requirements of North Somerset Council's Highways Development Design Guide, the preliminary design of the Banwell Bypass and Highway Improvements has been designed using the principles set out within the requirements of DMRB.
- 2.5.42 Any deviations away from DMRB requirements have been undertaken following an assessment that has concluded that the outcomes would result in overall project benefits, and which would better align with project outcomes. All deviations from the DMRB have been recorded as Departures from Standards. The Southern Link Road has been designed in line with the DMRB.

- 2.5.43 In response to the concern raised regarding cut and fill within paragraph 4.4.10 of the Planning Statement, the Southern Link alignment has been optimised during design development work to minimise cut and fill. An offset to the existing alignment would require an increased area of cut or fill along the length of the carriageway and diverge from scheme objectives.

#### *Carbon Assessment*

- 2.5.44 Carbon assessments are undertaken in accordance with PAS 2080 and will be continued throughout detailed design. This is documented within the Carbon Management Plan (Environmental Statement Volume 3 Chapter 14 Appendix 14.D). It defines how the quantification and management of whole life carbon emissions associated with the project will be carried out for the Scheme.
- 2.5.45 The Carbon Management Plan states that opportunities to reduce carbon can arise through the careful selection of supplier details, this includes the consideration of the selection of quarry for sourced aggregates. The concern regarding a shortage of local materials is acknowledged, and the obtainment of construction materials is being carefully considered as part of the Early Contractor Involvement (ECI), with contractor input throughout the design process, including close collaboration with material suppliers. Therefore, viable options to attain the necessary construction materials, whilst taking opportunities to reduce carbon, remain under consideration.
- 2.5.46 This additional information helps to validate the applicant's position that alternatives have been identified and assessed at all key stages of the planning and design process.

#### **Air quality**

- 2.5.47 As detailed out in Chapter 5 of the Environmental Statement Update Report, particulate monitoring in Banwell will be secured through an appropriate planning condition.
- 2.5.48 Separately, a construction management plan will be prepared at the detailed design stage to minimise the impacts of human receptors in the vicinity of the proposed construction works.

- 2.5.49 That plan shall provide information regarding measures to control the emission of dust (in accordance with the methodology provided in the IAQM 2018 Guidance on Monitoring in the Vicinity of Demolition and Construction Sites) and dirt during construction.
- 2.5.50 The speed control measures and speed limit extent changes within the villages of Churchill, Winscombe and Sandford are limited in speed change and spatial extent and do not materially alter the scope of the Scheme which was originally assessed. This is unlikely to cause a significant change in average speeds or traffic flows on the assessed road network therefore no change to the Environmental Statement conclusion on air quality impacts is anticipated.
- 2.5.51 The applicant considers that additional information verifies and helps strengthen the air quality case for the Scheme.

### **Cultural heritage**

- 2.5.52 As detailed out in Chapter 6 of the Environmental Statement Update Report, geoarchaeological analysis has determined the palaeoenvironmental significance of the Tidal Flat Deposits below the Scheme is low overall and does not merit further investigation.
- 2.5.53 Some areas of the Scheme, including the Moor Lane to Riverside link and the eastern compound, were not included in the original geophysical surveys carried out prior to the publication of the Environmental Statement. These areas are covered in the Geophysical Survey Report that has been submitted to the LPA. No additional archaeological sites were identified by this survey.
- 2.5.54 The applicant has also submitted five addendums to Chapter 6 of the Environmental Statement, alongside detailed responses to comments raised by Historic England, the North Somerset Council Archaeologist, and Conservation and Heritage Officer. In turn, they address:

1. Hydrology
2. Evaluation Trenching (Summary)
3. Assessment of Banwell Monument and Bone Caves
4. Proposed Demolition of part of a Boundary Wall at 25 Castle Hill and likely Impact on the Banwell Conservation Area
5. Palaeoenvironmental Assessment

2.5.55 The applicant considers that additional information verifies and helps strengthen the cultural heritage case for the Scheme.

2.5.56 Historic England and the North Somerset Council Senior Archaeological officer raised queries about the visual setting to the Conservation Area, Listed Buildings and Scheduled Monuments. These are addressed in the Cultural Heritage update found in Chapter 6 of the Environmental Statement Update Report, and no change is proposed to the landscaping proposals including planting for the Scheme.

### **Landscape**

2.5.57 In their response Natural England requested that where the additional land would be immediately available to be managed as mitigation for impacts on Horseshoe bats, planting or appropriate management should occur at the start of construction or ahead of construction if possible. This has been accepted and details will be included in the Landscape and Ecology Management Plan (LEMP).

2.5.58 As detailed in Chapter 7 of the Environmental Statement Update Report, The Mendip Hills AONB Authority has responded in support of the planning application, and the applicant is committed to working with the AONB Authority as appropriate through the detailed design, construction and aftercare phases of the Scheme implementation.



- 2.5.59 In particular, the applicant will work closely with the AONB Authority to ensure that there is no change to the setting of the AONB based on these or any further changes as the detailed design progresses, should the Scheme proceed.
- 2.5.60 In addition, some minor amendments have been made to address the utilities requirements for low height planting associated with the utilities easements. This has resulted in some changes in design from woodland planting to scrub, woodland edge or grassland to ensure that the requirements are adhered to. Information received from the Utilities companies have confirmed that planting of hedgerow species is acceptable, but they should not include tree species. The overall areas covered by the landscape elements has not significantly changed, and there is no change to the proposed landscape functions.
- 2.5.61 The applicant considers that additional information verifies and helps strengthen the landscape case for the Scheme.

### **Biodiversity**

- 2.5.62 As detailed in Chapter 8 of the Environmental Statement Update Report, the Habitat Evaluation Procedure (HEP) calculation has been updated. The updated HEP has calculations for both Habitat Loss and Mitigation Provided with risk multipliers applied to the latter, as requested by Natural England and the North Somerset Council Ecologist. The output for the new Habitat Loss calculation is 13.31Ha of mitigation required (minimum requirement). The Mitigation Provided calculation has an output of 17.31Ha (equivalent) mitigation being provided, which is more than the minimum required.
- 2.5.63 The assessment has also been updated to reflect the change in land take for replacing playing fields at Banwell Football Club.
- 2.5.64 Also as agreed with Natural England and the North Somerset Council Ecologist, additional bat mitigation is proposed, including additional hop overs for safe bat crossing points and an additional 7.7Ha of land for bat mitigation.

- 2.5.65 Management plans will be developed for the land identified through the HEP as bat mitigation, in particular for grazing management, to be secured by an appropriate planning condition.
- 2.5.66 The Environmental Masterplans have been submitted as part of the separate supporting Plans and Drawings Update report.
- 2.5.67 The design changes and results of the updated assessment are considered to verify and help strengthen the biodiversity case for the Scheme.

### **Geology and Soils**

- 2.5.68 As detailed in Chapter 9 of the Environmental Statement Update Report, the area of historical landfill will be further investigated to better characterise the potential sources of contamination and the extent of the landfill within the Scheme footprint. This will include soils and groundwater sampling, and ground gas monitoring.
- 2.5.69 The results will inform a foundation works risk assessment. This will be undertaken at the detailed design stage, should the Scheme proceed. The foundation works risk assessment will be prepared for the proposed piling works as part of the detailed design stage. This will ensure that the works do not result in unacceptable risks to the controlled waters receptors and human health and inform the materials management during the piling works.
- 2.5.70 As part of the construction management plan, which will be prepared at a detailed design stage should the Scheme proceed, a soil management plan will be produced. The plan will present a verification plan for materials use within the construction. In addition, it will set out acceptance criteria for use of materials sourced from the Scheme and imported materials.
- 2.5.71 In relation to the design changes requiring additional land in relation to additional bat mitigation and replacement playing fields at Banwell Football Club, all land is currently agricultural land.

- 2.5.72 The change to Agricultural Land Classification (ALC) area impacted by the revised Scheme is presented in Table 9.1 of Chapter 9 of the Environmental Statement Update Report. In summary, the increased areas of each of impacted ALC grade class do not exceed assessment thresholds and therefore there is no change to the completed assessments.
- 2.5.73 The applicant considers that additional information verifies and helps strengthen the geology and soils case for the Scheme.

### **Noise and vibration**

- 2.5.74 As detailed in Chapter 11 of the Environmental Statement Update Report, the speed control measures and speed limit changes within the villages of Churchill, Sandford and Winscombe are limited in speed change and spatial extent and do not materially alter the scope of the Scheme which was originally assessed. This is unlikely to cause a significant change in average speeds or traffic flows on the assessed road network therefore it is considered there is no change required to the Environmental Statement conclusion on operational noise impacts.
- 2.5.75 The applicant considers that additional information verifies and helps strengthen the noise case for the Scheme.

### **Population and human health**

- 2.5.76 As detailed in Chapter 12 of the Environmental Statement Update Report, changes involve additional land for Banwell Football club and providing additional speed control interventions and reducing the extents of speed limit changes as part of the proposed wider mitigation measures
- 2.5.77 These have been reviewed and whilst beneficial to people and human health, they would not result in any changes to the assessment of conclusions of the ES Chapter 12.
- 2.5.78 The applicant considers that additional information verifies and helps strengthen the population and human health case for the Scheme.

## **Road drainage and water environment**

- 2.5.79 As detailed in Chapter 13 of the Environmental Statement Update Report, the hydrological impact assessment would support an application for an abstraction licence, which would regulate the removal of groundwater from the aquifer. The hydrogeological impact assessments would set out monitoring requirements (including the duration and responsibilities), which would be incorporated into the Environmental Management Plan for the proposed scheme.
- 2.5.80 The applicant considers that additional information verifies and helps strengthen the road drainage and water environment case for the Scheme.

## **Climate**

- 2.5.81 As detailed in Chapter 14 of the Environmental Statement Update Report, the only changes to the design that could impact total GHG emissions from the scheme are from changes in habitat mitigation. Land use change would result in 48.5 tCO<sub>2</sub>e, 0.27% of the total construction emissions. As such, minor changes to the habitat mitigation are considered to have a negligible impact to the outcome found within the Environmental Statement.
- 2.5.82 The speed control measures and speed limit changes within the villages of Churchill, Sandford and Winscombe are limited in speed change and spatial extent and do not materially alter the scope of the Scheme which was originally assessed. This is unlikely to cause a significant change in average speeds or traffic flows on the assessed road network, therefore it is considered there is no change to the Environmental Statement conclusion on climate.

## **Cumulative Effects**

- 2.5.83 As set out in Chapter 15 of the Environmental Statement Update Report, there is no change with respect to the cumulative impacts with other developments.

## 2.6 Assessment conclusions of other submission documents in support of the application

- 2.6.1 This Planning, Design and Access Update Report provides an updated position to the Planning Statement and Design and Access Statement submitted in support of the planning application.
- 2.6.2 The Environmental Statement Update Report provides an updated position to the Environmental Statement takes into consideration the assessment reported in the Environmental Statement to include the Technical Report (Volume 1), Figures (Volume 2) and Technical Appendices (Volume 3).
- 2.6.3 The Plans and Drawings Update provides revised Red Line Boundary Plan, Highway Drainage Drawing, Private Means of Access Visibility Plan, Wider Mitigation General Arrangement Plans, Environmental Masterplans, and General Arrangement Drawings.
- 2.6.4 The planning application is supported by other submission documents, as listed in Table 1 of the application cover letter and considered in the Planning Statement. These include:
- Consultation Reports
  - Flood Evacuation Plan
  - Health Impact Assessment
  - Open Space Assessment
  - Walking Cycling Horse-riding Assessment Report and Review Report – Preliminary Design
  - Surface Water Drainage Strategy
  - Lighting Strategy
  - Speed Limit Assessment

- Transport Assessment
- Stage 1 Road Safety Audit Response

2.6.5 The applicant considers that the assessment conclusions of those documents remain valid, but are complemented by the additional information and points of clarification provided within this Planning, Design and Access Update, including the documents listed in its Table 1 and Table 2, and the Environmental Statement Update Report.

## 2.7 Case for the Scheme

2.7.1 The design changes and their assessed impacts as considered within the additional application documents serves to help demonstrate that the case for the scheme is improved further as part of the revised application, and that the Scheme continues to achieve its objectives as presented in Table 8 of the Planning Statement.

2.7.2 In particular, the additional bat mitigation, area of replacement playing fields for Banwell Football Club, and revised extents of speed limit changes as part of the wider mitigation measures – have all successfully addressed concerns raised on the original application. As such, the changes are considered to be improvements to the Scheme that further make the case for the proposed development being the preferred and best solution to deliver NSC Local Plan Policy DM20 and address the need for intervention described in section 1.2 of the Planning Statement.

## 2.8 National and local planning policy assessment

2.8.1 The relevant national legislative and policy context for the Scheme is set out in Section 5 of the Planning Statement, and remains unchanged. The assessment in Section 5 of the Planning Statement demonstrates that the Scheme complies with the relevant policy considerations of the NPPF in so far as they are important and relevant.

- 2.8.2 The relevant local policy context for the Scheme is set out in Section 5 and Appendix A of the Planning Statement, and remains unchanged.
- 2.8.3 An assessment of the Scheme against adopted and emerging local planning policy documents has been undertaken and is provided in Appendix B of the Planning Statement. The assessment demonstrates that the Scheme complies with local planning policy.
- 2.8.4 The design changes and their assessed impacts as considered within the additional application documents serves to help demonstrate that that the revised Scheme complies with national and local planning policy. The Environmental Statement Update Report has not identified any additional significant adverse effects and describes the improvements to the environmental case for the Scheme.
- 2.8.5 In particular, the applicant considers:
- a) The additional bat mitigation that has been agreed with Natural England and the North Somerset Council Ecologist helps ensure the relevant biodiversity policy tests continue to be met, with the environmental case for the Scheme being strengthened.
  - b) The additional area of replacement playing fields during operation and provision for temporary re-provision during construction that has been agreed with Banwell Football Club, helps ensure the relevant open space and playing field policy tests continue to be met, with the environmental case for the Scheme being strengthened.
  - c) The revised extents of speed limit changes and wider mitigation measures that have been agreed with North Somerset Council Highways and Transport Development Management department, helps ensure the relevant transport policy tests continue to be met, with the transport case for the Scheme being strengthened.

## 3 Conclusion

---

- 3.1.1 This update report has considered the additional information and application documents listed in Table 1 and Table 2, and the key design changes made to the application, and the likely impacts of the revised Scheme. The conclusions made in the Planning Statement, and Design and Access Statement, remain valid.
- 3.1.2 An Environmental Statement Update Report has considered and assessed the revised Scheme, and the conclusions made in the Environmental Statement remain valid.
- 3.1.3 The design continues to be driven by the local land use and character, and the relevant policy drivers for good design. These have formed design principles to guide the Scheme positively responding to landscape and heritage, biodiversity, people and climate factors.
- 3.1.4 The Scheme has been designed to high standards and will result in beneficial outcomes in terms of transport, economic, social and environmental benefits, which align with the vision and achieve the objectives of the Scheme. The identified benefits from the sustainable design and access of the Scheme will help ensure that it meets relevant policy requirements with regard to design and access.
- 3.1.5 The benefits of the Scheme will significantly outweigh any harm predicted. Mitigation and enhancement measures have been identified as set out in the Environmental Statement and its Update Report, seeking to protect and enhance the natural and built environment.
- 3.1.6 Having weighed up each of the elements assessed in respect of the Scheme and its likely impacts, considering compliance with national and local planning policy, and the transport, economic and environmental case for the Scheme, it is considered that the policy tests have been further met.
- 3.1.7 This update report has further demonstrated why the proposed development subject to this application should proceed.