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# **Bath & North East Somerset Council**

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## **Core Strategy and Site Allocations Development Plan Documents**

### **Sustainability Appraisal Final Scoping Report**

**Executive Summary  
December 2007**

**Planning Services  
Bath & North East Somerset Council**

Making Bath & North East Somerset an  
**even** better place to live, work and visit

## 1. Sustainability Appraisal Scoping Report

- 1.1 Bath & North East Somerset has begun preparation of a Core Strategy for the District and work is also soon to begin on the Allocations Development Plan Document (DPDs). Sustainability Appraisals are now an integral part of producing planning documents under the Planning and Compulsory Purchase Act 2004. When preparing DPDs local authorities must also meet the requirements of the European Directive<sup>1</sup> 'on the assessment of the effects of certain plans and programmes on the environment' commonly known as the Strategic Environmental Assessment (SEA) Directive.
- 1.2 The purpose of the Sustainability Appraisals (SA) is to ensure that environmental, social and economic considerations have been integrated into the preparation of DPDs. **This report sets out the SA framework which will be used to test the spatial objectives and options of these DPDs and will help to identify the most sustainable options available.**
- 1.3 This report has been prepared for consultation on the scope and level of detail that should be included in the SA. This Scoping Report is the first stage of a SA and incorporates the requirements for a Strategic Environmental Assessment (SEA).

## 2. Brief for the Core Strategy and Allocation DPD

- 2.1 **The Core Strategy** will set out the long term planning framework for Bath and North East Somerset. It will include the spatial vision, objectives and policies for a 10 year period from the adoption but also looking ahead to 2026. A key diagram will define the broad locations for strategic development sites. It also sets out policies to protect the environment.
- 2.2 To deliver the necessary development set out in the Core Strategy and Regional Spatial Strategy, the Council will produce **the Site Allocation DPD**. This will be based on an assessment of the sustainability and availability of land for housing, employment, retail and other development and delivery mechanisms. The DPD will be structured to take particular account of the different needs of different parts of the District.

## 3. Overall Methodology

- 3.1 The methodology for this appraisal was developed in accordance with guidance published by the ODPM (now DCLG).<sup>2</sup> In order to carry out the SA process effectively in an integrated manner, the Council has established the SA Group. The Group consists of officers with specialised expertise to cover Economic, Social and Environmental aspects. The SA Group work is led by the Planning Policy Team and SA workshops will run parallel to the DPD process in order to appraise options and emerging policies. The Council has also appointed an external consultant (Environ UK Limited) to provide 'critical friend' support to the SA group and to ensure the SA process is sound and accords with the regulations.

## 4. Topic Based Reviews

- 4.1 In order to assist the identification of key issues and use these to establish SA objectives, the scoping of existing policies and strategies, the baseline information and the identification of key sustainability issues are grouped and presented in the topic based sections. Each topic section leads to a number of specific SA objectives listed at the end of each section.

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<sup>1</sup> 2001/42/EC

<sup>2</sup> *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks* (ODPM Nov 2005)

## 5. Summary of the Key Issues

- 5.1 The climate change issue (both mitigation and adaptation) is an overarching issue for sustainable development therefore the implications of climate change must be considered through all topic areas.

### Air Quality and Noise

- 5.2 **Poor Air Quality in Bath City Centre** The main cause of pollution is transportation congestion. An area along London Road was declared an Air Quality Management Area (AQMA). A number of traffic 'hot spots' along the A-road network that exist elsewhere in the city have levels of pollution higher than the Government's acceptable limits and the Council must now declare more AQMAs.

### Biodiversity, flora and fauna

- 5.3 Bath and North East Somerset is a district rich in biodiversity with a range of sites designated internationally as well as locally for their ecological value which require protection. There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends and therefore a precautionary approach must be taken to development.
- 5.4 Although there are notable internationally important sites in the district which demand considerable regard in terms of planning, the success of habitats and species depends upon an ecosystem approach. Therefore the value of habitats not designated and habitat networks need consideration and protection. This is particularly pertinent in the light of climate change.

### Climate Change

- 5.5 The Council has a commitment to contributing towards the delivery of the UK climate change programme. There have been no major renewable energy schemes undertaken in the District and the LDF, guided by the SA, should provide the framework to assist delivery of the Council's commitments.
- 5.6 **Potential conflicts and pressure on land use:** There are conflicts between the needs of society, including economic and social development, the protection of the natural and historic environment, and the need to mitigate climate change. The balance between these demands will change as society, economic factors and technology change and adapt to our increasing understanding of climate change. These conflicts need to be recognised and dealt with in a responsible, flexible and creative way in order to serve the best interests of Bath and North East Somerset and its residents and businesses.
- 5.7 New development and redevelopment can have significant implications on flood risk. Strategic Flood Risk Assessment is in preparation and DPDs and SA should take account of this assessment.

### Cultural Heritage, Landscape and Archaeology

- 5.8 **Historic Environment:** Our wealth of historic assets, including 37 Conservation Areas, 6400 listed Buildings and the World Heritage Status of Bath together contribute to an exceptional historic environment. Current archaeological information on Bath is incomplete, as is knowledge about what will and will not have an adverse impact on buried or standing archaeology. Therefore the process of appraisal and assessment as defined in "*The Archaeology in Bath & North East Somerset*" SPG is important to ensure that archaeological remains are properly protected.
- 5.9 **B&NES has a rich and diverse landscape:** The Cotswold and Mendip Hills are recognised as being of national importance and are granted the status of Areas of Outstanding Natural Beauty (AONB). Much of the rural parts of the District are within the Bristol/Bath Green Belt which is an important control in maintaining the open character of these areas. The Forest of Avon is also a significant designation which covers the whole of the District except for those parts designated as AONBs. Two significant waterways: the River Avon and the Kennet and Avon Canal, along with

Chew Valley and Blagdon Lakes are important landscape features and resources for recreational use.

### **Economic Development**

- 5.10 **Employment:** There are significant local differences in unemployment. The public sector is the dominant employment sector across Bath and North East Somerset, especially in Bath. Retail and tourism are also key employment sectors in Bath resulting in many low skilled and / or low wage jobs. The Midsomer Norton and Radstock area is particularly vulnerable to wider economic change due to its dependence on a narrow range of manufacturing sectors.
- 5.11 **Skills:** There is an uneven spatial distribution of skills levels in the District with particular low skills issues in Midsomer Norton & Radstock and in wards of south west Bath.
- 5.12 **Work space:** The Bath and North East Somerset area, but especially Bath, currently faces a projected deficit in the provision of office space. The whole area suffers from a lack of speculative development of employment premises which has resulted in a cycle of low investment and loss of confidence as a location for business.
- 5.13 **Retail:** Bath under-performs on a number of the criteria tested by existing retail ranking surveys mainly because the floor space in Bath is limited by the Georgian period properties that dominate the City centre. There is a perceived limited supply of car parking within the main shopping area. Keynsham has only a limited number of national multiples and has a small catchment area for comparison shopping. The centre of Midsomer Norton has a good range of shops that cater for the day-to-day needs of local residents, however, it has only a limited number of national multiples and has a small catchment area for comparison shopping. In Radstock town centre Heavy traffic on the A362 and at the A362/A367 roundabout junction neither creates a pleasant shopping environment nor does it encourage pedestrian movement between the different parts of the town centre.
- 5.14 **Commuting:** High levels of out-commuting from Midsomer Norton and Radstock due to lack of provision of appropriate employment opportunities in the local area means that the link road south from Bath to Midsomer Norton and Radstock struggles to cope with current levels of commuter traffic. This also applies to Keynsham.

### **Housing**

- 5.15 **High house prices and housing shortage:** House prices in B&NES are significantly higher than the regional sub-regional and national average. The scale of house price inflation over recent years has led to a rapid deterioration in affordability. Higher house prices mean that significant numbers of local workers are unable to buy a home in the area where they work or were brought up. Problem varies with severity across the District.
- 5.16 **Shortage of Affordable Housing:** There is an imbalance between supply and demand for RSL properties. The current supply meets less than 15% of the demand identified through the Homeseekers Register.

### **Natural Resources, Water and Soil**

- 5.17 **Water Quality:** The river quality in Bath and North East Somerset is generally 'Fairly Good' or better according to the Environment Agency's monitoring. The Environment Agency has identified several areas as a Source Protection Zone.
- 5.18 **Hot Springs:** The hot springs in Bath have been, and continue to be, at the centre of economic, social and cultural developments in the City. As such, their protection is of paramount importance locally and nationally.
- 5.19 **Water availability and Climate Change:** The South West part of Bath and North East Somerset appears to show a slight water deficit with the 'no saving' scenario and compared to other counties in the South West. Managing the supply demand balance, in the face of the uncertainty of climate change and maintaining environmental standards, will be a major challenge for water resources management in the future.

- 5.20 **Efficient use of Previously Developed Land (Brownfield Land):** In the period 2005/06, 55% of new housing was built on previously developed land. Previously developed land may be contaminated from its previous use and require remediation before it can be redeveloped.

### **Safer and Stronger Communities**

- 5.21 **Changing population dynamics** There are increasing numbers of older people and decreasing numbers of younger people. Inward migration is also increasing, with emerging trends in the number of migrant workers attracted to the area from Eastern European countries.
- 5.22 **Access to facilities and local services:** The rural nature of the district means that communities face barriers in accessing day to day local services.
- 5.23 **Improving health and well-being:** There are pockets of health inequality broadly in line with areas of deprivation and the impact of an aging population will impact on healthcare provision in the future. Obesity is an increasing issue facing the whole of the country.
- 5.24 **Crime and the fear of crime:** Particular hotspots of activity are noticeable across the district. Children and young people's fear of crime is an identified issue in the area with the need for safe and attractive play spaces being identified by children as being particularly important.
- 5.25 **Stronger and cohesive communities –** There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. These issues coupled with a strong sense of local distinctiveness and pride in local areas shows that the sustainability objectives need to encourage the development of communities in a strong and cohesive way.
- 5.26 **Affordable housing and special needs housing:** Identified as a major issue in Bath & North East Somerset is the continued rising cost of housing in comparison to earnings. (See para 5.15 above)

### **Transport**

- 5.27 **Congestion:** The congestion in Bath City Centre, A4 between Bath, Keynsham and Bristol is particularly severe. Bus services are affected by traffic congestion causing reliability problems. Congestion and journey time delays affect rural communities as well as urban areas. Congestion also contributes to worsening air quality and the emission of major pollutants such as CO<sup>2</sup>, NO<sup>2</sup> and NO<sub>x</sub>.
- 5.28 **Accessibility:** Improvements in public transport can contribute significantly to improving accessibility to jobs, shops, school and services. Communities and individuals are often isolated due to the lack of convenient or attractive public transport. Cycling and walking networks often rely heavily on the all-purpose highway network, where heavy traffic flows, fumes, vibration, noise and intimidation all deter walking and cycling.
- 5.29 **Road safety:** More casualties occur within the built-up areas where traffic flows are highest, there is a greater density of vehicular turning movements, and the greatest potential for conflict between drivers and other road users. With the concentrations of pedestrians in city and town centres the design and maintenance of public spaces, crossings and footways have an impact on safety.
- 5.30 **Air Quality** in Bath City Centre has been poor. The main cause of pollution is transportation congestion.

### **Waste**

- 5.31 **Need to reduce waste generation, reduce waste to landfill and increase recycling:** There is a need to reduce waste generation and increase recycling in order to minimise waste disposal and reduce the use of energy and natural resources, and to reduce emission of the greenhouse gas methane (landfill is a major source of this gas).

## 6. Sustainability Appraisal Framework (Matrix)

6.1 The selection of objectives within the SA framework has come from the Topic Reviews undertaken and a brief review of SA objectives used in other recently published SA reports in other areas of the country. *The Strategic Sustainability Appraisal for the Draft Regional Spatial Strategy for the South West 2006 – 2026 (March 2006)* was closely assessed since the DPDs will have to be in general conformity with the Strategy.

SEA/SA Objectives	
Objective 1	Improve accessibility to community facilities and local services
Objective 2	Improve the health and well-being of all communities
Objective 3	Meet identified needs for sufficient and high quality housing
Objective 4	Increase availability of affordable and specific needs housing
Objective 5	Promote stronger and more cohesive communities
Objective 6	Reduce anti-social behaviour, crime and the fear of crime
Objective 7	Improve the availability and provision of training
Objective 8	Ensure communities have access to a wide range of employment opportunities
Objective 9	Enable local businesses to prosper
Objective 10	Promote vibrant city, town, local and village centres
Objective 11	Increase availability of local produce and materials
Objective 12	Ensure everyone has access to high quality and affordable public transport and promote cycling and walking
Objective 13	Reduce the need and desire to travel by car
Objective 14	Protect and enhance local distinctiveness
Objective 15	Protect and enhance the district's historic environment
Objective 16	Encourage and protect habitats and biodiversity.
Objective 17	Protect and enhance the district's cultural assets
Objective 18	Reduce pollution and greenhouse gas emissions
Objective 19	Encourage sustainable construction
Objective 20	Ensure the development of sustainable and/or local energy sources and energy infrastructure
Objective 21	Reduce vulnerability to, and manage flood risk
Objective 22	Encourage careful and efficient use of natural resources
Objective 23	Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

## 7. Consultation

7.1 The scoping report has been submitted to English Heritage, Environment Agency and Natural England (formerly Countryside Agency and English Nature) as well as other stakeholders likely to have an interest in the Sustainability Appraisal of the Local Development Framework. The Consultation was carried out for 5 weeks from 28th June to 2nd August 2007.

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### **Consultation Questions asked were;**

Question 1	Are there any other plans or programmes relevant to the DPDs that have not been included within this review?
Question 2	Is the baseline data appropriate to the DPDs?
Question 3	Is there any other relevant baseline data?
Question 4	Are there any inaccuracies or anomalies in the data?
Question 5	Do you agree that these are the key issues for the SAs of the DPDs?
Question 6	Do you have any comments about the SA Objectives?
Question 7	Do you have any comments about the proposed timetable?
Question 8	Do you have any comments about the proposed structure of the SA report?