



Bath and North East Somerset
Council

Core Strategy Spatial Options

Interim Sustainability Appraisal
Report

Appendix A: Appraisal Matrices

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**Bath and North East Somerset
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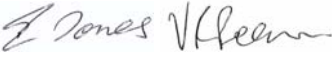

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Addendum

The matrices originally published in September 2009 have been amended following a consultation comment which identified an error in the presentation of baseline data.

The third column of each matrix contains baseline data which is tailored to the location of the assessment, where the data exists, where this does not exist then the district-wide baseline information is used. This is presented in order to provide the reader with some background context for the assessment. However, the full baseline data presented within the Sustainability Appraisal Scoping Report (Bath & North East Somerset (B&NES) Council, December 2007) has been used as the basis of the appraisal.

In addition, during the appraisal of the Core Strategy Spatial Options during July and August 2009, up-to-date baseline data sources, such as the Flood Risk Management Scoping Study (B&NES, May 2009) were used by the consultants to supplement the baseline data within the Sustainability Appraisal Scoping Report (B&NES, December 2007), and this information was also used to inform the assessment. Therefore the error relating to the matrices was presentational only.

In order to correct this presentational issue, the third column of each matrix has been reviewed in December 2009 to make sure that it presents an accurate summary of the baseline information available for that particular issue and updated as necessary.

| Table A1: District Wide Spatial Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Particular wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip. | <p>The provision of necessary infrastructure and access to the services and facilities residents need are included in the vision. Ensuring the timely delivery of social and physical infrastructure and meeting identified facilities needs are included in Strategic Objective 2. Maintaining cultural resources and assets is included under Strategic Objective 4.</p> <p>Options 1 and 2 will both bring new facilities to Bath city centre. Option 2 performs better with respect to providing new facilities and services to all communities as it focuses more development on Keynsham, Midsomer Norton and Radstock which should help facilitate the regeneration agendas within these towns. Option 2 will also provide slightly greater employment growth which (different to Option 1) would be focussed in Paulton and Peasedown St John, which are on key rural bus routes between Midsomer Norton and Radstock and Bath. More housing and development in these villages should help support the viability of these bus services, although there is a risk that increasing housing in these villages may increase travel by private car to access facilities in the towns and cities nearby (see Objective 11 below). The smaller urban extension to the SE of Bristol in Option 2 is unlikely to provide a secondary school and the</p> | <p>Option 2 performs better by supporting regeneration in Keynsham, Midsomer Norton and Radstock.</p> <p>Access to cultural facilities is not specifically dealt with within the district wide spatial strategy options however, it is better considered in the place-based strategy options.</p> <p>Increasing access to and participation in community and cultural facilities and activities should be added to Strategic Objective 4 although this objective is not in conflict with SA Objective 1.</p> |

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| | | | options document identifies that a review of secondary education for children in this part of the district would be needed. | |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. 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. | <p>The District-wide vision includes ensuring communities are healthy and safe. Strategic Objective 2 includes providing opportunities for sport, recreation and leisure pursuits. Healthy lifestyles and health inequalities are otherwise not mentioned.</p> <p>It is not clear whether either option has more or less potential to specifically support the provision of new healthcare facilities.</p> <p>A new hospital proposed in SE Bristol may be better supported by the slightly larger growth proposed in the urban extension in this area in Option 1. A new hospital in this area would improve access to health facilities in the North East region of the B&NES region. Options 1 and 2 both offer the introduction of new facilities and therefore health facilities may be incorporated into these options.</p> <p>There is no specific mention to the promotion of healthy lifestyles however Option 2 encourages a higher rate of development in the rural district which could lead to communities being exposed</p> | <p>No clear distinction in performance between either option.</p> <p>Care should be taken to reference reductions in health inequalities and also whether new facilities will incorporate doctor's surgeries.</p> <p>Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles.</p> |

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| | | | to more outdoor activities. | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | <p>The vision includes the provision of housing but does not mention affordability, however, Strategic Objective 3: Meeting Housing Need deals with ensuring sufficient affordable housing and the provision of gypsy and traveller sites.</p> <p>Options 1 and 2 are similar in their potential to provide affordable housing, however, Option 2 presents greater opportunities for affordable housing provision within the rural area and within Keynsham, Midsomer Norton and Radstock.</p> <p>Affordable housing provision is dealt with in more detail in the Core Policies: 3. Meeting Housing Need.</p> | <p>Option 2 presents greater opportunities to provide affordable housing in the rural area and within Keynsham, Midsomer Norton and Radstock.</p> <p>It may be worth making specific reference to Key Worker Accommodation where relevant.</p> |
| Objective 4: Promote stronger more vibrant and cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>It is clear that the vision deals with this objective as it actively encourages vibrant sustainable communities via a variety of aims and in a number of specific locations. Strategic Objective 2 also covers improving connection and integration of existing and new neighbourhoods and regenerating city and town centres. Strategy Objective 5 includes fostering vibrant city, town and local centres.</p> <p>The regeneration intended by all options will work to promote stronger and more</p> | <p>Option 2 provides more development within the rural area, Keynsham, Midsomer Norton and Radstock and should therefore support the vibrancy and cohesion of communities within these areas. This objective is considered in more detail within the place based options. Care will particularly be needed in planning the urban extensions which will abut existing communities.</p> |

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| | | | cohesive communities. The proposed housing of Option 2 will entail significant infrastructure issues for Keynsham and the A4 corridor between Bath and Bristol. Option 2 includes a greater amount of employment provision than option 1 which should help to create a more cohesive community. Option 2 will be accompanied with increased rural development in the form of employment and proposed regeneration which should help support and improve the vibrancy of the rural regions of the county. | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&NES. | <p>This is picked up in the vision but is not covered within the Strategic Objectives.</p> <p>Reducing crime and fear of crime is not specifically targeted in the options however the general regeneration of areas will be associated with improvements in community safety.</p> | <p>It may be beneficial for the options to include some reference to improving crime rates in the region.</p> <p>The Strategic Objectives would benefit from inclusion of objectives relating to safety and wellbeing.</p> |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton & Radstock. | <p>The vision includes a prosperous rural economy and Strategic Objective 5 includes providing new employment and training opportunities.</p> <p>Neither of the options specifically addresses skills and training. The smaller urban extension to the SE of Bristol in Option 2 is unlikely to provide a secondary school and the options document identifies that a review of secondary education for children in this</p> | <p>Options 1 and 2 perform similarly. Option 2 may present some difficulty with regard to provision of secondary education within the SE Bristol / Keynsham area, but this option may better address skills issues within the Midsomer Norton & Radstock area through the provision of greater employment opportunities.</p> <p>Care should be taken to ensure that access to learning is available to all</p> |

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| | | | part of the district would be needed. Option 2 could therefore perform less well compared to Option 1, as a secondary school could help provide courses for adults and improve skills. Option 2 provides greater support to regeneration within Midsomer Norton and Radstock, where there are currently skills issues and which may help address this issue through the provision of greater employment opportunities. | throughout the district. This objective is considered in greater detail in the place based options. |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give everyone in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a variety of sectors</p> | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation. The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of Writhlington, Westfield North and Midsomer Norton West are in the 50% most deprived areas, with Clandown in the 40% most deprived. There is a specific need to diversify the employment base in the Midsomer | <p>The vision includes a prosperous rural economy and provision of jobs. Strategic Objective 5 includes providing new employment opportunities.</p> <p>Options 1 and 2 would secure employment growth in the main cities of Bath and Bristol. Option 2 would aim to provide new employment across the region but with more focus on Keynsham Midsomer Norton & Radstock. which require new job creation to foster more sustainable patterns of development. Option 2 offers greater opportunities for new small and start up businesses in the rural area through diversification.</p> | <p>Option 2 performs better than Option 1 by offering greater economic growth in parts of the district other than mainly within the cities.</p> <p>This objective is considered in greater detail in the place based options.</p> <p>However it is important to consider equitable access to employment both paid and unpaid, as well as the provision of a diverse range of opportunities rather than just focussing on wealth generation.</p> |

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| | | Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector. | | |
| Objective 8: Enable local businesses to prosper | Increase the circulation of wealth within the local authority area (RSS 3.5) Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7) | <ul style="list-style-type: none"> The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space. There is no data on the vulnerability of the district to climate change. | <p>This should be picked up in Strategic Objective 5 'ensure that Bath & North East Somerset continues to have a prosperous economy' which contains a variety of objectives which are consistent with this SA Objective.</p> <p>Option 2 focuses more housing and employment development on the areas in need of regeneration, namely Keyhsham, Midsomer Norton and Radstock. The regeneration in this area will help local businesses to prosper. Option 2 also includes slightly more employment growth within the rural area, through diversification.</p> | <p>See the appraisal of the Core Policies in relation to flood risk.</p> <p>However it is important to ensure that issues to do with the circulation of wealth within the local economy are picked up on this objective, especially in relation to access to employment opportunities and unemployment. The potential impact of climate change on the economy should be picked up more clearly within Strategic Objective 1 'tackle the causes and effects of climate change'.</p> |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. | <p>This is not picked up within the objectives – it may be appropriate to specifically reference local markets within strategic objective 5.</p> <p>Both options aim to support rural economies and this could lead to increasing the availability of locally produced materials and food produce. Option 2 provides for slightly more (100 more jobs) in the rural area than Option 1. Option 2 also supports the provision of 840 more jobs in the Midsomer Norton and Radstock area which, being within</p> | <p>Option 2 performs better than Option 1 through the provision of greater employment opportunities across the district, rather than focusing development on the cities.</p> <p>It would be beneficial to state the areas within the district which could make use of local produce and improve the sustainability of society's shopping needs.</p> |

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| | | | the rural area, may also help support the local production of materials and food relating to the rural environment. | |
| Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region’s poor internal transport links The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City. Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303. | <p>This is picked up in Strategic Objective 6 ‘improve access and reduce traffic congestion’. The vision includes ensuring that residents, visitors and workers can get around the district safely and with ease, but this does not necessarily mean by public transport.</p> <p>Options 1 and 2 will be associated with impact on the A4 corridor due to the two urban extensions and stage 3 of the Bristol ring road will be required. However the Bath package and the Local Transport Plan will address the impacts of some of the proposed development. Option 2 will create a greater need for transport infrastructure requirements in the Midsomer Norton and Radstock area to help facilitate the greater employment development focused on this area. Development within this area and on the bus corridor between here and Bath should help strengthen the viability of bus services.</p> <p>By providing greater employment development within the rural area, Keynsham and Midsomer Norton and Radstock, Option 2 should create job opportunities closer to home within these</p> | <p>Option 2 would bring the greatest amount of improvement to public transport links and cater for a more sustainable pattern of movement around Midsomer Norton and Radstock.</p> <p>Care should be taken to make reference to the quality of public transport services.</p> |

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| | | | <p>areas and therefore easier to access by walking and cycling.</p> <p>Train services at Keynsham would also need improvement under both options.</p> | |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very high level of through traffic. This includes large numbers of HGVs en route to or from the Channel ports. Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads. High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic. The average journey to work is 13.23km (comparatively high) | <p>This should be picked up in Objective 6 'improve access and reduce traffic congestion'. The vision includes ensuring that residents, visitors and workers can get around the district safely and with ease, but this does not necessarily mean by means other than the private car.</p> <p>Both options 1 and 2 propose most housing and employment growth in the cities of Bath and Bristol which are the most sustainable locations and therefore minimise the need to travel. However, Option 2 presents a more dispersed pattern of growth, which, whilst having a potential to provide more employment opportunities where people live outside of the cities, could also result in more travel as rural residents would still need to travel to cities to access higher order facilities, such as hospitals, higher education, highly skilled jobs, high order retail and entertainment and cultural facilities.</p> | <p>Option 1 would perform best in reducing the need to travel by car due to the location of more development on existing and potential public transport links e.g. within the urban extensions.</p> <p>No recommendations.</p> |
| Objective 12: Protect and enhance local | Protect and enhance landscape and townscape (RSS 5.3) | <ul style="list-style-type: none"> There are 2 AONBs in the District – Mendip and Cotswolds AONBs (see SR for map). The district has a varied landscape | The vision includes protecting the diversity and high quality environment of the rural areas is retained and Strategic Objective 4: 'Conserve and enhance the | It is difficult to differentiate between the options. The urban extensions proposed in options 1 and 2 will have a great impact on the immediate landscape in |

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| distinctiveness | Value and protect diversity and local distinctiveness including rural ways of life (RSS 5.4) | <p>represented by 18 LCAs (see SR for map). Large areas of B&NES are Green Belt (61%)</p> <ul style="list-style-type: none"> Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views <ul style="list-style-type: none"> The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas. Large areas of Radstock are covered by a Conservation Area | <p>District's high quality natural and cultural heritage' includes retaining and enhancing local character and distinctiveness.</p> <p>The urban extensions proposed in options 1 and 2 will have a great impact on the immediate landscape in proximity to the cities.</p> <p>Option 1 will entail a little more restraint in the rural areas allowing for more limited development which will serve to protect the landscape.</p> <p>Option 2 will offer more support to rural economies and therefore should help ensure the value and protection rural ways of life. It is difficult to determine whether development will result in the loss of distinctiveness. For example, well designed development in keeping with valued local styles and materials within the Norton / Radstock area could help support local distinctiveness, however, large scale urban extensions present more of a challenge to preserving distinctiveness, particularly if this is formally of a rural area. Therefore, it is difficult to differentiate between the options.</p> | <p>proximity to the cities.</p> <p>No recommendations.</p> |
| Objective 13: Protect and enhance the | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> Bath was designated a World Heritage site in 1987. There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs | The vision includes protecting the diversity and high quality environment of the rural areas is retained and Strategic Objective 4: 'Conserve and enhance the | Option 2 appears to perform best with regard to maintaining cultural and historical assets as it reduces the pressure to develop the central areas of |

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| district's historic, environmental and cultural assets | | <p>and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath).</p> <ul style="list-style-type: none"> The area which was formerly part of the Somerset coalfield retains a rich industrial heritage. | <p>District's high quality natural and cultural heritage' includes retaining and enhancing local character and distinctiveness. The vision also makes reference to Bath's internationally renowned heritage.</p> <p>The urban extensions proposed in options 1 and 2 will have a great impact on the landscape and heritage of Bath and Bristol. The urban extension of SE Bristol will impact the scheduled ancient monument, Maes Knoll, and the urban extension of Bath will undoubtedly impact the world heritage site of Bath city centre. Option 2 employs an approach to provide greater opportunity for realising growth in other parts of the district, especially the Midsomer Norton and Radstock area and therefore the potential impact on the historical assets of Bath due to its status as a world heritage site, could be reduced.</p> | <p>Bath which holds great historic value.</p> <p>No recommendations.</p> |
| Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SPA: Chew Valley Lake SAC: Combe Down and Bathampton Mines form part of the 'Bath & Bradford-on-Avon Bats SAC'. SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC. There are 22 SSSIs (see map in SR) and 300 locally designated sites. 79% of units in favourable condition. | <p>Protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives.</p> <p>It is difficult to differentiate between the options as there is little significant difference between them in terms of where development is located, at this strategic level. More detailed is discussed in the place based options.</p> | <p>It would be beneficial to make reference to any designated habitats or protected species within the spatial options although this may be better dealt with in the place based policies.</p> <p>Green Infrastructure should be referred to within the vision, as key infrastructure required to accommodate development and should also be included within</p> |

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| change) | | <ul style="list-style-type: none"> BAP priority habitat is mapped in the SR | Option 1 would practice slightly more restraint in the rural areas which could lead to less impact on habitats and species. | Strategic Objective 2 which should include ensuring a network of green infrastructure is established and enhanced across the district and that biodiversity is enhanced. Reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity should be included in Strategic Objective 1. |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> AQMA (due to road traffic) declared on A4 in Bath. This was later extended to cover Bathwick Road. Whole of Bath may be declared AQMA. Radstock and Keynsham are to be reviewed. Gap in noise baseline information The river chemical and biological quality is generally Very Good to Fairly Good Nitrate is regularly found in groundwater in some areas. The far east and far west of the district is covered by GSPZs (including a part of Bath). | <p>This is picked up within the Strategic Objective 1: 'Tackle causes and effects of climate change' but it is considered that it does not sit well under this strategic objective and should be moved to Strategic Objective 2.</p> <p>Options 1 and 2 has identified the need to incorporate flood mitigation measures to facilitate the redevelopment in central Bath. These options also place the majority of development in the most sustainable locations and therefore reduce the need to use cars which may lead to reduced levels of air emissions. However, major new transport infrastructure will be needed along the A4 corridor for both options and in Midsomer Norton and Radstock for Option 2 (see above under Objective 11).</p> | The options perform similarly. Neither of the options includes strategies for minimising the pollution types specified in this SA objective. It would be beneficial to include mitigation for air pollution due to expected increases in congestion through new development, particularly in Option 2. Core Policy: Accessibility and Transport mentions the need to deal with air quality, noise and light pollution but the Core Strategy will need to contain more detail in order to control pollution and improve current conditions where these types of pollution are causing problems. |
| Objective 16: Encourage | Development that demonstrates | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 | This is partially covered in Strategic Objective 1 in terms of low carbon and | No difference between options. |

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| sustainable construction | sustainable design and construction Minimise consumption and extraction of minerals (RSS 6.3) Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. Waste infrastructure: 2 x waster transfer stations, 1 x railhead, 2 x materials recycling facilities, 3x recycling centres and 2x refuse collection and cleansing depots. | <p>energy efficiency but prudent use of resources and water consumption are currently not covered. These need to be picked up and might be best added to Strategic Objectives 2 as they are not directly connected to climate change.</p> <p>Strategic waste management issues are being addressed through the West of England Joint Waste Core Strategy. Sustainable construction is deal with within the Core Policies: Climate Change.</p> | Care should be taken to reference the destination for waste and consumption of materials. It is recommended that clear links are made with the core policy on sustainable design and construction. |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. | <p>This is covered in 'Strategic Objective 1: Tackle the causes and effects of climate change'.</p> <p>This is not covered by any of the options but is dealt with within the Core Policies: Climate Change. Renewable energy targets are proposed within the Core Policies and renewables the place based options discuss energy supply to a certain degree.</p> <p>Provision of decentralised energy supplies would be more feasible on large development sites, therefore Option 1 may perform better in this respect because it proposes a larger urban extension at SE Bristol (including a secondary school which could also be supplied by decentralised energy) and</p> | <p>Option 1 may perform better than Option 2 with regard to the provision of larger development sites (SE Bristol urban extension and brownfield land in Bath) which may improve the feasibility of decentralised energy.</p> <p>Sustainable energy supply should be considered and requirements for each place considered in the Core Strategy need to be set out within the draft Core Strategy.</p> <p>This is picked up within Strategic Objective 1: 'Tackle causes and effects of climate change', which identifies the need to avoid development in flood zones – reference could be made to introduction of flood mitigation techniques</p> |

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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> The areas prone to flooding tend to follow the main rivers. <p>The areas most at risk of flooding are;</p> <ul style="list-style-type: none"> Bath -at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Keynsham -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. Midsomer Norton/Radstock -at risk of flooding from rivers, surface water and sewers. Note: Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century | <p>development on large MOD brownfield sites within Bath.</p> <p>This is picked up within Strategic Objective 1: ‘Tackle causes and effects of climate change’, which identifies the need to avoid development in flood zones – reference could be made to introduction of flood mitigation techniques.</p> <p>Options 1 and 2 has identified the need to incorporate flood mitigation measures to facilitate the redevelopment in central Bath. Both options direct development to Keynsham and Midsomer Norton and Radstock which contains areas at risk of flooding (including flood zone 3). Land in flood zone 3 should ideally be avoided for development. The SFRA should identify which land which is within flood zone 3b (functional floodplain) which is not suitable for most types of development. This is considered in more detail in the appraisals of the places options.</p> <p>The Options document wishes to seek opinions on whether the Core Strategy needs to contain a policy on flood risk as it would be expected that developments will be subject to the sequential test. It is important that the Level 2 SFRA (due in August 2009) is used to inform the choice of spatial development strategy at the district and more local place level.</p> | <p>The need for flood mitigation measures in Bath is identified for both options.</p> <p>For Option 2, the comparison of how the option will help achieve the spatial objectives should make reference to the need for flood mitigation measures within the centre of Bath.</p> <p>The Core Policies at present do not identify where specific flood mitigation measures will be needed and as the Flood Management Strategy shows, these will differ depending on the settlement and therefore this should be acknowledged within the District-wide spatial strategy options.</p> |

| Table A1: District Wide Spatial Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 19: Encourage careful and efficient use of natural resources | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses. Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>This is not picked up in the objectives or the vision. An objective should be developed which is broad enough to include issues such as water and materials consumption, land use and pollution. Safeguarding minerals is covered under Strategic Objective 2.</p> <p>Both of the options would require development of some brownfield sites, particularly in Bath. Option 2 does not rely on the redevelopment of MOD brownfield sites within the city and therefore would result in the development of less brownfield land. In this option more development is directed towards more rural parts of the district which could result in more development on Greenfield land around Keynsham and potentially at Midsomer Norton and Radstock</p> <p>Both of the options include large urban extensions which would result in the loss of Greenfield land, although Option 2 includes a slightly smaller SE Bristol urban extension which would reduce the amount of Greenfield land lost in this area (although possibly not across the district as the quantum of development is the same for both options).</p> <p>There is no significant difference in the performance of the options with regard to consumption of minerals and water,</p> | <p>The options generally perform well with regard to the use of brownfield land, however, Option 2 performs less well compared within Option 1 in this respect.</p> <p>The supply of water is not addressed within the options, although gas and electricity transmission networks are mentioned. The spatial distribution of development should address water supply issues, such as the need for infrastructure improvements.</p> |

| Table A1: District Wide Spatial Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | <p>however, the size of development sizes could affect the feasibility of achieving high levels of sustainable construction and therefore Option may perform less well in this respect, with regards to the smaller SE Bristol option that it includes.</p> <p>Options 1 and 2 do not present any capacity issues for gas and electricity transmission networks.</p> | |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>This is not picked up by the objectives and would benefit from being included in Strategic Objective 2.</p> <p>None of the District wide spatial strategy options indicate waste management options. The options document refers to the West of England Joint Waste Core Strategy which is dealing with strategic waste management issues in association with neighbouring administrative areas.</p> | Although waste management is being planned for in another document it would be helpful to understand the implications of the spatial development of the District on waste management planning, in the draft version of the Core Strategy. |

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| Overall Commentary: | <p>The District wide vision reflects local issues and only a small number of gaps have been identified where it is not consistent with the coverage of the SA objectives. The SA team welcome the apparent prioritisation of climate change within the Strategic Objectives.</p> <p>Protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives. It is recommended that Green Infrastructure is referred to within the vision, as key infrastructure required to accommodate development and should also ideally be included within Strategic Objective 2 such as “ensuring a network of green infrastructure is established and enhanced across the district and that biodiversity is enhanced”. Reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity should be included in Strategic Objective 1. The potential impact of climate change on the economy should also be picked up more clearly within Strategic Objective 1 ‘tackle the causes and effects of climate change’.</p> |
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Several sub-objectives should be added to or would sit better under 'Strategic Objective 2: Accommodate development growth requirements in a sustainable way and supported with the necessary infrastructure'. This includes pollution, resources use, waste management and sustainable construction.

Currently there are a number of sub-objectives listed e.g. focus development in locations served by efficient and reliable public transport, which are not linked to Code Policies or the District wide spatial development strategy which perhaps should be.

The vision includes ensuring that residents, visitors and workers can get around the district safely and with ease, but this does not necessarily mean by means other than the private car and this is therefore a potential inconsistency.

Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles.

Please see the appraisal matrix for the full details of recommendations.

There is not much difference between the two options with regards to many of the SA objectives, however, Option 2, which focuses a little less development on the cities / urban extensions and more in Midsomer Norton and Radstock, Keynsham and the rural areas should better facilitate regeneration in these towns in order to improve their sustainability and provide more facilities and employment within certain villages.

Encouraging the development of sustainable or local energy sources and energy infrastructure has not been included within the options and nor has water supply. This should be considered as the need for climate change mitigation and adaptation has been identified as a key spatial issue for the district. Therefore as a minimum, reference should be made to the appropriate core policies.

Option 1 performs well for reducing the reliance on car travel due to the sustainable location of new development focusing on the cities and along existing and potential new public transport links. However, it is noted in the Core Strategy options document that major improvements to the strategic transport infrastructure would be required along the A4 corridor for both options. Option 1 may perform better than Option 2 with regard to the provision of larger development sites (SE Bristol urban extension and brownfield land in Bath) which may improve the feasibility of decentralised energy.

Option 2 appears to perform best in maintaining cultural and historical assets as it reduces the pressure to develop Bath which holds great historic value. This option also performs well in supporting rural economies and retaining local distinctiveness. Option 2 presents greater opportunities to provide affordable housing in the rural area and within Keynsham, Midsomer Norton and Radstock.

Various suggestions have been made to improve detail in the options in order to address specific gaps. For example, the Core Policies at present do not identify where specific flood mitigation measures will be needed and as the Flood Management Strategy shows, these will differ depending on the settlement and therefore this should be acknowledged within the District-wide spatial strategy options.

| Table A2: Draft Core Policies and Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Performance of Policies and comparison of options | Potential for mitigation or enhancement |
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Particular wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip. | <p>The proposed policy framework on infrastructure provision addresses social and community infrastructure and sets out how the policy framework will ensure timely and appropriate provision.</p> <p>The policy framework on community services and facilities sets out comprehensively how an evidence-based policy will be developed to meet the community facility needs of present and future generations. The policy addresses the ease and safety of access and the affordability of access to services. This should mean that access to services is more equal for different equality groups and should ensure higher community participation.</p> | None |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. The impact of an aging population will | <p>A number of the proposed policy frameworks address health issues.</p> <p>The proposed policy framework on infrastructure provision addresses the provision of health infrastructure and sets out how the policy framework will ensure timely and appropriate provision.</p> <p>The policy on green infrastructure addresses the multi-functional nature of GI in that it provides for port, recreation, local food production all of which will help contribute to healthy lifestyles. The GI policy directly refers to community health</p> | |

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| | | <p>impact on healthcare provision in the future. Obesity is an increasing issue facing the whole of the country.</p> | <p>and cohesiveness.</p> <p>The policy on securing highest quality urban design makes reference to development proposals meeting the Building for Life standards. This should enable people to stay in their own homes longer as they get older.</p> <p>The proposed policy framework on community services and facilities and accessibility also highlight the link between healthy lifestyles, community cohesiveness, health inequalities and access to services.</p> | |
| <p>Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing</p> | <p>Help make suitable housing available and affordable for everyone (RSS 2.1)</p> | <ul style="list-style-type: none"> • High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. • Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. • Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | <p>The proposed policy framework on affordable housing addresses this issue and sets out a number of options for addressing housing need. It is difficult to appraise the sustainability of the options without having access to the strategic viability assessments (which are not yet completed). However, some general comments are included below.</p> <p>With regard to the <u>geography options</u> option 1 would not allow for a policy to be developed which can be tailored to different areas. It is important that the policy is targeted towards meeting specific needs and option 1 would not be able to do this. Options 2 and 3 would be better at this but option 3 would be the most effective as it can also set minimum standards for larger sites where it should be possible to include a larger number of affordable homes.</p> <p>In terms of <u>proportion and tenure split options</u> the most effective options are the</p> | <p>Options should be developed based on evidence and that are as tailored to the very different areas in the district. The strategic viability assessments will be used to develop these policies so the policies that are developed are likely to be based on evidence and be as tailored as possible.</p> <p>It is not clear at the moment what the difference between the two rural policy options is and this should be clarified.</p> |

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| | | | <p>ones recommended by the SHMA or ones that are felt to be realistic. These would be proportion: options 2 or 3; and tenure split: options 1 or 3.</p> <p>In terms of <u>site thresholds options</u> it would not seem reasonable to expect self build projects to have an affordable housing obligation as these are usually 1 or 2 houses. Therefore option 1 would be more reasonable.</p> <p>In terms of <u>intermediate housing options</u> a more targeted policy would the most appropriate. This would probably be represented by policy 2.</p> <p><u>Mix options</u> should be defined on the basis of evidence collected by the council. This should take into account the current mix of the area and the services available. In areas with service deficiencies high density development is unlikely to be viable.</p> <p>In terms of <u>rural housing options</u> it is uncertain what the difference between the options is. How would the policy be different if it were given top priority?</p> | |
| <p>Objective 4: Promote stronger more vibrant and cohesive communities</p> | <p>Promote stronger more cohesive communities (RSS 2.4)</p> | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>The policy framework on community services and facilities addresses the ease and safety of access and the affordability of access to services.</p> <p>This should mean that access to services is more equal for different equality groups and should ensure higher community participation and community cohesiveness.</p> | |

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| | | | As recommended in Circular 1/2006 'Planning for Gypsy and Traveller Caravan Sites' a criterion based policy will be developed. | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&NES. | The proposed policy framework on highest quality urban design states that development proposals should meet the Secured by Design standard and the same policy states that proposals should reduce anti-social behaviour, crime and the fear of crime. All of these measures should help to make new development as secure as possible. | None |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton & Radstock. | <p>The proposed policy framework on infrastructure provision addresses education infrastructure and sets out how the policy framework will ensure timely and appropriate provision.</p> <p>The policy framework on community services and facilities sets out comprehensively how an evidence-based policy will be developed to meet the community facility needs of present and future generations. This includes education and training facilities. Community education is mentioned as an example.</p> | None |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs The English Indices of Deprivation (2004) ranks B&NES as the 259th (73.76%) least deprived local authority out of 354 LAs. There are some wards in Radstock, in particular, which experience comparatively high levels of | The proposed policy framework on a prosperous economy discusses a broad range of town centre uses. The policy approach also addresses other economic issues such as making provision for a range of businesses and the need to address rural economic issues. The next step is to set out how areas contribute to the spatial vision for the district. It would be useful if the policy as it is developed is more specific about the growth sectors in the district and how it will specifically | It would be useful if the policy as it is developed is more specific about the growth sectors in the district and how it will specifically assist development in these sectors. |

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| | Provide a diverse range of employment opportunities in a variety of sectors | <p>unemployment linked to patterns of deprivation mapped in the indices of deprivation.</p> <ul style="list-style-type: none"> The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of Writhlington, Westfield North and Midsomer Norton West are in the 50% most deprived areas, with Clandown in the 40% most deprived. There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector. | assist development in these sectors. | |
| Objective 8: Enable local businesses to prosper | <p>Increase the circulation of wealth within the local authority area (RSS 3.5)</p> <p>Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7)</p> | <ul style="list-style-type: none"> The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space. There is no data on the vulnerability of the district to climate change. | | |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. | The proposed policy framework on community services and facilities places emphasis on meeting local needs locally and increasing availability of local produce. | None |
| Objective 10: Ensure everyone has access to high | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links The high level of self-containment in | The proposed policy framework on accessibility and transport sets out a comprehensive policy approach that addresses access to community transport, transport impact of | The policy when developed should mention the need to reduce the need to travel by car. |

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| <p>quality and affordable public transport and promote cycling and walking</p> | | <p>Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City.</p> <ul style="list-style-type: none"> Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303. | <p>development proposals, healthy lifestyles and strategic infrastructure. However there is no reference to reducing the need to travel by car even though it is mentioned as something communities think is important.</p> | |
| <p>Objective 11: Reduce the need and desire to travel by car</p> | <p>Reduce the need/desire to travel by car (RSS 4.1)</p> | <ul style="list-style-type: none"> Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very high level of through traffic. This includes large numbers of HGVs en route to or from the Channel ports. Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads. High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic. The average journey to work is 13.23km (comparatively high) | | |
| <p>Objective 12: Protect and enhance local distinctiveness</p> | <p>Protect and enhance landscape and townscape (RSS 5.3)</p> <p>Value and protect diversity and local distinctiveness including rural ways of</p> | <ul style="list-style-type: none"> There are 2 AONBs in the District – Mendip and Cotswolds AONBs (see SR for map). The district has a varied landscape represented by 18 LCAs (see SR for map). Large areas of B&NES are Green Belt (61%) Bath has a distinctive townscape in the | <p>The proposed policy framework on securing highest quality urban design makes reference to high quality urban design through development proposals responding to character appraisals, conservation area appraisals and local design statements; the provision of design led processes and the provision of design statements. This should ensure</p> | <p>None</p> |

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| | life (RSS 5.4) | <p>way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views</p> <ul style="list-style-type: none"> The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas. Large areas of Radstock are covered by a Conservation Area | <p>that local landscape and townscape character is reflected in design proposals.</p> <p>The proposed policy framework on landscape addresses comprehensively which elements will be needed to protect and enhance local landscape character.</p> | |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> Bath was designated a World Heritage site in 1987. There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath). The area which was formerly part of the Somerset coalfield retains a rich industrial heritage. | <p>The proposed policy framework on historic environment outlines a comprehensive policy approach to protecting the historic and cultural environment.</p> <p>The proposed policy approach for renewable energy should address the requirements / issues surrounding renewable energy and older / listed buildings. Mention is made in the draft policy explanation and this should be translated into policy.</p> <p>The proposed policy framework on the World Heritage Site sets out two options of how to address protection of the WHS. Option 2 would be a more appropriate way of protecting the WHS as it is more evidence based and is not as rigid as option 1. It is also backed up by a system of impact assessments for each development proposal.</p> | The proposed policy approach for renewable energy should address the requirements / issues surrounding renewable energy and older / listed buildings. |
| Objective 14: Encourage and protect habitats and biodiversity. | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SPA: Chew Valley Lake SAC: Combe Down and Bathampton Mines form part of the 'Bath & Bradford-on-Avon Bats SAC'. SAC: Compton Martin Ochre Mine is a component site of the North Somerset | The proposed policy framework on green infrastructure sets out what GI is, its benefits and how the council will take forward the issue. This should provide a positive framework for the provision and enhancement of green infrastructure. | It would be useful for the draft policy explanation to make some reference to the Habitat Regulations Assessment that is being undertaken on the LDF so people can be fully informed of all the processes that the council is involved in to protect |

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| <p>(taking account of climate change)</p> | | <p>and Mendip Bats SAC.</p> <ul style="list-style-type: none"> • There are 22 SSSIs (see map in SR) and 300 locally designated sites. 79% of units in favourable condition. • BAP priority habitat is mapped in the SR | <p>However, it would be useful for the draft policy explanation to make some reference to the Habitat Regulations Assessment that is being undertaken on the LDF so people can be fully informed of all the processes that the council is involved in to protect and enhance biodiversity.</p> <p>The proposed policy framework on nature conservation is comprehensive in its coverage and should provide a positive framework for the provision and enhancement of habitats and species. The proposed policy framework makes useful links to the issues of green infrastructure and climate change.</p> <p>The HRA screening assessment has identified the potential for effects on Natura sites with relation to the potential provision of renewable energy infrastructure, flood risk management, safeguarding minerals, waste, gypsies travellers etc., and historic environment. The avoidance of these potential impacts will be addressed in later stages of the HRA. In addition, the HRA has identified the potential for impacts on Natura sites from any major infrastructure provision and accessibility and transport provision which may need further review once details are known. This will be examined in more detail during the next stage of the HRA.</p> | <p>and enhance biodiversity.</p> |
| <p>Objective 15: Reduce land, water, air, light, noise</p> | <p>Minimise land, water, air, light, noise pollution (RSS 6.5)</p> | <ul style="list-style-type: none"> • AQMA (due to road traffic) declared on A4 in Bath. This was later extended to cover Bathwick Road. Whole of Bath may be declared AQMA. Radstock and Keynsham are to be reviewed. | <p>Accessibility and Transport mentions the need to deal with air quality, noise and light pollution but as the policy approach develops it will need to contain more detail on locations where problems exist</p> | <p>As the policy approach to accessibility and transport develops it will need to contain more detail on locations where pollution problems exist in order to control pollution and improve current conditions</p> |

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| pollution | | <ul style="list-style-type: none"> • Gap in noise baseline information • The river chemical and biological quality is generally Very Good to Fairly Good • Nitrate is regularly found in groundwater in some areas. • The far east and far west of the district is covered by GSPZs (including a part of Bath). | in order to control pollution and improve current conditions where these types of pollution are causing problems. | where these types of pollution are causing problems. |
| Objective 16: Encourage sustainable construction | <p>Development that demonstrates sustainable design and construction</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> • All new homes must be Zero Carbon' from 2016 • Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. • B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. • Waste infrastructure: 2 x waster transfer stations, 1 x railhead, 2 x materials recycling facilities, 3x recycling centres and 2x refuse collection and cleansing depots. | The proposed policy framework on sustainable construction outlines the reduction in CO2 emissions that different types of new development should achieve and these are sufficiently ambitious targets. For residential development, CFSH target levels are outlined (which are much broader than just energy/carbon) whereas for non residential development, target CO2 emissions only are specified. It would be useful if wider issues of sustainable construction are included for non residential development – for example BREEAM targets or further requirements set out in a SPD in the form of essential and preferred targets for each type of development. It would also be useful if development thresholds were clearer. | Sustainable construction proposed policy approach: It would be useful if wider issues of sustainable construction are included for non residential development – for example BREEAM targets. It would also be useful if comprehensive sustainable design and construction requirements for all major development were set out in a SPD in the form of essential and preferred targets for each type of development. This could include wider issues of resource use. It would also be useful if development thresholds were discussed. In the table would “all other proposals” refer to developments over 10 dwellings / 1000m2? |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | <p>Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1)</p> <p>Promote sustainable energy generation and distribution</p> | <ul style="list-style-type: none"> • CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) • There is no record of any major renewable energy schemes undertaken in the District. • A renewable energy research study has been undertaken. • Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic | The proposed policy framework on Renewable Energy sets out renewable energy targets for heat and electricity. The policy needs to be clearer about the difference between the two columns in the renewables table and why they are in different units. Units and technologies need to be defined – perhaps a glossary would be useful. The Decentralised Energy policy sets out thresholds and criteria for on site renewable energy development and sets a good framework for substantially | Some clarity is required concerning the difference between the two columns in the renewables table. It would also be helpful if the units and technologies are defined. It is felt that some clarity in needed in the wording of this policy. |

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| | | buildings. | reducing emissions from new development. | |
| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> The areas prone to flooding tend to follow the main rivers. The areas most at risk of flooding are; <ul style="list-style-type: none"> Bath -at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Keynsham -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. Midsomer Norton/Radstock -at risk of flooding from rivers, surface water and sewers. Note: Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century. | <p>The flood risk management sets out what research has been undertaken with regards to flooding in the area and poses the question of whether a separate policy on flooding is needed. It is for the council (taking into account the views of consultees) to decide this but PPS25 good practice guide does refer to the need for Core Strategy LDDs to reflect the Council's strategic planning policies and approach to flood risk.</p> <p>It would be useful for policy to address other aspects of climate change adaptation and also sustainable drainage systems and the levels of attenuation that developments should attain. This can either be in the flood risk policy or within the sustainable construction policy / SPD.</p> | <p>Consider whether it would be useful to include a flooding policy in light of the recommendations within the PPS25 good practice guide.</p> <p>It would be useful for policy to address other aspects of climate change adaptation and also sustainable drainage systems and the levels of attenuation that developments should attain. This can either be in the flood risk policy or within a sustainable construction policy / SPD.</p> |
| Objective 19: Encourage careful and efficient use of natural resources | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses. Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>The proposed policy framework on Safeguarding Minerals sets out what elements a future minerals policy could include and this list seems comprehensive in most matters. One area that is not covered is the issue of impact on Natura 2000 sites. The emergent RSS identifies that the Habitat Regulations Assessment accompanying the RSS identifies a number of N2K sites where mineral extraction could directly affect site integrity. These include Bath and Bradford on Avon Bats SAC. It would be useful if the policy</p> | <p>It would be useful if the Safeguarding Minerals policy addresses the potential of minerals development to affect the integrity of Natura 2000 sites. At this stage this could be fairly minimal (the addition of ...including the effect on sites designated as Natura 2000 sites to bullet point 3 N.B – the term Natura 2000 should be defined in a glossary if it is used).</p> <p>It would be useful if water consumption targets are set and this could be done in the sustainable construction policy.</p> |

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| | Minimise consumption and extraction of minerals (RSS 6.3) | | <p>acknowledges this issue and is clear how it will be dealt with.</p> <p>The issue of water consumption is not addressed within the core policies. It is acknowledged that the Infrastructure Plan will address the requirements of adequate water supply. However an important issue is to ensure that water saving technologies and water saving targets are applied to development. The Government’s ambition is to reduce average consumption to 130 litres per head per day by 2030, or to as low as 120 litres per head per day depending on technological development and innovation (Defra, Future Water 2008). It would be useful if water consumption targets are set and this could be done in the sustainable construction policy.</p> | |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>The section on waste outlines the fact that a joint planning strategy for waste will be prepared for the West of England.</p> <p>The policy on highest quality urban design states that proposals should be accompanied by sustainability statements which consider operational and construction waste minimisation</p> | None |

Overall Commentary:

There has been significant development of the Core Policies since the last set of issues and options were appraised in October 2008. Many of the comments made by the SA team have been taken on board including better references to community participation, cohesion and health, reducing crime, access to services, availability of local produce, local distinctiveness, sustainable construction and supply of renewable energy.

In general the core policies do address the important issues and when fully developed should lead to a comprehensive set of policies. However, there are some areas that need development and some of these are discussed below:

- Affordable housing proposed policy approach: A number of options are proposed and these should be developed based on evidence and should be tailored to the very different areas in the district. The strategic viability assessments will be used to develop these policies so the policies that are developed are likely to be based on evidence and be as tailored as possible. However, it is not clear at the moment what the difference between the two rural policy options is and this should be clarified.
- Gypsies, travellers and travelling showpeople proposed policy approach some clarification is needed to ensure clarity and consistency between the policy approach and the Gypsy and Traveller Accommodation Assessment.
- Prosperous economy proposed policy approach: It would be useful if the policy as it is developed is more specific about the growth sectors in the district and how it will specifically assist development in these sectors.
- Sustainable construction proposed policy approach: It would be useful if wider issues of sustainable construction are included for non residential development – for example BREEAM targets. It would also be useful if comprehensive sustainable design and construction requirements for all major development were set out in a SPD in the form of essential and preferred targets for each type of development. This could include wider issues of resource use. It would also be useful if development thresholds were discussed. In the table would “all other proposals” refer to developments over 10 dwellings / 1000m²? It’s not clear from the policy.
- Renewable energy proposed policy approach: Some clarity is required concerning the difference between the two columns in the renewables table. It would also be helpful if the units and technologies are defined. At the moment it is unlikely that a member of the public would understand this policy. In addition, it would be useful if the policy addressed the potential for the development of energy infrastructure to affect the integrity of Natura 2000 sites.
- Flood risk management proposed policy approach: Consider whether it would be useful to include a flooding policy in light of the recommendations within the PPS25 good practice guide that “Core Strategy LDDs reflect the Council’s strategic planning policies and approach to flood risk.” It would be useful for policy to address other aspects of climate change adaptation and also sustainable drainage systems and the levels of attenuation that developments should attain. This can either be in the flood risk policy or within a sustainable construction policy / SPD.
- Safeguarding minerals proposed policy approach: it would be useful if the policy addressed the potential of minerals development to affect the integrity of Natura 2000 sites. At this stage this could be fairly minimal (the addition of ...including the effect on sites

designated as Natura 2000 sites to bullet point 3). N.B – the term Natura 2000 should be defined in a glossary if it is used.

- The HRA screening assessment has identified the potential for effects on Natura sites with relation to the potential provision of renewable energy infrastructure, flood risk management, safeguarding minerals, waste, gypsies travellers etc., and historic environment. The avoidance of these potential impacts will be addressed in later stages of the HRA. In addition, the HRA has identified the potential for impacts on Natura sites from any major infrastructure provision and accessibility and transport provision which may need further review once details are known. This will be examined in more detail during the next stage of the HRA.

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> Bath has a number of large green spaces that are regularly used for informal recreation including Royal Victoria Park, Alice Park, Sydney Gardens, Henrietta Park, Alexandra Park and Parade Gardens. There are 138 hectares of formal green space in Bath. Access to services is less of a problem in Bath than in the rural areas. | <p>This is covered in the Vision as it maintains that residents “will benefit from a high quality range of health, educational and recreational services and facilities that combine to enhance the liveability of existing neighbourhoods” and “residential areas will be served by vital and viable local service and shopping hubs providing for the day-to-day needs of the suburbs. Residential areas will be linked to the city centre via sustainable modes of transport”. This SA objective is also covered by objectives 5, 6 and 12 which both commit to providing high quality public services. Furthermore objective 8 will allow a convenient reliable public transport system to provide access to the facilities.</p> <p>There is not a large difference between options 1 and 2. The minimum concentration options (1B and 2B) will spread more office and retail development across Bath, rather than concentrating this type of development in the city centre and therefore options 1B and 2B may provide more access to facilities than options 1A and 2A, although this does not address access to public services. Both options would concentrate the majority of retail and office development within the city centre</p> | <p>The options perform similarly, but the minimum concentrations options (1B and 2B) by spreading some office and retail across the city, may improve access for certain areas to jobs and certain types of retail (likely to be bulky goods).</p> <p>No recommendations.</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| | | | which would provide easy public access to shops as the city centre should already be served by a good public transport network. | |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. 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. | <p>This is picked up in the Vision which aims to create more health facilities however no mention is given to the promotion of healthy lifestyles. This is however picked up in the strategic objective 12, which aims to provide high quality health facilities, and objectives 7 and 13 which aim to enhance the natural environment and provide high quality public space to encourage walking and cycling.</p> <p>Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles. The development of the riverside corridor includes better walking and cycling access to and along the riverside which will encourage exercise and healthier lifestyles. Neither option performs better than the other. The inclusion of residential development within the centre and the Western riverside area should encourage walking and cycling to access the city centre through proximity. The minimum concentration options (1B and 2B, which direct more employment uses out of the</p> | <p>The options perform similarly, but the minimum concentrations options (1B and 2B) by spreading some office and retail across the city, may encourage more walking and cycling within the urban extension specifically.</p> <p>No recommendations.</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | centre, may help achieve more internalisation of journeys within the urban extension, by providing employment and housing in the same location. | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | <p>This is picked up in Vision by aiming for a “range of household types.” Spatial objective 3 covers this SA objective thoroughly and ensures that new housing “is suited to a range of incomes and types of households.”</p> <p>Both options will supply housing split between the city and the urban extension, although option 2 will supply 1,000 fewer homes than option 1. The mix of housing is not discussed in this section of the options document, but is discussed within the Core Policies: meeting housing need.</p> | <p>Both options perform similarly, although option 2 will provide 1,000 fewer new homes than option 1.</p> <p>It may be worth making specific reference to Key Worker Accommodation where relevant.</p> |
| Objective 4: Promote stronger more vibrant <i>and</i> cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>It is clear that the vision deals with this objective as it actively encourages vibrant sustainable communities via a variety of aims. It is further supported by the strategic objective 5 “to enhance Bath’s central shopping area” and objective 7 “to secure improvements to the public realm.” Both of these objectives, assisted by others, such as objective 12 (provision of facilities including cultural and leisure) and objective 13 (access to green space) will encourage more cohesion and vibrancy within communities. Community cohesion and integration with regard to</p> | <p>Options 1 and 2 perform similarly although the minimum concentration options may help improve the mix of uses within the urban extension which would help improve the vibrancy of the new neighbourhood by providing employment uses alongside residential. This would help avoid creating a dormitory residential area during the day time.</p> <p>No recommendations.</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | <p>the urban extension has not been addressed within the vision and objectives, here, for the whole of Bath, and in the vision and objectives specific to the urban extension.</p> <p>Options 1 and 2 perform similarly. Both concentration options will focus the majority of retail and office space within the central area which will help maintain footfall in the centre and improve activity and vibrancy. The minimum concentration options may help improve the mix of uses within the urban extension.</p> <p>Both options will protect local centres around Bath.</p> <p>Mixed use neighbourhoods have the greatest potential for vibrancy and cohesion through creating activity throughout the day and evening and at different times of the week.</p> <p>Cross reference is made to the draft Bath Public Realm Strategy which will help improve vibrancy of the centre.</p> | |
| Objective 5: Reduce anti-social behaviour, crime and the | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre and the South West area of Bath City (along with North Keynsham) experience the highest levels of recorded priority crime in B&NES. Developments in the Bath City Centre | This is not picked up in the vision and or strategic objectives. It is recommended that regeneration and good urban design in objective 11 is extended to deal with improving safety and security, or in a new objective relating to minimising resource | <p>Both options 1 and 2 would perform similarly with respect to this objective.</p> <p>Crime should be referenced as an area for improvement.</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| fear of crime | | need to be aware of their impact on the night-time economy of that area. | <p>use and ensuring sustainable, secure design.</p> <p>There is no specific mention to the reduction of crime or fear of crime although all of the options intend on regeneration or more office/retail provision so this should be associated with less opportunities for acts of crime.</p> | |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular low skills issues in wards in south west Bath. | <p>The vision includes an educated and multi-skilled work force and ensuring that residents benefit from a high quality range of educational services. Furthermore objective 10 “enables the growth of the higher education sector” so that it can sustain the contribution it makes to the city’s educational and socio-economic profile. Spatial objective 12 also aims to give access to high quality education facilities.</p> <p>Bath is a university town, providing two universities. The availability of training and access to learning is therefore high, however this is not improved upon by the spatial options set out for Bath. All the options focus on improving the employment of the region through office and retail provision. Mention is made to the council’s review of secondary school place provision but analysis of access to schools has not been made or mentioned. The need for new schools, for</p> | <p>Both options 1 and 2 would perform similarly with respect to this objective.</p> <p>Reference could be made to providing more learning opportunities within Bath and whether additional schools are needed in any areas.</p> |

Table A3: Bath Spatial Development Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | example, within the BWR area, has not been discussed and this type of detail may be better considered within the SPD for the neighbourhoods such as BWR and others that may come forward (see page 27 of the options document). | |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give everyone in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a variety of sectors</p> | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs The English Indices of Deprivation (2004) ranks B&NES as the 259th (73.76%) least deprived local authority out of 354 LAs. There are some wards in Bath which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation. | <p>This is covered thoroughly by the vision which intends Bath to be a “prosperous productive city with a buoyant economy sustained by an educated multi-skilled workforce.” Objective 1 aims “to expand the stock of modern office and other workspaces” and objective 2 will ensure “that a critical level of land is available for industrial enterprise.” This highlights the provision for a diverse range of employment opportunities.</p> <p>All of the options work convincingly towards improving employment in the region, providing both office location and more retail for job creation. Both options 1 and 2 would encourage a mix of city centre uses. The minimum concentration options (1B and 2B) may create better outcomes by locating bulky good retail in more appropriate locations (i.e. not in the city centre).</p> | <p>The minimum concentration options (1B and 2B) may create better outcomes by locating bulky good retail in more appropriate locations (i.e. not in the city centre).</p> <p>No mention is given in any of the options to the provision of unpaid work and the objective to reduce income inequality.</p> <p>It is important to consider equitable access to employment both paid and unpaid rather than just focussing on wealth generation.</p> |
| Objective 8: Enable local businesses to prosper | Increase the circulation of wealth within the local authority area (RSS 3.5) | <ul style="list-style-type: none"> The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space. There is no data on the vulnerability of | This should be picked up in Objective 1 which aims to pay particular attention to the “indigenous companies” which will concentrate employment and investment locally. | <p>Both options 1 and 2 would perform similarly with respect to this objective.</p> <p>It would be beneficial to mention reducing vulnerability of the economy to climate</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7) | the district to climate change. | Also objective 9 aims to maintain the “Bath city break market” by increasing the stock of accommodation for tourist and keeping revenue within Bath. All of the options will help to increase the circulation of wealth within Bath through the provision of increased employment opportunities and retail. | change. |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. | <p>This is not picked up within the objectives – may be appropriate to specifically reference local markets within strategic objective 5.</p> <p>Both options 1 and 2 would perform similarly with respect to this objective.</p> | <p>Both options 1 and 2 would perform similarly with respect to this objective.</p> <p>There is no mention about local produce, markets and the availability of local produce to the public in Bath.</p> |
| Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region’s poor internal transport links The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City. There is a perceived limited supply of car parking within the main shopping area and some of the key car parks are a 5-10 minute walking distance from the City Centre. | <p>This should be picked up in Objective 8 ‘enhancing convenient circulation and access within Bath through the reliability and appeal of public transport.’</p> <p>The Options 1 and 2 do not differ in terms of public transport provision or viability. The city centre would still remain a hub and key destination regardless of the minimum or maximum concentration options. .</p> <p>There is an aim to expand the park and rides around the city to intercept in-commuting and the proposed rapid transit between Newbridge and the city centre is mentioned.</p> | The Options 1 and 2 do not differ in terms of public transport provision. |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very high level of through traffic. This includes large numbers of HGVs en route to or from the Channel ports. Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads. There is a high level of self-containment in Bath with 71% of people living and working in the area There is increasing patronage for bus travel within the built up area of Bath | <p>This should be picked up in Objective 8 ‘enhancing convenient circulation and access within Bath through the reliability and appeal of public transport.’</p> <p>The Options 1 and 2 do not differ in terms of public transport provision or viability. The development of the riverside corridor includes better walking and cycling access to and along the riverside which will encourage exercise and healthier lifestyles. Neither option performs better than the other. The inclusion of residential development within the centre and the Western riverside area should encourage walking and cycling to access the city centre through proximity. The minimum concentration options (1B and 2B), which direct more employment uses out of the centre, may help achieve more internalisation of journeys within the urban extension, by providing employment and housing in the same location.</p> | <p>The Options A and B do not differ in terms of public transport provision. The minimum concentration options (1B and 2B), which direct more employment uses out of the centre, may help achieve more internalisation of journeys within the urban extension, by providing employment and housing in the same location.</p> <p>There is no mention of reducing the need/desire to travel by car within the options. The travel strategy for Bath should be mentioned.</p> |
| Objective 12: Protect and enhance local distinctiveness | <p>Protect and enhance landscape and townscape (RSS 5.3)</p> <p>Value and protect diversity and local distinctiveness</p> | <ul style="list-style-type: none"> Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views. | <p>The vision covers distinctiveness by focusing on the built heritage, thermal springs and landscape setting of Bath and states that the “impact on wider environmental commons will be mitigated.” This is further picked up in objective 11 which ensures that “new development conserves and enhances the special qualities of Bath and universal</p> | <p>The options do not differ in terms of their performance against this SA Objective.</p> <p>No recommendations.</p> |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | including rural ways of life (RSS 5.4) | | <p>values of the World Heritage Site... through a range of design solutions". Also objective 13 "aims to maintain a high quality green and blue space network".</p> <p>The options do not differ in terms of their performance against this SA Objective. Both options 1 and 2 involve an urban extension of the same size which is likely to effect the World Heritage Site and release green belt to the south/south west to accommodate the urban extension. The planned protection of the green belt beyond the urban extension will aid the separate distinctiveness of the city of Bath and mitigate for merging with local urban settlements such as Keynsham.</p> | |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> Bath was designated a World Heritage site in 1987. There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath). | <p>The vision describes that "Bath's identity, founded on its built heritage, thermal springs and landscape setting... will be enhanced." Also objective 11 ensures that "new development conserves and enhances the special qualities of Bath and universal values of the World Heritage Site... through a range of design solutions".</p> <p>Objective 7 also deals with the improvements to the "public realm so that it benefits Bath's status as a world heritage site, reinforces the environmental quality and essence of the city and invigorates social and cultural</p> | It is likely that all the planned office and retail development in the city centre will bring new buildings and frontages so care must be taken to keep the visual appearances in line with the historical aesthetic value. This will be dealt with in the Bath Public Realm and Movement Strategy. |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | <p>life.”</p> <p>Potential impacts of development on the historical assets and, in particular, the World Heritage site are discussed within the chapter and measures to enhance the appearance of under performing areas are also discussed. There is no difference between the options 1 and 2 and there is not considered to be any significant difference between the minimum and maximum concentration options.</p> | |
| Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change) | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SAC: Combe Down and Bathampton Mines form part of the Bath & Bradford-on-Avon Bats SAC. BAP priority habitat is mapped in the SR. Bath has some priority habitat on the city outskirts. There are the following Local Nature Reserves in or adjacent to Bath – Kensington Meadows, Twerton Roundhill and Carrs Wood. | <p>The vision partially deals with this issue by stating that the “impact on the wider environmental commons will be mitigated”, although the meaning of the sentence could be clearer.</p> <p>Maintaining and enhancing wildlife corridors is included in Objective 13 – reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity.</p> <p>None of the options make reference to the protection of habitats and species. As these are options for the city of Bath only there is likely to be less designated habitats and protected species than within other areas of the district. More</p> | Care needs to be taken to look for opportunities to enhance habitats particularly making sure that the city does not become a barrier to migration and that migratory routes and corridors are retained and enhanced. The green infrastructure network should be referred to with regard to the potential location of development and how new development might be able to contribute to the green infrastructure network within the city. The green Infrastructure network and strategy is currently under development. Care will be needed not to increase light pollution, particularly in the river corridor area and it would be advisable to mention avoiding light pollution within any design principles for Bath. |

Table A3: Bath Spatial Development Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | development and activity along the river corridor may cause impacts on certain species, in particular, bats. | |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> • AQMA (due to road traffic) declared on A4 in Bath. This was later extended to cover Bathwick Road. Whole of Bath may be declared AQMA. • Gap in noise baseline information • The river chemical and biological quality is generally Very Good to Fairly Good • The far east and far west of the district is covered by GSPZs (including a part of Bath). | <p>This is not picked up within the vision however objective 8 identifies the need to “address congestion and air quality” with increased transport facilities. There is no mention of light, noise or water pollution. Water pollution should be of key importance due to the location on the River Avon. The Vision would benefit from inclusion of reducing the impact of transport on the environment and people and reducing light pollution within the city.</p> <p>Neither of the options make any reference to minimising pollution. It is expected that the increased development/regeneration of the city centre to include more office and retail space will create air emissions and noise pollution. No reference is made to tackling air quality issues within the centre.</p> | The preferred option will need to make specific reference to pollution minimisation particularly in areas where specific issues have been identified. Care will be needed not to increase light pollution, particularly in the river corridor area and it would be advisable to mention avoiding light pollution within any design principles for Bath. |
| Objective 16: Encourage sustainable construction | Development that demonstrates sustainable design and construction Minimise consumption and extraction of | <ul style="list-style-type: none"> • All new homes must be Zero Carbon’ from 2016 • Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. • B&NES is one of the top recycling authorities within the country, recycling | This should be picked up in Objective 11 ‘range of design solutions’ – care should be taken to reference the destination for waste and consumption of materials. An additional objective could be added (or text added to objective 11) which covers minimising resource use and ensuring sustainable, secure design | No difference between options 1 and 2. Use of natural resources is not mentioned within the vision or objectives. This issue is also discussed in the appraisal of the SW Bath urban extension. Sustainable construction (in terms of the Code for Sustainable Homes) is now dealt with within the Core Policies proposed policy frameworks which proposes targets or |

Table A3: Bath Spatial Development Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | minerals (RSS 6.3) Reduce waste not put to any use (RSS 6.4) | 37% of household waste in 2005/06. | No consideration is given to sustainable design and construction, mineral consumption and waste management. | different types / sizes of developments and this will apply in Bath. As a minimum reference should be made to the appropriate core policies. |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. | <p>This is not picked up within the objectives and given some of the overarching objectives it may be appropriate to include a separate objective to deal with energy consumption and infrastructure. The vision refers to a carbon conscious economy, but greater emphasis should be given to generating more energy used within the city from low carbon and renewable sources.</p> <p>No specific mention is given to the installation of renewable is energy technologies although this is dealt with within the Core Policies proposed policy frameworks.</p> | Both options perform similarly. More emphasis could be made within the chapter on Bath on the need for the carbon footprint of the city to be reduced and therefore this will include use of low carbon and renewable energy sources within the city. As a minimum reference should be made to the appropriate core policies. |
| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> Bath is at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Bath City Centre has suffered significant flooding in recent years. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century. | <p>This is picked up within objective 14 but is not mentioned within the vision. Risks of climate change should ideally be added to the first paragraph in the vision where 'harnessing the need to change' is referred to.</p> <p>Flood risk is mentioned with regard to the proposed development within the River Corridor Zones but no mention is made of the potential need for SUDS for all new development within the city and in the</p> | <p>Both options perform similarly.</p> <p>The high level principles and conceptual response for the central area should include an additional bullet:</p> <ul style="list-style-type: none"> Include flood risk mitigation measures in accordance with the Flood Risk Mitigation Strategy. <p>Objective 14 should ideally be strengthened, in order to recognise other factors which lead to flood risk within Bath</p> |

Table A3: Bath Spatial Development Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | <p>urban extension.</p> <p>Sites included in both options (2A Central Zone, 2B Lower Bristol Road, and B3 Newbridge Industrial Zone) require consideration of the exception test within the sequential test carried out by B&NES Council. This is because they contain flood zone 3 land, however it is stated that the lowest risk sites within zone 3 can accommodate the development proposed.</p> | (such as sewers), the need for flood resilient design and the need for infrastructure to offset loss of floodplain capacity from development in the city. |
| Objective 19: Encourage careful and efficient use of natural resources | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses. Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>This is not picked up in the vision or objectives. An objective should be developed which is broad enough to include issues such as water consumption and land use or that it incorporates the idea of sustainable consumption (see above).</p> <p>None of the options clearly set out to make wise use of land, keep water consumption within local carrying capacity or minimise extraction of minerals. No difference between options 1 and 2 although Option 2 presents a lower quantum of overall development and may therefore reduce the demand for Bath stone (if this is specified for development in certain places).</p> | No difference between options 1 and B although Option 2 presents a lower quantum of overall development and may therefore reduce the demand for Bath stone (if this is specified for development in certain places). Use of natural resources is not mentioned within the vision or objectives. This issue is also discussed in the appraisal of the SW Bath urban extension. Sustainable construction (in terms of the Code for Sustainable Homes) is now dealt with within the Core Policies, proposed policy frameworks which proposes targets or different types / sizes of developments and this will apply in Bath. |
| Objective 20: Promote waste | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | This is not picked up by the objectives. See recommendations above relating to adding text or an additional objective on | No difference between options 1 and 2. This is not picked up by the objectives. |

| Table A3: Bath Spatial Development Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | | | <p>minimising resource use and sustainable construction. Minimising waste is also relevant and should be mentioned within the vision and/or objectives.</p> <p>No mention is given to waste management in any of the options but this is better dealt with within the core policies. Part of the Western Riverside development will involve the relocation of the existing civic waste and recycling centre to a brownfield site bordering the A4 as it approaches Bath. This will mean moving the only waste recycling centre in Bath from a central location to a location on the outskirts of the city which may be less accessible to more residents but equally, may be more accessible if traffic /access is more suitable than in the centre / Upper Bristol Road area, which can become congested.</p> | See recommendations above relating to adding text or an additional objective on minimising resource use and sustainable construction. Minimising waste is also relevant and should be mentioned within the vision and/or objectives. |

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| Overall Commentary: | <p>The vision is specific to Bath and has been developed from the issues identified. A number of comments and recommendations are made relating to the vision and objectives for Bath as follows:</p> <ul style="list-style-type: none"> • The main gap within the vision and objectives are in relation to sustainable consumption. The vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. greater emphasis should be given to generating more energy used within the city from low carbon and renewable sources. An additional objective could be added (or text added to objective 11) which covers minimising resource use and ensuring sustainable, secure design. • Risks of climate change should ideally be added to the first paragraph in the vision where 'harnessing the need to change' is |
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referred to. Objective 14 should ideally be strengthened, in order to recognise other factors which lead to flood risk within Bath (such as sewers), the need for flood resilient design and the need for infrastructure to offset loss of floodplain capacity from development in the city (according to the Flood Risk Management Strategy Scoping Study, Capita Symonds, May 2009). Vulnerability to flood risk will be a key issue for Bath city centre with the onset of climate change.

- The Vision would benefit from inclusion of reducing the impact of transport on the environment and people and reducing light pollution within the city.
- In objective 13, reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity.
- It may be appropriate to specifically reference local markets within strategic objective 5.
- Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles.
- Care should be taken to reference the preservation of rural ways of life if an area identified in the region.
- Community cohesion and integration with regard to the urban extension has not been addressed within the vision and objectives, here, for the whole of Bath, and in the vision and objectives specific to the urban extension.
- It may be worth making specific reference to Key Worker Accommodation in relation to housing provision where relevant.
- It is important to consider equitable access to employment both paid and unpaid rather than just focusing on wealth generation.

The appraisal has not found a vast degree of difference between options A and B, however the minimum concentration options (1B and 2B) have been identified as having potential benefit in terms of placing more employment and retail within the new urban extension which should improve its sustainability, reducing the need for HGVs to travel into the centre by locating bulky retail uses outside of the centre and potentially increasing local access to employment uses in areas other than the centre.

A number of recommendations have been made within the matrix. These include:

- The high level principles and conceptual response for the central area should include an additional bullet:
 - Include flood risk mitigation measures in accordance with the Flood Risk Mitigation Strategy.

- As a minimum reference should be made to the appropriate core policies which deal with sustainable construction and energy.
- The green infrastructure network should be referred to with regard to the potential location of development and how new development might be able to contribute to the green infrastructure network within the city. The green Infrastructure network and strategy is currently under development.
- Care will be needed not to increase light pollution, particularly in the river corridor area and it would be advisable to mention avoiding light pollution within any design principles for Bath.
- There is no mention of reducing the need/desire to travel by car within the options. The travel strategy for Bath should be mentioned.
- Reference could be made to providing more learning opportunities within Bath and how school places will be delivered to new school-age population, including new residents of the urban extension.

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> Bath has a number of large green spaces that are regularly used for informal recreation including Royal Victoria Park, Alice Park, Sydney Gardens, Henrietta Park, Alexandra Park and Parade Gardens. There are 138 hectares of formal green space in Bath. Access to services is less of a problem in Bath than in the rural areas. | <p>With relation to the vision and objectives for Bath Urban extension, objective 2 aims “to offer easy, safe and affordable access to local employment and educational opportunities” and objective 3 aims to “Offer access to a wide range of services and facilities and support the needs of new and existing communities”. Objective 13 also address access through aiming for “a comprehensive range of transport modes including walking, cycling, public transport and car to the employment opportunities services and facilities that Bath and the wider area has to offer”. Although not specifically dealt with, access to cultural activities could be picked up in the above-mentioned objectives and also through objective 10 which aims to “incorporate a network of connected high quality accessible green infrastructure providing recreation and biodiversity opportunities and visual benefits.”</p> <p>Information about the facilities that each option could provide is not provided. It could be assumed that option 1, being isolated from the rest of Bath, would need to include new facilities because access to neighbouring areas would be limited. Employment opportunities may differ between the options as option 1 is</p> | <p>Option 1 performs slightly better than Option 2 by being a more attractive location for businesses.</p> <p>There is greater potential for option 1 to provide new facilities; option 2 has greater potential to contribute towards viability and quality of adjoining facilities in adjacent areas.</p> <p>No recommendations.</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | <p>highlighted as having a potentially significant employment role, being an attractive location for businesses.</p> <p>Option 1 is located on a good public transport corridor but integration with neighbouring areas may be difficult due to topographical separation. . Option 2 could be well linked to the centre and the south of the district but links to Bristol would be less strong. Option 2 has greater potential to contribute towards the quality of adjoining facilities in adjacent areas.</p> <p>Option 1 could benefit existing communities in the Twerton area as the text mentions the potential for the option to provide facilities for the Twerton area. Option 2 could also provide facilities to support regeneration in the south of Bath, through helping to address deficiencies in allotment provision, for example.</p> | |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top | <p>The vision and a number of objectives address the idea of healthy living however this should be particularly picked up in objectives 10, 12 and 13 which commit to improving pedestrian and cycling facilities, recreation opportunities and promote healthy lifestyles. Improvements to health facilities can be seen through objectives 2 and 3 which intend to provide facilities such as doctor's surgeries in line with housing</p> | <p>Both options are similar in their potential to promote walking and cycling. Option 2 could present the easiest walking and cycling topography on the site due to the flat topography but a steep descent into the town centre could discourage walking and cycling into the city.</p> <p>It is assumed that both of the options presented equal opportunity to provide health care facilities.</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | (RSS 1.3) | <p>25% of local authorities.</p> <ul style="list-style-type: none"> 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. | <p>increase.</p> <p>The topography of the Option 1 site may discourage walking and cycling although it would be well connected to Bristol and Bath via the Bristol-Bath cycle route. Option 1 is disconnected from the Twerton area by the Newton Brook valley and new walking and cycling access over this valley would be needed.</p> <p>Option 2 would involve development on the Cotswolds AONB with a detrimental effect, although this may encourage healthier lifestyles for residents with improved access to the countryside.</p> <p>Option 2 would be the best option for promoting healthy lifestyles through walking and cycling on site because it is on a flat site to the south of the city of Bath. However, cycling from the city centre to this area involves a steep upward gradient and might be discouraging. Option 2 is also furthest from the centre compared with the other option.</p> | No recommendations |
| Objective 3: Meet identified needs for sufficient, high quality and | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 | Affordable housing is covered in objective 4 which aims to “provide a mix of housing types, tenures and sizes, including at least... affordable housing to meet the identified need of all sectors of the community”. This covers the need to | Option 1 appears to have greater certainty of delivery of 2,000 dwellings at this stage which means that it has a greater chance of providing more affordable housing than option 2. |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| affordable housing | | <p>times the lower quartile resident annual earnings.</p> <ul style="list-style-type: none"> Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | cater for all members of society. | No recommendations |
| Objective 4: Promote stronger more vibrant and cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>The vision supports inclusion and regeneration in the river corridor and deprived areas within the south of bath but does not make reference to integrating with nearby communities. This is an important issue which should be reflected in the vision and objectives. This is partially dealt with in objective 5 which “ensures that the identity of villages close to the city is maintained or enhanced.” Community involvement is mentioned within the supporting text.</p> <p>All of the options are located close to deprived areas at Twerton and elsewhere in south Bath which could pose difficulties in terms of community cohesion between existing and new communities, particularly if new communities are seen to be more affluent and provided with better facilities.</p> <p>Option 1 is physically separated from Twerton by the Newton Brook Valley making physical cohesion and access to the new facilities that the extension will offer, more challenging than potentially</p> | <p>Both of the options present challenges for community cohesion between existing and new communities. Option 1 may present the most challenging physical circumstances.</p> <p>No recommendations</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | for option 2. However, option 1 may provide the best options for supporting the economic vitality of the city through having greater potential for provision of employment space attractive to businesses. | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre and the South West area of Bath City (along with North Keynsham) experience the highest levels of recorded priority crime in B&NES. | <p>Ensuring safe communities is included within the vision and objectives and therefore this SA Objective is adequately covered.</p> <p>Although crime and fear of crime is not specifically mentioned all of the options will serve to reduce crime through general regeneration and provision of employment and facilities and the objectives for the urban extension make reference to creating a safe neighbourhood through design.</p> | <p>Both options appear to perform similarly.</p> <p>No recommendations.</p> |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular low skills issues in wards in south west Bath. | <p>This is covered in the provision of educational facilities in objective 2.</p> <p>Option 1 would perform well in providing access to learning due to its location close to Bath Spa University.</p> | Reference could be made to the planned facilities for education within each option, as it is expected that these may differ depending on how neighbouring areas are provided for. Schools are also important in relation to community cohesion. |
| Objective 7: Ensure communities have access to a wide | Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1) | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs The English Indices of Deprivation | <p>Access to employment opportunities is included in objective 2.</p> <p>Option 1 is in a location that is likely to provide the best opportunities for contributing to the economic vitality of the</p> | Option 1 has the most potential to provide strategic employment opportunities on site. It would be beneficial to indicate whether a range of employment opportunities in a variety of sectors would be available. The Bath minimum |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| range of employment opportunities, paid or unpaid | <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a variety of sectors</p> | <p>(2004) ranks B&NES as the 259th (73.76%) least deprived local authority out of 354 LAs.</p> <ul style="list-style-type: none"> There are some wards in Bath which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation. | <p>city. Employment development here will benefit the whole city as its location adjoining Bath is the most attractive to the business community. The good access to local and strategic public transport networks linking the development to Bath means that everyone has access to work. Option 2 provides more opportunities for local employment but is less attractive to the business community and therefore plays a more limited role in the employment strategy for the whole city.</p> | <p>concentration spatial options suggest that the urban extension might be suitable for some retail, such as bulky goods. The option 1 location might be the most suitable of the options. It is difficult to see whether there is any difference between the options in terms of their ability to reduce poverty and income inequality.</p> <p>No recommendations</p> |
| Objective 8: Enable local businesses to prosper | <p>Increase the circulation of wealth within the local authority area (RSS 3.5)</p> <p>Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7)</p> | <ul style="list-style-type: none"> The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space. There is no data on the vulnerability of the district to climate change. | <p>This is covered by objective 5 “contribute to the sustainable economic vitality of the city as a whole”.</p> <p>Option 2 brings the risk of impacting on the identity of South Stoke due to development in the eastern region of the proposed area. This could lead to decreased local distinctiveness. Option 1 would impact on the identity of Newton St Loe..</p> | <p>Option 1 has the most potential to provide strategic employment opportunities on site. All of the options have the potential to effect the distinctiveness of at least one village immediately next to the extension which could affect local businesses.</p> <p>Mention could be made to ensuring that the urban extension buildings, businesses and infrastructure are adapted to the impacts of climate change.</p> |
| Objective 9: Increase availability of local produce and materials | <p>Meet local needs locally (RSS 3.4)</p> | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. | <p>This is picked up in the vision through embedding local food production in the design of the extension. Objectives 12, 14 and 16 also makes reference to a more sustainable use of resources, which could include making use of local</p> | <p>No recommendations.</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | materials, although it is not explicit. All of the options provide the opportunity to link into local food production. | |
| Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City. There is a perceived limited supply of car parking within the main shopping area and some of the key car parks are a 5-10 minute walking distance from the City Centre. | <p>This is covered in the vision, which mentioned sustainable transport means linking the extension to city centre and other areas. Objective 12 aims for the extension to be a place that is easy to navigate. Objective 12 aims for good access through a range of transport modes including walking, cycling, public and public transport to access employment opportunities, services and facilities in Bath and the wider area. However, the objective also refers to ensuring access by car which works against this objective.</p> <p>Option 1 is located on a good public transport corridor. Option 1 is associated with topography not suitable for regular everyday walking and cycling although it would be well connected to Bristol and Bath via the Bristol-Bath cycle route. Option 1 is disconnected from the Twerton area by the Newton Brook valley and new walking and cycling access over this valley would be needed. Due to the nature of the location intended for option 2, being on a flat plateau, cycling and walking would be more widely accepted and encouraged. However, cycling from</p> | The options are similar in their potential to promote walking and cycling. Option 2 appears would present the easiest walking and cycling topography on the site due to the flat topography but a steep decent into the town centre could make discourage walking and cycling into the city. |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | the city centre to this area involves a steep upward gradient which might be discouraging. Option 2 could be well linked to the centre and the south of the district but links to Bristol would be less strong. | |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very high level of through traffic. This includes large numbers of HGVs en route to or from the Channel ports. Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads. There is a high level of self-containment in Bath with 71% of people living and working in the area There is increasing patronage for bus travel within the built up area of Bath | <p>As above, emphasis is placed on sustainable transport modes and alternatives to the car within the vision and objectives, but objective 12 also refers to ensuring access by car which works against this objective.</p> <p>Both options A and B could lead to less dependence on the use of cars due to the location of the developments nearer to Bath city and being served by good public transport. Option 1 however may lead to increased growth on the River/Lower Bristol Road corridor which could cause congestion on the A4/36.</p> | No recommendations |
| Objective 12: Protect and enhance local distinctiveness | Protect and enhance landscape and townscape (RSS 5.3) Value and protect diversity and local | <ul style="list-style-type: none"> Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views. | The vision and objectives place emphasis on the potential impact and need for mitigation of an extension in this area on the city of Bath (inferring the World Heritage site), and the surrounding landscape in terms of views and setting. This is also picked up in objective 6 which aims to mitigate for the detrimental effect | All of the options would have impacts on local distinctiveness, landscape and views. No recommendations |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | distinctiveness including rural ways of life (RSS 5.4) | | <p>on environmental assets and objective 8 which aims to create “a high quality place with its form and appearance responding to the character and context provided by the site and the wider area”. Objective 5 aims to maintain and enhance the identity of villages close to the city. Furthermore objective 12 will result in a more sustainable approach to development.</p> <p>Option 2 could potentially threaten the separate identity of South Stoke which would remove its distinctiveness as its own community. If this site is developed, the city would become visible from a wide area of the surrounding countryside, whereas at the moment it is hidden until the point of arrival. This would be a negative impact on the integrity of the setting of the World Heritage Site. The extension of the city at this point will create a largely separated settlement area, visually disconnected with the existing city. The majority of the site is within the Cotswold AONB (although land at the site could be of lesser landscape quality than land outside of the AONB). Option 1 performs poorly in relation to objectives of integration into the neighbouring locality and minimising detrimental environmental impacts. Option 1 would have a major landscape impact as the location is highly visually prominent.</p> | |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> Bath was designated a World Heritage site in 1987. There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath). | <p>The vision and objectives place emphasis on the potential impact and need for mitigation of an extension in this area on the city of Bath (inferring the World Heritage site), and the surrounding landscape in terms of views and setting. This is also picked up in objective 8 which aims to mitigate for the detrimental effect on environmental assets and objective 9</p> <p>Option 1 does not perform well with regards to impact on cultural and historical assets. The location of option 1 would cause significant harm to the setting of the world heritage site and to the Cotswolds AONB to the north. There could be a potential detrimental impact on the historic environment including the remains of known Iron Age and Roman occupation. A lot of the land intended for option 2 lies within the Cotswolds AONB and could result in moderate impact on the setting of the city. This option would also have significant impact on Wansdyke which is a scheduled ancient monument.</p> | <p>All of the options present potential for negative impacts on local cultural assets, the World Heritage Site and the Cotswold AONB.</p> <p>No recommendations</p> |
| Objective 14: Encourage and protect habitats and biodiversity. | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SAC: Combe Down and Bathampton Mines form part of the Bath & Bradford-on-Avon Bats SAC. BAP priority habitat is mapped in the SR. Bath has some priority habitat on the city outskirts. | This should be picked up in objective 8 which aims to mitigate for the detrimental effect on environmental assets. Objective 13 also aims to provide biodiversity opportunities. The objectives would be strengthened through including reference | All of the options have potential for negative effects on biodiversity. All sites are Greenfield and could result in the loss of habitats. Option 2 (and possibly option 1) has the potential to affect bats which are highly protected. This issue is being |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| (taking account of climate change) | | <ul style="list-style-type: none"> There are the following Local Nature Reserves in or adjacent to Bath – Kensington Meadows, Twerton Roundhill and Carrs Wood. | <p>to particular habitats or species, particularly enhancing BAP species and habitats through the development and achieving a net gain in biodiversity.</p> <p>All options are considered likely to cause significant impact to habitats and species. Option 1 will have a significant impact on the strategic green belt which could impact habitats. There are no known significant nature conservation issues on the actual site, although further assessment may indicate otherwise. Option 2 in particular could impact bats by being located very close to a Special Area of Conservation, although Option 1 could also affect bats. Option 2 is within a Strategic Nature Area identified for protection and restoration of habitats within the RSS. Option 1 has the potential to affect floodplains of the River Avon which also affect other important habitats. Option 1 may provide green infrastructure as there are opportunities to make use of existing features including the Newton Brook Valley and the Carrs Woodland Local Nature Reserve. Option 2 also has potential to provide access to informal green space and ecological enhancement. The HRA screening assessment has identified the potential for effects on Natura sites with relation to each of the options being considered.</p> | <p>considered in a separate Habitats Regulations Assessment. Option 1 would have a significant effect on the green belt and could affect habitats of the River Avon. All options have the potential to provide access to natural green space and contribute to green infrastructure.</p> <p>No recommendations.</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | Further work will be carried out as part of the next stage of the HRA to examine the potential for these impacts in more detail and to identify appropriate mitigation strategies. | |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> AQMA (due to road traffic) declared on A4 in Bath. This was later extended to cover Bathwick Road. Whole of Bath may be declared AQMA. Gap in noise baseline information The river chemical and biological quality is generally Very Good to Fairly Good The far east and far west of the district is covered by GSPZs (including a part of Bath). | <p>This should be picked up in objective 14 and objective 8 which requires the extension to “be located and designed in a way that minimises detrimental impact on environmental assets”.</p> <p>Option 1 may cause greater pressure on the A4/36 due to growth associated with the River/Lower Bristol Road corridor. This would be associated with greater air pollution from increased vehicles on this route. Option 1 development could also impact the floodplains of the River Avon and Newton Brook and lead to future water pollution incidents.</p> | An air pollution mitigation strategy would be needed for option 1. |
| Objective 16: Encourage sustainable construction | <p>Development that demonstrates sustainable design and construction</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>This is picked up in objective 14 which aims for a more sustainable use of resources. However, no mention is made of sustainable construction specifically, or the destination of waste (see below).</p> <p>None of the options make individual reference to sustainable design and construction and therefore neither of the spatial options stands out as being any better than another.</p> | <p>Neither of the spatial options stands out as being any better than another.</p> <p>It would be beneficial to detail plans for waste management, recycling or methods for sustainable design and construction , in line with recommendations made relating to the vision and objectives.</p> |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
|---|--|--|---|---|
| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | Reduce waste not put to any use (RSS 6.4) | | | |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. | This is picked up in the vision which includes zero carbon buildings and making use of local energy sources. Detail relating to zero carbon buildings and sustainable construction has been added to the supporting text). | Neither of the spatial options stands out as being any better than another. No recommendations. |
| Objective 18: Reduce vulnerability to, and manage flood risk to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> Bath is at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Bath City Centre has suffered significant flooding in recent years. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century. | This is picked up in objective 14 which aims Option 1 has the potential to exacerbate current flood risks by developing on the floodplain of the River Avon and Newton Brook. Both options presents risk of land instability which could be worsened by climate change and create flood risk if landslides enter water courses. | Neither of the options are clear of flood risk however it appears that option 1 performs worst as it is in the floodplain. No recommendations. |
| Objective 19: Encourage careful and efficient use of natural | Promote the conservation and wise use of land (RSS 5.2) Keep water | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the | Efficient use of resources is covered in objective 14 and objective 11 "encourages the efficient use of land". Option 1 brings development on the green belt which could be viewed as not | All options result in loss of Greenfield land. Option 1 would result in loss of greenbelt land. Option 2 would result in loss of AONB land. Supply of water is mentioned in the text |

| Table A4: New Neighbourhood in an urban extension to Bath Options | | | | |
|--|--|---|---|---|
| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| resources | <p>consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <p>Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses.</p> <ul style="list-style-type: none"> Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>conserving this strategic planning tool. Option 2 encroaches on the Cotswolds AONB, which will result in the loss of high quality land from a landscape point of view.</p> | <p>relating to Option 2 but this is less clear within Option 1.</p> |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>Although not specifically referenced, this is partially dealt with by objective 14 which should result in less waste. However care should be taken to reference how the waste produced in the extension will be managed.</p> <p>No mention is given to waste management in any of the options.</p> | <p>As B&NES is already one of the top recycling authorities, this is less of an urgent issue for the options. It is recommended that mention should be made to how the waste arising from the site in construction and operation will be managed and whether and how this will link into the energy strategy for the district – such as whether any waste will be used as a biomass fuel supply, for example, in anaerobic digestion.</p> |

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| Overall Commentary: | <p>New Neighbourhood in an urban extension to Bath vision and objectives</p> <p>Overall, the vision and objectives for the Bath urban extension are consistent with, and cover the majority of the SA objectives. However, a potential conflict has been identified between SA objectives 10 and 11 and the Bath urban extension objective 13 which aims to provide access by a range of transport modes, including the car. Although car access will be provided for within the urban extension, it's inclusion within the objective 13 creates a tension with the SA objectives.</p> |
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A number of recommendations are made as follows:

- Reference should be made to the core policies which are proposing specific standards / design codes / guidance for the urban extensions which deals with sustainable construction.
- Care should be taken to reference how the waste produced in the extension will be managed (provision of some details from the West of England Joint Waste Core Strategy would be useful).
- Other than reference to flooding, resilience to the impacts of climate change are not considered within the vision or objectives. Ensuring that the urban extension buildings, businesses and infrastructure are adapted to the impacts of climate change could be added to the vision or objectives.
- The objectives would be strengthened through including reference to specific habitats or species, particularly enhancing BAP species and habitats through the development and achieving a net gain in biodiversity.

New Neighbourhood in an urban extension to Bath: Options

There is still no clear cut answer to which option performs best overall; both options are associated with their own merits and disadvantages. Some issues have not been dealt with in the text relating to the options and these have been flagged up for consideration.

Option SWB 1 is the option preferred by B&NES. Option SWB1 currently presents the most secure delivery of up to 2,000 new homes. Option SWB1 would be a favoured location for new business premises and may provide space for bulky retail uses, relocated from the city centre. Option SWB1 therefore provides the best opportunities for contributing to the economic vitality of the city and performs well in relation to public transport accessibility, although it does not encourage healthy lifestyles through walking and cycling due to its topography. An air pollution mitigation strategy would be needed for option A. Option A is in the vicinity of an area of flood risk, however, development in these areas can be avoided.

Both options present challenges in terms of landscape impact, some of which will be difficult to mitigate.

Both options present challenges for community cohesion between existing and new communities. Option SWB1 may present the most challenging physical circumstances. All of the options would have impacts on local distinctiveness, landscape and views. Option B may present landscape and visual effects which can be more effectively mitigated.

None of the options detail the type of services and facilities that would be provided within each extension and whether these might differ and therefore there is uncertainty over whether each option could provide facilities for neighbouring areas or whether they would share any existing facilities. This could have an impact on community cohesion as well as access to services and facilities.

Both options have potential for negative effects on biodiversity. All sites are Greenfield and could result in the loss of habitats. Option SWB 2 (and possibly also Option SWB1) has the potential to affect bats which are highly protected. The HRA screening assessment has identified the potential for effects on Natura sites with relation to each of the options being considered. Further work will be carried out as part of the

next stage of the HRA to examine the potential for these impacts in more detail and to identify appropriate mitigation strategies. Option SWB1 would have a significant effect on the green belt and could affect habitats of the River Avon. All options have the potential to provide access to natural green space and contribute to green infrastructure. Both options could be well served by public transport into the city centre.

The options are similar in their potential to promote walking and cycling. Option SWB2 appears to present the easiest walking and cycling topography on the site due to the flat topography but a steep descent into the town centre could make discourage walking and cycling into the city. Option SWB2 could be well served by public transport into the city centre.

Supply of water is mentioned in the text relating to Option SWB2 but is not dealt with as clearly within Option SWB1.

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|---|---|---|---|
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> In Keynsham the Memorial Park provides the principal area for informal recreational use, complemented by Kelston Park and the Manor Road playing field. There are 23 hectares of formal green space in Keynsham. Indoor sporting needs are largely met by Keynsham Leisure Centre There is an identified deficiency in the overall supply of sports pitch provision in Keynsham taking account of recreational land prone to flooding. | <p>The vision includes achieving good access to a range of local services and facilities and good access to the city amenities of Bath and Bristol. The objectives also include improving the retail offer whilst encouraging use of local services and products.</p> <p>Both options aim to improve access to greenspace and waterways for recreation and access to sustainable transport.</p> <p>Both options perform similarly as they both propose housing development within the strategic site. Housing development within the strategic site will be well located close to facilities in the centre and the railway station.</p> | <p>Both options perform similarly. Housing development within the strategic site will be well located close to facilities in the centre and the railway station.</p> <p>It needs to be demonstrated that the options, particularly Option 2 which involve less retention of green space at the Somerdale site, will provide sufficient accessible green space for all.</p> <p>It's not clear what the mixed use development in 2 at the Somerdale site will comprise. Will it provide a mixture of different types of employment space or would it provide other facilities such as small scale retail, education, community centre etc? It would be helpful if more information could be provided.</p> |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. The impact of an aging population in | <p>The vision includes creating a healthier place, promoting healthy lifestyles and improving access to green space and waterways for recreation.</p> <p>Both options perform similarly as above, in terms of access to facilities (including health care) within the town and in terms of encouraging recreation. Both options would encourage cycling and walking to access the town centre.</p> | <p>Neither of the options mentions the provision of cycleways or ways to encourage pedestrian movement to promote health lifestyles. It is assumed that a movement strategy will be included within the preferred option and town centre masterplan, particularly for the strategic site and K2 allocation.</p> |

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|--|--|--|--|
| | | Keynsham will impact on healthcare provision in the future. | | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> House prices in Keynsham are slightly above average for B&NES. Of the households in need in Keynsham, newly forming households unable to afford to buy are the dominant group | Option 2 provides more housing than option 1 and therefore has greater chance to provide a higher proportion of affordable housing. Affordable housing is dealt with in the Core Policies. | No recommendations. |
| Objective 4: Promote stronger more vibrant and cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>The vision and objectives includes maintaining Keynsham's identity as a separate settlement and achieving a thriving town.</p> <p>Both options will help strengthen the vibrancy and the sense of community of the town. Through the provision of a mixed use community at the Somerdale site and the provision of a greater number of jobs, Option 2 may be more beneficial for the town and may better support regeneration of the High Street.</p> <p>However, community support may lean more towards the retention of more greenspace at the Somerdale site and therefore option 2 may create negative feeling within the community.</p> | Option 2 may be more beneficial for the vibrancy of the town and give more support to regeneration. However, there may be negative community feeling associated with the loss of greenspace at the Somerdale site. |
| Objective 5: Reduce anti-social | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Keynsham experiences one of the highest levels of recorded priority crime in B&NES. This is mainly in Keynsham North Ward. | <p>Safety and crime are no covered by the vision or objectives.</p> <p>Both options focus on regeneration and</p> | <p>The options perform similarly although Option 2 may be more beneficial.</p> <p>Ensuring the community is safe should be</p> |

| Table A5: Keynsham Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| behaviour, crime and the fear of crime | | | development enhancing employment opportunities which will help tackle issues of crime and anti-social behaviour. Option 2 may have a greater positive impact than option 1 on regeneration through generating more developer contributions for use to improve the public realm. | included in the vision and/or objectives. |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is considerable commuting to secondary schools in Keynsham from SE Bristol. | <p>Education and training facilities are specifically mentioned within the vision or objectives, however reference is made to access to facilities within the vision and objectives.</p> <p>Neither of the options mentions the provision of training or skills increase. However the committed regeneration in each option may lead to improved education facilities in schools.</p> | <p>The options perform similarly.</p> <p>The vision and objectives could be strengthened to include access to good education facilities, particularly as secondary school provision is being reviewed.</p> |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a</p> | <ul style="list-style-type: none"> The unemployment rate in Keynsham is lower than the UK average. However, there are some wards in Keynsham which experience comparatively high levels of unemployment linked to patterns of deprivation. Wholesale and retail trade, public services and manufacturing are the largest sectors in Keynsham. A significant % of employment in Keynsham is provided by a few key employers. Keynsham does not rank highly on the indices of deprivation. The central area of Keynsham is indexed as the most | <p>The vision and objectives include developing the town as an employment centre.</p> <p>Both options seek to focus on regeneration and development within the strategic site to enhance employment opportunities however Option 2 will result in the provision of more jobs and therefore performs better against this SA objective.</p> | <p>The options perform similarly although Option 2 may be more beneficial.</p> <p>No recommendations.</p> |

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|--|---|---|--|---|
| | variety of sectors | deprived, whereas the eastside of Keynsham is the least deprived. | | |
| Objective 8: Enable local businesses to prosper | Increase the circulation of wealth within the local authority area (RSS 3.5) Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7) | <ul style="list-style-type: none"> Keynsham is a relatively vital and viable town centre but retail yields are higher and therefore less attractive to retailers than those of Trowbridge or Chippenham. There is no data on the vulnerability of the town to climate change. | <p>The vision and objectives include developing the town as an employment centre, a thriving town and building on the reputation as a fair trade town.</p> <p>Both options seek to focus on regeneration and development within the strategic site to enhance local businesses. Option 2 may have a greater positive impact than option 1 on regeneration through generating more developer contributions for use to improve the public realm.</p> | Options perform similarly, although Option 2 may be more beneficial than option 1. No recommendations. |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. | <p>The objectives include improving the retail offer whilst encouraging use of local services and products.</p> <p>Neither of the options particularly offer the chance to increase availability of local produce and materials although both will help boost the retail sector within the centre.</p> | Options perform similarly, although Option 2 may be more beneficial than option 1. No recommendations. |
| Objective 10: Ensure everyone has access to high quality and affordable public | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There are widening opportunities for bus travel for local destinations. There is a high level of car ownership in Keynsham for an urban area with good bus links and a mainline rail service. Only 2% of residents travel to work by train. | <p>The vision includes increasing frequency, use, quality and accessibility of public transport, walking, cycling and other sustainable transport options. The objectives include increasing sustainable transport provision.</p> <p>Both options focus development in the same areas, although more development</p> | The options perform similarly. Neither of the options mentions the provision of cycleways or ways to encourage pedestrian movement to promote health lifestyles. It is assumed that a movement strategy will be included within the preferred option and town centre masterplan, particularly for the strategic site and K2 allocation. |

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|--|---|---|--|
| transport and promote cycling and walking | | | will occur in Option 2 which involves mixed use development at the Somerdale site. Mixed used development in this area should make jobs and facilities closer to more people, encouraging walking and cycle. Option 2 may also present greater viability to public transport routes by providing more housing, although the mechanisms for achieving the vision in terms of increasing use and frequency of public transport are not clear. | No recommendations |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> The A4 through Keynsham is subject to high levels of congestion A mainline railway connects Keynsham to London More than 60% of people in Keynsham commute elsewhere to work. | <p>The vision includes increasing frequency, use, quality and accessibility of public transport, walking, cycling and other sustainable transport options. The objectives include increasing sustainable transport provision.</p> <p>Both options focus development in the same areas, although more development will occur in Option 2 which involves mixed use development at the Somerdale site. Mixed used development in this area should make jobs and facilities closer to more people, encouraging walking and cycle.</p> | <p>As above. The options perform similarly.</p> <p>No recommendations</p> |
| Objective 12: Protect and enhance local distinctiveness | Protect and enhance landscape and townscape (RSS 5.3) Value and protect diversity and local | <ul style="list-style-type: none"> The Green Belt has influenced the growth and the identity of the town, helping it to retain its own identity Keynsham is in the Avon Valley LCA. The landscape consists primarily of the meandering River Avon and its wide valley with a generally flat or gently | <p>Both of the options will maintain the green belt gap between Bristol and Keynsham and will help enhance the appearance and identity of Keynsham. These issues are also key to the vision and objectives.</p> <p>Option 1 offers slightly more in that it has</p> | <p>The options perform similarly but option 1 may perform slightly better through enhancing green space provision.</p> <p>No recommendations</p> |

| Table A5: Keynsham Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | distinctiveness including rural ways of life (RSS 5.4) | sloping valley floor. | committed to enhancing particular public spaces, namely the Keynsham Memorial Park through linking it into green space in the Somerdale site. | |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> Keynsham High Street is a Conservation Area. The town centre of Keynsham has many historic buildings but many of the old shops were replaced with modern units in the 1960s and 1970s and the High Street lacks vibrancy and coherence. High rise council offices and the surrounding precinct are incongruous with the character and appearance of the town | <p>Regeneration of the town and improvements to the public realm are key to the vision and objectives.</p> <p>Both options will help regenerate the town centre but Option 2 may generate more developer contributions which will lend weight to public realm and High Street improvements.</p> | Option 2 may perform slightly better than option 1 through the potential to generate more developer contribution to help public realm improvements, |
| Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change) | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> Keynsham has three SSSIs at the edge of the parish (Stidham Farm, Cleeve Wood and Bickley Wood). These are all in favourable condition. There are no SAC's or SPAs in the vicinity of Keynsham. There are areas of Coastal Floodplain grazing marsh (BAP priority habitat) to the north of Keynsham parish. There is a community woodland on the eastern side of Keynsham (Manor Road Community Woodland). | <p>Access to green space is included within the objectives, but ecology, biodiversity, habitats and species and green infrastructure are not. However, nature conservation is covered within the proposed policy framework for the Core Policies.</p> <p>Neither option uses Green Belt land to extend the town, although Option 2 places more development on green space within the Somerdale site and therefore option 1 performs better against this SA Objective. There is a UK priority habitat at the Somerdale factory which will need to be protected and enhanced through the redevelopment but it is not</p> | <p>Option 1 performs better than option 2. The UK priority habitat at the Somerdale factory should be retained and enhanced. It's not currently clear whether this is possible and it should be made more explicit. If it cannot be retained, can the same habitat be recreated elsewhere, over a larger area?</p> <p>Green infrastructure should be included within spatial plans for the town.</p> |

| Table A5: Keynsham Options | | | | |
|---|--|---|---|--|
| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | | | clear whether this is possible in option 2. Option 1 provides enhanced green space in the Somerdale factory area, linking it into the Memorial Park, which will enhance the local green infrastructure. | |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> Radstock and Keynsham are soon to be reviewed for air quality. Gap in noise baseline information The River Avon and Chew go through the town of Keynsham. The river chemical and biological quality is generally Very Good to Fairly Good | <p>Pollution and environmental impacts are not covered within the vision or objectives. However, these are dealt with to a certain degree within the District-wide vision and objectives.</p> <p>Option 2 may present issues relating to water pollution in the River Avon (and ground water?).</p> | SUDS will be required in the Somerdale area which prevent polluted surface water runoff from entering watercourses or groundwater. |
| Objective 16: Encourage sustainable construction | <p>Development that demonstrates sustainable design and construction</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | The vision and objectives make reference to developing the town's green credentials. No specific targets have been set for development in Keynsham and sustainable construction is not mentioned. | The development planned in Keynsham presents a key opportunity to reduce the town's carbon footprint and a strategy for this e.g. including specific targets for sustainable construction or particular projects, such as food production, should be considered at this stage. |
| Objective 17: Ensure the development of sustainable | Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) A renewable energy research study has | The vision and objectives make reference to developing the town's green credentials but no reference is made to carbon emissions and renewable energy. This is dealt with in the proposed policy | There is a potential for the waste recovery facility to be used for a community heating system. The development planned in Keynsham presents a key opportunity to reduce the |

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|---|--|---|--|
| and/or local energy sources and energy infrastructure | Promote sustainable energy generation and distribution | been undertaken. <ul style="list-style-type: none"> There is no record of any major renewable energy schemes undertaken in the District. | framework in Core Policies. | town's carbon footprint and a strategy for this e.g. including specific targets for sustainable construction or particular projects, such as food production, should be considered at this stage. |
| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> Keynsham is at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. | <p>Flood risk and the impacts of climate change are not mentioned within the vision or objectives. It could be argued that these are important issues for the town, but they are covered in the District-wide vision and objectives. See also comments relating to flood risk within the Core Policies appraisal matrix.</p> <p>Keynsham town centre lies in flood zones 1 and 2 and have passed question 2 of the sequential test¹. The exception test is not required for the town centre.</p> <p>The Somerdale site is not included within the LDF sequential test. Part of the site lies within flood zone 2 and it is adjacent to areas which regularly flood which are flood plains for the River Avon. Any development within this area will need to undertake an FRA and a sequential test will need to be applied to determine the suitability of land for development.</p> | <p>As option 2 involves more development of green space at the Somerdale factory site (which will be providing a water attenuation function), this option performs less well than option 1.</p> <p>In order for the Core Strategy to be robust, the suitability for land within the Somerdale site for development should be determined, particularly if Option 2 is taken forward as a preferred option.</p> <p>As flood risk is an important issue within the town it should be mentioned within the vision and/or objectives.</p> |

¹ Bath & North East Somerset Local Development Framework Core Strategy Options Paper (working draft August 2009)

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|---|--|---|--|
| | | | <p>The Flood Risk Management scoping study identifies options for dealing with flood risk at Keynsham which include flood storage to the south and east, raised defences within the town centre and the Somerdale factory area, improving maintenance in the centre, SUDS, improved flood warning, and pumping may be required in the A4 end of the High Street. A surface water management plan will be needed for Keynsham.</p> <p>As option 2 involves more development of green space at the Somerdale factory site (which will be providing a water attenuation function), this option performs less well than option 1.</p> | |
| <p>Objective 19: Encourage careful and efficient use of natural resources</p> | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption</p> | <ul style="list-style-type: none"> 49% of the dwellings completed in the district during the period 1996-2006 have been provided on previously developed land. In Keynsham, the number of dwellings delivered on brownfield sites has been falling since 2002/03. Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>Use of resources is covered within the District-wide vision and objectives.</p> <p>The options do not involve any expansion of the town into the Green Belt areas (apart from the existing commitments – K2) which is an efficient use of land. However, option 2 could include more development of green space at the Somerdale site and therefore this option performs less well than option 1.</p> | <p>It would be beneficial if the options detailed any planned infrastructure facilities to cope with the increased capacity due to development. The development planned in Keynsham presents a key opportunity to reduce the town's carbon footprint and a strategy for this e.g. including specific targets for sustainable construction or particular projects, such as food production, should be considered at this stage.</p> <p>It is assumed that there will be no buildings at the Somerdale factory site that will be suitable for retention or</p> |

Table A5: Keynsham Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|--|---|--|---|---|
| | and extraction of minerals (RSS 6.3) | | | conversion. If so, there should be a strategy for the recycling of the demolition material and use should be found for this material as close to the site as possible, within the redevelopment in the first instance or within a 35 mile radius. The reuse of as much material as possible should be achieved. |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>Use of resources and waste management are not covered within the vision and objectives. See comments relating to the District-wide vision and objectives and the Core Policies.</p> <p>Both of the options involve the provision of a waste recovery facility.</p> | As B&NES is already one of the top recycling authorities, this is less of an urgent issue for the options. See comments on waste management relating to the proposed policy frameworks for the Core Policies. |

Overall Commentary:

The vision and objectives have good coverage of the SA Objectives, although a number of gaps have been identified. Recommendations have been made in relation to some gaps, however, others are considered to be dealt with sufficiently within the District-wide vision and objectives or the reader is referred to comments made in relation to the appraisal of the District-wide vision and objectives. The recommendations are:

- As flood risk is an important issue within the town it should be mentioned within the vision and/or objectives. The vision and objectives could be strengthened to include access to good education facilities, particularly as secondary school provision is being reviewed.
- Ensuring the community is safe should be included in the vision and/or objectives.

The key differences between the options 1 and 2 are the more intensive use of the Strategic Site in Option 2 and for mixed use instead of

office led regeneration. Option 2 would provide a higher number of new homes (1,600) which it is proposed will bring with it more developer contributions to be used to improve the public realm in the High Street and thus boost the regeneration of the retail sector in the High Street.

Options 1 and 2 perform similarly on a number of aspects but the greater number of homes proposed in the Strategic Site may make low carbon / renewable energy technologies more viable and potentially a higher standard of sustainable construction although numbers of new housing are relatively low and therefore economies of scale may not be as possible as they would be in an urban extension, for example.

Option 2 also uses more Greenfield land for development and therefore provides less access to green space than option 1 and may present increased flood risk as it will reduce green space which provides a water attenuation function. It should be demonstrated that the options, particularly Option 2, will provide sufficient accessible green space for all. Green infrastructure should be included within spatial plans for the town.

As option 2 involves more development of green space at the Somerdale factory site (which will be providing a water attenuation function), this option performs less well than option 1 in terms of flood risk. In order for the Core Strategy to be robust, the suitability for land within the Somerdale site for development should be determined, particularly if Option 2 is taken forward as a preferred option.

The development planned in Keynsham presents a key opportunity to reduce the town's carbon footprint and a strategy for this e.g. including specific targets for sustainable construction or particular projects, such as food production, should be considered at this stage.

| Table A6: New Neighbourhood at South East Bristol Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Particular wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip. | <p>The vision and objectives for the urban extension state that it will provide a range of services and facilities supporting the needs of new and existing communities. Development in the Whitchurch area would benefit from improvements to facilities within south Bristol, such as the proposed new hospital and new academy (secondary) school in Brislington, although this is dependent on securing a good public transport service into these areas and the city centre.</p> <p>Access to facilities in Keynsham from the Whitchurch area may cause considerable impact on Queen Charlton..</p> <p>The Hicks Gate area has good access to Bristol facilities and services due to good public transport accessibility however, it is separated from such facilities by the Park and Ride and retail park at Brislington. Capacity limitations at Hicks Gate would mean that the development would not be of sufficient size to provide a range of facilities and services within the extension, without development in the Brislington area within the Bristol City Council administrative area.</p> | <p>The Whitchurch location performs better than the Hicks Gate area with regard to access to facilities and services.</p> <p>It would be useful to provide more detail on the services and facilities that could be provided within the Whitchurch location and how these could be used by existing residents within Whitchurch and neighbouring areas.</p> |
| Objective 2: Improve the | Improve Health (RSS 1.1) | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral | The vision includes promoting healthy lifestyles and the objectives include designed a healthy environment. It is | The Whitchurch location appears to perform better than the Hicks Gate option in terms of encouraging walking and |

| Table A6: New Neighbourhood at South East Bristol Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| health and well-being of all communities | <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <p>wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards.</p> <ul style="list-style-type: none"> The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. 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. | <p>difficult to compare the Whitchurch area with the Hicks Gate area as it is not clear what each area might be able to provide in terms of health facilities. The Whitchurch location would be located closer than the Hicks Gate area to the proposed new south Bristol hospital which will provide inpatient beds, diagnostics, day surgery, urgent care, outpatient clinics and community dental facilities.</p> <p>It is intended that the Whitchurch location will provide some services, facilities and employment and therefore this would encourage walking and cycling for local trips. There is also the potential for a disused railway line to be used as a green link into Bristol, which it is assumed would be for walking and cycling, rather than a rapid transit or other form of motorised transport. There are a range of sports and recreation facilities in the Whitchurch area that would need to be safeguarded and potentially extended. The Hicks Gate area also contains sports facilities which it has been argued should be retained and developed further, reducing the development capacity of this area further. The Hicks Gate option may not encourage walking and cycling to access employment, services and facilities because the site is isolated from such facilities etc. Access to Keynsham</p> | <p>cycling and access to healthcare facilities, because it is closer to the new south Bristol hospital site.</p> <p>Care should be taken to reference how health inequalities will be targeted.</p> |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | may be more appealing and a shorter distance to cycle. The Whitchurch preferred option may provide greater access to the countryside. | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | The higher range of housing proposed in the Whitchurch area (3,650) is likely to deliver more affordable housing than the lower range (3,300). The spatial objectives includes provision of a proportion of affordable housing (but a percentage is not given) and a mix of housing types. Affordable housing and housing mix are not mentioned in the vision, but these are included in the district wide section. | The Whitchurch location has capacity to provide housing and therefore more affordable housing. |
| Objective 4: Promote stronger more vibrant and cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>There is no mention of community cohesion within the vision or spatial objectives but the spatial objectives do include achieving an extension that is well integrated into the south Bristol urban area.</p> <p>The Whitchurch location is challenging because it could result in the significant extension of the existing village of Whitchurch which may not be welcomed by the existing community due to the impacts on the setting of the village, views, sense of openness, access to the countryside, noise, light, traffic and lack of distinctiveness that could result. The new development could provide a benefit</p> | The Whitchurch location probably presents the greater potential to achieve a vibrant mixed use neighbourhood at Whitchurch through placing development in one area allowing a comprehensive effort to manage transition and increase the viability of existing facilities within Whitchurch. Addressing community cohesion in the Whitchurch area, particularly in relation to impacts on the existing communities, should be given more consideration, especially in the vision and objectives. |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | <p>in the form of additional facilities, employment and improved public transport into other parts of Bristol. The new development would also border deprived areas of south Bristol and cohesion with these areas could be problematic if better facilities and services were provided to the new community that exist in these areas and if the transition were not managed well.</p> <p>Hicks Gate location is challenging because the site is isolated from the rest of Bristol (particularly residential areas) and Keynsham.</p> | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&NES. | The objectives make reference to creating safe access to employment etc. The general regeneration of the areas of Hicks Gate and Whitchurch would serve to decrease crime levels. | This is not specifically covered in the options and although it is not a key issue identified in the area, consideration should be given to the inclusion of safe and secure design where appropriate, for example, in an SPD or design codes. |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton & Radstock. | New education and training facilities are being developed in the areas of Bristol adjacent to Whitchurch and therefore this location performs well compared with the Hicks Gate area. | Little information is provided about where children would be educated. The Whitchurch location is close to areas in Bristol which are set to be provided with new education and training facilities and therefore provides better access to education and training than the Hicks Gate area. More reference could be made to how children and young adults will be educated in both options and |

| Table A6: New Neighbourhood at South East Bristol Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | | whether community centres might be provided which could potentially play a role in training provision. . |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a variety of sectors</p> | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation. The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of Writhlington, Westfield North and Midsomer Norton west are in the 50% most deprived areas, with Clandown in the 40% most deprived. There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector. | <p>Both areas have the potential to contribute to the economy of Bristol. The Stockwood area adjacent to the Whitchurch preferred option experiences out-commuting for employment and has a low level of jobs by ward and it is therefore important that new employment is provided in the urban extension to prevent increasing this problem.</p> <p>The market for commercial space in this area needs to be investigated as the potential to provide certain types of jobs may be limited.</p> <p>The Hicks Gate area may present greater opportunities to provide employment development and could potentially provide jobs that are accessible to residents of Keynsham. .</p> | <p>The Whitchurch area does not necessarily perform better than the Hicks Gate area. Analysis is needed to identify the market for employment space in the Whitchurch area and the need for such information is mentioned within the text.</p> <p>A diverse range of employment opportunities would benefit the urban extension in order to provide opportunities for a range of people.</p> |
| Objective 8: Enable local businesses to prosper | <p>Increase the circulation of wealth within the local authority area (RSS 3.5)</p> <p>Reduce vulnerability of</p> | <ul style="list-style-type: none"> The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space. There is no data on the vulnerability of the district to climate change. | <p>Both areas would have the potential to contribute to the economic vitality and growth of the city of Bristol however this does not necessarily encourage local businesses to prosper. Development at Whitchurch may help support the existing (but limited) facilities on Whitchurch High</p> | <p>There is no specific text in the options concerning the locality of business and local wealth circulation. Consideration should be given to the impacts of climate change on the economy.</p> |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | the economy to climate change and harness opportunities arising (RSS 3.7) | | Street. The spatial objectives include contributing to the economic vitality of south Bristol. | |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. | <p>The Hicks Gate area would have good access to Keynsham and Bristol. The Whitchurch location is intended to offer access to Keynsham but Bristol city centre and district centres will be the main point for shopping. However, local food producers / farm shops within the rural area to the south of Whitchurch may be accessible from the urban extension by bicycle, public transport (if along the A37) and car.</p> <p>The provision of allotment space for either option is not specifically addressed, although this is covered in the green infrastructure policy in the district wide section, and specific mention is made to local food production.</p> | If appropriate, reference could be made to the availability of local produce particularly through the provision of flexible spaces for local markets and ensuring that there will be an appropriate range of local shops and facilities which support the local community and provide an opportunity to encourage the use of local produce and materials. Provision of allotment space should be addressed. Is there a need in this area, for example? Will provision be made for new residents in the urban extension? |
| Objective 10: Ensure everyone has access to high quality and affordable public transport and | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links | <p>The Hicks Gate area could be well served by public transport into Bristol city centre. It is located close to the Brislington park and ride. It is also on the route between Bath and Bristol. Development in this area may require investment in a transport package.</p> <p>The Whitchurch area is dependent on the south east Bristol urban extension</p> | <p>The Whitchurch location would provide facilities and services on site and therefore presents an opportunity for the internalisation of trips. The need for a package of transport measures for development in the Hicks gate area is also uncertain.</p> <p>The potential impacts of the South East Bristol transport package are unknown</p> |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|-----------------------------------|---|--|---|--|
| promote cycling and walking | | | <p>transport package if it is to meet transport objectives and therefore this is currently an uncertainty. Whitchurch is currently poorly served by public transport and the A37 is congested as it is a key route into Bristol from the rural area, Options for the south east Bristol corridor major transport improvements, including potential bus rapid transit, a park and ride and other highway improvement are being explored.</p> <p>A public transport link may be proposed between Whitchurch and Keynsham which may impact on Queen Charlton.</p> <p>It is intended that the Whitchurch location will provide some services, facilities and employment and therefore this would encourage walking and cycling for local trips. There is also the potential for a disused railway line to be used as a green link into Bristol, which it is assumed would be for walking and cycling, rather than a rapid transit or other form of motorised transport.</p> <p>Access to Keynsham may be more appealing and a shorter distance to cycle. The Whitchurch location may provide significant access to the countryside.</p> | <p>and these could present secondary impacts with regard to the SA.</p> <p>No recommendations.</p> |
| Objective 11: Reduce the need and | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to | The Hicks Gate area could be well served by public transport into Bristol city centre. It is located close to the Brislington park | Reference should be made to strategies for reducing the reliance on cars i.e. car clubs and sharing schemes. More detail |

| Table A6: New Neighbourhood at South East Bristol Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| desire to travel by car | | <p>Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.</p> <ul style="list-style-type: none"> The average journey to work is 13.23km (comparatively high) | <p>and ride. It is also on the route between Bath and Bristol.</p> <p>The Whitchurch location would create a neighbourhood that is relatively self contained however travel into Bristol would be a major desire line. The south east Bristol urban extension transport package would need to include walking, cycling and public transport measures.</p> | is needed on the South East Bristol Transport Package, although it is understood that this is under development. |
| Objective 12: Protect and enhance local distinctiveness | <p>Protect and enhance landscape and townscape (RSS 5.3)</p> <p>Value and protect diversity and local distinctiveness including rural ways of life (RSS 5.4)</p> | <ul style="list-style-type: none"> There are 2 AONBs in the District – Mendip and Cotswolds AONBs (see SR for map). The district has a varied landscape represented by 18 LCAs (see SR for map). Large areas of B&NES are Green Belt (61%) | <p>Both options will result in the extension of the urban area into Greenfield areas.</p> <p>Any development at Hicks Gate option has would reduce the gap between Keynsham and Bristol and compromise the greenbelt function that the area is currently providing.</p> <p>The Whitchurch location has the potential to impact the setting of the scheduled ancient monument Maes Knoll and the Chew Valley skyline, however, development has been pulled back and reduced in scale in order to avoid areas with potential for these impacts. However, it would effect the distinctiveness of Whitchurch village as a separate settlement.</p> <p>Some land parcels considered for development in the Whitchurch area could erase the green link and visual</p> | Whitchurch performs better through maintaining the green belt between Bristol and Keynsham and, now that development has been pulled back and reduced in scale, has less potential to impact on local features such as the Maes Knoll. However, it could adversely effect the distinctiveness of Whitchurch village. |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | separation of Whitchurch and surrounding settlements. | |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath). The area which was formerly part of the Somerset coalfield retains a rich industrial heritage. | <p>The Whitchurch location has the potential to impact the setting of the scheduled ancient monument Maes Knoll and the Chew Valley skyline, however, development has been pulled back and reduced in scale in order to avoid areas with greatest potential for these impacts. However, it could adversely effect the distinctiveness of Whitchurch village. Development in parcel 4a would have impacts on the setting of Grade II* Lyons Court Farm and the medieval field pattern at the edge of Whitchurch.</p> <p>The Hicks Gate area includes some historical assets such as 3 Grade II Listed Buildings, a registered Park and Garden, a Neolithic henge, numerous Prehistoric, Roman and medieval findspots and post-medieval boundary markers. Archaeological impact assessment would be required in order to better understand these features and potential impacts upon them.</p> | A mitigation and enhancement strategy for historic assets would be required for development in both the Whitchurch and Hicks Gate areas. |
| Objective 14: Encourage and protect habitats and biodiversity. (taking | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SPA: Chew Valley Lake SAC: Combe Down and Bathampton Mines form part of the 'Bath & Bradford-on-Avon Bats SAC'. SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC. | <p>The spatial objectives include the incorporation of a network of connected high quality accessible green infrastructure providing recreation and biodiversity opportunities.</p> <p>The Whitchurch location could potentially</p> | An ecological mitigation, enhancement strategy and management plan will be required for the preferred option. This will include a green infrastructure network which connects into the network extending out of Bristol, the creation of new areas of species rich grassland and |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|---|--|---|---|
| account of climate change) | | <ul style="list-style-type: none"> There are 22 SSSIs (see map in SR) and 300 locally designated sites. 79% of units in favourable condition. BAP priority habitat is mapped in the SR | <p>result in the loss of Skylark habitat (priority species and Section 41 species).</p> <p>There are some nature conservation features within the Hicks Gate area, including a SNCI bordering the site and potentially important hedgerows on the site.</p> | new woodland and to contribute to national Biodiversity Action Plan targets, and the retention of important hedgerows. The ecological mitigation and enhancement strategy will need to be integrated within the masterplan and SPD. |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> Radstock and Keynsham are to be reviewed for air quality shortly. Gap in noise baseline information The river chemical and biological quality is generally Very Good to Fairly Good The far east and far west of the district is covered by GSPZs (including a part of Bath). | <p>The spatial objectives include minimising water quality but do not mention air quality or soils.</p> <p>Both options will contribute additional traffic onto the highways network and the Whitchurch location would require additional public transport services into the rest of Bristol and Keynsham. The Whitchurch location could increase traffic on the A37 which is already congested and the new residents could be affected by the existing congestion issues. There is uncertainty over the impact on noise and air quality from transport that could be associated with the Whitchurch location as the option is reliant on the South East Bristol transport package, which is still under development.</p> | <p>A mitigation strategy particularly related to potential air quality impacts will need to be developed as part of the development of the preferred option. Other environmental mitigation strategies will also be needed such as to limit light pollution in what is currently an urban fringe, in order to limit the impact of extending the city limit into the rural area.</p> <p>Impacts on other elements of the environment, such as air quality and soils should ideally be mentioned within the spatial objectives.</p> |
| Objective 16: Encourage sustainable construction | Development that demonstrates sustainable design and construction | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter | The vision includes that the neighbourhood will be exemplar, will promote low carbon lifestyles and buildings will be zero carbon. | Issues such as durability and flexibility should be considered alongside sustainable construction. |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|---|---|---|---|
| | <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> <p>Reduce waste not put to any use (RSS 6.4)</p> | <p>heating, but will increase the need for summer cooling.</p> <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. Waste infrastructure: 2 x waster transfer stations, 1 x railhead, 2 x materials recycling facilities, 3x recycling centres and 2x refuse collection and cleansing depots. | <p>Specific reference is included in relation to the waste hierarchy and sustainable construction and renewable energy standards which cross refers to the District wide spatial options where this information is presented. .</p> <p>Although it is not stated how many new homes could be delivered at Hicks Gate, it is assumed that it would be significantly less than the preferred option which may make high standards of sustainable construction less viable.</p> | |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | <p>Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1)</p> <p>Promote sustainable energy generation and distribution</p> | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. | <p>The vision includes that the neighbourhood will be exemplar, will promote low carbon lifestyles and buildings will be zero carbon.</p> <p>The Whitchurch location should present a scale of development which would ensure that zero carbon / high sustainability standards will be viable. The larger the development, the more viable some technologies may be. A development at Hicks Gate, if taken forward, might be combined with development nearby within the Bristol City Council administrative area and therefore it is difficult to comment on the scale of development that might be possible, were it to be taken forward.</p> | <p>No specific mention is given to how the Urban extension will deliver a "zero-carbon development" and how this will relate to the existing settlement of Whitchurch. Will any existing buildings be connected to a CHP network? Will existing buildings be retrofitted with energy efficient and renewable energy technologies in order to bring benefit to existing residents? If Whitchurch is to be integrated within the urban extension a target should be set for carbon emissions from existing buildings and activities such as transport and the extension should be considered comprehensively. The proposed use of renewable energy technologies/infrastructure should be discussed.</p> |
| Objective 18: | Reduce vulnerability to, | <ul style="list-style-type: none"> The areas prone to flooding tend to | The Whitchurch location does not lie | The Whitchurch location does not lie |

Table A6: New Neighbourhood at South East Bristol Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|--|--|--|---|
| Reduce vulnerability to, and manage flood risk (taking account of climate change) | and manage flood risk (taking account of climate change) (RSS 5.6) | <p>follow the main rivers.</p> <ul style="list-style-type: none"> Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century | <p>within an area at risk of flooding (zone 1) and has passed the sequential test. However, the absence of risk of flooding does not negate the need for surface water attenuation in order to avoid increasing flood risk elsewhere and therefore SUDS may be needed.</p> <p>The Hicks Gate development lies just south of the River Avon and mitigation such as to contain surface water runoff would be needed.</p> | <p>within an area at risk of flooding and therefore performs better than the Hicks gate area. However, the absence of risk of flooding does not negate the need for surface water attenuation in order to avoid increasing flood risk elsewhere and therefore SUDS may be needed.</p> |
| Objective 19: Encourage careful and efficient use of natural resources | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses. Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>Sustainable use of resources is included within the spatial objectives. Both options result in loss of Greenfield land.</p> <p>Supply of water and energy is not mentioned, although the vision states that buildings should be zero carbon which suggests high levels of efficiency in resource use.</p> | <p>Both options result in loss of green belt land.</p> <p>How the extension will be supplied with water and energy should be addressed.</p> |
| Objective 20: Promote waste | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | Objective 16 relates to waste management and infrastructure. | As B&NES is already one of the top recycling authorities, this is less of an urgent issue for the options. It is recommended that mention should be |

| Table A6: New Neighbourhood at South East Bristol Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | | | | made to how the waste arising from the site in construction and operation will be managed and whether and how this will link into the energy strategy for the district – such as whether any waste will be used as a biomass fuel supply, for example, in anaerobic digestion. |

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| Overall Commentary: | <p>New Neighbourhood at South East Bristol vision and objectives</p> <p>A number of gaps have been identified within the vision and spatial objectives as follows:</p> <ul style="list-style-type: none"> • Addressing community cohesion in the Whitchurch area, particularly in relation to impacts on the existing communities, should be given more consideration, especially in the vision and objectives. • Impacts on other elements of the environment, such as air quality and soils should ideally be mentioned within the spatial objectives. • There is some uncertainty relating to transport (objectives 10 and 11) because the South East Bristol transport package is still under development and it is therefore difficult to understand how travel will be managed for an urban extension. <p>New Neighbourhood at South East Bristol: options</p> <p>Areas in the vicinity of the Whitchurch location would benefit from improvements to facilities within south Bristol, such as the proposed new hospital and new academy (secondary) school in Brislington, although this is dependent on securing a good public transport service into these areas and the city centre. Access to facilities in Keynsham from the Whitchurch may cause considerable impact on Queen Charlton.</p> <p>The Hicks Gate area has good access to Bristol facilities and services due to good public transport accessibility however, it is separated from such facilities by the Park and Ride and retail park at Brislington. Capacity limitations at Hicks Gate would mean that the development would not be of sufficient size to provide a range of facilities and services within the extension, without development in the Brislington area within</p> |
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the Bristol City Council administrative area.

Development at the Whitchurch location could increase traffic on the A37 which is already congested and the new residents could be affected by the existing congestion issues. There is uncertainty over the impact on noise and air quality from transport that could be associated with at Whitchurch as the option is reliant on the South East Bristol transport package, which is still under development.

More reference could be made to how children and young adults will be educated in both options and whether community centres might be provided which could potentially play a role in training provision.

The higher range of housing proposed in the Whitchurch preferred option (3,650) is likely to deliver more affordable housing than the lower range (3,300).

Both options have the potential to contribute to the economy of Bristol. Stockwood, the area adjacent the Whitchurch in Bristol experiences out-commuting for employment and has a low level of jobs by ward and it is therefore important that new employment is provided in the urban extension to prevent increasing this problem.

The market for commercial space in the Whitchurch area needs to be investigated as the potential to provide certain types of jobs may be limited.

The Whitchurch location is a reduced scale of development than in the draft RSS , this pulls development back from areas which could cause impacts on the setting of the Maes Knoll scheduled monument and affect the Chew valley skyline.

How the extension will be supplied with water and energy should be addressed. No specific mention is given to how the Urban extension will deliver a “zero-carbon development” apart to references to Code levels and how this will relate to the existing settlement of Whitchurch. Will any existing buildings be connected to a CHP network? Will existing buildings be retrofitted with energy efficient and renewable energy technologies in order to bring benefit to existing residents? If Whitchurch is to be integrated within the urban extension a target should be set for carbon emissions from existing buildings and activities such as transport and the extension should be considered comprehensively.

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|---|---|--|--|
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Public open space provision in Norton-Radstock includes the recently enhanced spaces at Tom Huyton Park in Radstock and Radstock Memorial Park, and largely comprises small amenity areas and playing fields. | <p>The vision is stronger in that it now addresses the fact that the area should become a more self contained hub. The objectives address the provision of local services in the town centres.</p> <p>Options 1 and 2 both seek to regenerate the town centres (by allocating them as strategic sites) and provide a wider range of services and facilities to the wider community (including a town park in Midsomer Norton). However, 1 would need a substantial amount of public support and intervention. Therefore, option 2 will provide greater scope to improve community facilities and serves.</p> | Option 2 performs better in terms of improving accessibility to community facilities and services as it is likely to require less public money to regenerate the town centres. If Option 1 is chosen more work is needed on the amount of regeneration that could occur in the absence of substantial private development. |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> <p>Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities. 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. | <p>The vision states that the area will have long standing and resilient communities. The objectives address the contribution of housing to strengthened local communities and address access to social services and facilities.</p> <p>Midsomer Norton and Radstock have a shortage of formal green space and a town park has been proposed to remedy the deficiency. Both Options include the Town Park and opportunities to connect the National Cycle Network through the town. However, as identified above projects listed under option 1 would require a substantial amount of public</p> | <p>Option 2 performs better in terms of healthy lifestyles as contributions from developers may make the town park development more likely to occur.</p> <p>As the policy develops it will be important to set out what additional healthcare facilities might be needed in the town under the preferred option.</p> |

| Table A7: Midsomer Norton and Radstock Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| | | | <p>funding and it is uncertain whether this will be available.</p> <p>The document is not clear in terms of whether additional health facilities will be needed under either of the options.</p> | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Intermediate options (such as shared ownership) and private renting are more affordable in Midsomer Norton than the rest of Bath & North East Somerset. | <p>The vision states that the area will have long standing and resilient communities and Objective 6 addresses local housing needs. The following phrase has been removed from the housing objective “by providing an appropriate mix of dwellings in sustainable locations”. It would be useful if the concept of sustainable housing were re-instated to the objectives.</p> <p>Option 1 will provide 1000 homes compared to 1700 new homes as part of Option 2. As the houses in option 1 are mostly from existing commitments it will be difficult (if sites have planning permission) to provide additional affordable homes over and above what has already been agreed. Therefore, Option 2 is likely to be more able to provide affordable homes.</p> | <p>Re-instate the concept of sustainable housing to the objectives.</p> <p>Option 2 is better able than option 1 to provide affordable homes.</p> |
| Objective 4: Promote stronger more vibrant <i>and</i> cohesive | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>The vision states that the area will have long standing and resilient communities. The objectives address the contribution of housing to strengthened local communities and address access to social services and facilities.</p> | <p>Option 2 performs better in promoting stronger communities as it encourages better use of the town centre sites and is more likely to facilitate the town park in Midsomer Norton</p> |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|--|--|---|--|---|
| communities | | | Option 2 performs better in promoting stronger communities as it encourages better use of the town centre sites and is more likely to facilitate the town park in Midsomer Norton. All of these will aid cohesion. | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&NES. | <p>The issue is not addressed in the vision and objectives. However, crime is not a significant issue in the area.</p> <p>The regeneration of the town centres could lead to an improved urban environment, encouraging people to spend time in it increasing natural surveillance. This should lead to a reduction in the fear of crime.</p> | No recommendations |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton & Radstock. | <p>Access to learning is not directly addressed in the vision although references are made to Midsomer Norton and Radstock being central service areas and being the hub for social services (the assumption is that education and training is addressed as part of this). Objective 2 makes references to strengthening education and training by better links to businesses.</p> <p>All of the options offer regeneration which may bring increased education facilities and this is mentioned when the strategic sites are being discussed. However, access to learning is a major issue in the</p> | <p>All of the options offer regeneration which may bring increased education facilities however this is not implicit in the options.</p> <p>Access to learning is a major issue in Midsomer Norton and Radstock and therefore should appear more prominently in the document.</p> |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | | | area and in the preferred options should appear more prominently in the document. | |
| Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid | <p>Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1)</p> <p>Reduce poverty and income inequality (RSS 3.3)</p> <p>Provide a diverse range of employment opportunities in a variety of sectors</p> | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average Wage rates are lower than the UK average and there are many low skill/wage jobs There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation. The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of Writhlington, Westfield North and Midsomer Norton west are in the 50% most deprived areas, with Clandown in the 40% most deprived. There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector. | <p>The vision makes reference to Midsomer Norton and Radstock being central employment centres and adapting to new opportunities such as being a centre for sustainable energy. Objectives refer to creating a modern and diverse economy and creating a range of local employment opportunities.</p> <p>Option 1 and 2 are very different in terms of the number of jobs forecast. Option 1 predicts 1050 jobs and Option 2 predicts 1900 jobs. However, it is unclear where the difference in 850 jobs comes from and a more detailed breakdown will be needed in the preferred options document. If the figures are realistic option 2 is more positive for employment. 2 will also provide different types of employment sites from town centre office development, mixed use development and business park development uses.</p> | <p>Option 2 will be more positive in terms of employment as it will bring more jobs to the town and will also provide different types of employment sites.</p> <p>The preferred option will need to be more detailed in terms of where the predicted jobs will be focused (in terms of sites).</p> |
| Objective 8: Enable local businesses to prosper | <p>Increase the circulation of wealth within the local authority area (RSS 3.5)</p> <p>Reduce vulnerability of</p> | <ul style="list-style-type: none"> Local employment is heavily reliant on the manufacturing sector which accounts for 27.9% of jobs, nearly 2.5 times the national average. In contrast service sector employment at 62% is well below average figures, with office based jobs at 11%, less than a third of | <p>The vision makes reference to Midsomer Norton and Radstock being central employment centres and adapting to new opportunities such as being a centre for sustainable energy. Objectives refer to creating a modern and diverse economy through supporting companies and</p> | <p>Both options will help to keep jobs in the local area (see above) but Option 2 includes a higher job target.</p> <p>The preferred option should address the vulnerability of the areas' economies to climate change.</p> |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|--|---|---|---|--|
| | the economy to climate change and harness opportunities arising (RSS 3.7) | <p>GB rates.</p> <ul style="list-style-type: none"> Printing and packaging provides approximately 2,000 jobs, 27% of total employment, which is focussed in a small number of large companies. Norton Radstock has a number of Industrial Estates which offer modern accommodation in a range of sizes. There is also a cluster of medium size advanced engineering companies. There is no data on the vulnerability of the district to climate change. | <p>creating a range of local employment opportunities.</p> <p>Both options will help to keep jobs in the local area (see above) but Option 2 includes a higher job target. Neither option mentions climate change adaptation.</p> | |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> No data is available on the availability of local produce. Over 50% of residents travel out of the area to work. Midsomer Norton is the main shopping centre for the area and its rural catchment, with nearly three times the number of retail units compared with Radstock which performs a more local service role. Both Town Centres have a good range of community facilities. | <p>The issue is not addressed in the vision and objectives. However this is addressed in the core policies.</p> <p>Both options aim to keep jobs and services in the local community. However, Option 2 will make the area more self sustaining. Option 2, however, will require careful planning of infrastructure to reduce out-commuting.</p> | Option 2 performs better because it will make the area more self sustaining than Option 1. |
| Objective 10: Ensure everyone has access to high quality and affordable public transport and promote | Make public transport, cycling and walking easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303. | <p>The vision states that the towns will have good public transport, high levels of cycling and walking, be well connected to Bath and Bristol and will become a self contained hub. Objective 5 states that the quality of public transport will be improved.</p> <p>It is assumed that Option 2 will require a greater amount of investment in public</p> | <p>Option 2 will perform better as more investment will be needed in sustainable transport schemes to support development.</p> <p>The preferred option needs to be clearer about the infrastructure that will be developed to support development.</p> |

| Table A7: Midsomer Norton and Radstock Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
| cycling and walking | | | transport although this is not explicit in the options. If this is the case Option 2 will perform better as more investment is being put into sustainable transport schemes. | |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic. | <p>The vision states that the towns will have good public transport, high levels of cycling and walking, be well connected to Bath and Bristol and will become a self contained hub. Objective 5 states that the quality of public transport will be improved. This should reduce the need to travel by car.</p> <p>Option 1 would probably perform best to reduce the reliance on cars as it aims to regenerate the existing communities and keep business and employment local, therefore reducing the need to out-commute. It is acknowledged in the document that more careful planning would be needed for Option 2 to reduce out-commuting.</p> | Option 1 would probably perform best to reduce the reliance on cars as it aims to keep business and employment local. It is acknowledged in the document that more careful planning would be needed for Option 2 to reduce out-commuting. |
| Objective 12: Protect and enhance local distinctiveness | Protect and enhance landscape and townscape (RSS 5.3) Value and protect diversity and local distinctiveness including rural ways of | <ul style="list-style-type: none"> Large areas of Radstock are covered by a Conservation Area The district has a varied landscape represented by 18 LCAs (see SR for map). The area is within the Norton Radstock Southern Farmlands. | <p>The vision states that the towns will be vibrant and distinct centres and will have enviable rural settings and a rich natural environment. Objective 4 refers to the town's unique landscape setting.</p> <p>Both options would maintain the separation between settlements and local settings and identifies. The impact of development on local distinctiveness</p> | No recommendations |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| | life (RSS 5.4) | | would depend on how the core policies of the LDF were applied. | |
| Objective 13: Protect and enhance the district's historic, environmental and cultural assets | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures (of which 5000 lie within the City of Bath). The area which was formerly part of the Somerset coalfield retains a rich industrial heritage. | <p>The vision states that the towns will be vibrant and distinct centres. Objective 4 refers to the town's built environmental quality.</p> <p>All of the options commit to regeneration and implementation of the plans for the park and regeneration of the town centres. However, as already discussed the park is more likely to go ahead under Option 2. The aim is to enable Radstock Town Centre Strategic Site to maximise tourist facilities based on its mining heritage.</p> <p>The impact on other aspects of the environment would depend on how the core policies of the LDF were applied.</p> | All of the options commit to regeneration and implementation of the plans for the park and regeneration of the town centres. However, as already discussed the park / town centre regeneration are more likely to go ahead under Option 2. |
| Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change) | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> SPA: Chew Valley Lake SAC: Combe Down and Bathampton Mines form part of the 'Bath & Bradford-on-Avon Bats SAC'. SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC. There are 22 SSSIs (see map in SR) and 300 locally designated sites. 79% of units in favourable condition. BAP priority habitat is mapped in the SR | <p>The vision states that the towns will have a rich natural environment. Objective 4 refers to the town's natural environmental quality.</p> <p>The absence of greenfield development in Option 1 may have a positive impact upon the habitats and species surrounding settlements in the Somer Valley. It is less clear from Option 2 whether Greenfield development will be required.</p> | <p>The absence of Greenfield development in Option 1 means that it performs better under this criterion.</p> <p>The preferred option should be clearer about the amount of Greenfield development that will be required.</p> <p>Ensure consistency in the coverage of the two sections on strategic sites.</p> |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|--|---|--|--|
| | | | The sections on the strategic sites are inconsistent as Radstock discusses green corridors but Midsomer Norton does not. | |
| Objective 15: Reduce land, water, air, light, noise pollution | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> Radstock and Keynsham are to be reviewed for air quality shortly. Gap in noise baseline information The river chemical and biological quality is generally Very Good to Fairly Good | <p>The following phrase has been removed from the housing objective and this could have a negative effect “by providing an appropriate mix of dwellings in sustainable locations”. It would be useful if the concept of sustainable housing were re-instated to the objectives.</p> <p>None of the options include pollution strategies.</p> | <p>Re-instate the concept of sustainable housing to the objectives.</p> <p>None of the options include mitigation for pollution and this should be included as the strategy progresses.</p> |
| Objective 16: Encourage sustainable construction | <p>Development that demonstrates sustainable design and construction</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>The vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.</p> <p>Option 1 could be said to perform best in comparison to the other options as it aims to capitalise on existing structures and reduce new buildings.</p> <p>The sections on the strategic sites are inconsistent as Radstock discusses high quality design but Midsomer Norton does</p> | <p>The vision and objectives should address sustainable construction.</p> <p>Option 1 performs better in terms of sustainable resource use as it aims to capitalise on existing structures.</p> <p>The impact on sustainable construction will depend on how the core policies of the LDF are applied.</p> <p>Ensure consistency in the coverage of the two sections on strategic sites.</p> |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
|---|--|--|--|--|
| | | | not. The impact on sustainable construction will depend on how the core policies of the LDF are applied. | |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. | <p>The vision makes reference to Midsomer Norton and Radstock being central employment centres and adapting to new opportunities such as being a centre for sustainable energy and tapping into low carbon opportunities.</p> <p>The sections on the strategic sites are inconsistent as Radstock discusses sustainable energy but Midsomer Norton does not.</p> <p>This is not covered by any of the options.</p> | <p>The need for increased development of renewable energy and biomass production should identified as a key task for the area as the options are further developed. This is especially the case as the vision identifies the area as a future area for sustainable energy.</p> <p>Ensure consistency in the coverage of the two sections on strategic sites.</p> |
| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> Midsomer Norton/Radstock is at risk of flooding from rivers, surface water and sewers. Note: Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century | <p>The issue is not addressed in the vision and objectives. See assessment of Core Policies.</p> <p>Midsomer Norton and Radstock Town Centres have been identified as more vulnerable to housing development as part of the SFRA sequential text background paper. However, the Spatial Options paper does not address flooding.</p> | It is currently unclear whether flood issues would stop development of housing on strategic sites in Midsomer Norton and Radstock and the preferred options paper needs to address this issue. |
| Objective 19: Encourage careful and | Promote the conservation and wise use of land (RSS 5.2) | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: | The issue is not addressed in the vision and objectives. See assessment of Core Policies. | Option 1 performs well because it aims to concentrate new housing on brownfield sites. It is less clear from Option 2 whether Greenfield development will be |

Table A7: Midsomer Norton and Radstock Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Conclusions and potential for mitigation or enhancement |
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| efficient use of natural resources | <p>Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2)</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> | <p>the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses.</p> <ul style="list-style-type: none"> Modelling of future water use shows part of the District show a light water deficit with the 'no saving' scenario. | <p>Option 1 performs well in terms of making wise use of land because it aims to concentrate new housing on brownfield sites. It is less clear from Option 2 whether Greenfield development will be required.</p> | <p>required.</p> <p>The preferred option should be clearer about the amount of Greenfield development that will be required.</p> |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>The issue is not addressed in the vision, objectives or spatial options. See assessment of Core Policies.</p> | <p>No recommendations</p> |

Overall Commentary:

The spatial vision has been further developed and is now more future focused and discusses both how the area will retain it's identify and role but also how it will develop its future identity and role. The vision now addresses issues such as a step change in jobs, regeneration, becoming a more self contained hub, having a rich natural environment and the vision now states that the area will be a centre for sustainable energy.

The objectives have also been strengthened with the addition of a new objective on local employment opportunities, strengthened objectives on wider economic benefits and low carbon business opportunities (objective 1), further consideration of reducing out-commuting (objective

5), building on the identities of town centres (objective 3) and meeting housing needs in order to strengthen communities. Two areas of weakness have been identified in the objectives. The first is the removal of the following from the housing objective: “by providing an appropriate mix of dwellings in sustainable locations”. It would be useful if the concept of sustainable housing were re-instated to the objectives. The second is the fact that the vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

Option 1 performs better in some of the environmental criteria because the general level of development in Option 1 is lower (1000 houses and 1050 jobs compared to 1700 houses and 1900 jobs for Option 2) and more likely to occur on previously developed land. This means that significant Greenfield land is less likely to be required and fewer natural resources are needed to service new development. Option 1 is also less likely to cause out commuting. However, both options will maintain the separation between settlements and local settings and identifies and the effect of both options on most of the key environmental criteria will depend on how the core policies of the LDF are applied.

Option 2 performs better Option 1 in many of the social criteria as many of the regeneration objectives and highlighted projects (such as the Midsomer Norton town park) need funding from private development to guarantee their success. Option 1 consists mainly of development that is already in the pipeline (has planning permission or is allocated in the Local Plan) so is unlikely to bring any new developer funding. Because of the quantum of development, Option 1 will also contribute less to the provision of affordable houses and health/education services.

Option 2 performs better economically as it will provide for more jobs and will also provide different types of employment sites from town centre office development, mixed use development and business park development uses. It will help the area be more self sustaining than Option 1 and will therefore need to include more sustainable transport measures to work. However, the risk of out-commuting is higher with Option 2.

Some issues that require consideration as the preferred option is further developed are:

- As the policy develops it will be important to set out what additional healthcare facilities might be needed in the town under the preferred option.
- Access to learning is a major issue in Midsomer Norton and Radstock and therefore should appear more prominently in the preferred options document. It is discussed in the Spatial Options document but not in a detailed way.
- It is unclear where the difference in 1850 jobs comes from (between options 1 and 2) and a more detailed breakdown will be needed in the preferred options document.
- The preferred option should address the vulnerability of the areas' economies to climate change.
- The preferred option needs to be clearer about the infrastructure that will be developed to support development.

- The amount of detail and the coverage of the sections on the strategic sites need to be consistent. Radstock, for instance addresses green corridors, quality design and energy issues and Midsomer Norton does not. Energy issues, in particular are key aspects of the strategic sites that needs development.
- None of the options include mitigation for pollution and this should be included as the strategy progresses.
- It is currently unclear whether flood issues would stop development of housing on strategic sites in Midsomer Norton and Radstock and the preferred options paper needs to address this issue.

Table A8: Rural Areas Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|---|--|--|---|
| Objective 1: Improve accessibility to community facilities and local services | <p>Help everyone access basic services easily, safely and affordably (RSS 4.3)</p> <p>Increase access to and participation in <i>community and cultural facilities and activities</i> (RSS 2.5)</p> | <ul style="list-style-type: none"> Over half of the wards within Bath & North East Somerset are ranked below 100 on the access to services index. Wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip. The only formal park in the villages is Paulton Memorial Park. Elsewhere in the rural settlements provision for informal recreation generally takes the form of recreation grounds, village greens and other areas of amenity open space. There is 57.01 hectares of open space in the parishes. | <p>The objectives discuss increasing easy, safe and affordable access to local services.</p> <p>Policy Issue Rural A: Option 1 would improve access to facilities and services for a select list of villages but would leave large areas of the district (a large swathe through the middle of the district) without a nearby policy C settlement. Option 2 would mean that more people have access to a policy C settlement. However, the amounts of development proposed may mean that services aren't viable.</p> <p>Policy Issue Rural B: This may have some negative effects as housing could be developed in unsustainable locations in terms of access to services.</p> <p>Policy Issue Rural C: The policy will help to safeguard rural shops as a community resource.</p> | No recommendations |
| Objective 2: Improve the health and well-being of all communities | <p>Improve Health (RSS 1.1)</p> <p>Reduce Health inequalities (RSS 1.2)</p> | <ul style="list-style-type: none"> Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards. The Sport England survey 2006 showed | <p>The vision is stronger in that it now references healthier lifestyles. Objective 3 discusses increasing easy, safe and affordable access to local services and this is assumed to include health services.</p> <p>Policy Issue Rural A: Option 1 would</p> | No recommendations |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | Promote healthy lifestyles, especially routine daily exercise (RSS 1.3) | <p>that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities.</p> <ul style="list-style-type: none"> 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. | <p>improve access to health facilities and services for a select list of villages but would leave large areas of the district without a nearby policy C settlement. Option 2 would mean that more people have access to a policy C settlement but the amounts of development proposed may mean that services aren't viable or public transport to those settlements aren't viable.</p> <p>Policy Issue Rural B: The policy approach could have a negative effect on communities if affordable housing is developed in areas with few or no services. This needs to be balance against the fact that some villages have an acute affordability problem and are forcing residents (especially younger residents) to move away from family and friends.</p> <p>Policy Issue Rural C: The rural diversification policy will help with the health of rural areas by aiming to provide them with local work thus reducing the need to travel and the stress that accompanies this.</p> | |
| Objective 3: Meet identified needs for sufficient, high quality <i>and</i> | Help make suitable housing available and affordable for everyone (RSS 2.1) | <ul style="list-style-type: none"> High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 | <p>The vision and Objective 2 discusses improving the level of affordable housing for local people that is of an appropriate mix.</p> <p>Policy Issue Rural A: Option 1 would lead</p> | Rural exception sites should be used in conjunction with other policy instruments which tackle affordability more widely. |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| <i>affordable housing</i> | | <p>times the lower quartile resident annual earnings.</p> <ul style="list-style-type: none"> Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. | <p>to rural housing being focused in a smaller number of areas which are nearer to facilities and will make these services more viable.</p> <p>Policy Issue Rural B: The strategy is likely to increase the proportion of affordable housing but a rural exceptions policy may lead to some effects that are considered unsustainable, the most likely being accessibility and transport effects. However, rural exceptions policy are a way of targeting certain villages with an acute affordability problem so are useful when used in this way with an affordable housing target in other areas.</p> | |
| Objective 4: Promote stronger more vibrant and cohesive communities | Promote stronger more cohesive communities (RSS 2.4) | <ul style="list-style-type: none"> There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. | <p>The vision recognises that rural areas are made up of communities and several of the objectives address issues that will help promote strong communities – access to services and transport, economic diversification and availability of local produce etc.</p> <p>Policy Issue Rural A: Option 1 would lead to more sustainable communities generally as development is focused and enables better services to be developed. Option 2 would be less positive overall as development would be spread more thinly and would not enable services to be strengthened.</p> | If Policy Issue Rural A: Option 1 is developed large areas of the district will be without access to a policy C settlement and more innovative ways of developing services will become important. Is there a role for policy to promote this? |

Table A8: Rural Areas Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|--|--|--|---|--|
| | | | Policy Issue Rural C: This policy issue focuses on rural diversification which would lead to stronger, more cohesive communities through sense of ownership and improved use of current rural facilities. | |
| Objective 5: Reduce anti-social behaviour, crime and the fear of crime | Reduce crime and fear of crime (RSS 2.3) | <ul style="list-style-type: none"> The rural areas of the district display relatively low levels of crime. | <p>Crime and fear of crime are not referred to directly in the vision and objectives but several of the objectives will help to strengthen communities and therefore reduce the fear of crime.</p> <p>None of the options include measures to reduce fear of crime. However it may be indirectly impacted through regeneration commitments.</p> | No recommendations |
| Objective 6: Improve the availability and provision of training | Give everyone access to learning, training, skills and knowledge (RSS 2.2) | <ul style="list-style-type: none"> There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular low skills issues in Midsomer Norton & Radstock and in wards of south west Bath. | <p>Objective 3 discusses increasing easy, safe and affordable access to local services and this is assumed to include education and training.</p> <p>None of the options mention the provision of training or skills. However the committed regeneration in each option may lead to improved education facilities in schools.</p> | No recommendations |
| Objective 7: Ensure communities have access to a wide range of | Give every in the region access to satisfying work opportunities, paid or unpaid (RSS 3.1) Reduce poverty and | <ul style="list-style-type: none"> The unemployment rate for B&NES is lower than the UK average. Wage rates are lower than the UK average and there are many low skill/wage jobs. The rural areas generally feature in the least deprived areas in England. | <p>The vision discusses diversification of the rural economy and local enterprise. Objective 5 discusses fostering economic diversification.</p> <p>Policy Issue Rural C: Should provide employment for a range of employment</p> | All of the elements mentioned in the list (regarding option C) in the Spatial Options document should be included in the policy. |

Table A8: Rural Areas Options

| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
|---|---|---|---|---|
| employment opportunities, paid or unpaid | income inequality (RSS 3.3) Provide a diverse range of employment opportunities in a variety of sectors | <ul style="list-style-type: none"> However, Bathavon North, Englishcombe, Corston, Hinton Blewet and Chew Valley are within 10% of most deprived areas with barriers to obtaining suitable housing and in accessing key local services. Whitchurch is within the 10% most deprived areas for Crime and Disorder. | sectors and members of society. It also acts to reduce poverty and income inequality by supporting local farm shops, home working and safeguarding rural shops. | |
| Objective 8: Enable local businesses to prosper | Increase the circulation of wealth within the local authority area (RSS 3.5) Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7) | <ul style="list-style-type: none"> There is no data on the vulnerability of the district to climate change. | The vision discusses diversification of the rural economy and local enterprise. Objective 5 discusses fostering economic diversification. Policy Issue Rural C: Details many strategies to increase the circulation of wealth in the rural areas. | No recommendations |
| Objective 9: Increase availability of local produce and materials | Meet local needs locally (RSS 3.4) | <ul style="list-style-type: none"> There is no data available on the availability of local produce. | Objective 6 addresses increasing the availability of local produce and materials to support economic diversification. Policy Issue Rural C: Performs very well with regards to increasing the availability of local produce and materials because it actively encourages local farm shops and farmers markets. | No recommendations |
| Objective 10: Ensure | Make public transport, cycling and walking | <ul style="list-style-type: none"> There is no direct link to the motorway network in B&NES and the sub-region has poor internal transport links. | The vision discusses sustainable travel options and reduced reliance on the car. Objective 4 also discusses sustainable | If Policy Issue Rural A: Option 1 is developed large areas of the district will be without access to a policy C |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| everyone has access to high quality and affordable public transport and promote cycling and walking | easier and more attractive (RSS 4.4) | <ul style="list-style-type: none"> The important issue in the rural areas is maintaining and where possible expanding the role of the bus whilst recognising the contribution of community transport. | <p>travel options and this objective has been strengthened and now includes the consideration of the quality of the public transport and now also addresses walking and cycling.</p> <p>Policy Issue Rural A: Option 1 would lead to more sustainable communities generally as development is focused and enables better transport services to be developed. Option 2 would be less positive overall as development would be spread more thinly and would not enable transport services to be strengthened.</p> | settlement and more innovative ways of developing services will become important. Is there a role for policy to promote this? |
| Objective 11: Reduce the need and desire to travel by car | Reduce the need/desire to travel by car (RSS 4.1) | <ul style="list-style-type: none"> The average journey to work is 13.23km (comparatively high) | <p>The vision discusses sustainable travel options and reduced reliance on the car.</p> <p>Policy Issue Rural A: Option 1 would lead to more sustainable communities generally as development is focused and enables better transport services to be developed thus reducing the need for the communities served by the select list to travel by car. However, all the other settlements would need to use their cars as they are distant from a Policy C settlement. Option 2 would be less positive overall as development would be spread more thinly and would not enable transport services to be strengthened.</p> <p>Policy Issue Rural B: Is likely to increase the need to travel by car as the rural exceptions policy could lead to</p> | |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | | | development in unsustainable locations. Policy Issue Rural C: Should reduce the need to commute long distances by car by providing more local employment opportunities in rural areas. | |
| Objective 12: Protect and enhance local distinctiveness | Protect and enhance landscape and townscape (RSS 5.3) Value and protect diversity and local distinctiveness including rural ways of life (RSS 5.4) | <ul style="list-style-type: none"> There are 2 AONBs in the District – Mendip and Cotswolds AONBs (see SR for map). The district has a varied landscape represented by 18 LCAs (see SR for map). Large areas of B&NES are Green Belt (61%) The character of the villages in B&NES are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas. | <p>The vision has removed the references to the Cotswolds and Mendips AONB. Policy protection for the AONBs is still strong but their removal makes it clear that all landscapes in the district are worthy of protection. Objective 1 discusses maintaining and enhancing the character and distinctiveness of rural areas.</p> <p>Policy Issue Rural A: It may be negative if the green belt settlements are added to the list. However, this depends on the location and scale of development and they should not be removed from the list as large areas of the district could be affected and this could seriously affect the viability of services in those villages.</p> <p>Policy Issue Rural C: Performs very well in valuing and protecting diversity and local distinctiveness because it concentrates on rural diversification and options to promote rural ways of life and support for local services and products.</p> | Green belt settlements should not be removed from the list as large areas of the district could be affected and this could seriously affect the viability of services in those villages. A greater consideration is required with relation to the location and likely scale of development before deciding development is unsuitable. |
| Objective 13: Protect and enhance the | Maintain and enhance cultural and historical assets (RSS 5.5) | <ul style="list-style-type: none"> There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings | The vision addresses the distinctive character of settlements. | No recommendations |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| district's historic, environmental and cultural assets | | and structures (of which 5000 lie within the City of Bath). | <p>Policy Issue Rural B: It will be important to use the rural exceptions policy only in villages with a housing development boundary otherwise rural exception sites could be in the countryside and negatively affect the environment.</p> <p>Policy Issue Rural C: Performs well in terms of enhancing cultural and historical assets as it promotes local diversity and encourages re-use of farm buildings.</p> | |
| Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change) | Protect and enhance habitats and species (taking account of climate change) (RSS 5.1) | <ul style="list-style-type: none"> • SPA: Chew Valley Lake • SAC: Combe Down and Bathampton Mines form part of the 'Bath & Bradford-on-Avon Bats SAC'. • SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC. • There are 22 SSSIs (see map in SR) and 300 locally designated sites. 79% of units are in favourable condition. • BAP priority habitat is mapped in the SR | <p>The vision is stronger in that it now makes reference to functional networks of priority habitats that are more resilient to climate change. Objective 8 on protecting and enhancing the character of the local environment is new.</p> <p>Policy Issue Rural B: It will be important to use the rural exceptions policy only in villages with a housing development boundary otherwise rural exception sites could be in the countryside and negatively affect the environment.</p> <p>Policy Issue Rural C: Care will need to be taken when re-developing redundant buildings that protected species aren't affected. Protected species legislation should ensure this is the case.</p> | No recommendations |
| Objective 15: Reduce land, water, air, | Minimise land, water, air, light, noise pollution (RSS 6.5) | <ul style="list-style-type: none"> • Rural areas have good air quality compared to the towns. • Gap in noise baseline information | The vision refers to the high quality of the environment in rural areas. | None of the options include mitigation for pollution and this should be included as the strategy progresses. |

| Table A8: Rural Areas Options | | | | |
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| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| light, noise pollution | | <ul style="list-style-type: none"> The river chemical and biological quality is generally Very Good to Fairly Good Nitrate is regularly found in groundwater in some areas. The far east and far west of the district is covered by GSPZs. | None of the options include pollution strategies. | |
| Objective 16: Encourage sustainable construction | <p>Development that demonstrates sustainable design and construction</p> <p>Minimise consumption and extraction of minerals (RSS 6.3)</p> <p>Reduce waste not put to any use (RSS 6.4)</p> | <ul style="list-style-type: none"> All new homes must be Zero Carbon' from 2016 Fuel poverty figures have risen as a result of rising fossil fuel prices. Climate change may reduce the need for winter heating, but will increase the need for summer cooling. B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. Waste infrastructure: 2 x waster transfer stations, 1 x railhead, 2 x materials recycling facilities, 3x recycling centres and 2x refuse collection and cleansing depots. | <p>The vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.</p> <p>Policy Issue Rural C: Aims to capitalise on existing structures and reduce new buildings.</p> | The vision and objectives should address sustainable construction. |
| Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure | <p>Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1)</p> <p>Promote sustainable energy generation and distribution</p> | <ul style="list-style-type: none"> CO2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes undertaken in the District. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic | <p>Objective 7 refers to the need to promote renewable energy developments.</p> <p>This is not covered by any of the options but is covered in the Core Policies.</p> | No recommendations |

| Table A8: Rural Areas Options | | | | |
|---|---|--|--|---|
| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | | buildings. | | |
| Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change) | Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6) | <ul style="list-style-type: none"> The areas prone to flooding tend to follow the main rivers. The areas most at risk of flooding are; Bath -at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Keynsham -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. Midsomer Norton/Radstock -at risk of flooding from rivers, surface water and sewers. Note: Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources. Global temperatures will rise between 1.4 – 5.5°C over the 21st Century. | <p>The issue is addressed with reference to the environment.</p> <p>This is not covered by any of the options but is covered in the Core Policies.</p> | No recommendations |
| Objective 19: Encourage careful and efficient use of natural resources | <p>Promote the conservation and wise use of land (RSS 5.2)</p> <p>Keep water consumption within local carrying capacity limits (taking account of</p> | <ul style="list-style-type: none"> 49% of the dwellings completed during the period 1996-2006 have been provided on previously developed land. B&NES has two significant waterways: the River Avon and the Kennet and Avon Canal which together with the Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses. Modelling of future water use shows part | <p>The issue is not addressed in the vision and objectives. See assessment of Core Policies.</p> <p>Policy Issue Rural C: Re-use of existing buildings and infrastructure is intended.</p> | No recommendations |

| Table A8: Rural Areas Options | | | | |
|--|--|--|--|---|
| SEA/SA Objectives | Detailed questions: Does the policy / proposal... | Baseline data | Comparison of options | Potential for mitigation or enhancement |
| | climate change) (RSS 6.2) Minimise consumption and extraction of minerals (RSS 6.3) | of the District show a light water deficit with the 'no saving' scenario. | | |
| Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) | Reduce waste not put to any use (RSS 6.4) | <ul style="list-style-type: none"> B&NES is one of the top recycling authorities within the country, recycling 37% of household waste in 2005/06. | <p>The issue is not addressed in the vision and objectives. See assessment of Core Policies.</p> <p>None of the options have any effect on waste management.</p> | No recommendations |

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| Overall Commentary: | <p>The options presented in the rural areas section deal with a diverse number of issues and the options are not mutually exclusive as in other policy areas.</p> <p>The spatial vision has been further developed although there have been few significant changes. The main changes are the removal of the specific reference to the Cotswold's and Mendips AONBs. The addition of a reference to healthier lifestyles and the addition of references to functional networks of priority habitats that are more resilient to climate change.</p> <p>The objectives have also been strengthened with the addition of a two new objectives on protecting and enhancing the natural environment and increasing availability of local produce and materials. Other issues have also been strengthened in the objectives including the consideration of easy, safe and affordable access to services, the provision of high quality public transport that is accessible and improved walking and cycling routes. Only one area of weakness has been identified and this is the fact that the vision and objectives do not deal with</p> |
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sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

The options presented in the rural areas section deal with a diverse number of issues and the options are not mutually exclusive as in other policy areas. Policy Issue Rural A has three options – selecting a select number of policy C settlements (option 1), selecting a longer list of policy C settlements (option 2) and there is also the option of whether to include settlements which are in the Green Belt. Policy Option 1 would be positive in many ways because it would enable services and facilities to be developed in key settlements and the quantum of development likely would make these services (and public transport services) more viable. However, those villages which are remote from this select list would have more difficulty accessing rural services. Option 2 would mean more villages have access to a policy C settlement but the levels of development in this more dispersed pattern may mean none of these services are actually viable. This is made more difficult if the green belt settlements are removed as the majority of the district is green belt. More work is needed on the location and likely scale of development in the green belt before deciding development is unsuitable.

Policy Issue Rural B discusses a rural affordable housing exceptions policy. This policy could be positive in those villages where there is an acute affordability problem. However, the policy could result in development in unsustainable locations. Rural exception sites should be used in conjunction with other policy instruments which tackle affordability more widely. Policy Issue Rural C addresses rural diversification and would lead to stronger, more cohesive communities through sense of ownership and improved use of current rural facilities. Under option C, all of the elements mentioned in the list in the Spatial Options document should be included in the policy.