



Bath and North East Somerset Core Strategy Development Plan Document

Sustainability Appraisal of the Proposed Changes to the Submitted Core Strategy

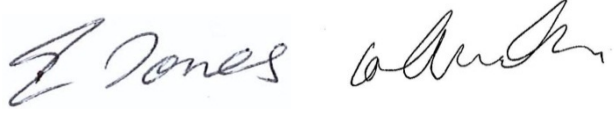
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Separate Annexes:

The relevant Annexes for the consultation from 26th March – 8th May 2013 are:

Annex A: Review of Relevant Plans, Programmes and Strategies

Annex B: Baseline Data

Annex D: Policy Appraisal Matrices

Annex H: Potential Cumulative Effects

Annex I: Contextual Indicators Monitoring Programme

Annex L: Locational Alternatives Appraisal Matrices

Annex M: Screening of Proposed Changes to the Submitted Core Strategy

Explanation

There have been significant changes made to the submitted Core Strategy to address soundness issues raised by the Inspector. Changes were considered in a number of stages and all reasonable options were assessed throughout using the SA framework. The SA reports set out how the SA influenced the production of the Core Strategy. Whilst efforts have been made to make the report itself as accessible as possible, the SA is complex due to the number of assessments and range of options assessed, including outcomes presented in the Annexes. The report is prepared using a consistent approach, and is presented in full for transparency. In utilising the SA process as an integral part of plan making to assess the options and inform the strategy in an iterative way, its apparent complexity and length is unfortunately unavoidable.

The table below sets out the key stages and relevant SA reports/Annexes. All documents are available from the Core Strategy Examination Core Document from;

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf

Core Document number is shown as CDXX/X. Some Annexes present the assessment of previous stages.

Core Strategy	Accompanying SA reports	Consultation	Notes
Publication Draft Core Strategy CD5/5	The SA report (Nov 2010) CD4/A10	16th Dec 2010 to 3rd Feb 2011	
The Draft Core Strategy submitted (3rd May 2011) CD5/7	The SA report (April 2011) CD4/A13		Some changes to the Publication Draft Core Strategy were made responding to the consultation comments.
Changes proposed to the submitted Core Strategy (CD5/27) The examination was temporarily suspended to allow the Council to respond to the	The SA report (September 2011) CD4/A17 Updated again following review of the Bath Compensatory	19 th Sep – 21 st Oct 2011	A Housing Contingency Assessment was undertaken. The Council decided not to identify additional housing contingency. Annex K presents the findings of the

Inspector's preliminary comments and questions in ID/1 and ID/4.	Storage (flood risk mitigation measures) CD4/A20 and 21		Contingency Assessment for the sake of completeness and robustness.
January to March 2012: Examination hearings June 2012: Examination suspended to enable the Council to undertake further work to address the Inspector's preliminary conclusions.			
March 2013: Changes to the Core Strategy agreed by the Council and published for consultation	SA Report (this report) including a number of annexes (see above)	26 th March – 8 th May 2103	Changes include the inclusion of urban extension locations to respond to up-to-date housing requirements.

Glossary

Acronym and Title	Explanation
AAP (Area Action Plan)	A Development Plan Document that provides a detailed planning policy framework for a part of the Council's area that is a key area for change or conservation.
AMR (Annual Monitoring Report)	A document within the LDF that monitors progress in implementing the Local Development Scheme and the effectiveness of the Council's adopted policies.
Core Strategy	A Development Plan Document that sets out the key elements of the planning framework, including strategic objectives and core policies, with which other DPDs must be in conformity.
Development Plan	The statutory framework for planning decisions, comprising the Regional Spatial Strategy and the Development Plan Documents prepared by local planning authorities (including the County Council and District Councils).
DPD (Development Plan Document)	The main type of Local Development Document which form part of the Development Plan, and include a Core Strategy, site specific allocations, development control policies and area action plans.
LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents.
Local Plan	A plan prepared by district, unitary and national park authorities but which is being superseded by Development Plan Documents.
NPPF (National Planning Policy Framework)	Published in March 2012, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. The NPPF consolidates and replaces most previous planning policy guidance from Government.
Proposals Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents.
RSS (Regional Spatial Strategy)	A document, forming part of the development plan prepared by the regional planning body that provides the strategic framework within which local authorities prepare their Development Plan Documents.
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SCI (Statement of Community Involvement)	A document within the LDF setting out the County Council's proposals for involving the local community and other stakeholders in the preparation of LDDs and the determination of planning applications.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.

1 Introduction

1.1 Background

The preparation of the Bath & North East Somerset (B&NES) Core Strategy has been subject to a fully integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of:

- The SEA Regulations (*Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004*) which requires an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment;
- The Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework which requires sustainability appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents; and
- Applicable Government guidance including *A Practical Guide to the Strategic Environmental Assessment Directive* (Office of the Deputy Prime Minister, 2005) and Sustainability Appraisal section of the Plan Making Manual (<http://www.pas.gov.uk/pas/>).

The integrated process is therefore termed Sustainability Appraisal (SA) and it incorporates the requirements of the SEA Regulations. The SA is being carried out by B&NES Planning Services and ENVIRON, using a team of consultants experienced in SA and SEA of local authority spatial planning documents.

This report is the main output of the SA and has been produced alongside the production of the plan and is published at the same time. In this way, consultees were given the greatest amount of sustainability information on which to base their responses to the Proposed Changes to the Submitted Core Strategy.

1.2 Structure of This Report

This SA report includes the required elements of an environmental report as required by the SEA Regulations. Table 1.1 signposts the relevant sections of the SA report that represent the required contents of the environmental report.

SEA Regulations – requirement for an environmental report	Where covered in the SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	The contents and main objectives of the plan are presented in Section 2. The plan's relationships to other plans and programmes is addressed in Section 4 and Annex A.

Table 1.1: Contents of the SA report	
SEA Regulations – requirement for an environmental report	Where covered in the SA Report
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.	Section 4 and Annex B
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 4 and Annex B
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4 and Annex A
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Section 6 and Annexes D and L (the definition of significance is addressed in Section 3.3).
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 6 and Annex D and L.
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 5. Difficulties are addressed in Section 3.6.
A description of measures envisaged concerning monitoring in accordance with Regulation 17	Section 7
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Regulation 12(3) and (4))	The whole report does this.
Consultation Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).	The public and environmental authorities will be given 6 weeks to comment on the Proposed Changes to the Submitted Core Strategy and SA Report.

This chapter provides an introduction to the Core Strategy and related SA process. The rest of this report is structured as follows:

- Section 2 describes the content and main objectives of the Core Strategy;
- Section 3 outlines the methodology used in the SA;
- Section 4 describes the plan's relationship with other plans, programmes and environmental / sustainability objectives and the sustainability baseline;
- Section 5 sets out the summary reasons for selecting the alternatives dealt with and the results of the appraisal of options considered in the development of the Core Strategy;
- Section 6 sets out the results of the appraisal of the proposed changes to policies within the Submitted Core Strategy;
- Section 7 outlines initial proposals for monitoring the residual sustainability effects; and
- Section 8 describes the next steps.

1.3 Habitats Regulations Assessment

The Core Strategy has been subject to a parallel Habitats Regulations Assessment (HRA). HRA of plans is a requirement of the Conservation of Habitats and Species Regulations 2010 and relates to the protection of European designated nature conservation sites.

A screening exercise has identified that four European designated sites could be at some potential risk from indirect effects from the Core Strategy such habitat damage or disturbance. These 4 sites are as follows and were identified as requiring more detailed screening:

- Bath & Bradford-on-Avon Bats SAC
- Chew Valley SPA
- North Somerset and Mendip Bats SAC
- Mells Valley SAC

In a similar way elements of the Core Strategy were reviewed to gain an initial understanding of where and what the main issues of concern would be. This approach flagged up the following sections as needing detailed review in the HRA:

- Chapter 1: Vision & District-wide spatial strategy;
- Chapter 2: Shaping the future of Bath - a spatial strategy;
- Chapter 5: Rural Areas Spatial Strategy; and
- Chapter 6: Core policy framework.

The findings of the HRA can be found within the report entitled 'Habitat Regulation Assessment for the Bath & North East Somerset Core Strategy Publication Document October 2010' available here: www.bathnes.gov.uk/corestrategy

An HRA of the Core Strategy Publications Document was completed in November 2010. This concluded that the different elements of the Core Strategy as amended to address the issues raised within the HRA, and when considered alongside the requirements of the Place Making DPD proposed, are not likely to result in significant effects upon any European site within or adjacent to B&NES.

An HRA Screening was undertaken on the Schedule of significant changes proposed for the Core Strategy following consultation on the draft Core Strategy and the Inspectors preliminary comments and questions. This concluded that the proposed changes when considered alongside the requirements of the Place Making DPD, are not likely to result in significant effects upon any European site within or adjacent to B&NES. The findings of the HRA can be found within the report titled 'Assessment of Likely Significant Effect on a European Site' and is available here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-HabitatRegulationsAssessment.pdf>

Proposed Changes to the Submitted Core Strategy introduced a number of greenfield development locations. A further draft HRA screening assessment was undertaken to inform the Council's consideration, on 4th March, of these changes to the Core Strategy. This draft report can be found here:

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/scspsc_hra_2013.pdf

An HRA of the Proposed Changes to the Submitted Core Strategy which were agreed by the Council on the 4th March and some minor revisions to policies was undertaken in March 2013 and this HRA report is to be consulted on alongside the Proposed Changes to the Submitted Core Strategy.

1.4 Consultation on the Sustainability Appraisal

A draft SA Report was first published for consultation alongside the Publication Core Strategy during the period 16th December 2010 to 3rd February 2011. The purpose of that consultation was to provide the statutory environmental bodies and other interested parties with the opportunity to express their opinion on the SA Report. It also enabled the reader to use the information within the SA Report to guide their deliberations on the plan.

This SA report has been prepared for consultation alongside the Proposed Changes to the Submitted Core Strategy 2013.

This report is an update of previous SA reports that have been provided throughout the drafting of the Local Plan process. The SA reports that have been provided previously have included a number of annexes. However, the SA report produced at this stage is focused purely on the Proposed Changes to the Submitted Core Strategy, therefore only the following SA documents are provided:

- The SA report and Non-Technical Summary (this report);
- The results of a screening exercise on the Proposed Changes to the Submitted Core Strategy that sets out in detail which changes were considered significant and therefore which changes to the plan have been assessed (Annex M)
- The SA matrices of the Proposed Changes to Submitted Core Strategy (Annex D)
- The SA matrices of the locational alternative appraisal (Annex L)

Once the Local Plan is published it will be necessary to produce a final version of the SA. This final version of the SA report will include the following:

- The final SA report and Non-Technical Summary
- Annex A: Review of Relevant Plans, Programmes and Strategies

- Annex B: Baseline Data
- Annex C: Core Strategy Spatial Options consultation document (2009) Summary of Sustainability Appraisal Findings
- Annex D: Policy Appraisal Matrices
- Annex E: Appraisal of the Submission Core Strategy, Urban Extensions Commentary
- Annex F: Potential Cumulative Effects
- Annex G: Contextual Indicators Monitoring Programme
- Annex H: Potential Cumulative Effects
- Annex I: Contextual Indicators Monitoring Programme
- Annex J: Submission Draft Changes Screening Table
- Annex K: Assessment of Housing Contingency Sites (August 2011)
- Annex L: Locational alternative appraisal matrices
- Annex M: Proposed Changes to Submitted Core Strategy Screening

2 Bath & North East Somerset Core Strategy Development Plan Document

2.1 Spatial Planning in Bath and North East Somerset

Spatial planning in Bath and North East Somerset is currently guided by the saved policies within the Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire Joint Replacement Structure Plan and the Bath and North East Somerset Local Plan. The process is also influenced by a variety of strategy and policy documents at the national, regional and local level which relate to specific issues such as employment land, open space or biodiversity.

Under the terms of Planning and Compulsory Purchase Act 2004, Local Planning Authorities (LPAs) are obliged to replace their adopted Local Plans with a Local Development Framework (LDF). A typical LDF consists of a number of Local Development Documents (LDDs) including:

- A Core Strategy (Part 1 of the Local Plan) which outlines the vision, objectives and policies for spatial land use planning in a LPA area;
- Area Action Plans which are a type of Development Plan Document (DPD) focused upon a specific location or an area subject to conservation or significant change (for example major regeneration);
- Site Allocations DPD which outlines the sites which have been selected to accommodate housing and other development; and
- Supplementary Planning Documents (SPD) may cover a range of issues, both topic and site specific, which may expand policy or provide further detail to policies in a Development Plan Document.

This report only covers the SA process for the preparation of the Bath & North East Somerset Core Strategy.

2.2 The Content of the Core Strategy (Part 1 of the Local Plan)

The Core Strategy is a key policy document for Bath & North East Somerset (B&NES) that puts in place a strategic planning framework to guide change and development in the District over the next 20 years. It sets out a Spatial Vision for the District and seven Strategic Objectives which expand this Vision into specific issues for the area which need to be addressed. Sustainable Development is the core principle underpinning the Core Strategy, expressed through the Spatial Vision and Strategic Objectives. The Core Strategy sets out the policy framework for the District's different places, as well as general policies.

Table 2.1 Structure of the Core Strategy Document

1. Introduction, Vision and District-wide spatial strategy	
2. Bath	6. Core Policies
3. Keynsham	
4. Somer Valley	
5. Rural Areas	

7. Monitoring and Review

2.3 The Core Strategy Vision, Strategy and Objectives

The Vision is supported by seven Strategic Objectives. These are presented below.

<p>Objective 1</p>		<p>SCS Driver: Climate Change</p>
<p><i>Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate</i></p> <ul style="list-style-type: none"> • reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services • ensuring the location and layout of new development enables and encourages people to make the fullest possible use of public transport, walking and cycling • encouraging and supporting the increased generation and use of renewable and low carbon energy, including through the delivery of community led schemes • promoting sustainable and energy efficient design and construction • shaping places so as to minimise vulnerability and provide resilience to impacts arising from climate change including increased flood risk • facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals • maintaining and enhancing a network of connected and multifunctional green spaces for people and wildlife serving climate change adaptation and mitigation purposes 		
<p>Objective 2</p>		<p>SCS Driver: Growth</p>
<p><i>Protect and enhance the District's natural, built and cultural assets and provide green infrastructure</i></p> <ul style="list-style-type: none"> • ensuring that growth and development takes place within the environmental capacity of the District • making optimum use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible • helping to conserve and enhance the quality & character of our built and natural heritage • maintaining and enhancing an accessible and multifunctional network of well linked green spaces • helping to conserve, enhance and restore the diversity and resilience of the District's wildlife • helping to avoid water, air, light and noise pollution and the contamination of land • capitalising on the role our heritage has in promoting local distinctiveness, place-making and supporting regeneration • maintaining an outstanding built & natural environment by ensuring that new development responds appropriately to the locally distinctive context and meets high standards of design • facilitating continuing and wide participation in cultural activities 		

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Objective 3		SCS Driver: Economy Inequalities Locality
<p><i>Encourage economic development, diversification and prosperity</i></p> <p>The Council's Economic Development Strategy seeks to stimulate a more productive, competitive and diversified economy across the District and promotes a higher value added economy (smart growth) where indigenous companies are retained and able to grow, other knowledge based sectors are attracted to the area and the industrial sector continues to contribute to the local economy.</p> <ul style="list-style-type: none"> • increasing the availability of modern office space in Bath thereby enabling indigenous companies to expand and the city to better respond to external demand • maintaining an appropriate supply of land in Bath for industrial processes and services to ensure the city retains a mixed economy • enabling tourism to continue to make an important contribution to the economy of Bath and promoting the tourism potential of other parts of the District e.g. by facilitating the provision of visitor accommodation • capitalising on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge based sectors and retaining those skills and talents in the city and wider area • repositioning Keynsham as a more significant business location enabling it to attract new employers to compensate for the closure of Cadbury Somerdale • ensuring that a sufficient and responsive supply of appropriate land and premises is available and improvement of skills is facilitated at Midsomer Norton and Radstock to help strengthen their roles as employment centres for the southern part of the District • enabling small scale local employment development, including those related to innovation opportunities, in the rural areas 		

Objective 4		SCS Driver: Growth Inequalities Demographic Change
<p><i>Invest in our city, town and local centres</i></p> <ul style="list-style-type: none"> • Bath city centre and Keynsham, Midsomer Norton and Radstock town centres need to be improved as centres for social and economic activity and as places for entertainment, culture and shopping. The local and neighbourhood centres across the urban and rural parts of the District need to be sustained, so they continue to play an important role in meeting the day to day needs of their local residents. • enhancing Bath's central shopping area, to maintain its competitiveness, diverse offer and reputation for independent and niche retailing • introducing more commercial space, suitable for a range of enterprises, as part of new mixed use developments on underperforming sites in and close to Bath city centre 		

- improving the quality and capacity of shops within the core of Keynsham and Midsomer Norton town centres
- introducing more office and residential floor space into Keynsham, Midsomer Norton and Radstock town centres
- improving the quality of the public realm in the city, town and local centres
- providing better pedestrian and cycle routes into and within the city, town and local centres
- ensuring existing and proposed parks are well integrated into and play a central role in the centres of Bath, Keynsham and Midsomer Norton
- enabling appropriate tourism opportunities in the city and town centres
- protecting and enhancing the range of services and facilities provided in local, neighbourhood and village centres, encouraging the provision of efficient, low carbon energy for example from district heating or combined heat and power systems.

Objective 5		SCS Driver: Economy Inequalities Locality
<p><i>Meet housing needs</i></p> <ul style="list-style-type: none"> • enabling the delivery of new homes needed to respond to expected demographic and social changes and as far as possible to support the labour supply to meet our economic development objectives • ensuring that the new homes provided are of high quality design and reflect and cater for a range of incomes and types of household, including those in need of affordable housing • addressing the accommodation needs of gypsies & travellers • ensuring the accommodation needs of any increase in the number of students can be met sustainably • ensure that the development of new homes is aligned with the provision of the necessary infrastructure 		

Objective 6		SCS Driver: Inequalities
<p><i>Plan for development that promotes health and well being</i></p> <ul style="list-style-type: none"> • enabling more opportunities for people to lead healthier lifestyles and have a greater sense of well-being through facilitating active modes of travel, encouraging social interaction and designing high quality, safe streets and spaces • promoting and delivering regeneration opportunities that can contribute to a reduction in the health and social inequalities across the District • encouraging and facilitating increased local food production • ensuring the timely provision of social and physical infrastructure, including health, welfare, spiritual, recreational, leisure and cultural facilities 		

Objective 7	SCS Driver: Economy & Growth
<p><i>Deliver well connected places accessible by sustainable means of transport</i></p> <p>In conjunction with the Joint Local Transport Plan, the LDF will deliver this by:</p> <ul style="list-style-type: none"> • locating and designing new development in a way that reduces the need and desire to travel by car and encourages the use of public transport, walking and cycling • ensuring that development is supported by high quality transport infrastructure which helps to increase the attractiveness of public transport, walking and cycling • promoting improved access to services especially for rural and more remote areas 	

3 Sustainability Appraisal Methodology

3.1 Approach adopted for this Sustainability Appraisal

The methodology for this appraisal was developed in accordance with guidance published by the ODPM (now DCLG) as outlined in the Table 3.1 below. Stage A of the SA was undertaken by Council Officers within the Planning Policy Team with advice from ENVIRON UK Ltd consultants. ENVIRON consultants subsequently undertook the options appraisals and the appraisal of the Publication Core Strategy and subsequent proposed changes to the Submitted Core Strategy in collaboration with the Officers within the Planning Policy Team.

Table 3.1: Key Tasks for Sustainability Appraisals	
SA Stage	Purpose of the SA Stage
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	To document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed
A2: Collecting baseline information	To provide an evidence base for sustainability issues, effects prediction and monitoring
A3: Identifying sustainability issues and problems	To help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring
A4: Developing the SA framework	To provide a means by which the sustainability of the plan can be appraised
A5: Producing scoping report and consulting on the scope of the SA	To consult with statutory bodies with social, environmental, or economic responsibilities to ensure the appraisal covers the key sustainability issues
Stage B: Developing and refining options and assessing effects	
B1: Testing the DPD objectives against the SA framework	To ensure that the overall objectives of the DPD are in accordance with sustainability principles and provide a suitable framework for developing options
B2: Developing the DPD options	To assist in the development and refinement of the options, by identifying potential sustainability effects of options
B3 and B4: Predicting and evaluating the effects of the DPD	To predict the significant effects of the DPD and assist in the refinement of the DPD
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	To ensure that all potential mitigation measures and measures for maximising beneficial effects are considered and as a result residual effects are identified
B6: Proposing measures to monitor the significant effects of implementing the DPD	To detail the means by which the sustainability performance of the DPD can be assessed
Stage C: Preparing the Sustainability Appraisal Report	
C1: Preparing the SA Report	To provide a detailed account of the SA process (in a format

Table 3.1: Key Tasks for Sustainability Appraisals	
SA Stage	Purpose of the SA Stage
	suitable for public consultation and decision makers), including the findings of the appraisal and how it influenced the development of the DPD
Stage D: Consulting on the preferred options and SA Report	
D1: Public participation on the preferred options of the DPD and the SA Report	To provide the public and statutory bodies with an effective opportunity to express their opinion on the SA Report and to use it as a reference point when commenting on the DPD.

3.2 Stage A: Scoping

Stage A has been completed. An SA Scoping Report of the Core Strategy DPD was produced in June 2007 to help ensure that the SA process covered the key sustainability issues for spatial planning in Bath & North East Somerset.

ENVIRON supported Bath & North East Somerset officers in the development of the Scoping Report from an early stage and undertook an independent review and verification of the report in 2007 prior to its publication.

The Scoping Report presents the outputs of all of the tasks in Stage A (the scoping phase of the SA) and includes baseline information, review of relevant plans and identification of significant sustainability issues for the Core Strategy DPD. From all of the information collected, an "SA Framework", or set of sustainability objectives, was developed, against which the various components of the Core Strategy have been appraised. A draft SA Framework was included in the Scoping Report and has been updated following consultation on the Scoping Report.

The data presented within the Scoping Report has been updated in response to the consultation responses received on the Scoping Report. Some of the information presented within the Scoping Report was updated in February 2010 because a considerable amount of time had passed since the Scoping Report was prepared in 2007. The updated data has informed the appraisal of the Core Strategy. The updated Scoping Report information can be found in Section 4. The Framework was again updated taking into account the publication of the National Planning Policy Framework in December 2012.

3.3 Stage B: Assessing Options

The integration of sustainability into the plan starts formally at the stage of issues and options. The effects of the strategic options have been assessed in broad terms with the aim of assisting in the selection of the preferred options. This has been an iterative process with the following key stages:

- Mid 2008 informal comments were provided by ENVIRON on the emerging options (the assessment focused on the appropriateness of the vision and objectives for the plan as a whole and each sub area). These comments were presented and discussed at a meeting with Bath and North East Somerset Council planning policy team and used to inform the development of the consultation version of the Spatial Options Paper;
- Late 2008 further comments were provided by ENVIRON on the emerging options and were again presented and discussed at a meeting with Bath and North East Somerset Council planning policy team. These recommendations were used internally by Bath

and North East Somerset Council to help formulate spatial options and core policies;
and

- In August 2009 a Core Strategy Spatial Options document was assessed and the results presented in an Interim Sustainability Appraisal Report (ENVIRON September 2009) which accompanied the Core Strategy Spatial Options document during a consultation period which ran from 19th October to 11th December 2009 (with comments accepted until 15th January 2010); and
- In August/September 2011 a Housing Contingency Assessment was undertaken, informed by the SA Framework to ensure that these further options had been thoroughly assessed within the SA. This assessment undertook a relative comparison of the housing contingency sites and their potential implications for the overall SA of the Core Strategy.
- In February/March 2013 the Proposed Changes to the Submitted Core Strategy were assessed. The results are presented in Annex D and L of this report and subject to public consultation from 26th March to 8th of May 2013. This appraisal was reviewed in the light of changes made to the Submission version of the Core Strategy in response to comments received both during the consultation period and subsequently by the Planning Inspector. Any necessary changes were highlighted in the appraisal matrices (Annex D) and included within this report in underlined text.

Assessment techniques

Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is a relatively simple matrix. It allows for a discussion and comparison of each of the options under consideration. The simplicity of the matrix is designed to reflect the fact that strategic options should (and in many cases can only be) assessed in broad terms due a lack of spatial expression. A combination of expert judgement and analysis of baseline data has been used to judge the effects of the issues and options.

A 'no plan' scenario has not been developed as part of the options development. However, this has been taken into account as each issue, option and policy has been assessed against the current social, environmental and economic characteristics of the area and the likely future situation without a Core Strategy based on the trends in the baseline identified in the Scoping Report (future baseline).

Significance has been defined within the appraisal of the Core Strategy as follows:

Score	Description	Symbol
Major positive impact	The option / plan achieves all of the applicable SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	++
Minor positive impact	The option / plan achieves some of the SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	+
Neutral	The option / plan does not have an effect on the achievement of the SA Objective or SA questions	0

Score	Description	Symbol
Minor negative impact	The option / plan conflicts with some of the SA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors	-
Major negative impact	The option / plan conflicts with all of the applicable SA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors. In addition the future baseline indicates a worsening trend in the absence of intervention	- -
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective	?

On the basis of the criteria set out within Table 3.2, significant effects have been considered to be major positive, major negative effects, plus any minor negative or uncertain effects. Uncertain effects are considered to be significant because they could potentially result in major positive or major negative effects. Minor negative effects are considered to be significant because, although not a major effect, a minor negative effect might on its own be significant due to the degree to which it conflicts with the SA question and/or the sensitivity of receptors.

3.4 Stage C: Preparing the SA Report and Stage D: Consulting on the SA Report

This document is the latest version of the SA Report. It outlines the significant effects on the environment, social and economic factors of the latest version of the plan and the reasonable alternatives considered as part of the issues and options assessment. It outlines the reasons for selecting the preferred option and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the plan.

Various versions of this SA report have been produced which report on different stages of the assessment. These versions are described below.

The SA Report was originally produced for consultation alongside the Publication (Draft) Core Strategy. The consultation period for the DPD and the SA Report was 16th December 2010 to 3rd February 2011.

In September 2011 changes to the submission version of the Core Strategy were provided by the Council to ENVIRON to undertake an update of the assessment and produce a new version of the SA report. These changes were those made to address the Inspector's preliminary comments issued prior to the hearings and those changes proposed in March 2011 that were considered to be significant by the Inspector. A screening assessment was undertaken of the changes to determine which amendments warranted re-assessment. The conclusions of the assessment were that the following policy changes were significant and should be assessed:

- New policy DW2: Housing Contingency;
- Amendments to Bath Transport Package measures;
- Amendments to CP2 and CP4;

- Clarification to policy CP11: Gypsies, Travellers & Travelling Showpeople
- New policy CP9a: Minerals

The SA report was subsequently amended and prepared for consultation in 2011.

This March 2013 version of the SA report has been prepared to take into account further changes proposed by the Council. These include rolling changes made by the Council arising from comments made by the Inspector and objectors through discussions at the hearings; changes made to reflect the Inspector's preliminary conclusions and post examination suspension changes. A further screening assessment was undertaken in March 2013 on these changes to determine whether they were likely to be significant for the SA and require further assessment. This screening assessment is included in Annex M of this report and this SA report reflects these changes.

The next stages of production of the Core Strategy/SA report after this stage are:

- July 2013: Anticipated resumption of the Examination hearings; and
- September/October 2013: Inspector's Report anticipated, followed by adoption of the Core Strategy later in the year.

3.5 Difficulties encountered in compiling information or carrying out the appraisal

Baseline Data

Some data gaps have been identified within Annex B and Table 4.2 in Section 4. Where there are gaps in the baseline, this has made it difficult to predict the future evolution of the baseline characteristics without the implementation of the Core Strategy.

There is no 'noise map' for the district and no other information is available relating to the noise baseline.

Carrying out the Appraisal

The purpose of this work is to assess the sustainability implications of any significant changes to the Submitted Core Strategy. There have been many changes to the Submitted Core Strategy, some more significant than others. Deciding which changes could have a significant effect is potentially complex. This process has been managed through carrying out an in depth screening process aimed at identifying changes that are significant in terms of sustainability (including environmental) objectives.

Another difficulty has been found in recoding the changes made to the appraisal results, in a transparent and easy to understand way. This process has been managed through underlining new text and highlighting removed text in strikethrough. This scheme has been used, however, purely in the SA matrices and results section. As this SA report is a completely new report reporting on a new stage of SA it has not been done for the SA report (apart from in the results section).

SA relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using an expert, judgement-led qualitative assessment. A 'precautionary approach' is taken, especially with qualitative judgements.

The SEA Regulations state that effects assessment should include assessment of secondary, cumulative, synergistic, short, medium and long-term permanent and temporary,

positive and negative effects. At this strategic level the information is often not available to assess to this level of detail. However, where information is available on the likelihood of different types of impacts this has been included in the results.

4 Relationship with other Plans and Programmes and Baseline

What the SEA Regulations say...

Information for Environmental Reports...

1. An outline of the plan's relationship with other relevant plans and programmes; and

5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

(N.B. ODPM guidance (2005) extends this to include other sustainability objectives).

4.1 The plan's relationship with other plans and programmes (policy context)

As identified in Section 3.1 the purpose of this stage is to document how the plan is affected by outside factors and suggest ideas for addressing any constraints.

In order to fulfil the requirements of the SEA Regulations (above), a review has been undertaken of other relevant plans, policies, programmes (PPPs) and objectives.

Reviews of relevant plans and programmes were presented in the Scoping Report. The review has been updated in February 2010 in order to take account of publications since the last update of the review undertaken in June 2007 and this is presented in Annex A.

Many of the plans, policies and programmes that have been reviewed pick up on some aspect of the "sustainable development" agenda but this may not be their primary purpose. Some of the key "sustainable development" messages coming out of the review of plans, policies and programmes are presented in Table 4.1.

Topic	Sustainable Development Messages
Air quality and noise	<ul style="list-style-type: none"> • Improve air quality and reduce air, noise and light pollution;
Biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity;
Climate change and flood risk	<ul style="list-style-type: none"> • Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change;
Community, health and well-being	<ul style="list-style-type: none"> • Improve peoples' health and reduce health inequalities; • Protect and provide access to appropriate levels of open space;

	<ul style="list-style-type: none"> • Create mixed, safe communities and promote social inclusion;
Economy and employment	<ul style="list-style-type: none"> • Promote high quality and sustainable tourism; • Ensure a resilient and economically sustainable food system;
Energy and carbon emissions	<ul style="list-style-type: none"> • Support low carbon economies and achieve successful and competitive businesses both urban and rural; • Promote energy efficiency; • Promote and provide for renewable energy;
Historic environment	<ul style="list-style-type: none"> • Protect and enhance the historic environment; • Promote good design and sustainable construction;
Housing	<ul style="list-style-type: none"> • Meet strategic housing requirements for the district; • Provide affordable housing to meet identified needs; • Promote good design and sustainable construction; • Incorporate the principles of sustainable development;
Natural resources	<ul style="list-style-type: none"> • Make the best use of previously developed land; • Promote higher densities of development in accessible locations; • Protect soil resources including high quality agricultural land; • Promote water efficiency;
Landscape	<ul style="list-style-type: none"> • Protect and provide access to appropriate levels of open space;
Transport	<ul style="list-style-type: none"> • Reduce the need to travel and promote sustainable transport options; and
Waste	<ul style="list-style-type: none"> • Ensure natural resources are used efficiently and waste is minimised, reused or recycled.

4.2 How sustainability objectives have been taken into account

In 2007, when the scoping stage of the SA was undertaken, a framework of SA Objectives was developed by B&NES to be used as a framework for appraising the DPDs of the B&NES LDF, including the Core Strategy. This framework of SA Objectives was consulted on in order to ensure that it addresses the key sustainability issues within B&NES.

ENVIRON undertook a review of the SA Framework in 2008 prior to appraisal of options. The review identified a number of areas for improvement and as a result the following changes were made to the SA Framework:

- Appraisal questions were inserted in order to guide the appraisals;
- The framework was linked to the RSS whilst at the same time ensuring that it also reflects the local issues identified within the objectives and within the scoping report; and
- The framework was streamlined where there was repetition between objectives. Amendments were made to amalgamate some objectives which resulted in an overall reduction of the number of objectives from 23 to 20.

As the changes made to the SA Framework in 2008 did not constitute a change in scope, the revised framework was not consulted on specifically following the review. Consultees were given the opportunity to comment on the revised SA Framework in 2009 when the Interim Sustainability Appraisal Report (ENVIRON September 2009) was consulted on.

Following the update of the PPPs in February 2010, two new appraisal questions were added to the SA Framework to reflect the objectives within documents published since 2007 and these are shown in italics in Table 4.2.

In December 2012 the Sustainability Framework was reviewed to ensure that the latest Government planning policy contained within the new National Planning Policy Framework (March 2012) was fully taken into account in the Core Strategy and the SA. This review led to some minor changes to the Sustainability Objectives and some additional appraisal questions, and these changes are shown below in Table 4.2 as underlined text.

Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)	
Appraisal questions added in July 2010 are shown in <i>italics</i> Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined	
SA Objectives	Detailed questions: Does the policy/option ...
Objective 1: Improve accessibility to community facilities and local services	Help everyone access basic services easily, safely and affordably Increase access to and participation in community and cultural facilities and activities
Objective 2: Improve the health and well-being of all communities	Improve Health Reduce Health inequalities Promote healthy lifestyles, especially routine daily exercise
Objective 3: Meet identified needs for sufficient, high quality and affordable housing	Help make suitable housing available and affordable for everyone <u>Help development viability and deliverability</u>
Objective 4: Promote stronger more vibrant and cohesive communities	Promote stronger more cohesive communities
Objective 5: Reduce anti-social behaviour, crime and the fear of crime	Reduce crime and fear of crime
Objective 6: Improve the availability and provision of <u>employment training</u>	Give everyone access to learning, training, skills and knowledge
Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid	Give everyone in the region access to satisfying work opportunities, paid or unpaid Reduce poverty and income inequality Provide a diverse range of employment opportunities in a variety of sectors
Objective 8: <u>Build a strong, competitive economy and Enable enable</u> local businesses to prosper	Increase the circulation of wealth within the local authority area Reduce vulnerability of the economy to climate change and harness opportunities arising

Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)

Appraisal questions added in July 2010 are shown in *italics* Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined

SA Objectives	Detailed questions: Does the policy/option ...
	<u>Contribute to the vitality and viability of town centres.</u> <u>Support a prosperous rural economy</u>
Objective 9: Increase availability of local produce and materials	Meet local needs locally <i>Support local food producers</i>
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 <u>Promote sustainable transport to reduce the need for major transport infrastructure</u>
Objective 11: Reduce the need and desire to travel by car	Reduce the need/desire to travel by car
Objective 12: Protect and enhance local distinctiveness	Protect and enhance landscape and townscape <u>Ensure potential impacts of development on AONB and landscape character and its statutory purpose are assessed</u> Value and protect diversity and local distinctiveness including rural ways of life
Objective 13: Protect and enhance the district's historic, environmental and cultural assets	Maintain and enhance cultural and historical assets
Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change)	Protect and enhance habitats and species (taking account of climate change) <u>Ensure potential impacts of development on the conservation objectives for local, national and international designated sites are assessed</u>
Objective 15: Reduce land, water, air, light, noise pollution	Minimise land, water, air, light, noise pollution
Objective 16: Encourage sustainable construction	<u>Help d</u> Development that demonstrates sustainable design and construction Minimise consumption and extraction of minerals
Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure	Reduce non-renewable energy consumption and 'greenhouse' emissions Promote sustainable energy generation and distribution
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) <i>Enable us to cope with hotter, drier summers (shade, ventilation, ground conditions etc)</i>
Objective 19: Encourage careful and efficient use of natural resources	Promote the conservation and wise use of land Keep water consumption within local carrying capacity

Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)

Appraisal questions added in July 2010 are shown in *italics* Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined

SA Objectives	Detailed questions: Does the policy/option ...
	limits (taking account of climate change) Minimise consumption and extraction of minerals
Objective 20: Promote waste management <u>in</u> accordance with the waste hierarchy (Reduce, Reuse and Recycle)	Reduce waste not put to any use

This updated version of the SA Framework has been used to appraise the sustainability of the Proposed Changes to the Submitted Core Strategy.

4.3 The Sustainability Baseline

What the SEA Regulations say...

Information for Environmental Reports...

2. *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*
3. *The environmental characteristics of those areas likely to be significantly affected*
4. *Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Habitats Directive.*

The comprehensive baseline information which describes the B&NES area is presented in the Scoping Report which can be obtained from B&NES Council or from the following link: www.bathnes.gov.uk/corestrategy

Key baseline data was updated between February 2010 and August 2010, as it became available and Table 4.3 presents key updated baseline data. In addition, trend information reported in the Scoping Report has been used to identify the “future baseline”, the potential evolution of the baseline in the absence of the plan.

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
Air quality	
<p>Nitrogen dioxide concentrations in Bath are increasing. An AQMA for nitrogen dioxide (NO²) exists along the A4 London Road (Bath), including Bathwick Street. It is likely that the whole of the city of Bath will be declared an AQMA.</p> <p>An AQMA has been declared in the centre of Keynsham.</p> <p>There are no AQMAs in Midsomer Norton, Radstock or elsewhere in the district.</p>	<p>Over the next 5-10 years there is the potential for air quality to either remain the same or decline in within Bath and air quality could decline in Keynsham without improvements to traffic levels on the High Street. The Bath Package is a major transport programme designed to provide an improved public transport system, relieve traffic congestion and improve emissions. It includes the provision of a bus rapid transit scheme, increased park and ride parking spaces and creating a more cyclist and pedestrian friendly city. There is some uncertainty regarding the funding of the Bath Package, however, following the general election in May 2010 and therefore the future traffic situation, transport infrastructure and air quality in Bath is uncertain.</p>
Noise	
<p>There is a gap in the baseline data regarding noise levels within the District.</p>	<p>Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.</p>
Biodiversity	
<p>The following sites are designated for nature conservation:</p> <ul style="list-style-type: none"> • SPA: Chew Valley Lake • SAC: Combe Down and Bathampton Mines, 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 59 SSSIs in B&NES and 300 locally designated sites. 71% of SSSI units are in favourable condition. • There are 300 locally designated sites. <p>A BAP priority habitat is mapped in the Scoping Report.</p>	<p>The district's biodiversity is at threat from development; human activities such as pollution, roads, disturbance, farming practices; loss of habitat; loss of food sources and a changing climate.</p> <p>Climate change is likely to disadvantage some species through altering seasons, changing habitats, causing habitat fragmentation (e.g. through drought) and introducing new species which could compete with others for space or could prey on them. However, climate change may also benefit some species for the same reasons.</p>
Climate change and flood risk	

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>The areas prone to flooding tend to follow the main rivers.</p> <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). Level 2 SFRA has shown that large proportions of the central area and areas closest to the River Avon are in Flood Zone 3a and 3b (the highest risk). The Flood Risk Management Strategy Report (produced by Atkins in June 2010) identified that the preferred flood risk solution to allow development of sites within Bath, that lie below the 1% AEP (1 in 100 year) +20% (climate change allowance) flood level, would be a combination of on-site flood defences and provision of a compensatory storage area upstream of Bath. Phase 1 of a study commissioned by BANES to investigate the provision of compensatory storage upstream of Bath city centre to balance future loss of flood storage volume from the delivery of allocated sites has been completed (WYG 2011). Following the Flood Risk Management Strategy, the Hydraulic Modelling has now been completed. The Black and Veatch Bath Flood Risk Management Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes and implement compensatory flow conveyance schemes. • Keynsham -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. A level 2 SFRA has shown that a small area to the north of the Somerdale site is in Flood Zone 2. A small area to the South East of the town centre may also be Flood Zone 3a. 	<p>Global temperatures are predicted to rise between 1.4 – 5.5°C over the 21st Century. Climate change is likely to increase the areas at risk of flooding in the long term.</p> <p>Other effects of climate change are reported to be¹:</p> <ul style="list-style-type: none"> • The region is becoming warmer and by the 2050s average temperatures may be as much as 3.5°C warmer in summer; • High summer temperatures are becoming more frequent, and very cold winters are becoming increasingly rare; • Winters are becoming wetter (a 5 - 20% increase is expected by the 2050s), whilst summers are becoming drier (10 - 40% decrease by the 2050s); • Relative sea level continues to rise, and could be as much as 80cm higher by the 2080s; • Changes to insurance costs and coverage are expected, in particular in vulnerable geographic areas or economic sectors; and • Loss of habitats and indigenous species could occur as well as longer growing seasons and increased potential for novel agricultural crops. <p>In the absence of the Core Strategy, development will not necessarily be accompanied by sustainable drainage measures and pollution may increase.</p>

¹ Warming to the idea - South West Region Climate Change Impacts Scoping Study (South West Climate Change Impacts Partnership, January 2003)

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<ul style="list-style-type: none"> • Midsomer Norton -at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that the town centre is in Flood Zone 1. Small areas are at higher risk of flooding. Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. • Radstock - at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that some of the central parts of the town centre are in Flood Zone 2 and 3a. • Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources. 	
Community and well being	
<p>In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip. There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district.</p> <p>There are 115 LSOAs in the B&NES Unitary Authority area. According to the Indices of Multiple Deprivation (IMD) 2007, 4 of these 115 areas are among the most deprived 20% nationally. They are home to about 5,600 people. 4 different wards (out of the 37 in B&NES) contain one such area, all are in Bath.</p> <p>No areas in B&NES are within the most deprived 10% nationally. The most deprived Lower Super Output Area (LSOA) is part of Twerton ward, Bath, which is among the most deprived 14% of English LSOAs.</p> <p>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> <p>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</p>	<p>If not addressed, crime, deprivation and access to services are likely to remain problems.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>In 2008 the Office for National Statistics estimated that the population of B&NES in 2006 was 173,100 and that between 2006 and 2026 the population of the district will increase by 9.5%.</p> <p>Nationally, predicted future trends in population dynamics are: rising household numbers, reflecting increasingly rapid decline in household size, due to ever increasing life expectancy, more households separating and higher inward migration both from other areas of the UK and internationally.</p> <p>The number of over 80 year olds in the district has been projected to increase by 16% by 2026. The impact of an aging population will impact on healthcare provision in the future.</p> <p>Obesity is an increasing issue facing the whole of the country.</p>

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>in the most affluent wards.</p> <p>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.</p>	
Economy and employment	
<p>There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton and Radstock.</p> <p>The percentage of the economically active population of B&NES which are unemployed is lower than the UK and regional percentages.</p> <p>Wage rates are lower than the UK average and there are many low skill/wage jobs.</p> <p>There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation.</p> <p>The English Indices of Deprivation (2004) ranks B&NES as the 259th (73.76%) least deprived local authority out of 354 Local Authorities. Within Bath, there are pockets of deprivation, most severely in the Twerton West and Whiteway areas.</p> <p>Kingsmead and Whiteway are within the 10% most deprived areas for Crime and Disorder and Kingsmead is also within the 10% most deprived for Health and Disability, Income and Living Environment Deprivation.</p> <p>The rural areas generally feature in the least deprived areas in England. 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.</p> <p>The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of</p>	<p>Without intervention the pattern of skills levels and wages within the district is likely to remain the same.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>Unemployment in some wards in Radstock, again, may remain the same, without intervention to improve skills levels and the diversity of employers in the area.</p> <p>Local food producers may continue to experience barriers to expansion.</p> <p>The district, especially Bath, may experience a lack of office space.</p>

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>Writhlington, Westfield North and Midsomer Norton West were in the 50% most deprived areas, with Clandown in the 40% most deprived according to the 2004 IMD.</p> <p>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> <p>The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space.</p> <p>There are a number of Local Food Suppliers in the District and the North East Somerset & Bath Local Food Partnership was set up in 2007 to encourage the production, sale, purchase and consumption of quality foods produced in the local area. The Partnership commissioned a survey in to local food production in the B&NES area. Key findings included a need for the planning system to support barriers to expansion of local food producers.</p>	
Historic environment	
<p>Bath was designated a World Heritage site in 1987.</p> <p>There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&NES (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register 2010.</p> <p>The area which was formerly part of the Somerset coalfield retains a rich industrial heritage.</p>	<p>If no development takes place (in the absence of the plan) the value of the designated sites and areas should remain the same. However, climate change may put historic assets at risk due to extreme weather events, flooding, hotter, drier summers and wetter winters.</p>
Housing	
<p>High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers.</p> <p>Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the</p>	<p>It is unknown how many housing developments will come forward within the next 5 years due to the economic downturn of recent years. It may remain difficult to secure a mix of decent affordable homes.</p> <p>Without the pro-active planning represented by the plan, it is unlikely that</p>

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>overall need for affordable housing in B&NES is concentrated in Bath City. Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals.</p> <p>Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials.</p>	<p>B&NES will be able to provide enough affordable housing to satisfy future requirements.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve.</p> <p>Historically there has been a statistically low level of demand for gypsy and traveller sites with some unauthorised occupation of land by gypsy and travellers within the district. However, there is a national shortage of these types of sites and the West of England Gypsy and Traveller Accommodation Assessment (2007) recommends that 19 permanent pitches and 20 transit pitches are found for the gypsy and travelling communities in B&NES in the period 2006-2011. The report also indicates that one plot for travelling showpeople should be provided in B&NES by 2011.</p>
Land	
<p>B&NES has prepared a Remediation Statement (2002) relating to contaminated land located in Keynsham. This land has been remediated, including the removal of all material, contaminated and uncontaminated, from the site and, therefore, permanently removing the pollutant linkage.</p> <p>No further land is registered as contaminated under Part 2A of the Environmental Protection Act 1990.</p> <p>82% of new or converted dwellings in the District completed during 2008/09 were built on previously developed land.</p>	<p>As developments occur on contaminated land they will be remediated. Therefore, the amount of contaminated land will decrease over the next 5-10 years.</p> <p>The amount of development that is built on brownfield land should remain high in the district.</p>
Landscape	
<p>There are 2 AONBs in the District – Mendip and Cotswolds AONBs. The district has a varied landscape represented by 18 LCAs. Large areas of B&NES are Green Belt (61%).</p> <p>Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.</p> <p>Without the Core Strategy, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.</p>

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>overlooking open ground and panoramic views.</p> <p>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.</p> <p>Large areas of Radstock are covered by a Conservation Area.</p>	
Transport	
<p>Over 50% of residents travel out of the area to work. The average journey to work is 13.23km (comparatively high). 2001 data showed a high proportion of the population travelling to work by car.</p> <p>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. 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.</p> <p>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.</p> <p>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.</p> <p>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> <p>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> <p>Problems with congestion are experienced in Bath, Keynsham and Radstock.</p> <p>Any proposals for the further development of the area will need to address</p>	<p>The Bath Package is a major transport programme designed to provide a modern integrated easy to use public transport system. This includes the provision of a bus rapid transit scheme and creating a more cyclist and pedestrian friendly city. There is some uncertainty regarding the funding of the Bath Package following the general election in May 2010 and therefore the future traffic situation and transport infrastructure in Bath is uncertain.</p> <p>The high proportion of the district's population recorded in 2001 who travel to work by car will continue unless alternative and more attractive modes of transport are provided.</p> <p>Increased traffic would exacerbate all of the existing problems outlined in the baseline data. Nonetheless, if the interventions set out in the Bath Package are successfully implemented, this situation can be controlled in Bath.</p>

Table 4.3: Summary of the Sustainability Baseline Data	
Sustainability baseline / issues / characteristics of the area	Suggested evolution without the plan
<p>this by bringing relief from current congestion, and promoting more sustainable forms of transport.</p>	
Waste	
<p>B&NES is one of the top recycling authorities within the country, recycling 41% of household waste in 2009/10.</p> <p>Waste infrastructure: 2 x waster transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots.</p> <p>Every day B&NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset.</p>	<p>Levels of recycling have been increasing and there is no reason to believe that this trend will change.</p> <p>However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.</p>
Energy and carbon emissions	
<p>CO₂ emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes)</p> <p>There is no record of any major renewable energy schemes within the district. There are a few small scale schemes undertaken on an individual basis but no comprehensive survey of existing installations has been undertaken and this may be a gap in baseline information.</p> <p>A renewable energy research study has been undertaken.</p> <p>Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings.</p>	<p>With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years.</p> <p>Historic buildings may be difficult to make more energy efficient in light of existing planning controls.</p> <p>On-site renewable energy technologies are developing in response to Part L of the Building Regulations and targets set in other areas of the UK. The percentage of energy generated from renewable sources is likely to increase in the future.</p>
Water	
<p>The river chemical and biological quality is generally Very Good to Fairly Good</p> <p>Nitrate is regularly found in groundwater in some areas.</p> <p>The far east and far west of the district is covered by Ground Source Protection Zones (including a part of Bath).</p>	<p>With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.</p>

5 Reasons for Choosing Options and Alternatives and Results of the Appraisals of Options

What the SEA Regulations say...

Information for Environmental Reports...

6. The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).

7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.

5.1 Introduction

The SEA Regulations require that the Environmental Report outlines the reasons for selecting the alternatives dealt with. ODPM guidance states that to adhere to this requirement the Environmental Report should outline:

- The main strategic options considered, how they were identified and the reasons for selecting the options (see Section 3.3 of this report for details of the options considered);
- A comparison of the social, environmental and economic effects of the options and how social, environmental and economic issues were considered in choosing the preferred options; and
- Other options considered, and why these were rejected.

Several appraisals of the sustainability of different spatial options have been undertaken during the development of the Core Strategy, and the results of these assessments have influenced subsequent iterations of the Core Strategy since its first publication.

A summary of the different assessments of options is presented in Section 5.3.

5.2 Assumptions made during the assessment

SA relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using an expert, judgement-led qualitative assessment. A 'precautionary approach' is taken, especially with qualitative judgements and mitigation is suggested if there is any doubt as to the effect of the plan.

The nature of the Core Strategy is that it is an overarching strategic document which presents the core spatial planning policies and provides the policy 'hooks' on which to 'hang' subsequent development plan policies and documents.

In light of this, the appraisal has:

- Indicated where assessment is not possible or where additional data is required; and
- Indicated the mitigation needed in two ways:
 - Direct mitigation: indicate where changes to the Core Strategy DPD is needed to include specific measures to deal with a potential negative impact or a lack of information;
 - Indirect mitigation: indicate matters that need to be developed as the Core Strategy is further developed or where information needs to be provided within another planning document.

5.3 The reasons for selecting alternatives

The process of preparing the Core Strategy is itself one that involves consideration of issues and options. Consideration of alternatives as required by the SEA Regulations has therefore been an integral part of that process. The reasons for developing and selecting the strategy as chosen at different stages has been outlined in previous SA reports and is not repeated here. However, a summary of the issues and options assessments that have been carried out at each stage of the SA process and where to find out more information, such as their findings, is outlined below.

5.4 Options Appraisals in 2008

The Core Strategy Issues and Options Paper (October 2008) was appraised by the SA consultants. Comments and recommendations were fed back to B&NES officers as the paper was developed. The results of this process are recorded in the Core Strategy Spatial Options- Interim Sustainability Appraisal September 2009, which can be found here: <http://www.bathnes.gov.uk/environmentandplanning/planning/localdevelopmentscheme/Pages/corestrategy.aspx>

5.5 Spatial Options Appraisals (2009)

The Core Strategy Spatial Options Consultation document (October 2009) set out discreet options which were subject to sustainability appraisal in August 2009. These included: district wide spatial options and spatial options for Bath, a new neighbourhood in an urban extension to Bath, Keynsham, New Neighbourhood at South East Bristol, Midsomer Norton and Radstock, and options for Rural areas. The consultation document also outlined core policies.

Detailed policy wording was not included in the Spatial Options document. At this stage the issues dealt with by the policies along with a suggested policy direction were indicated. The conclusions of the SA at the Options stage, along with the consultation responses and additional evidence, were used to inform the preparation of policy wording included in the Publication Core Strategy.

The full results of the Spatial Options appraisals are presented within the Core Strategy Spatial Options Interim Sustainability Appraisal Report Appendix A (September 2009, Revised December 2009), which can be found here: <http://www.bathnes.gov.uk/environmentandplanning/planning/localdevelopmentscheme/Pages/corestrategy.aspx>

5.6 Additional work on Urban Extensions (August 2011)

Through the appraisal of the Spatial Options Consultation document (October 2009) the SA appraised and compared the merits and disadvantages of two options for urban extensions to the South East of Bristol, at Whitchurch and at Hicks Gate which adjoined the Bristol City Council administrative area and two options for urban extensions to Bath, at Twerton to the west of the city, and on the Odd Down plateau to the south.

The chosen District Spatial Strategy included within the Publication Core Strategy moved away from urban extensions. The options presented within the Core Strategy Spatial Options consultation document (October 2009) did not include an option with no urban extensions. As such, it was difficult to compare the potential positive and negative effects of the options considered in the Spatial Options document with the spatial strategy presented within the Publication and the Submission Core Strategy.

In order to ensure that the sustainability implications of the District Spatial Strategy (DW1) which did not include urban extensions were fully understood, an additional assessment was undertaken to examine the implication of moving away from the options of urban extensions considered in the Core Strategy Spatial options consultation document (October 2009). The assessment considered and compared (as far as possible) the effects of the options which included urban extensions appraised through SA in 2009 and the effects of the Publication Core Strategy District Spatial Strategy appraised as a part of the whole Publication Core Strategy in 2010.

An assessment was undertaken in August 2011 to assess the relative performance of the housing contingency sites, which included the four sites considered previously, however the scale and the area of development have been modified. This assessment can be found in full in Annex K. This assessment was undertaken using the SA Framework used to assess the previous options and thus for the purposes of the Regulations, was compatible with previous assessments and informed the development of the plan. The assessment not only considered a relative comparison of the four sites, but also considered the sites relative to the existing plan – that is without release of Green Belt. Therefore in regard to this updated assessment, and for the purposes of Article 5.1 of the SEA Directive *and St Albans District Council v Secretary of State for Communities and Local Government* we consider that reasonable alternatives for this policy area have been considered.

Transport Strategy

Changes to some aspects of the Council's Transport Strategy for Bath were made within the Submission version of the Core Strategy and these are detailed within Annex J of the SA Report (ENVIRON, 2011). The Measures included are:

- Bath Transport Package – comprising a range of measures including three extended Park & Ride sites; upgrading nine routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key routes into the city displaying information about car parking availability;
- Improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Mid Somer Norton;
- Rail improvements, such as the electrification of Great Western Railway mainline by 2016; the new 15 year GWR franchise (including the Greater Bristol Metro Project); and increasing the capacity of local rail services travelling through Bath Spa rail station, improving attractiveness of rail travel to and from Bath;

- B&NES has been awarded Local Sustainable Transport Fund key component funding for a number of measures and also been invited by the Department for Transport to submit a major bid to the Local Sustainable Transport Fund for £25.5million jointly with the other three West of England authorities;
- Creating a more pedestrian and cyclist-friendly city centre through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas;
- Other improvements to walking and cycling infrastructure through the Council's Integrated Transport annual settlement and the implementation of 'Smarter Choices' for transport e.g. through the development of travel plans for new and existing sites and the expansion of car clubs;
- Updating the Council's Parking Strategy for Bath which will broadly maintain central area car parking at existing levels in the short term and continue to prioritise management of that parking for short and medium stay users.

Therefore there has been the deletion of the previously proposed new Park and Ride site to the east of the city. The reasons for this deletion was to allow alternatives to be developed possibly involving rail, to maximise the potential benefits of electrification of the GWR and the awarding of an extended rail franchise to achieve substantial modal shift.

In addition the Council agreed to:

- instruct officers to work on alternatives to Bathampton Meadows park and ride, possibly involving rail, as part of the future Transport Strategy;
- liaise with Wiltshire Council and other authorities about measures to remove some of the through traffic along the London Road and other cross border transport issues;
- implement measures to remove HGVs from London Road - this 10% of traffic creates 40% of the pollution;
- instruct officers to examine how we can obtain substantial "modal shift" from the private car to rail in recognition of potential for rail expansion with the electrification of the GWR and the awarding of an extended rail franchise.

5.7 Appraisals for the Proposed Changes to the submitted Core Strategy including urban extension locational alternatives (March 2013)

The results of this stage of the appraisal (March 2013) is summarised in Section 6 of this report.

Later stages of the SA process also require plan makers to outline the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with. It is not possible to address this yet as the plan has not been adopted. This will be addressed in the SA Adoption Statement (see Section 8 of this report for details).

5.8 How the SA has informed development of the Core Strategy

The SA has presented the positive and negative effects of the options previously consulted on in order to inform decision making. In most cases, no one option was identified as a preferred option with regards to the SA. The SA of options and subsequent SA of proposed changes have influenced the development of the Publication Core Strategy and the subsequent Submission Core Strategy in the following specific ways:

- The Core Strategy objectives now include references to health and wellbeing, addressing health inequalities, safety, increasing local food production, provision and access to training, especially in the Somer Valley, reducing the need and desire to travel by car and access to high quality sustainable transport, promoting local character and distinctiveness, the protection and provision of green infrastructure, climate change, energy and CO₂ reduction;
- More detail is provided in relation to flood mitigation measures needed in specific settlements e.g. Bath;
- Greater emphasis on how air quality issues will be addressed in Bath have been included in the Bath Strategy chapter;
- Creating safe places has been included in the Environmental Quality Policy (CP6);
- The integration of affordable housing into new developments has been added to policy CP9;
- References to the need to consider archaeological impact of CHPs and cumulative impacts of new developments on social infrastructure / community facilities have been added to supporting text;
- Greater emphasis has been given to increasing the availability of local produce and materials in the Core Strategy;
- The addition of cultural assets to the policy covering historic environment (policy CP6);
- Enhancement as well as protection/safeguarding of nature conservation assets has been added to the policy covering nature conservation (CP6) and also taking account of climate change through the enhancement of wildlife corridors and green infrastructure;
- Wider issues of sustainable construction are now covered in a specific sustainable construction policy which includes standards for sustainable design for residential and non-residential development which change over time in response to Government targets;
- A specific decentralised energy policy is now included (policy CP4);
- Consideration of pollution and utilities provision is included in policy CP11 Gypsies, Travellers and Travelling Showpeople Policy;
- Sites for gypsies, travellers and travelling showpeople are suitably located to allow access by sustainable modes of transport (CP11);
- Centres and retailing (policy CP12) now supports the provision of markets and community facilities within settlement centres;
- Greater emphasis is given to sustainable transport in the Rural Areas Strategy chapter;
- Inclusion of the reuse of the Cadbury's buildings in policy KE2;
- The design core policy now ensures that designing out crime in new developments is a requirement;
- The provision of training and improving skills is dealt with in the place-based policies, where skills levels have been identified in certain places (i.e. Midsomer Norton and Radstock);
- The spatial strategy refers to the need to improve skills in the Somer Valley area in order to deliver growth in the local economy in that area;

- The district strategy makes allowance for Greenfield development and therefore suitable control of development will be required through the core policies and the development management policies within the forthcoming Place Making DPD;
- The Sustainable Construction Core Policy encourages the reuse and recycling of demolition materials;
- Landscape and visual assessment, and archaeological assessment are now required to be undertaken prior to any Greenfield development. This is a now requirement of the development management policy in the forthcoming Place Making DPD;
- Ecological assessment are now required to be undertaken prior to development of Greenfield sites. This is also a requirement of the development management policy in the forthcoming Place Making DPD which also requires ecological assessment of brownfield sites;
- The flood risk management policy CP5, now promotes SuDs which provide wildlife habitats as well as surface water management, where appropriate; and
- Affordable Housing (policy CP9) is now required to be integrated within a development and should not be distinguishable from market housing.

6 Results of the Appraisal

What the SEA Regulations say...

Information for Environmental Reports...

6. The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).

7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.

The full results of the appraisal are reported in Annex D and L to this report. Potential cumulative effects of the Core Strategy are identified in Section 6.1 and within the matrices in Annex D and L.

6.1 Summary of the Findings of the Appraisal

Table 6.1 presents the significant effects of the vision, strategic objectives, policies and strategies of the Core Strategy. Significant effects are considered to be those which are potential major positive, major negative, minor negative and uncertain. Unless otherwise stated, the effects in Table 6.1 are over the short, medium and long term. The effects presented in Table 6.1 include potential cumulative effects where found.

Please note that the assessment process that is presented in Annex D has drawn on the information provided as part of Annex L in relation to the following policies:

- Policies B3A, B3B and B3C;
- Policies KE3 and KE4; and
- Policy RA5

Annex L: Locational Alternatives Appraisal

Responding to the Inspector's preliminary conclusion (ID28), the Council has reviewed both the District's housing requirement through the Strategic Housing Market Assessment (SHMA) and the District's housing land supply through the Strategic Housing Land Availability Study (SHLAA).

The revised housing target proposed is 12,700 homes from 2011 to 2029, based on the findings of SHMA, adding the Local Plan backlog, an extra to address affordable housing needs, 5 year land supply and flexibility to respond to non-delivery risks. The latest SHLAA identifies 10,852 dwellings within the existing urban areas. This leaves a shortage of around 1,870 homes. The need to boost existing housing land supply requires the identification of new housing/development locations.

In order to find the most sustainable locations to meet the needs of the district, the Council applied a sequential staged assessment. A strategic approach was taken, appropriate to the Core Strategy level of plan-making and to minimize pre-empting the preparation of the Placemaking DPD that will consider sites in more detail. The approach to alternatives (or options) appraisal has involved a hierarchical approach.

Stage 1	District-wide locational sequence assessment
Stage 2	Identification of suitable locations based on cells around existing settlements
Stage 3	Site assessments
Stage 4	Growth level assessments

The appraisals draw on key findings within various evidence sources. The studies and assessments below are particularly important for this assessment. The matrices show only a key summary. Further detail is available in the full reports. These are:

Strategic Housing Market Assessment

Strategic Housing Land Availability Assessment

Infrastructure delivery Programme Update

Green Belt Review (Arup 2013)

Development Concept Frameworks (Arup 2013)

Landscape Visual Assessment

Ecological Environmental Capacity Study Update

B&NES Core Strategy Transport Evaluation

Strategic Flood Risk Assessments and Sequential/Exception Test update

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
Vision and Objectives	<p>The vision and objectives generally perform well against the SA objectives. A number of potential major positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 2: Improve the health and well-being of all communities; • Objective 3: Meet identified needs for sufficient, high quality and affordable housing; • Objective 5: Reduce anti-social behaviour, crime and the fear of crime; • <u>Objective 6: Improve the availability and provision of training;</u> • Objective 8: Enable local businesses to prosper; • <u>Objective 9: Increase availability of local produce and materials;</u> • Objective 11: Reduce the need and desire to travel by car; • Objective 12: Protect and enhance local distinctiveness; • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; • Objective 16: Encourage sustainable construction; • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure; • <u>Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change); and</u> • Objective 19: Encourage careful and efficient use of natural resources <p>An uncertain performance was recorded with regards to ‘Objective 15: Reduce land, water, air, light, noise pollution’ because it is not clear that avoiding pollution can be inferred from the high level reference to environmental quality within the vision.</p> <p>One potential minor negative effect has been identified as follows:</p> <ul style="list-style-type: none"> • Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle): It is considered that waste management has been omitted from the vision and objectives. <p>No potential cumulative negative or positive effects have been identified.</p> <p>Mitigation is <u>was</u> put forward to address at the potential negative effects and the uncertain effect identified, as follows:</p> <ul style="list-style-type: none"> • Sustainable waste management, reducing waste arisings and the waste hierarchy should be referred to within strategic objective 1;

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA

Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>and</p> <ul style="list-style-type: none"> • Strategic objective 1 should make reference to the need to avoid pollution relating to water, air, light and noise in relation to the protection of natural resources. <p><u>This mitigation measure has been rejected by the Council.</u></p> <p>Recommendations have been put forward to improve the performance of the vision and objectives against the SA Objectives, as follows:</p> <ul style="list-style-type: none"> • The second bullet point under strategic objective 2 should be reworded to read: “helping to conserve, enhance and restore the diversity and resilience of species and habitats, especially the District’s wildlife sites; • The vision could be more specific in addressing SA Objective 1 by making reference within the first two paragraphs to people meeting their needs locally or having good access to community facilities and local services; • The vision or objectives should make specific reference to achieving cohesive communities. This could be specifically in relation to new housing developments under strategic objective 6; • The second to last paragraph of the vision and strategic objective 4 should include improving skills in Midsomer Norton and Radstock with reference to improving local job opportunities and supporting the local economy through attracting new employers; • Strategic objective 43 should make reference to reducing income inequality in the district; • The vision could be more specific in addressing this SA Objective by making reference within the first two paragraphs to meeting needs locally, especially with regards to materials and produce; • A bullet point could be added to strategic objective 8 which encourages a reduction in distances travelled by meeting needs for materials and produce locally; • Strategic objective 8 should refer to the provision of public transport that is affordable; and • Planning to protect people and property from the risk of flooding should be included within the vision. <p><u>Since the vision and objectives were appraised, amendments have been made in response to the mitigation and recommendations put forward. A residual minor negative effect remains with regards to SA Objective 20: Promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle): It is considered that waste management has been omitted from the vision and objectives and a minor negative effect is recorded. Mitigation has been taken on board as suggested for SA Objective 15: Reduce land, water, air, light, noise pollution and the performance with regards to this objective is now minor positive in the short, medium and long terms.</u></p> <p><u>Changes made in response to the recommendations have generally improved the performance of the vision and</u></p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<u>objectives with regards to the SA Objectives. However, not all recommendations have been taken on board.</u>
Model Policy on Presumption in Favour of Sustainable Development	<p><u>The model policy on the presumption in favour of sustainable development has been added to the Core Strategy via Proposed Modifications in February 2013. The policy mainly has a neutral or positive performance with regards to the SA Objectives.</u></p> <p><u>A number of potential major positive effects have been identified in relation to the following SA Objectives:</u></p> <ul style="list-style-type: none"> • <u>Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid;</u> • <u>Objective 8: Build a strong competitive economy and enable local businesses to prosper; and</u> • <u>Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change).</u> <p><u>A number of minor potential positive effects have been identified in relation to the following SA Objectives:</u></p> <ul style="list-style-type: none"> • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing</u> • <u>Objective 13: Protect and enhance the district’s historic, environmental and cultural assets;</u> • <u>Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change); and</u> • <u>Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure</u> <p><u>No potential major negative effects have been identified</u></p> <p><u>No potential cumulative effects have been identified.</u></p> <p><u>No mitigation has been identified.</u></p> <p><u>Enhancement is put forward to address the potential neutral effects identified, as follows:</u></p> <ul style="list-style-type: none"> • <u>Performance of the policy against all the objectives could be enhanced by rewording the policy to ensure that where relevant policies in the Local Plan are silent on an issue, permission will only be granted subject to the two caveats. This would ensure the policy is in greater accordance with the intent of paragraph 14 of the NPPF than it is in its current form.</u> <p><u>The council has responded that the policy reflects the NPPF. However, Core Strategy and Joint Waste Core Strategy policies would provide further guidance to meet this objective.</u></p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
District Strategy	<p>The Spatial Strategy has a mixed performance with regards to the SA Objectives.</p> <p>A number of potential major positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing; and</u> • Objective 8: Enable local businesses to prosper. • Objective 13: Protect and enhance the district's historic, environmental and cultural assets; and • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change). <p>A potential major negative effect has been identified as follows:</p> <ul style="list-style-type: none"> • Objective 15: Reduce land, water, air, light, noise pollution: the growth proposed in Bath could exacerbate the existing poor air quality within much of the city. Similarly, growth in Keynsham could also exacerbate the air quality issue on the High Street. <p><u>Two potential negative effects have been identified as follows:</u></p> <ul style="list-style-type: none"> • Objective 15: The growth proposed in Bath could exacerbate the existing poor air quality within much of the city. Similarly, growth in Keynsham could also exacerbate the air quality issue on the High Street. • <u>Objective 19: The plan proposes strategic changes to the Green Belt boundary. The location introduces development to greenfield land so cannot be considered as conserving land.</u> <p><u>Uncertain effects have been identified as follows:</u></p> <ul style="list-style-type: none"> • <u>Objective 12, Objective 13 and Objective 14: The spatial strategy proposes strategic changes to the inner Green Belt boundary. Dependent on the exact changes to the Green Belt boundaries, there could be impacts on landscape character, heritage and biodiversity.</u> <p>Uncertain effects have been identified as follows:</p> <ul style="list-style-type: none"> • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure: the redevelopment of brownfield sites could potentially have less opportunities for decentralised renewable energy solutions / zero carbon design compared with large scale urban extensions. From 2016 all new dwellings will need to be zero carbon and townscape constraints may be a constraint on on-site energy generation in Bath.

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>No potential cumulative effects have been identified.</p> <p>Mitigation is put forward to address the potential negative and uncertain effects identified, as follows:</p> <ul style="list-style-type: none"> • Objective 12, Objective 13 and Objective 14: The Placemaking Plan will establish the new detailed Green Belt boundaries. It is important that issues of landscape, biodiversity and heritage are considered as part of this process. • Objective 15: The Transport and Movement Core Policy needs to set out how the proposed development in the spatial strategy can be accommodated without exacerbating air quality issues and reducing the effectiveness of AQMA action plans. The area-based policies will need to identify if any transport related infrastructure is needed in order to deliver the proposed growth in each area; • Objective 19: Greenfield land take cannot be mitigated against but policies are included in the plan to reduce the effects of this greenfield land take. <p>Recommendations were have also been put forward to improve the performance of the spatial strategy and these have been taken on board in the Core Strategy. are as follows:</p> <ul style="list-style-type: none"> • The design core policy will need to ensure that designing out crime in new developments is a requirement of planning policy; • The provision of training and improving skills should be dealt with in the place-based policies, where skills levels have been identified in certain places (i.e. Midsomer Norton and Radstock); • The spatial strategy should refer to the need to improve skills in the Somer Valley area in order to deliver growth in the local economy in that area; • The district strategy makes allowance for Greenfield development and therefore suitable control of development will be required through the core policies and the development management policies within the forthcoming Place Making DPD; and • The Sustainable Construction Core Policy should encourage the reuse and recycling of demolition materials. <p>Since the District Strategy was appraised, a number of changes have been made to the Core Strategy which have addressed the mitigation measures and some of the recommendations. The resultant improved 'scores' are reflected in the matrix above. As a result, the performance against 'SA Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid' is now minor positive in the short, medium and long terms. As a result of mitigation put in place with regards to 'SA Objective 15: Reduce land, water, air, light, noise pollution', the performance against this SA objective is considered to have improved but a residual effect of minor negative and minor positive in the short, medium and long terms remains. As a result of the development of Core Policies relating to energy, the performance of the District Strategy with regards to 'SA Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure' is now minor positive in the short, medium and long terms.</p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA

Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>The response from BANES officers to recommendations made in the appraisal will generally improve the performance of the policy in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 5: Reduce anti-social behaviour, crime and the fear of crime; • Objective 6: Improve the availability and provision of training; • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; and • Objective 16: Encourage sustainable construction.
<p>Shaping the Future of Bath A Spatial Strategy Bath Additional Policies – Policy B3A Land adjoining Old Town, Policy B3B Land adjoining Weston, Policy B3C Extension to MOD, Endsleigh</p>	<p>The overall Bath Strategy has a mixed performance with regards to the SA Objectives. No potential cumulative effects for Bath city have been identified. <u>However, the potential cumulative effects of the development sites to be allocated within Bath will need to be considered through the development of the Placemaking Plan and its SA.</u></p> <p>Major positive effects are identified with regards to the following SA Objectives:</p> <ul style="list-style-type: none"> • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing;</u> • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid; • Objective 12: Protect and enhance local distinctiveness; and • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets. <p>Minor negative effects are identified in relation to:</p> <p>as follows (unless otherwise stated, effects are predicted over the short, medium and long term):</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services, Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking and Objective 11: Reduce the need and desire to travel by car (in the medium and long term): Residents of the redeveloped MoD Endsleigh and, to a lesser degree, MoD Foxhill sites might not have such good access to the city centre or local centres; • Objective 15: Reduce land, water, air, light, noise pollution: Although the growth proposed in Bath is dependent on the Bath package of transport measures, the Bath package was developed to address pre-Core Strategy issues. The extent which the Bath package will improve air quality in the context of increased activity within the river corridor is uncertain and air quality could worsen. <u>Given the submission draft changes, the potential for negative impacts is increased albeit not certain.</u>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA

Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Objective 5: Reduce anti-social behaviour, crime and the fear of crime: The Bath Strategy does not address antisocial behaviour or other crime-related issues. Anti-social behaviour has been identified as a problem in the city centre. <p>Uncertain effects are identified <u>over the medium and long terms in relation to the following:</u></p> <ul style="list-style-type: none"> • Objective 19: Encourage careful and efficient use of natural resources: It unclear whether sustainable design principles will also apply to development elsewhere in the city, apart from in the Central Area and Western Corridor. • Objective 14: Encourage and protect habitats and biodiversity, in the short term; an ecological assessment will be required to determine the potential effect on ecology of the compensatory flood storage. • <u>Objective 1: Improve accessibility to community facilities and local services;</u> • <u>Objective 2: Improve the health and well-being of all communities;</u> • <u>Objective 4: Promote stronger more vibrant and cohesive communities;</u> • <u>Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking;</u> • <u>Objective 11: Reduce the need and desire to travel by car;</u> • <u>Objective 14: Encourage and protect habitats and biodiversity</u> • <u>Objective 15: Reduce land, water, air, light, noise pollution.</u> <p><u>The uncertainty is mainly as a result of the Modifications to the Bath policies proposed within February 2013 which directs housing to the outer neighbourhoods of the city and modifications in March 2013 which outline areas of Green Belt Release. These detailed site boundaries will not be allocated through the Core Strategy and mitigation for potential negative effects will need to be put in place through the development of the Placemaking Plan. This mitigation has been identified below and within the matrix above, in the appropriate places. Uncertainties are also recorded in relation to the effects of the flood management scheme suggested for development sites in Bath.</u></p> <p>Mitigation is put forward to address the negative and uncertain effects identified as follows:</p> <ul style="list-style-type: none"> • The Bath Strategy (and/or accompanying Infrastructure Delivery Plan (IDP)) should identify that the redevelopment of the MoD Ensleigh and MoD Foxhill sites will need to be delivered with sustainable transport access to the city centre and local centres. • Building on the identification of district/ local centres in the Core Strategy, the Placemaking DPD should set out more specific policies

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>for enhancing specific local centres where a need / opportunity has been identified.</p> <ul style="list-style-type: none"> • The Bath Strategy (and/or accompanying IDP) should refer to the need to improve the network of health centres if a strategic deficiency has been identified. • The Bath Strategy (and/or accompanying IDP) should refer to the need to improve various aspects of the green infrastructure network if a strategic deficiency or opportunity has been identified. Allotments are currently mentioned. • The provision of health clinics or centres could be something that developers could be asked to contribute to. The Bath Strategy (and/or accompanying IDP) should refer to the need to improve the network of health centres if a strategic deficiency has been identified. • The Bath Strategy should identify air quality as a key distinctive issue to be addressed as part of the delivery of development with regards to avoiding increasing air pollution. A Core Policy or Development Management Policy may be needed or should be saved from the existing LP — referring to PPS23. • The Bath Strategy should make reference to identified crime issues in the central zone. The Central Zone, the Bath Strategy should consider whether any locally specific planning policies could be adopted to address these issues. If not reference should be made in the relevant core policy to PPS1 and ‘Safer Places — The Planning System and Crime Prevention’. • The Core Strategy (either in the Bath section or elsewhere) needs to set out how the proposed growth can be delivered without increasing air pollution (i.e. measures additional to (Bath package) and how developers will be expected to contribute to achieving this goal. • The Bath Strategy should make reference to not creating light pollution, particularly along the river. • The Bath Strategy should make reference to the need to protect groundwater resources. • Bath Strategy should state that the Place Making DPD will establish the potential use of individual sites and set out sustainable design principles, in relation to the whole of Bath. The Bath Strategy could also make reference to the Sustainable Construction and High Quality Design Core Policies. • <u>Ecological assessment of any flood mitigation measures needed.</u> • <u>Further investigation of flood mitigation measures to confirm whether the solution is deliverable and logistically viable.</u> • <u>The Placemaking Plan will allocate development sites in Bath and through its development, potential effects of the choice of sites and their potential effects will be assessed, mitigated and positive benefits enhanced.</u> • <u>The Placemaking Plan will need to set out requirements in order to ensure that vibrant and cohesive communities are achieved through the redevelopment of large brownfield sites.</u>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA

Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>The HRA March 2013 also recommends the following development requirements as sites are developed:</p> <ul style="list-style-type: none"> • <u>Policy B3A: Retention, buffering and management of the southern tree belt to retain foraging and flight line function at the southern edge of the site. Controlled light levels to support bat use of the tree belt, including zones of no artificial light adjacent to the protected tree belt, and limited luminescence of 0.1lux of ecological features retained or created within the site. Provision of high quality open space within the development or as a buffer to existing high quality foraging habitat to the south of the site. This to be designed to minimise urban fringe pressures on existing land-use practice to the south.</u> • <u>Policy B3B: Avoidance and adequate protection of habitat features of importance to bat foraging and commuting through an ecological site master plan. Detailed survey work to be undertaken prior to master-planning the site to determine key flight lines across the site and key foraging areas within or adjacent to the site. Key flight lines and foraging areas will be retained, enhanced and buffered within the master plan, and measures will include restrictive lighting as appropriate.</u> • <u>Policy B3C: Retain existing linear habitat features on site; provide well planned open space and GI to absorb increased recreational pressures.</u> <p>Recommendations are also made in order to improve the performance of the Bath Strategy:</p> <ul style="list-style-type: none"> • The Bath Strategy should consider whether it is likely to encourage green sectors to locate within the city and if there are any specific policies that are required. • The Bath Strategy should state that the Place Making DPD will establish the potential use of individual sites and set out sustainable design principles, in relation to the whole of Bath. • The Strategy should make reference to the PPS 25 sequential test in relation to the sites identified for development. • This policy or a separate flood risk policy needs to set out whether SUDS will be required on development sites within Bath. • The Bath Strategy should make specific reference to increasing riverfront activity which is not detrimental to wildlife. • Although wildlife and green infrastructure are mentioned a couple of times in the Bath Strategy the Bath Strategy would perform better against this SA Objective if there were some mention of biodiversity and green infrastructure within the Bath Vision and for the green infrastructure network of the city to be shown on the proposals map and/or the diagrams within the Bath Strategy. <p>Since the Bath Strategy was appraised, a number of changes have been made to the wording of the strategy in response to the mitigation measures and recommendations put forward. The residual effects of the Strategy with regard to the SA objectives are identified <u>within the matrix and the summary above. is as follows (over the short, medium and long term):</u></p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services: minor positive;

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Objective 2: Improve the health and well-being of all communities: minor positive; • Objective 5: Reduce anti-social behaviour, crime and the fear of crime: neutral; • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking: minor positive; • Objective 11: Reduce the need and desire to travel by car: minor positive; • Objective 15: Reduce land, water, air, light, noise pollution: minor negative; and • Objective 19: Encourage careful and efficient use of natural resources: minor positive. <p>Changes made in response to the recommendations have generally improved the <u>Bath performance of the Bath policies and Vision Strategy.</u></p> <p><u>Submission draft changes that have been considered in this revised assessment are:</u></p> <ol style="list-style-type: none"> 1) <u>Removal of a segregated bus transport from Newbridge Park and Ride;</u> 2) <u>Newbridge Park and Ride expanded by 250 rather than 500 spaces</u> 3) <u>Removal of the new Park and Ride to the East of Bath.</u> <p><u>Proposed Modifications to the Core Strategy (February 2013) have also led to amendments to the assessment details of this policy and this has resulted in changes to the performance of the policies with regards to the SA Objectives.</u></p> <p><u>The Proposed Modifications to the Bath policies have led to a number of changes to their performance. More housing is now proposed to be delivered in Bath than at the previous assessment stage in September 2011 and Policy BA1 now performs better (major positive effects) in relation to Objective 3: 'Meet identified needs for sufficient, high quality and affordable housing'. However, Policy BA1 now directs housing to the outer neighbourhoods (which are likely to include surplus MOD sites on the periphery of the city). This has altered the assessment undertaken in September 2011 and introduced more uncertainty into the assessment. The SA Objectives affected are as follows:</u></p> <p><u>Uncertain effects in the medium and long terms:</u></p> <ul style="list-style-type: none"> • <u>Objective 1: Improve accessibility to community facilities and local services;</u> • <u>Objective 2: Improve the health and well-being of all communities;</u> • <u>Objective 4: Promote stronger more vibrant and cohesive communities;</u>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • <u>Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking;</u> • <u>Objective 11: Reduce the need and desire to travel by car; and</u> • <u>Objective 15: Reduce land, water, air, light, noise pollution.</u> <p><u>Additional mitigation measures have been put forward in relation to potential uncertain effects; as follows:</u></p> <ul style="list-style-type: none"> • <u>Mitigation: The Placemaking Plan will allocate development sites in Bath and through its development, potential effects of the choice of sites and their potential effects will be assessed, mitigated and positive benefits enhanced. Mitigation: The Placemaking Plan will need to set out requirements in order to ensure that vibrant and cohesive communities are achieved through the redevelopment of large brownfield sites.</u> <p><u>Additional changes in March 2013 relate to the inclusion of three areas of Green belt release. Major positive effects in the medium and long term are identified with regards to the following SA Objectives:</u></p> <ul style="list-style-type: none"> • <u>Objective 1: Improve accessibility to community facilities and local services</u> • <u>Objective 2: Improve the health and well-being of all communities</u> • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing</u> • <u>Objective 4: Promote stronger more vibrant and cohesive communities</u> • <u>Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid</u> • <u>Objective 8: Build a strong competitive economy and enable local businesses to prosper</u> • <u>Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking</u> • <u>Objective 11: Reduce the need and desire to travel by car</u> <p><u>Minor negative effects are identified in relation to:</u></p> <ul style="list-style-type: none"> • <u>Objective 9: Increase availability of local produce and materials. Greenfield development leads to loss of agricultural land, therefore negative impact on this objective.</u> • <u>Objective 12: Protect and enhance local distinctiveness. All three sites are highly sensitive in terms of landscape.</u> • <u>Objective 13: Protect and enhance the district’s historic, environmental and cultural assets. All three sites are highly sensitive in terms</u>

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p><u>of heritage.</u></p> <ul style="list-style-type: none"> • <u>Objective 15: Reduce land, water, air, light, noise pollution. New development could cause pressure on the existing road network, with associated greater air and noise pollution from increased vehicles. The prominence of the locations could also lead to light pollution. Any development has the potential to cause water pollution and land contamination. However this is minimised with modern construction practices.</u> • <u>Objective 19: Encourage careful and efficient use of natural resources. In general, identifying development area on greenfield sites does not contribute to promoting the conservation of land. Adherence to the LDF sustainable construction policies should help ensure that water and natural resource consumption is reduced.</u> <p><u>There are no uncertain impacts identified. Mitigation is put forward to address the negative effects identified as follows:</u></p> <ul style="list-style-type: none"> • <u>Allotments should be provided for new residents;</u> • <u>(Policy B3A): Mitigation (B3A): Despite the measures put in place as part of the policy, development of the site area could still have a negative impact on the local distinctiveness of Bath which would be difficult to fully mitigate. However, the impact could be reduced slightly by containing development to a tight area closely connected with the Sulis Manor area.</u> • <u>(Policy B3B): Despite the measures put in place as part of the policy, development of the site area could have a negative impact on the local distinctiveness of Bath which would be difficult to fully mitigate. Limiting development to the lower parts of the slope closely connected to existing development would reduce the effect on these aspects providing development is contained by a strong hedgerow/ tree belt.</u> • <u>(Policy B3C): Despite the measures put in place as part of the policy, development of the site area could still have a negative impact on local distinctiveness which would be difficult to fully mitigate. Limiting development to the eastern field would reduce the effect on these aspects providing development is contained by the existing hedgerow/ tree belt. Development of the site area within the western field would have a high negative impact.</u> <p><u>The council has responded that the policies requires providing improved habitat connectivity, through the retention and enhancement of existing high valued habitat, and well integrated provision of green space (formal, natural and allotments). The masterplanning process would ensure to address the additional issues related to each of the sites. If these measures are taken on board in masterplanning the effect should be reduced to minor negative / neutral.</u></p>

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
<p>Keynsham Spatial Strategy <u>Keynsham Additional Policies – Policy KE3 Land adjoining East Keynsham, Policy KE4 Land adjoining South West Keynsham</u></p>	<p>These policies mainly have the potential to result in major or minor positive effects with regards to most of the SA Objectives. Major positive effects were identified in relation to the following SA Objectives (in the short, medium and long term unless otherwise stated):</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services; • Objective 2: Improve the health and well-being of all communities; • Objective 4: Promote stronger more vibrant and cohesive communities; • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid (in the medium and long term); • Objective 8: Enable local businesses to prosper; • Objective 9: Increase availability of local produce and materials; • Objective 11: Reduce the need and desire to travel by car; and • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure. <p>Minor positive effects were identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 3: Meet identified needs for sufficient, high quality and affordable housing • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking • Objective 12: Protect and enhance local distinctiveness; and • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); • Objective 15: Reduce land, water, air, light, noise pollution; • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change); and • Objective 19: Encourage careful and efficient use of natural resources. • Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle) <p>A major negative effect has been identified in relation to waste arisings because the potential waste facility at Broadmead Lane is not included as key infrastructure for the Keynsham spatial strategy and Policy KE2 does not make reference to the reuse of the buildings at the Somerdale site. The demolition of the Cadbury factory at Somerdale could produce large amounts of demolition material which could</p>

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>potentially be sent to landfill.</p> <p>Neutral performances were recorded for the other SA Objectives (3 in total).</p> <p>Mitigation is put forward to address the major negative effect identified, as follows:</p> <ul style="list-style-type: none"> • Policy KE2 should encourage the reuse of buildings at the Somerdale site and should encourage the use of any demolition material on site in the redevelopment of the site; • The potential waste facility at Broadmead Lane could be used to provide heat as part of the district heating system and if appropriate, such a link between a district heating system and the proposed waste plant should be made clear within the supporting text; <p>A potential positive cumulative effect has been identified with regards to encouraging and protecting biodiversity through the protecting, linking up and enhancement of the green infrastructure network in and around Keynsham.</p> <p>An additional recommendation is made to improve the Keynsham Spatial Strategy with regards to the SA Objectives, as follows:</p> <ul style="list-style-type: none"> • It would be useful for the reader to understand how the district heating system would be delivered and which neighbourhoods it is intended to serve. <p>Since the strategy was appraised, policy KE2 has been amended to include the text “Consider the potential for converting and reusing some or all of the factory buildings at Somerdale”. Demolition material is covered by Policy CP2, and the Broadmead Lane site itself is allocated within the West of England Waste Core Strategy. This will be added as a key infrastructure requirement in the District Wide chapter. This addresses one of the proposed mitigation measures. The other mitigation measure has not led to a change in policy wording, but policy authors have provided further information about the feasibility of the waste facility linking in to the proposed CHP. The residual effect with regards to SA Objective 20 is now considered to be minor positive in the short, medium and long term. The additional recommendation has not led to a policy wording change because it is not considered to be an appropriate level of detail for the Core Strategy. This information will be provided within the District Heating Study.</p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have led to amendments to the assessment details of these policies but have not altered the assessment ‘scores’.</u></p> <p><u>Additional changes in March 2013 relate to the inclusion of two areas of Green belt release. Major positive effects in the medium and long term are identified with regards to the following SA Objectives:</u></p> <ul style="list-style-type: none"> • <u>Objective 1: Improve accessibility to community facilities and local services</u> • <u>Objective 2: Improve the health and well-being of all communities</u>

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing</u> • <u>Objective 4: Promote stronger more vibrant and cohesive communities</u> • <u>Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid</u> • <u>Objective 8: Build a strong competitive economy and enable local businesses to prosper</u> • <u>Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking</u> • <u>Objective 11: Reduce the need and desire to travel by car</u> <p><u>Minor negative effects are identified in relation to:</u></p> <ul style="list-style-type: none"> • <u>Objective 9: Increase availability of local produce and materials. Greenfield development leads to loss of agricultural land, therefore negative impact on this objective.</u> • <u>Objective 12: Protect and enhance local distinctiveness. Both sites are sensitive in terms of landscape.</u> • <u>Objective 15: Reduce land, water, air, light, noise pollution. New development could cause pressure on the existing road network, with associated greater air and noise pollution from increased vehicles. The prominence of the locations could also lead to light pollution. Any development has the potential to cause water pollution and land contamination. However this is minimised with modern construction practices.</u> • <u>Objective 19: Encourage careful and efficient use of natural resources. In general, identifying development area on greenfield sites does not contribute to promoting the conservation of land. Adherence to the LDF sustainable construction policies should help ensure that water and natural resource consumption is reduced.</u> <p><u>There are no uncertain impacts identified. Mitigation is put forward to address the negative effects identified as follows:</u></p> <ul style="list-style-type: none"> • <u>Allotments should be provided for new residents.</u> • <u>Policy KE3: Avoid development on the open valley of the River Avon to the north of the railway.</u> <p><u>The council has responded that the policies require improved habitat connectivity and well-integrated provision of green space (formal, natural and allotments) and that the landscape sensitivity will be carefully assessed through the Placemaking Plan to mitigate the impact. If these measures are taken on board in masterplanning the effect should be reduced to neutral.</u></p>
Somer Valley	The Strategy for the Somer Valley chapter and the three policies contained therein generally have a positive effect with regards to the SA

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
Spatial Strategy	<p>Objectives. Major positive effects were identified with regard to the following SA objectives:</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services; • <u>Objective 2: Improve the health and well-being of all communities;</u> • Objective 3: Meet identified needs for sufficient, high quality and affordable housing; • Objective 4: Promote stronger more vibrant and cohesive communities; • Objective 6: Improve the availability and provision of training; • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid; • Objective 8: Enable local businesses to prosper; • Objective 9: Increase availability of local produce and materials; • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking; • Objective 11: Reduce the need and desire to travel by car; • Objective 12: Protect and enhance local distinctiveness; • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure; and • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change). <p>Minor positive effects are identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 2: Improve the health and well-being of all communities; • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); • Objective 15: Reduce land, water, air, light, noise pollution; and • Objective 19: Encourage careful and efficient use of natural resources. <p>A neutral performance is recorded in relation to:</p> <ul style="list-style-type: none"> • Objective 5: Reduce anti-social behaviour, crime and the fear of crime; • Objective 16: Encourage sustainable construction; and

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Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Objective 20: Promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle). <p>No potential cumulative effects have been identified.</p> <p>A number of recommendations are also made to improve the performance of the Somer Valley strategy and policies. The recommendations are as follows:</p> <ul style="list-style-type: none"> • The strategy would be improved if Policy CV1 included a principle to increase allotment provision in Midsomer Norton and Radstock (where deficiencies have been identified). • The policies could be improved if improvements to biodiversity were specifically targeted or new nature reserves were to be created through the placemaking principles. • The performance of the strategy would be improved if it encouraged the reuse of existing buildings where possible. • As a key theme of the strategy for the Somer Valley is self-reliance there is an opportunity to improve the strategy for the Somer Valley by encouraging the management of waste arisings locally, such as through encouraging community composting. However, it is recognized that waste management for the district is dealt with by the West of England Waste Core Strategy and therefore the Core Strategy has little influence over how waste is managed within the area. • <u>Recommendation from the HRA March 2013: Avoidance and adequate protection of habitat features of importance to bat foraging and commuting through ecological site master plans. Detailed survey work will be undertaken prior to master-planning sites to determine key flight lines across the sites and key foraging areas within or adjacent to the sites. Key flight lines and foraging areas will be retained, enhanced and buffered within the master plan, and measures will include restrictive lighting as appropriate. This would need to feed into the Place Making Development Plan.</u> <p>Since the strategy was appraised, Policy SV1 has been amended to increase allotment provision where deficiencies have been identified. This is in response to the first recommendation listed above. This has improved the performance of the policy with regards to SA Objective 2. No other changes have been made to the Strategy although policy authors have identified core policies which deal with some of the issues identified with regards to the recommendations.</p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have led to amendments to the assessment details of these policies but the performance of the policy with regards to the SA Objectives has not altered and the 'scores' remain the same.</u></p>
Rural Delivery Strategy Policy	The rural delivery strategy generally has a mixed or neutral performance with regards to the SA Objectives. With regards to a number of the SA objectives, the strategy has the potential to have both a minor positive and a minor negative performance. This is because the

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
<p>RA1 Development in the villages meeting the listed criteria, RA2 Development in villages outside the Green Belt not meeting policy RA1 criteria, Policy RA3 Community facilities and shops, Policy RA4 Rural Exception Sites and Policy RA5 Land at Whitchurch</p>	<p>rural delivery strategy aims to maintain current levels of access to services and facilities in villages, including through a presumption for retention of village grocery shops and support for new community facilities and shops.</p> <p>New housing development in the rural areas will be directed to the ‘appropriate villages’ which meet the criteria set out in Policy RA1 ‘appropriate development in the villages meeting the listed criteria’ which includes consideration of the number of facilities in the village and access to public transport. However, this does not address barriers to access to services and facilities experienced by other villages and therefore negative effects have also been recorded. The ability for the rural delivery strategy to address all barriers to access to services and facilities experienced by other villages is limited. <u>Changes in March 2013 introduced a strategic Green Belt Release at Whitchurch.</u> Such mixed performances have been recorded with regards to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services; • Objective 2: Improve the health and well-being of all communities; • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing</u> • Objective 4: Promote stronger more <i>vibrant and</i> cohesive communities; • Objective 9: Increase availability of local produce and materials; • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking; and • Objective 11: Reduce the need and desire to travel by car. • <u>Objective 12: Protect and enhance local distinctiveness</u> • <u>Objective 13: Protect and enhance the district’s historic, environmental and cultural assets</u> <p><u>Before the addition of the Green Belt release at Whitchurch,</u> the performance of the rural delivery strategy with regards to a number of the SA Objectives was minor positive but with some uncertainty, because the scale of development proposed in the rural areas is not significant, however, it could have involved the development of Greenfield land and therefore some uncertainty exists <u>existed</u> with regards to potential effects relating to landscape and visual, ecology and biodiversity and archaeology. This relates <u>related</u> to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 12: Protect and enhance local distinctiveness; • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; and • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change). <p>The scores for Objectives 13 and 14 have now changed to a mixture of minor positive and minor negative with the addition of the Green</p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p><u>Belt release at Whitchurch. This is because the general location of the Green Belt release is sensitive in terms of landscape and heritage.</u></p> <p>Minor positive effects have been identified in relation to the following objectives:</p> <ul style="list-style-type: none"> • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid • Objective 8: Build a strong competitive economy and enable local businesses to prosper • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change). <p>The performance against objective 17 has changed from a neutral score before the addition of the Green Belt release at Whitchurch. Large scale development will provide an opportunity to incorporate larger scale low carbon schemes. The policy also requires that development should scope for and incorporate renewable energy.</p> <p><u>Minor negative effects are identified in relation to:</u></p> <p><u>Objective 15: Reduce land, water, air, light, noise pollution. New development could cause pressure on the existing road network. This would be associated with greater air and noise pollution from increased vehicles on this route. The prominence of the location at Whitchurch could also lead to light pollution. Any development has the potential to cause water pollution and land contamination. However this is minimised with modern construction practices. This has changed from a neutral score before the addition of the Green Belt release at Whitchurch.</u></p> <p><u>Objective 19: Encourage careful and efficient use of natural resources. Identifying development area on greenfield sites does not contribute to promoting the conservation of land. Adherence to the LDF sustainable construction policies should help ensure that water and natural resource consumption is reduced. This has changed from a neutral score before the addition of the Green Belt release at Whitchurch.</u></p> <p>A potential negative cumulative effect has been identified in relation to housing development putting pressure on existing facilities, such as schools, public transport, and Park and Ride facilities. This effect should be mitigated by the Infrastructure Provision Core Policy which requires new development to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities. The supporting text of the Infrastructure Provision Core Policy states that ‘infrastructure’ includes physical, social and green infrastructure. However, policy wording is needed to ensure that housing developments consider the potential for cumulative effects with regard to social infrastructure / community facilities.</p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<p>All other effects are neutral.</p> <p>Mitigation is put forward to address the potential negative effects and the uncertain effects identified, as follows:</p> <ul style="list-style-type: none"> • Landscape and visual assessment should be undertaken prior to any Greenfield development. This should be a requirement of development management policy in the forthcoming Place Making DPD. • Archaeological assessment should be undertaken prior to any Greenfield development. This should be a requirement of development management policy in the forthcoming Place Making DPD; • Ecological assessment should be undertaken prior to development of Greenfield sites. This should be a requirement of development management policy in the forthcoming Place Making DPD which should also require ecological assessment of brownfield sites; • Policy wording is needed to ensure that applications for housing developments consider the potential for cumulative effects with regard to social infrastructure / community facilities; and • The potential negative effects on SA Objectives 2 and 4 should be mitigated by the Infrastructure Provision Core Policy which requires new development to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities. The supporting text of the Infrastructure Provision Core Policy states that ‘infrastructure’ includes physical, social and green infrastructure. No action is therefore required. • <u>Policy RA5: Allotments should be provided for new residents.</u> • <u>Policy RA5: Connectivity to bus services should be given consideration.</u> • <u>All development within B&NES, and specifically, all new housing proposals, must clearly demonstrate how site design proposals will help to maintain the integrity of Natura 2000 sites. For SAC sites this to include the protection and enhancement of important bat foraging areas and flight lines.</u> <p><u>If these measures are taken on board in masterplanning the effect should be reduced to neutral.</u></p> <p>Since the Rural Strategy was appraised, the supporting text of the Infrastructure Provision Core Policy has been amended to refer to the need for potential cumulative effects to be considered which should offset the potential negative cumulative effect identified. No further changes were required but the responses from the policy authors have removed the uncertainty recorded in the appraisal with regards to SA objectives 12, 13 and 14.</p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have led to amendments to the assessment details of this policy but the performance of the policy with regards to the SA Objectives has not altered and the ‘scores’ remain the same.</u></p> <p><u>The addition of a Green Belt release at Whitchurch in March 2013 has led to some changes to the assessment and these have</u></p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<u>been outlined above.</u>
Core Policies	
Energy Hierarchy, CP1 Retrofitting Existing Buildings, CP2 Sustainable Construction, CP3 Renewable Energy, CP4 District Heating	<p>The energy hierarchy policy and policies CP1 to CP4 generally perform well against the SA Objectives. A number of potential significant positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • <u>Objective 3: Meet identified needs for sufficient, high quality and affordable housing;</u> • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid; • Objective 8: Enable local businesses to prosper; • Objective 12: Protect and enhance local distinctiveness; • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); • Objective 15: Reduce land, water, air, light, noise pollution; • <u>Objective 16: Encourage sustainable construction;</u> • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure; • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change); and • Objective 19: Encourage careful and efficient use of natural resources. <p>One potential major negative effect was identified in relation to Objective 13: Protect and enhance the district's historic, environmental and cultural assets. The following mitigation measure is put forward to address the effect as follows:</p> <ul style="list-style-type: none"> • The need to assess potential impacts on archaeology when considering feasibility of CHP should be highlighted within policy CP4 or within the supporting text. <p>No uncertain effects have been identified.</p> <p>A potential positive cumulative effect has been identified which is that the measures encourages through the energy hierarchy policy and policies CP1 to CP4 could result in an overall cumulative effect on reducing greenhouse gas emissions.</p> <p>A number of recommendations have been <u>was</u> put forward to improve the policy, as follows:</p>

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Major developments in relation to policy CP2 should be defined or a reference provided to where major developments are defined if it is elsewhere in the Core Strategy. • The criteria set out in policy CP2 could be clearer in promoting resource efficiency by inserting the word ‘minimisation’ after the word ‘waste and inserting the words ‘efficiency in materials use, including’ in front of ‘The type, life cycle....’ • Policy CP2 could specifically encourage the reuse and recycling of Bath stone and demolition material. <p>A general recommendation for Policy CP2 has been identified as follows:</p> <ul style="list-style-type: none"> • Greater clarity is needed for policy CP2 to indicate that it is applicable to major developments only. Suggest the policy is adjusted to say: <i>“An exception to the delivery of the BREEAM and Code standards this policy will only be made where it can be demonstrated that meeting the provisions of this policy would render development unviable.”</i> • Greater clarity is needed for policy CP3/4 to indicate that it is applicable to major developments only. Suggest the policy is adjusted to say: <i>“Any impact of this policy on the viability of schemes will be given careful consideration. Major developments will require an energy strategy that clearly demonstrates early consideration of appropriate energy supply and management.”</i> <p>With regards to references to Code for sustainable homes assessments within policy CP2, the following amendments to policy wording are recommended:</p> <ul style="list-style-type: none"> • Reference to ‘design stage assessments’ should be changed to ‘pre-assessments’ and a recommendation should be included that pre-assessments are undertaken by an accredited assessor; and • ‘Post-construction’ assessments should replace ‘post-occupancy’ assessments. <p>The policies have since been amended in line with the mitigation and recommended enhancement measures put forward above. The changes made in response to the recommendations have improved the performance of the policies. The change made in response to the mitigation measure has offset the potential major negative effects with regards to SA Objective 13 and the performance will now be neutral over the short, medium and long terms.</p> <p><u>The changes to the policy clarify the exceptions to it. By doing this it allows developers to achieve lower levels of performance where it is not demonstrated to be viable. How this might manifest itself over the plan period is uncertain and so in its current form there is no material effect on the scoring.</u></p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have also led to some small amendments to the assessment commentary but again there is no material effect on the scoring.</u></p>
CP 5 Flood Risk	This Flood Risk Policy is not relevant to a number of SA Objectives, but where it is relevant, the policy generally performs well. No

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
Management	<p>potential negative or uncertain effects have been identified.</p> <p>Potential major positive effects have been identified in relation to:</p> <ul style="list-style-type: none"> • <u>Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); and</u> • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change). <p>No potential cumulative effects have been identified.</p> <p>A recommendation has been put forward to improve the performance of the policy as follows:</p> <ul style="list-style-type: none"> • This policy could promote SuDS which provide wildlife habitats as well as surface water management, where appropriate. <p>Since the policy was appraised, the policy has been improved through the addition of explanatory text in response to the recommendation made in the appraisal.</p>
CP6 Environmental Quality	<p>No potential negative or uncertain effects have been identified.</p> <p>A number of potential major positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 8: Enable local businesses to prosper; • Objective 12: Protect and enhance local distinctiveness; • Objective 13: Protect and enhance the district’s historic, environmental and cultural assets; • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); and • Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure <p><u>Proposed modifications to Policy CP6 since Submission have led to amendments to the assessment details. Text has been added to the policy so that it allows for developments which mitigate and adapt to the impacts of climate change as long as the benefit outweighs any harm to the significance of the heritage asset. This change to the policy has led to the introduction of uncertainty in the major positive ‘scores’ relating to SA Objective 13: Protect and enhance the district’s historic, environmental and cultural assets.</u></p>
CP7 Green Infrastructure	<p>Policy CP7 is not relevant to a number of SA Objectives. No potential negative or uncertain effects have been identified.</p> <p>A number of potential major positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 4: Promote stronger more vibrant and cohesive communities;

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking; • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change); and • Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change). <p>A potential positive cumulative effect has been identified for 'SA Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change)' through the provision of additional green infrastructure and achieving greater connectivity of habitats across the district and sub-region. This could benefit a variety of species in climate change adaptation, improve biodiversity and reduce habitat fragmentation.</p>
CP8 Green Belt	One potential major positive effect has been identified in relation to 'SA Objective 12: Protect and enhance local distinctiveness'.
CP8a Minerals	<p><u>Potential major positive effects have been identified for 7 SA Objectives.</u></p> <p><u>A mixed performance of minor positive and uncertain effects has been recorded with regards to 'SA Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change)'</u></p> <p><u>No cumulative effects have been identified.</u></p>
CP9 Affordable Housing and CP10 Housing Mix	<p>Both policies perform very well with regards to 'SA Objective 2: Improve the health and well-being of all communities' but Policy CP40 has a mixed performance (minor positive and uncertain) with regards to 'SA Objective 3: Meet identified needs for sufficient, high quality and affordable housing' because it is not clear how housing that meets the needs of older people, disabled people and those with other special needs will be delivered. Policy CP9 could have a minor negative effect with regards to 'SA Objective 4: Promote stronger more vibrant and cohesive communities' because it does not stipulate that affordable housing should be fully integrated into developments with market housing.</p> <p>No potential cumulative effects were identified.</p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have led to amendments to the assessment details of this policy. The performance of Policy CP10 remains largely the same, although with the inclusion of the following text, the uncertainty in relation to SA Objective 2: "Improve the health and well-being of all communities" has been removed:</u></p> <p><u><i>"specific accommodation needs of older people will be addressed through the Placemaking Plan, including considering the allocation of appropriate sites."</i></u></p>
CP11 Gypsies, Travellers & Travelling	<p>A potential minor negative effect has been identified as follows:</p> <ul style="list-style-type: none"> • Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle): This policy does not

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
Showpeople Policy	<p>mention providing suitable space and / or facilities for the storage and collection of recyclables.</p> <p>A potential uncertain effect has been identified as follows:</p> <ul style="list-style-type: none"> • Objective 15: Reduce land, water, air, light, noise pollution: This policy requires adequate services for foul water, surface water and waste disposal but does not include consideration of the storage of hazardous substances such as fuels or the vulnerability of groundwater and therefore an uncertain effect is recorded. • <p>Potential major positive effects are identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking; and • Objective 11: Reduce the need and desire to travel by car. <p>No potential cumulative effects have been identified.</p> <p><u>The submission draft changes to this policy will not have a material effect on the scores in this table. The policy has been updated to include more detail on the number of pitches and more detail on the delivery of the pitches through a separate DPD. Whilst this doesn't affect scores, it does provide greater certainty in regard to future pitch provision and development of policies related to this.</u></p> <p><u>Proposed Modifications to the Core Strategy (February 2013) have led to amendments to the assessment of this policy and as a result, minor positive effects are now recorded in relation to SA objectives 8 and 9, relating to increasing the availability of local produce and building a strong competitive economy and enable local businesses to prosper. This is because the policy now requires sites to be large enough to provide live/work units if required and these could both support local business and the production of local goods.</u></p>
CP12 Centres and Retailing	<p>This policy generally performs well. Major positive effects have been identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 1: Improve accessibility to community facilities and local services; • Objective 4: Promote stronger more vibrant and cohesive communities; • Objective 8: Enable local businesses to prosper; • Objective 11: Reduce the need and desire to travel by car; • Objective 12: Protect and enhance local distinctiveness; and • Objective 13: Protect and enhance the district's historic, environmental and cultural assets. <p>Uncertainty was recorded with regards to the following SA Objectives:</p> <ul style="list-style-type: none"> • Objective 2: Improve the health and well-being of all communities; • Objective 5: Reduce anti-social behaviour, crime and the fear of crime; and

Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA	
Policy or Strategy	Summary of Significant Effects of the Policy or Strategy (before mitigation)
	<ul style="list-style-type: none"> • Objective 9: Increase availability of local produce and materials.
CP 13 Infrastructure Provision Policy	<p>Potential major positive effects have been identified in relation to ‘SA Objective 2: Improve the health and well-being of all communities’ and ‘SA Objective 4: Promote stronger more vibrant and cohesive communities’.</p> <p>The following potential indirect positive effects have been identified as follows:</p> <ul style="list-style-type: none"> • Objective 5: Reduce anti-social behaviour, crime and the fear of crime: There is an indirect relationship between crime and safety and the provision of social infrastructure, which could help to reduce anti-social behaviour by providing welfare and leisure facilities for young people, for example; • Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid: an indirect positive effect may occur as some jobs may be provided through the provision of social infrastructure such as healthcare, education, welfare, leisure etc; and • Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change): An indirect effect of this policy could be the enhancement of biodiversity through the provision of green infrastructure, which would also provide benefits for wildlife in light of climate change by providing migration routes between habitats. <p>No potential minor negative effects or cumulative effects have been identified.</p>

Mitigation measures and recommendations were put forward in the appraisal matrices and these have been considered by the policy authors. The mitigation measures and recommendations put forward by the consultants have been responded to by policy authors and, where relevant, the assessment matrices in Annex D have been amended to reflect the residual effects.

6.2 Potential Cumulative Effects

The SEA Regulations require an assessment of cumulative effects. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. The term can also be used to describe synergistic effects, which interact to produce a total effect greater than the sum of the individual effects.

A separate cumulative effects assessment has been undertaken following the assessment of the individual policies. The cumulative effects assessment has considered potential cumulative effects of other programmes, plans, policies and projects with the effects of the Core Strategy for B&NES and the cumulative effects of different policies within the plan.

The potential cumulative effects for the different policies within the plan have been identified as part of the appraisal of the individual policies and are recorded within Table 6.1 in this report and in the appraisal matrices within Annex D.

Annex L Stage 4 assessment also shows the potential cumulative effects of taking into account urban extension locations.

In addition, a number of programmes, plans, policies and projects have been identified as potentially having effects on receptors within the Bath and North East Somerset Area. The programmes, plans, policies and projects have been identified on the basis of forthcoming activities / development which would occur within the plan period to 2026 and relate only to published plans or related documents (such as options consultation documents).

The cumulative assessment with the other plans, policies and projects is presented in Table H.1 of the separate Annex H.

Potential negative cumulative effects have been identified in relation to air quality and traffic as a result of the following plans:

- Wiltshire Core Strategy; and
- Bristol Core Strategy Submission version (2010).

In addition, uncertain cumulative effects have been identified in relation to the following plans:

- North Somerset Core Strategy;
- Mendip Core Strategy; and
- West of England Joint Waste Core Strategy.

6.3 Residual Effects

The mitigation measures and recommendations put forward by the consultants have been responded to by policy authors and, where relevant, the assessment matrices within Annex D have been amended to reflect the residual effects. The summaries at the end of each assessment matrix include comments regarding the differences that mitigation and recommendations have made to the performance of policies assessed.

Table 6.3 presents the potential residual cumulative effects of the Core Strategy which have not been directly addressed by revisions to the Core Strategy.

Indicators for monitoring these potential residual effects are proposed in Section 7.

Table 6.3: Cumulative Effects of the Core Strategy and other relevant Plans and Programmes				
Policy or Strategy of the Core Strategy	Potential negative or uncertain effects	Reasoning	Suggested mitigation	Response from policy authors
West of England Joint Waste Core Strategy	Uncertain potential for negative cumulative effects on air quality and traffic.	This potential effect would be in combination with the B&NES Core Strategy, particularly Policies B1, B3A, KE1 and KE3 in relation to allocated residual waste management site at: BA19 Broadmead Lane, Keynsham; and BA12 Former Fuller's Earth Works, Fosseway, Bath. The potential technology to be used at these sites would be determined by a private planning application.	Any planning applications for residual waste treatment facilities would be subject to Environmental Impact Assessment which would include the consideration of cumulative effects. This effect is very uncertain. No further mitigation can be suggested in this instance which would reduce the uncertainty.	No response required.
Mendip Core Strategy	The potential for a negative cumulative effect in relation to the B&NES Core Strategy is uncertain.	The spatial strategy and quantum of housing and employment development are not known.	At this stage of the development of the Mendip Core Strategy there is a lack of certainty over quantum and location of development therefore it is not appropriate for the B&NES Core Strategy to put forward mitigation for this uncertain effect.	No response required.
North Somerset Core Strategy	The potential for a negative cumulative effect in relation to the B&NES Core Strategy is uncertain.	The expansion of Bristol Airport could potentially increase traffic movements across B&NES, if increased flights are proposed. However, the potential for a negative effect with regards	There is no mitigation that can be put forward to reduce the uncertainty of whether a cumulative effect could occur and it is not within the remit of the B&NES Core Strategy to address potential effects of traffic	No response required.

		to traffic is uncertain as it is not clear whether increases in traffic on certain roads within B&NES is likely.	associated with Bristol Airport.	
Bristol Core Strategy Submission version (2010)	Potential negative cumulative effect on air quality and traffic congestion	There is a focus of new housing development in south Bristol. This could potentially increase traffic commuting into Bath from Bristol which could potentially lead to a negative cumulative effect on air quality and traffic congestion affecting Bath and Keynsham.	<p>The Bath Package would mitigate for cumulative effects with regards to air quality and traffic in Bath. However, there is currently uncertainty that the Bath Package will receive the funding that it needs in order to go ahead. There would also be a need for the Bath Package to come forward in time for development outside of Bath to ensure people are using sustainable methods of travel to enter Bath.</p> <p>The Greater Bristol Bus Network will link Bristol, Bath, Keynsham, Midsomer Norton and Radstock with showcase bus corridors. The Greater Bristol Bus Network would mitigate for cumulative effects in Keynsham by improving the bus services between Bristol, Keynsham and Bath.</p>	No response required.
Wiltshire Core Strategy	Uncertain potential negative cumulative effect on air quality and traffic levels in Bath.	Growth in Chippenham and Bradford on Avon could potential increase commuting into Bath which could result in a potential negative cumulative effect on air quality and traffic levels in Bath. However, this is uncertain because the	Cumulative effects associated with increased congestion in Bath from in commuting from Chippenham and Bradford on Avon could be mitigated through the Bath Package which includes a new park and ride on the east of Bath. However, there is currently uncertainty that the Bath Package	No response required.

		<p>balance of employment use and housing that would be proposed within these settlements (and therefore the potential for the balance to mitigation in commuting) is not known.</p>	<p>will receive the funding that it needs in order to go ahead.</p>	
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7 Monitoring

7.1 Introduction

What the SEA Regulations say...

Information for Environmental Reports...

9. A description of the measures envisaged concerning monitoring in accordance with regulation 17, which states:

17 (1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

17 (2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with 17(1).

The SEA Regulations require the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate remedial action where necessary.

The monitoring undertaken on the Core Strategy will help to:

- Monitor the significant effects of the plan;
- Track whether the plan has had any unforeseen effects;
- Ensure that action can be taken to reduce / offset the significant effects of the plan including any unforeseen effects; and
- Provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

The requirements of the SEA Regulations focus on monitoring the environmental effects of the plan. This equates to the plan's potential and identified significant effects so that any unforeseen or unintended effects can be identified quickly. It may be difficult to implement monitoring mechanisms for unforeseen effects, or to attribute such effects to the implementation of the Core Strategy when they occur. Due to this difficulty we have suggested a number of more general monitoring indicators which are linked to the SA Objectives (contextual indicators, see Annex I).

The Good Practice Guide on Local Development Frameworks advises that the monitoring of significant sustainability effects should be integrated with other monitoring of Local Development Frameworks. For this reason, B&NES Council will report significant sustainability effects in future Annual Monitoring Reports published each December. The significant sustainability effects indicators have been drawn from the indicators in the baseline data of this SA (contextual indicators). Separate indicators are identified to monitor potential significant adverse effects identified within the appraisal of policies. The indicators aim to:

- Concentrate on the key sustainability issues identified in the appraisal;
- Provide information to identify when problems, including unforeseen ones, arise; and
- Contribute to addressing deficiencies in data availability identified in this appraisal.

Monitoring will allow the Council to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the Core Strategy, or for further policy guidance to be developed (for example an SPD).

Table 7.1 set outs the proposed significant effects monitoring programme. The proposed monitoring programme for contextual indicators is presented in Annex I. In terms of the significant effects highlighted through this SA, it is important that the indicators suggested are compatible as far as possible with those suggested as part of the AMR. Table 7.1 and Table I.1 in Annex I identify the proposed source of indicators, including whether they are monitored as part of the AMR.

Potential issue	Proposed indicators	Published targets	Source of data	Frequency of reporting
Municipal waste	6b: Amount of municipal waste arising, and managed by management type and the percentage each management type represents of the waste managed	The recycling target in B&NES is 50% in 2009/10.	AMR	Annual
Construction waste	Tonnage of construction and demolition waste produced and proportion that is recycled / reused.	From Rubbish to Resource, The Regional Waste Strategy: to ensure that by the year 2020 over 45% of waste is recycled and reused and less than 20% of waste produced in the region will be landfilled. In cooperation with 4 district councils (West of England Joint waste Strategy) the aim is to reduce landfill by 75% over the next five years.	Environment Agency	Annual
Recycled aggregates	M2: Production of (i) secondary and (ii) recycled aggregates	N/A	AMR	Annual

Table 7.1: Proposed Monitoring Programme – Significant Effects Indicators

Potential issue	Proposed indicators	Published targets	Source of data	Frequency of reporting
Air quality	Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1.3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm ₁₀), sulphur dioxide)	Member States are required to reduce exposure to PM2.5 in urban areas by an average of 20% by 2020 based on 2010 levels. It obliges them to bring exposure levels below 20 micrograms/m ³ by 2015 in these areas. Throughout their territory Member States will need to respect the PM2.5 limit value set at 25.	B&NES	Bi-annual

8 Next Steps

A Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.

The SEA Regulations set out the particulars that should be covered by the statement as follows:

- How environmental (sustainability) considerations have been integrated into the Core Strategy DPD;
- How the Environmental (SA) Report has been taken into account;
- How opinions expressed in response to consultation have been taken into account;
- The reasons for choosing the Core Strategy DPD as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the Core Strategy DPD.

For further information on the timetable with regard to the next steps in the production of the Core Strategy please contact the Planning Policy team on 01225 477548.