



Bath and North East Somerset
Council

Core Strategy Spatial Options

Interim Sustainability Appraisal
Report

Prepared for:

**Bath and North East Somerset
Council**

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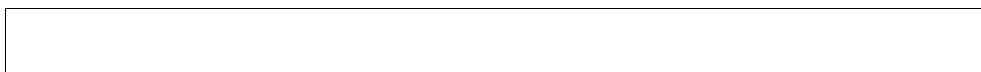
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Glossary

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Local Plan	A plan prepared by district, unitary and national park authorities but which is being superseded by Development Plan Documents.
PPG (Planning Policy Guidance)	Government planning guidance notes on a number of different topics, now being incrementally replaced by Planning Policy Statements.
PPS (Planning Policy Statement)	Government planning policy statements on a number of different topics which are being introduced to replace Planning Policy Guidance notes.
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.
RPG (Regional Planning Guidance)	A formerly non-statutory policy document prepared by the Secretary of State which, upon commencement of the Planning and Compulsory Purchase Act 2004, became the Regional Spatial Strategy.
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.

Acronym and Title	Explanation
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) for the formal strategic assessment of certain plans and programmes which are likely to have significant effects on the environment.
Submission Draft	The draft of the Core Strategy which is submitted to the Secretary of State. This is the draft of the document that will be debated at the Examination in Public.

1 Introduction

1.1 Background

Bath and North East Somerset Council is in the process of developing their Local Development Framework (LDF) Core Strategy. The preparation of the LDF Core Strategy is being subject to a full integrated sustainability appraisal and strategic environmental assessment in line with the requirements of:

- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (which requires a 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); and
- The Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12 (PPS12) (which requires sustainability appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents).

The sustainability appraisal has been carried out by ENVIRON using a team of consultants experienced in SA and SEA of local authority spatial planning documents.

1.2 Purpose of the Sustainability Appraisal

The purpose of the sustainability appraisal is to promote sustainable development by integrating sustainability considerations into the plan making process. This has been done so far through a number of stages:

- The production of a SA scoping report (in December 2007) which examined the sustainability issues of relevance to the area and used these to produce a sustainability appraisal framework against which to measure the plan;
- Informal feedback to the council on the emerging options particularly focusing on the appropriateness of the vision and objectives for the plan as a whole and each sub area in mid 2008 and additional advice and feedback to help the Council to develop the spatial options in late 2008.
- The production of an interim SA report (this report) which outlines the results of the sustainability appraisal of the options paper which will go out to consultation in October 2009. The SA team has examined the sustainability effects of the spatial options put forward for consideration and provided recommendations to the Council as to how to develop the Submission Draft of the Core Strategy in a sustainable manner.

The next stage of the appraisal will be the assessment of the effects of the Submission Draft.

1.3 Aim and structure of this report

This report constitutes the first formal interim sustainability appraisal report (SA report) for the Bath and North East Somerset LDF Core Strategy. The purpose of SA is to integrate sustainability and environmental considerations into plan making. In order to do this, it is necessary for plan makers to be aware of the implications of their decisions as early as

possible in the planning process. Assessing options helps to ensure that sustainability considerations are integrated into plan making at the earliest stages. Therefore, the purpose of this report is to outline the sustainability effects of the spatial options in order guide the plan makers as they write the Submission Draft.

This report has been produced alongside the production of the Spatial Options consultation document and is published at the same time. In this way, consultees are given the fullest amount of sustainability information on which to base their responses to the Spatial Options document. Please note that this is not a formal SA report. The formal SA report will be published at the Submission Draft stage.

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

- **Chapter 2** describes the background to and the preparation of the Core Strategy;
- **Chapter 3** outlines the methodology used in the sustainability appraisal;
- **Chapter 4** sets out the results of the appraisal of the different elements of the plan and outlines recommendations that the Bath and North East Somerset Council should take forward when developing the Submission Draft; and
- **Chapter 5** sets out the next steps of the SA.

Information on the relationship between the Core Strategy and other plans, programmes and environmental / sustainability objectives as well as detail of the baseline environmental and sustainability conditions of the area can be found within the SA scoping report.

1.4 How to comment on the report

The interim SA report is being published for consultation alongside the options document from the period 19th October to 11th December 2009. The purpose of this consultation is to provide the statutory environmental bodies and other interested parties the opportunity to express their opinion on the interim SA report. It also enables them to use the information within the SA report to guide their deliberations on the options document. Please send your comments on this report by 11th December 2009 to:

Bath and North East Somerset Council Options Consultation

Planning Policy

Planning Services

Bath & North East Somerset Council

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Bath, BA1 2DP

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2 Bath and North East Somerset LDF Core Strategy

2.1 Spatial Planning in Bath and North East Somerset

Spatial planning in Bath and North East Somerset is currently guided by the Regional Spatial Strategy for the South West, 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 specific strategy and policy documents at the national, regional and local level which relate to specific issues such as employment land, open space or biodiversity.

The Government has introduced comprehensive changes to the development planning system via the Planning and Compulsory Purchase Act 2004. Under the terms of this Act, Local Planning Authorities (LPAs) are obliged to replace their adopted Local Plans with new-style plans, to be known as a Local Development Framework (LDF). A typical LDF consists of a number of Local Development Documents (LDDs) including:

- A Core Strategy 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 focused upon a specific location or an area subject to conservation or significant change (for example major regeneration);
- Site Allocations Development Plan Document which outlines the sites which have been selected to accommodate housing and other development; and
- Supplementary Planning Documents 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 Bath and North East Somerset LDF Core Strategy and addresses the spatial options presented.

The next stages of the production of the Core Strategy are:

- Autumn 2009: Publication of the options document for consultation with the public;
- During 2010: Preparation of the Submission Draft Core Strategy and publication for consultation;
- Spring 2011: Examination in Public of Core Strategy; and
- End of 2011: Adoption of Core Strategy.

3 Methodology of the Appraisal

3.1 Sustainability appraisal stages

Sustainability appraisal is carried out as an integral part of DPD preparation and has a number of set stages. Stage A has already been completed and we are now currently undertaking Stage B.

Table 2: SA stages

DPD Stage	SA Stage	Purpose of the SA Stage
Pre production / evidence gathering	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
Production	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 <i>This is the stage we are at now</i>
	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	To detail the means by which the sustainability

DPD Stage	SA Stage	Purpose of the SA Stage
	monitor the significant effects of implementing the DPD	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 suitable for public consultation and decision makers), including the findings of the appraisal and how it influenced the development of the DPD
Examination	Stage D: Consulting on the SA report	
	D1: Public participation on the Submission Draft 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 B: Assessing Options (Issues and options stage)

As outlined in Planning Policy Statement 12 the purpose of the Sustainability Appraisal is to appraise the social, environmental and economic effects of strategies and policies in a Local Development Document from the outset of the plan preparation process. The SA is a tool used in ensuring that decisions are made that meet the requirements of sustainable development. The integration of sustainability into the plan starts formally at the stage of issues and options. In keeping with ODPM guidance, the effects of the strategic options have been assessed in broad terms with the aim of developing the Submission Draft. This has been done in three 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 the consultation document 'Core Strategy Options Paper' was assessed. The results of this assessment will be consulted on alongside this Options Paper. This assessment has been informed by the Habitats Regulation Assessment (HRA) screening assessment which is being undertaken concurrently.

Therefore the SA has been an integral part of the development of the options.

3.2.1 August 2009 assessment (Interim SA Report)

For the August 2009 assessment (the following were assessed:

District wide spatial options

- Spatial vision and six strategic objectives
- Option 1 – new development focused in and around the cities with a limited role for the towns and rural areas;
- Option 2 – New development less focused on the cities with a greater role for the towns and rural areas.

Core policies

- Renewable energy;
- Decentralised energy;
- Sustainable construction;
- Flood risk management;
- Infrastructure provision;
- Green infrastructure;
- Safeguarding minerals;
- Affordable housing;
- Gypsies, travellers and travelling showpeople;
- Urban design;
- Nature conservation;
- Landscape;
- Historic environment;
- World heritage site;
- Prosperous economy;
- Community services and facilities; and
- Accessibility and transport.

Bath options

- Vision and spatial objectives;
- Bath spatial option A and B, maximum and minimum concentration responding to district-wide options 1 and 2;
- Areas of change – the riverside (4 zones); and
- The outer neighbourhoods.

New Neighbourhood in an urban extension to Bath options

- Vision and spatial objectives; and

- Spatial options SWB 1 and SWB 2.

Keynsham options

- Vision and spatial objectives;
- Keynsham strategic site;
- Strategic waste recovery facility site; and
- Spatial options 1 and 2.

New Neighbourhood at South East Bristol options

- Vision and spatial objectives; and
- Spatial options.

Midsomer Norton and Radstock options

- Vision and spatial objectives;
- Option 1 and 2; and
- Town Centre Strategic Sites.

Rural areas options

- Vision and spatial objectives; and
- Policy issues.

3.2.2 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 Objectives and Questions). The framework of SA Objectives and SA Questions is presented in Table 3. 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.

No zero-plan scenario has been developed as part of the issues and options development. However, this has been taken into account as each issue, option and site is assessed against the current social, environmental and economic characteristics of the area which is subject to the Core Strategy and the likely future situation without a Core Strategy based on the trends in the baseline identified in the Scoping Report (future baseline).

Table 3: SA Framework

SEA/SA Objectives	Detailed questions: Does the policy / proposal...
Objective 1: Improve accessibility to community facilities and local services	Help everyone access basic services easily, safely and affordably (RSS 4.3) Increase access to and participation in community and cultural facilities and activities (RSS 2.5)
Objective 2: Improve the health and well-being of all communities	Improve Health (RSS 1.1) Reduce Health inequalities (RSS 1.2) Promote healthy lifestyles, especially routine daily exercise (RSS 1.3)
Objective 3: Meet identified needs for sufficient, high quality <i>and affordable</i> housing	Help make suitable housing available and affordable for everyone (RSS 2.1)
Objective 4: Promote stronger more <i>vibrant and cohesive</i> communities	Promote stronger more cohesive communities (RSS 2.4)
Objective 5: Reduce anti-social behaviour, crime and the fear of crime	Reduce crime and fear of crime (RSS 2.3)
Objective 6: Improve the availability and provision of training	Give everyone access to learning, training, skills and knowledge (RSS 2.2)
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 (RSS 3.1) Reduce poverty and income inequality (RSS 3.3) Provide a diverse range of employment opportunities in a variety of sectors
Objective 8: Enable local businesses to prosper	Increase the circulation of wealth within the local authority area (RSS 3.5) Reduce vulnerability of the economy to climate change and harness opportunities arising (RSS 3.7)
Objective 9: Increase availability of local produce and materials	Meet local needs locally (RSS 3.4)
Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	Make public transport, cycling and walking easier and more attractive (RSS 4.4)
Objective 11: Reduce the need and desire to travel by car	Reduce the need/desire to travel by car (RSS 4.1)
Objective 12: Protect and enhance local distinctiveness	Protect and enhance landscape and townscape (RSS 5.3) Value and protect diversity and local distinctiveness including rural ways of life (RSS 5.4)
Objective 13: Protect and enhance the district's historic, environmental and cultural assets	Maintain and enhance cultural and historical assets (RSS 5.5)
Objective 14: Encourage and protect habitats and biodiversity. (taking account	Protect and enhance habitats and species (taking account of climate change) (RSS 5.1)

of climate change)	
Objective 15: Reduce land, water, air, light, noise pollution	Minimise land, water, air, light, noise pollution (RSS 6.5)
Objective 16: Encourage sustainable construction	Development that demonstrates sustainable design and construction Minimise consumption and extraction of minerals (RSS 6.3) Reduce waste not put to any use (RSS 6.4)
Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure	Reduce non-renewable energy consumption and 'greenhouse' emissions (RSS 6.1) Promote sustainable energy generation and distribution
Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change)	Reduce vulnerability to, and manage flood risk (taking account of climate change) (RSS 5.6)
Objective 19: Encourage careful and efficient use of natural resources	Promote the conservation and wise use of land (RSS 5.2) Keep water consumption within local carrying capacity limits (taking account of climate change) (RSS 6.2) Minimise consumption and extraction of minerals (RSS 6.3)
Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	Reduce waste not put to any use (RSS 6.4)

4 Results of the Appraisal

4.1 Introduction

This section of the report outlines the results of the appraisal undertaken of the August 2009 Options Paper. The results are presented in section 4.3 below and are structured in accordance with each part of the plan. Full results of the August 2009 assessment are presented within the matrices in Appendix A. Summaries of all stages of the SA will be provided in the SA process which will be published during subsequent stages of the plan preparation.

4.2 Assumptions made during the assessment

Sustainability appraisal 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 a matrix enabling an expert, judgement-led qualitative assessment to be made in most cases. 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.

4.3 Appraisal results

4.3.1 District-Wide Strategy (refer to Appendix A Table A1)

District Wide Vision and Objectives

The District wide vision reflects local issues and only a small number of gaps have been identified where it is not consistent with the coverage of the SA objectives. The SA team welcome the apparent prioritisation of climate change within the Strategic Objectives.

Protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives. It is recommended that Green Infrastructure is referred to within the vision, as key infrastructure required to accommodate development and should also ideally be included within Strategic Objective 2 such as "ensuring a network of green infrastructure is established and enhanced across the district and that biodiversity is enhanced". Reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity should be included in Strategic Objective 1. The potential impact of climate change on the economy should also be picked up more clearly within Strategic Objective 1 'tackle the causes and effects of climate change'.

Several sub-objectives should be added to or would sit better under 'Strategic Objective 2: Accommodate development growth requirements in a sustainable way and supported with the necessary infrastructure'. This includes pollution, resources use, waste management and sustainable construction.

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

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

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

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

District Wide Spatial Options

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

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

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

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

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

4.3.2 Core Policies (refer to Appendix A Table A2)

There has been significant development of the Core Policies since the last feedback in 2008. Many of the comments made by the SA team have been taken on board including better references to community participation, cohesion and health, reducing crime, access to services, availability of local produce, local distinctiveness, sustainable construction and supply of renewable energy. In general the core policies do address the important issues and when fully developed should lead to a comprehensive set of policies. However, there are some areas that need development and some of these are discussed below:

- Affordable housing proposed policy approach: A number of options are proposed and these should be developed based on evidence and should be tailored to the very different areas in the district. The strategic viability assessments will be used to develop these policies so the policies that are developed are likely to be based on evidence and be as tailored as possible. However, it is not clear at the moment what the difference between the two rural policy options is and this should be clarified.
- Prosperous economy proposed policy approach: It would be useful if the policy as it is developed is more specific about the growth sectors in the district and how it will specifically assist development in these sectors.
- Sustainable construction proposed policy approach: It would be useful if wider issues of sustainable construction are included for non residential development – for example BREEAM targets. It would also be useful if comprehensive sustainable design and construction requirements for all major development were set out in a SPD in the form of essential and preferred targets for each type of development. This could include wider issues of resource use. It would also be useful if development thresholds were discussed. In the table would “all other proposals” refer to developments over 10 dwellings / 1000m²? It’s not clear from the policy.
- Renewable energy proposed policy approach: Some clarity is required concerning the difference between the two columns in the renewables table. It would also be helpful if the units and technologies are defined. At the moment it is unlikely that a member of the public would understand this policy. In addition, it would be useful if the policy addressed the potential for the development of energy infrastructure to affect the integrity of Natura 2000 sites.
- Flood risk management proposed policy approach: Consider whether it would be useful to include a flooding policy in light of the recommendations within the PPS25 good practice guide that “Core Strategy LDDs reflect the Council’s strategic planning policies and approach to flood risk.” It would be useful for policy to address other aspects of climate change adaptation and also sustainable drainage systems and the levels of attenuation that developments should attain. This can either be in the flood risk policy or within a sustainable construction policy / SPD.
- Safeguarding minerals proposed policy approach: it would be useful if the policy addressed the potential of minerals development to affect the integrity of Natura 2000 sites. At this stage this could be fairly minimal (the addition of ...including the effect on sites designated as Natura 2000 sites to bullet point 3).
- The HRA screening assessment has identified the potential for effects on Natura sites

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

4.3.3 Approach to the Urban Extensions (refer to Appendix A Tables A4 and A6)

New Neighbourhood in an urban extension to Bath vision and objectives

Overall, the vision and objectives for the Bath urban extension are consistent with, and cover the majority of the SA objectives. However, a potential conflict has been identified between SA objectives 10 and 11 and the Bath urban extension objective 13 which aims to provide access by a range of transport modes, including the car. Although car access will be provided for within the urban extension, it's inclusion within the objective 13 creates a tension with the SA objectives.

A number of recommendations are made as follows:

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

New Neighbourhood in an urban extension to Bath: Options

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

Option SWB 1 is the option preferred by B&NES. Option SWB1 currently presents the most secure delivery of up to 2,000 new homes. Option SWB1 would be a favoured location for new business premises and may provide space for bulky retail uses, relocated from the city centre. Option SWB1 therefore provides the best opportunities for contributing to the economic vitality of the city and performs well in relation to public transport accessibility, although it does not encourage healthy lifestyles through walking and cycling due to its

topography. An air pollution mitigation strategy would be needed for option SWB1. Option SWB1 is in the vicinity of an area of flood risk, however, development in these areas may be avoidable. .

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

Both options present challenges for community cohesion between existing and new communities. Option SWB1 may present the most challenging physical circumstances. All of the options would have impacts on local distinctiveness, landscape and views. Option SWB2 may present landscape and visual effects which can be more effectively mitigated.

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

Both options have potential for negative effects on biodiversity. All sites are Greenfield and could result in the loss of habitats. Option SWB 2 (and possibly also Option SWB1) has the potential to affect bats which are highly protected. The HRA screening assessment has identified the potential for effects on Natura sites with relation to each of the options being considered. Further work will be carried out as part of the next stage of the HRA to examine the potential for these impacts in more detail and to identify appropriate mitigation strategies. Option SWB1 would have a significant effect on the green belt and could affect habitats of the River Avon. All options have the potential to provide access to natural green space and contribute to green infrastructure. Both options could be well served by public transport into the city centre

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

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

New Neighbourhood at South East Bristol vision and objectives

A number of gaps have been identified within the vision and spatial objectives as follows:

- Addressing community cohesion in the Whitchurch area, particularly in relation to impacts on the existing communities, should be given more consideration, especially in the vision and objectives.
- Impacts on other elements of the environment, such as air quality and soils should ideally be mentioned within the spatial objectives.

- There is some uncertainty relating to transport (objectives 10 and 11) because the South East Bristol transport package is still under development and it is therefore difficult to understand how travel will be managed for an urban extension.

New Neighbourhood at South East Bristol: options

Areas in the vicinity of the Whitchurch location would benefit from improvements to facilities within south Bristol, such as the proposed new hospital and new academy (secondary) school in Brislington, although this is dependent on securing a good public transport service into these areas and the city centre. Access to facilities in Keynsham from the Whitchurch may cause considerable impact on Queen Charlton.

The Hicks Gate area has good access to Bristol facilities and services due to good public transport accessibility however, it is separated from such facilities by the Park and Ride and retail park at Brislington. Capacity limitations at Hicks Gate would mean that the development would not be of sufficient size to provide a range of facilities and services within the extension, without development in the Brislington area within the Bristol City Council administrative area.

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

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

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

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

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

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

How the extension will be supplied with water and energy should be addressed. No specific mention is given to how the Urban extension will deliver a “zero-carbon development” apart to references to Code levels and how this will relate to the existing settlement of Whitchurch.

Will any existing buildings be connected to a CHP network? Will existing buildings be retrofitted with energy efficient and renewable energy technologies in order to bring benefit to existing residents? If Whitchurch is to be integrated within the urban extension a target should be set for carbon emissions from existing buildings and activities such as transport and the extension should be considered comprehensively.

4.3.4 Bath (refer to Appendix A Table A3)

Bath Vision and Objectives

The vision is specific to Bath and has been developed from the issues identified. A number of comments and recommendations are made relating to the vision and objectives for Bath as follows:

The main gap within the vision and objectives are in relation to sustainable consumption. The vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. greater emphasis should be given to generating more energy used within the city from low carbon and renewable sources. An additional objective could be added (or text added to objective 11) which covers minimising resource use and ensuring sustainable, secure design.

Risks of climate change should ideally be added to the first paragraph in the vision where 'harnessing the need to change' is referred to. Objective 14 should ideally be strengthened, in order to recognise other factors which lead to flood risk within Bath (such as sewers), the need for flood resilient design and the need for infrastructure to offset loss of floodplain capacity from development in the city (according to the Flood Risk Management Strategy Scoping Study, Capita Symonds, May 2009). Vulnerability to flood risk will be a key issue for Bath city centre with the onset of climate change.

The Vision would benefit from inclusion of reducing the impact of transport on the environment and people and reducing light pollution within the city.

In objective 13, reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity.

It may be appropriate to specifically reference local markets within strategic objective 5.

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

Community cohesion and integration with regard to the urban extension has not been addressed within the vision and objectives, here, for the whole of Bath, and in the vision and objectives specific to the urban extension.

It may be worth making specific reference to Key Worker Accommodation in relation to housing provision where relevant.

It is important to consider equitable access to employment both paid and unpaid rather than just focusing on wealth generation.

Bath Spatial Options

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

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

The high level principles and conceptual response for the central area should include an additional bullet:

Include flood risk mitigation measures in accordance with the Flood Risk Mitigation Strategy.

As a minimum reference should be made to the appropriate core policies which deal with sustainable construction and energy.

The green infrastructure network should be referred to with regard to the potential location of development and how new development might be able to contribute to the green infrastructure network within the city. The green Infrastructure network and strategy is currently under development.

Care will be needed not to increase light pollution, particularly in the river corridor area and it would be advisable to mention avoiding light pollution within any design principles for Bath.

There is no mention of reducing the need/desire to travel by car within the options. The travel strategy for Bath should be mentioned.

Reference could be made to providing more learning opportunities within Bath and how school places will be delivered to new school-age population, including new residents of the urban extension.

4.3.5 Keynsham (refer to Appendix A Table A5)

Keynsham Vision and Objectives

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

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

Keynsham Spatial Options

The key differences between the options 1 and 2 are the more intensive use of the strategic site in Option 2 and for mixed use instead of office led regeneration. Option 2 would provide a higher number of new homes (1,600) which it is proposed will bring with it more developer contributions to be used to improve the public realm in the High Street and thus boost the regeneration of the retail sector in the High Street.

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

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

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

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

4.3.6 Midsomer Norton and Radstock (refer to Appendix A Table A7)

Midsomer Norton and Radstock Vision and Objectives

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

The objectives have also been strengthened with the addition of a new objective on local employment opportunities, strengthened objectives on wider economic benefits and low carbon business opportunities (objective 1), further consideration of reducing out-commuting (objective 5), building on the identities of town centres (objective 3) and meeting housing needs in order to strengthen communities. Two areas of weakness have been identified in the objectives. The first is the removal of the following from the housing objective: “by providing an appropriate mix of dwellings in sustainable locations”. It would be useful if the concept of sustainable housing were re-instated to the objectives. The second is the fact that the vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

Midsomer Norton and Radstock Spatial Options

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

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

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

measures to work. However, the risk of out-commuting is higher with Option 2.

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

- As the policy develops it will be important to set out what additional healthcare facilities might be needed in the town under the preferred option.
- Access to learning is a major issue in Midsomer Norton and Radstock and therefore should appear more prominently in the preferred options document. It is discussed in the spatial options document but not in a detailed way.
- It is unclear where the difference in 850 jobs comes from (between options 1 and 2) and a more detailed breakdown will be needed in the preferred options document.
- The preferred option should address the vulnerability of the areas' economies to climate change.
- The preferred option needs to be clearer about the infrastructure that will be developed to support development.
- The amount of detail and the coverage of the sections on the strategic sites need to be consistent. Radstock, for instance addresses green corridors, quality design and energy issues and Midsomer Norton does not. Energy issues, in particular are key aspects of the strategic sites that needs development.
- None of the options include mitigation for pollution and this should be included as the strategy progresses.
- It is currently unclear whether flood issues would stop development of housing on strategic sites in Midsomer Norton and Radstock and the preferred options paper needs to address this issue.

4.3.7 Rural Areas (refer to Appendix A Table A8)

Rural Areas Vision and Objectives

The options presented in the rural areas section deal with a diverse number of issues and the options are not mutually exclusive as in other policy areas.

The spatial vision has been further developed although there have been few significant changes. The main changes are the removal of the specific reference to the Cotswold's and Mendips AONBs. The addition of a reference to healthier lifestyles and the addition of references to functional networks of priority habitats that are more resilient to climate change.

The objectives have also been strengthened with the addition of a two new objectives on protecting and enhancing the natural environment and increasing availability of local produce and materials. Other issues have also been strengthened in the objectives including the consideration of easy, safe and affordable access to services, the provision of high quality public transport that is accessible and improved walking and cycling routes. Only one area of weakness has been identified and this is the fact that the vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

Rural Areas Policy Options

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

Policy Issue Rural B discusses a rural affordable housing exceptions policy. This policy could be positive in those villages where there is an acute affordability problem. However, the policy could result in development in unsustainable locations. Rural exception sites should be used in conjunction with other policy instruments which tackle affordability more widely.

Policy Issue Rural C addresses rural diversification and would lead to stronger, more cohesive communities through sense of ownership and improved use of current rural facilities. Under option C, all of the elements mentioned in the list in the spatial options document should be included in the policy.

5 Next steps

5.1 Commenting on this report

The interim SA report is being published for consultation alongside the Spatial Options document from the period 19th October to 11th December 2009. The purpose of this consultation is to provide the statutory environmental bodies and other interested parties the opportunity to express their opinion on the interim SA report. It also enables them to use the information within the SA report to guide their deliberations on the Spatial Options document. Please send your comments on this report by the 11th December 2009 to:

<p>Bath and North East Somerset Council Spatial Options Consultation Planning Policy Planning Services Bath & North East Somerset Council Trimbridge House Trim Street Bath, BA1 2DP</p>
<p>Tel: 01225-477548 E Mail: planning_policy@bathnes.gov.uk</p>

5.2 The next stages of the appraisal

The next stages of the production of the Core Strategy are:

- Autumn 2009: Publication of the Spatial Options document for consultation with the public;
- During 2010 Preparation of the Submission Draft Core Strategy and publication for consultation;
- Spring 2011: Examination in Public of Core Strategy; and
- End of 2011: Adoption of Core Strategy.

The results of the assessment of the Spatial Options will be used by the council to develop the next version of the document (the Submission Draft). The SA team will then appraise the effects of the Submission Draft and a SA report will be published at the same time as the Submission Draft. These assessments will be informed by the Appropriate Assessment which will be undertaken as part of the Habitats Regulation Assessment. Consultees will get a chance to comment on both the Submission Draft and its related SA report.

