



Bath & North East Somerset
Core Strategy

Sustainability Appraisal Report
Annex F: Mitigation and Residual Effects of the
Submission Core Strategy Policies

Prepared for:

Bath & North East Somerset Council

Prepared by:


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Policy or Strategy	Mitigation Measures Suggested to Address Major and Minor Negative Effects and Uncertain Effects	Response from BANES Policy Authors	Residual Negative and Uncertain Effects of the Final Policy/Strategy
Vision and Objectives	<ol style="list-style-type: none"> 1. Sustainable waste management, reducing waste arisings and the waste hierarchy should be referred to within strategic objective 1; and 2. 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. 	<ol style="list-style-type: none"> 1. Disagree – sustainable waste management, including reducing waste arising and the waste hierarchy is fully covered in the Joint Waste Core Strategy. 2. Agree – Publication Version of Core Strategy reflects this recommendation but reference is made under objective 2 (as more relevant than climate change related objective) 	<p>SA Obj 20: No change. Minor negative in short, medium and long terms.</p> <p>SA Obj 15: minor positive in the short, medium and long terms.</p>
District Strategy	<ol style="list-style-type: none"> 1. 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. 2. 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. 3. 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. 4. The spatial strategy should provide more information on the reasoning behind the direction of new jobs to certain places and what it is hoped will be achieved (e.g. balance between jobs and homes, reducing commuting elsewhere for certain types of jobs). 	<ol style="list-style-type: none"> 1. Policy DW1 refers to the need to ensure there is deliverable space to enable job growth in the Somer Valley area. This is expanded upon in Policy SV1. Para 4.13 identifies the need for improved education and training linking local businesses with key training providers. 1. The Vision and Strategic Objectives have also been amended to refer to improving skills in Midsomer Norton/Radstock. 2. Para 6.93 clarifies that AQMAs in B&NES will be managed in accordance with PPS1 and PPS23. 3. The place based sections identify transport infrastructure improvements needed to support the strategy with an emphasis on sustainable means of transport. 4. Para 1.25 (Summary Spatial Strategy for 	<p>SA Obj 7: minor positive in the short, medium and long terms.</p> <p>SA Obj 15: minor negative and minor positive in the short, medium and long terms remain.</p> <p>SA Obj 17: minor positive in the short, medium and long terms.</p>

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	<p>5. The Core Strategy needs to address the how CO2 emissions targets will be achieved in this spatial strategy, particularly in Bath, where landscape and historic constraints exist. Ideally this should be addressed in the Spatial Strategy, with more detail provided within the area-based strategies, particularly in relation to the Bath Strategy.</p>	<p>B&NES) seeks to locate new development in the most sustainable locations and addresses the issue of out-commuting. This provides the context for the more detailed explanation in the based placed sections. A fuller explanation (with links to the relevant evidence) of the District-wide strategy will also be set out in a supporting Information Paper.</p> <p>5. The reduction of CO2 emissions is addressed principally through Policies CP1 – CP4. Policy CP4, in particular, provides the context for area based solutions in respect of district heating. Reference is also in the place based policies (including Bath) to the opportunities for District-Heating and other energy reduction measures, including the retrofitting of historic buildings with micro-renewables and energy efficiency measures.</p>	
Shaping the Future of Bath A Spatial Strategy	<p>1. 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.</p> <p>2. Building on the identification of district/ local</p>	<p>1. Reference made at para 2.19</p> <p>2. Agreed</p> <p>3. No strategic deficiency identified. No reference made.</p> <p>4. No strategic deficiency identified. Reference to key opportunity made at made at 2.25</p>	<p>SA Obj 1: minor positive in the short, medium and long terms;</p> <p>SA Obj 2: minor positive in the short, medium and long terms;</p> <p>SA Obj 5: neutral in the</p>

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	<p>centres in the Core Strategy, the Placemaking DPD should set out more specific policies for enhancing specific local centres where a need / opportunity has been identified.</p> <p>3. 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.</p> <p>4. 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.</p> <p>5. 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.</p> <p>6. 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’.</p> <p>7. The Bath Strategy should make specific</p>	<p>5. Air quality now mentioned at key issue IX. Reference also made at 6.93 to air quality in Bath.</p> <p>6. Reference will not be made as no locally specific planning policies can be identified that would significantly address the issues. Reference made to PPS 1 and ‘Safer Places’ at 6.27 of High Quality design section of Core Policies section</p> <p>7. Reference made at para 2.24</p> <p>8. Ground water resources and light pollution considered to be generic matter best dealt with in Environmental Quality section of Core Policy.</p> <p>9. Para 2.12 amended to clarify that the Placemaking Plan will establish development principles not only for the river Corridor but the whole of Bath’.</p>	<p>short, medium and long terms;</p> <p>SA Obj 10: minor positive in the short, medium and long terms;</p> <p>SA Obj 11: minor positive in the short, medium and long terms;</p> <p>SA Obj 15: minor negative in the short, medium and long terms; and</p> <p>SA Obj 19: minor positive in the short, medium and long terms.</p>

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	<p>reference to increasing riverfront activity which is not detrimental to wildlife.</p> <p>8. The Bath Strategy should make reference to not creating light pollution, particularly along the river and it should make reference to the need to protect groundwater resources.</p> <p>9. 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 Bath Strategy could also make reference to the Sustainable Construction and High Quality Design Core Policies.</p>		
Keynsham Spatial Strategy	<p>1. Policy KE2 should encourage the reuse of the buildings at the Somerdale site and should encourage the use of any demolition material on site in the redevelopment of the site.</p> <p>2. 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 support</p>	<p>1. Policy KE2 amended to include “Consider the potential for converting and reusing some or all of the factory buildings at Somerdale”.</p> <p>1. Demolition material is covered by Policy CP2, and the 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 should therefore not be seen as a potential major negative effect.</p> <p>2. District Heating Study concludes that the Broadmead Lane Waste Facility is too far from the KE2 policy area to be able to viably contribute to the district heating</p>	SA Obj 20: minor positive effect in the short, medium and long terms.

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		network.	
Somer Valley Spatial Strategy	No mitigation required.	n/a	n/a
Rural Areas Spatial Strategy	<ol style="list-style-type: none"> 1. 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. 2. 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. 3. 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. 4. 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 	<ol style="list-style-type: none"> 1. Agree. Landscape and visual assessment of any Greenfield development will be considered in the Place Making DPD. 2. Agree. Archaeological assessment of any Greenfield development will be considered the in Place Making DPD. 3. Agree. Ecological assessment of any Greenfield development will be considered the in Place Making DPD. 4. Agree - No action required. 5. The supporting text of the Infrastructure Provision Core Policy has been amended to refer to the need for potential cumulative effects to be considered. 	<p>The response from the policy authors removes the uncertainty recorded in the appraisal with regards to SA objectives 12, 13 and 14.</p> <p>The potential cumulative effect has been addressed.</p>

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	<p>infrastructure. No action is therefore required.</p> <p>5. Policy wording is needed to ensure that housing developments consider the potential for cumulative effects with regard to social infrastructure / community facilities.</p>		
Core Policies			
Energy Hierarchy, CPI Retrofitting Existing Buildings, CP2 Sustainable Construction, CP3 Renewable Energy, CP4 District Heating	<p>1. 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>	<p>1. Now included reference in supporting text – this has underpinned the research approach and so mitigation of these impacts and avoidance of areas of high risk has been taken</p>	<p>SA Obj 13: Action taken has offset the potential major negative effect. The performance will be neutral over the short, medium and long terms.</p>
CP5 Flood Management	No mitigation required.	n/a	n/a
CP6 Environmental Quality	No mitigation required.	n/a	n/a
CP7 Green Infrastructure	No mitigation required.	n/a	n/a
CP8 Green Belt	No mitigation required.	n/a	n/a
CP9 Affordable Housing and CP10 Housing Mix	<p>1. The supporting text of the policy or the policy itself could make it clearer whether private developers will be expected to provide dwellings suitable for older people, disabled people, and those with other special needs. Developers could be asked to provide a certain proportion of</p>	<p>1. Clarification provided. No change to policy or supporting text.</p> <p>2. Amendment made to policy wording as suggested.</p>	<p>SA Obj 2: minor positive in short, medium and long term.</p> <p>SA Obj 4: minor positive effect in the short, medium</p>

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	<p>dwelling which meet the Lifetime Homes standards.</p> <p>2. Policy CP9 should stipulate that affordable housing is integrated within developments and does not differ from market housing in terms of aesthetics.</p>		and long term.
CP11 Gypsies, Travellers & Travelling Showpeople Policy	<p>1. The fifth bullet point should be reworded to read 'adequate services including foul and surface water and waste disposal and recycling can be provided';</p> <p>2. The fifth point should be reworded to read 'adequate services including foul and surface water and waste disposal can be provided <i>with pollution control measures</i>'.</p>	<p>1. The third bullet point will ensure that the site is large enough to allow for adequate space for on-site facilities and amenity which could include space and / or facilities for the storage and collection of recyclables. Itemising every facility a site may provide in the policy will unnecessarily lengthen it.</p> <p>2. In recognition that the policy allows for commercial activity to take place on-site it may be prudent to address pollution control. Fifth point will be reworded to read 'adequate services including foul and surface water and waste disposal can be provided and any necessary pollution control measures'.</p>	<p>SA Obj 20: no change. Minor negative in the short, medium and long terms.</p> <p>SA Obj 15: minor positive over the short, medium and long terms.</p>
CP12 Centres and Retailing	<p>1. The supporting text of Policy CP12 could make it clearer that the policy will support the provision of health facilities within centres as well as other uses such as employment;</p> <p>2. Any controls on the night time economy which are considered necessary should be contained</p>	<p>1. Health facilities come under the umbrella of community facilities. Community facilities added to Policy CP12.</p> <p>2. No change required within Core Policy.</p> <p>3. Markets are supported by PPS4, but this should be clarified within the Core Policy.</p>	<p>SA Objective 2 – minor positive in the short, medium and long term;</p> <p>SA Objective 5 – neutral performance in the short, medium and long term. BANES will address crime</p>

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	<p>within the policies of the Placemaking DPD; and</p> <p>3. The policy or supporting text should identify whether markets and street trading are supported within suitable centres.</p>	Markets added to Policy CP12.	<p>and anti-social activity issues within the Placemaking DPD.</p> <p>SA Objective 9 – minor positive in the short, medium and long term.</p>
CP 13 Infrastructure Provision Policy	No mitigation is required.	n/a	n/a