



Bath & North East Somerset
Core Strategy

Sustainability Appraisal Report
Annex G: Recommendations and Residual Performance of the
Submission Core Strategy Policies

Prepared for:

Bath & North East Somerset Council

Prepared by:


**ENVIRON
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Version Control Record				
Issue	Description of Status	Date	Reviewer Initials	Authors Initials
A	First draft	28/10/10		VP
2	Final - Publication	18/11/10	JC	VP
3	Final – Submission	26/04/11	JC	VP

Policy or Strategy	Recommendations to enhance the Policy/Strategy	Response from BANES Policy Authors	Residual Performance of the Revised Policy/Strategy
Vision and Objectives	<ol style="list-style-type: none"> 1. The vision could be more specific in addressing this SA Objective by making reference within the first two paragraphs to people meeting their needs locally or having good access to community facilities and local services; 2. 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; 3. 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; 4. Strategic objective 4 should make reference to reducing income inequality in the district; 5. 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; 6. A bullet point could be added to strategic objective 8 which encourages a reduction 	<ol style="list-style-type: none"> 1. Also note objective 6 which includes reference to the timely provision of infrastructure (including services/facilities) in line with new development. 2. Not sure that creating cohesive communities is within the scope of the Core Strategy – how would spatial planning deliver this? (Reference in SA would be useful). 3. Agree – Somer Valley vision amended to refer to improving skills and reference also added into strategic objective no. 3. 4. The Core Strategy focuses on providing the necessary space to help facilitate economic prosperity/ diversification – this might lead to income inequalities being addressed (but may not) given the attractiveness of Bath, rather than other parts of the District, to higher value sectors. Reference could only be included in strategic objective 3 if it were supported by a clear policy approach – currently evidence is not available to support this. 5. Partially agree – reference included in Vision. Objective 8 is about improving connectivity and suggested addition does not sit well within it. 6. Partially agree – reference included in Vision. Objective 8 is about improving connectivity and suggested addition does not sit well within it. 7. The affordability of public transport is not an issue dealt with by the Core Strategy. It is addressed by the Joint Local Transport Plan (links between the Core Strategy 	<p>The changes made have improved the performance of the vision and objectives with regards to SA Objectives 6, 9, 15 and 18.</p>

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	<p>in distances travelled by meeting needs for materials and produce locally;</p> <p>7. Strategic objective 8 should refer to the provision of public transport that is affordable;</p> <p>8. 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; and</p> <p>9. Planning to protect people and property from the risk of flooding should be included within the vision.</p>	<p>and JLTP are made in the objective).</p> <p>8. 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> <p>9. Minor amendment made to strategic objective one to make reference to shaping places that minimise vulnerability to and are resilient to increased flood risk. This objective is also followed through in core policy framework and policy approach for Bath.</p>	
District Strategy	<p>1. The design core policy will need to ensure that designing out crime in new developments is a requirement of planning policy.</p> <p>2. 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).</p> <p>3. 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.</p>	<p>1. Policy CP6 seeks to achieve high quality and safe places. More detailed design guidance can be considered through the Placemaking DPD.</p> <p>2. 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. The Vision and Strategic Objectives have also been amended to refer to improving skills in Midsomer Norton/Radstock.</p> <p>3. Policy DW1 promotes sustainable development through prioritising brownfield opportunities for new development to</p>	<p>This has improved the performance of the District Strategy with regards to SA Objectives 5, 6, 13 and 15.</p>

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	<p>4. 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.</p> <p>5. The Sustainable Construction Core Policy should encourage the reuse and recycling of demolition materials.</p>	<p>limit the need to build on greenfield land.</p> <p>4. Policy CP2 requires applicants to demonstrate that waste and recycling during construction and in operation have been addressed as well as the type, lifecycle and source of materials to be used.</p>	
Shaping the Future of Bath A Spatial Strategy	<p>1. 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.</p> <p>2. 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> <p>3. 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.</p>	<p>1. Disagree with recommendation. It is for the Economic Strategy to consider this and for the Core Strategy to respond to the built environment implications i.e. specific workspace provision. The Policy for the Central area enables the location and growth of a number of office based green sectors. The Policy for Newbridge riverside retains land for more industrial green sectors.</p> <p>2. The Vision now refers to 'natural environment' which covers biodiversity and some aspects of GI. Reference to GI also implicit in references to boosting the city's profile as a place for recreation and leisure.</p> <p>3. All Green Infrastructure will be shown on the proposals map and key assets shown on the key diagram e.g. river Avon, canal and two tunnels cycle route.</p> <p>4. Change now made to 2.12 to this effect.</p> <p>5. The introduction to the Central Area and Western Corridor now refers to the PPS25 sequential test in relation to the sites identified for development.</p>	Changes made in response to the recommendations have generally improved the Bath Strategy.

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	<p>4. The Strategy should make reference to the PPS 25 sequential test in relation to the sites identified for development.</p> <p>5. This policy or a separate flood risk policy needs to set out whether SUDS will be required on development sites within Bath.</p>	<p>6. Issue of SUDs is devolved to flood risk management section of the core policies chapter at para 6.23</p>	
Keynsham Spatial Strategy	<p>1. 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>	<p>1. This will be outlined in the District Heating Study which will be published alongside the Core Strategy. It is considered inappropriate to include this amount of detail within the Core Strategy.</p>	No change.
Somer Valley Spatial Strategy	<p>1. The strategy would be improved if Policy SV1 included a principle to increase allotment provision in Midsomer Norton and Radstock (where deficiencies have been identified).</p> <p>2. The policies could be improved if improvements to biodiversity were specifically targeted or new nature reserves were to be created through the placemaking principles.</p> <p>3. The performance of the strategy would be improved if it encouraged the reuse of existing buildings where possible.</p> <p>4. As a key theme of the strategy for the Somer Valley is self-reliance there is an opportunity to improve the strategy for the</p>	<p>1. Policy SV1 has been amended to increase allotment provision where deficiencies have been identified.</p> <p>2. Noted. Specific areas for improvement will be identified as part of a Green Infrastructure Strategy and may be allocated through the Placemaking (Site Allocations) DPD.</p> <p>3. Note. Core Policies CP1 and CP2 will apply to this area.</p> <p>4. Comments noted. The principle of waste management is established through the Joint Waste Core Strategy DPD.</p>	<p>This has improved the performance of the policy with regards to SA Objective 2.</p> <p>No change.</p> <p>No change.</p>

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	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.		No change.
Rural Areas Spatial Strategy	No recommendations were made for this strategy.	n/a	n/a
Core Policies			
Energy Hierarchy, CPI Retrofitting Existing Buildings, CP2 Sustainable Construction, CP3 Renewable Energy, CP4 District Heating	<ol style="list-style-type: none"> 1. Major developments should be defined or a reference provided to where major developments are defined if it is elsewhere in the Core Strategy. 2. The criteria set out in the policy 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....' 3. Policy CP2 could specifically encourage 	<ol style="list-style-type: none"> 1. Done - added ref to national legislation that defines major development. 2. Done. 3. Too specific – covered in general criteria. 	<ol style="list-style-type: none"> 1. This has improved the performance of the policies. 2. This has improved the performance of the policies. 3. No change.

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	the reuse and recycling of Bath stone and demolition material.		
CP5 Flood Management	1. This policy could promote SuDs which provide wildlife habitats as well as surface water management, where appropriate.	1. Additional explanatory text included.	This has improve the performance of the policy with regards to SA Objective 14.
CP6 Environmental Quality	2. Policy CP6 would perform better if housing schemes were also required to comply with the principles of Secured by Design.	1. Policy CP6 is a high level strategic policy and applies to all design issues not specifically housing. Clause 1 seeks to implement high quality and safe places. One way of achieving this is could be through compliance with the principles of Secured by Design which would be a material consideration when considering housing proposals. The need for more detailed design policies can be considered through the preparation of the Placemaking DPD.	No change.
CP7 Green Infrastructure	No recommendations were made for this policy.	n/a	n/a
CP8 Green Belt	1. The control of pollution will need to be addressed within the development management policies of the Place Making DPD.	The control of pollution will be addressed in the development management policies of the Place Making DPD should it be deemed necessary to supplement national planning policy though the inclusion of more detailed policies.	No change to the performance of the policy.
CP9 Affordable Housing and CP10 Housing Mix	No recommendations were made for this policy.	n/a	n/a
CP11 Gypsies, Travellers &	1. In allocating sites for sites for gypsies, travellers and travelling showpeople, the	1. The Core Policy relating to Sustainable Construction (CP4) encourages the use of combined heat and power and/or	The changes made have improved the

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Travelling Showpeople Policy	<p>council could consider opportunities to connect such sites to local district power schemes and could provide information to users of the sites relating to options for renewable and low carbon energy generation with are compatible with mobile accommodation.</p> <p>2. Bullet point 5 could be amended to include the word 'utilities'.</p> <p>3. The first bullet point of the policy should be reworded to read 'good access (by foot or cycle) to local community services and facilities...'</p>	<p>combined cooling, heat and power and district heating. Sites for gypsies and travellers are not allocated through the Core Strategy but through the Gypsy & Traveller Site Allocations DPD. Opportunities to connect such sites to local district power schemes etc can be explored through the preparation of that document.</p> <p>2. Agree that bullet point 5 could be amended to include the word 'utilities'.</p> <p>3. The phrase 'good access' is intended to include walking and cycling but agree that the suggested wording could be included for clarity.</p>	performance of the policy with regards to SA Objectives 10, 11 and 17.
CP12 Centres and Retailing	No recommendations were made for this policy.	n/a	n/a
CP 13 Infrastructure Provision Policy	No recommendations were made for this policy.	n/a	n/a