

Summary of the changes that the Proposed Changes to the B&NES Submitted Core Strategy (March 2013) have made to the Sustainability Appraisal (SA)

Introduction

The Proposed Changes to the Submitted Core Strategy were screened for significant changes in relation to the SA. The Proposed Changes subject to the current SA comprise:

- All changes from the Schedule of Rolling Changes (February 2012); and
- All new changes coming out of Suspension review work 2013 to address issues raised by the Inspector which includes any further changes to those set out in the Schedule of Significant Proposed Changes in September 2011 (assessed in 2011).

As a result of the screening process, it was concluded that the previous assessments of the following policies (and in some cases, their supporting text) required review and amendment as necessary:

- DW1;
- Bath policies: B1, B2, B3, B5; B3A, B3B and B3C;
- Keynsham policies: KE1, KE2, KE3 and KE4;
- Somer Valley policies: SV1, SV2 and SV3;
- Rural Area policies: RA2, RA5;
- Policy SD1 (new policy and assessment required);
- Core Policy CP4;
- Core Policy CP6;
- Core Policy CP9 and CP10; and
- Core Policy CP11.

Findings of the amendments to previous policy assessments

Policy DW1

Objective 3: Meet identified needs for sufficient, high quality and affordable housing now performs more positively with the addition of further additional houses in the District over the lifetime of the plan.

The impact on Objective 12: Protect and enhance local distinctiveness is now uncertain (changed from minor positive) with the addition of the extra housing. The impact on Objective 13: Protect and enhance the district's historic, environmental and cultural assets and Objective 14: Encourage and protect habitats and are also now uncertain (changed from major positive). The impact will mainly depend on the changes proposed to the Green Belt but the general locations proposed are in areas with potential landscape, heritage and ecological sensitivities.

The impact on Objective 19: Encourage careful and efficient use of natural resources has changed to a mixture of minor positive and minor negative (changed from minor positive). This is because strategic changes to the Green Belt boundary cannot be considered as conserving land.

Additional mitigation measures have been put forward as follows:

- 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 19: Greenfield land take cannot be mitigated against but policies are included in the plan to reduce the effects of this greenfield land take.

Bath policies

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 Green Belt sites and other large sites in 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 potential major and minor negative effects plus uncertainty, into the assessment.

The SA Objectives affected are as follows:

New uncertain effects in the medium and long term:

- 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 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 14: Encourage and protect habitats and biodiversity
- Objective 15: Reduce land, water, air, light, noise pollution.

The uncertainty is mainly as a result of the Modifications to the Bath policies proposed in 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. Uncertainties are also recorded in relation to the effects of the flood management scheme suggested for development sites in Bath.

Additional mitigation measures have been put forward in relation to potential negative and uncertain effects; as follows:

- 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.
- Ecological assessment of any flood mitigation measures needed.

- Further investigation of flood mitigation measures to confirm whether the solution is deliverable and logistically viable.
- 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.
- 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.

The HRA March 2013 also recommends the following development requirements as Green Belt release sites are developed:

- 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.
- 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.
- Policy B3C: Retain existing linear habitat features on site; provide well planned open space and GI to absorb increased recreational pressures.

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:

- Objective 1: Improve accessibility to community facilities and local services
- Objective 2: Improve the health and well-being of all communities
- Objective 3: Meet identified needs for sufficient, high quality and affordable housing
- 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
- Objective 8: Build a strong competitive economy and enable local businesses to prosper
- 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

Minor negative effects are identified in relation to:

- Objective 9: Increase availability of local produce and materials. Greenfield development leads to loss of agricultural land, therefore negative impact on this objective.

- Objective 12: Protect and enhance local distinctiveness. All three sites are highly sensitive in terms of landscape.
- Objective 13: Protect and enhance the district's historic, environmental and cultural assets. All three sites are highly sensitive in terms of heritage.
- 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.
- 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.

There are no uncertain impacts identified. Mitigation is put forward to address the negative effects identified as follows:

- Allotments should be provided for new residents.
- (Policy 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.
- (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.
- (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.

The council has responded that the policies require 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.

Keynsham policies

Proposed Changes to the Core Strategy (February 2013) have led to amendments to the assessment details of these policies but this has not led to any changes to the assessment 'scores'.

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:

- Objective 1: Improve accessibility to community facilities and local services
- Objective 2: Improve the health and well-being of all communities

- Objective 3: Meet identified needs for sufficient, high quality and affordable housing
- 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
- Objective 8: Build a strong competitive economy and enable local businesses to prosper
- 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

Minor negative effects are identified in relation to:

- Objective 9: Increase availability of local produce and materials. Greenfield development leads to loss of agricultural land, therefore negative impact on this objective.
- Objective 12: Protect and enhance local distinctiveness. Both sites are sensitive in terms of landscape.
- 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.
- 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.

There are no uncertain impacts identified. Mitigation is put forward to address the negative effects identified as follows:

- Allotments should be provided for new residents.
- Policy KE3: Avoid development on the open valley of the River Avon to the north of the railway.

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.

Somer Valley policies

Proposed Changes 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.

Rural Area policies

Proposed Changes 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.

Changes in March 2013 introduced a strategic Green Belt release at Whitchurch. This has led to some changes to the results of the assessment. Before the addition of the Green Belt release at Whitchurch, 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 existed with regards to potential effects relating to landscape and visual, ecology and biodiversity and archaeology. This relates to the following SA Objectives:

- 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).

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 Belt release at Whitchurch. This is because the general location of the Green Belt release is sensitive in terms of landscape and heritage.

The strategy now performs slightly better in relation to Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure. This has changed from a neutral score before the addition of the Green Belt release at Whitchurch to a minor positive score. 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.

Minor negative effects are also now identified in relation to:

- 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.
- 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.

Additional mitigation is outlined as follows:

- Policy RA5: Allotments should be provided for new residents.
- Policy RA5: Connectivity to bus services should be given consideration.
- 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.

If these measures are taken on board in masterplanning the effect should be reduced to neutral.

Policy SD1 (new policy)

The model policy on the presumption in favour of sustainable development has been added to the Core Strategy via Proposed Changes in February 2013. The policy mainly has a neutral or positive performance with regards to the SA Objectives.

A number of potential major positive effects have been identified in relation to the following SA Objectives:

- Objective 3: Meet identified needs for sufficient, high quality and affordable housing
- 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; and
- Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change).
- A number of other potential minor positive effects have been identified in relation to the following SA Objectives:
- 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

No potential major negative effects have been identified

No potential cumulative effects have been identified.

No mitigation has been identified.

Enhancement is put forward to address the potential neutral effects identified, as follows:

- 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.

Core Policy CP4

Proposed Changes 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.

Core Policy CP6

Proposed Changes 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.

Core Policies CP9 and CP10

Proposed Changes 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:

“specific accommodation needs of older people will be addressed through the Placemaking Plan, including considering the allocation of appropriate sites.”

Core Policy CP11

Proposed Changes 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.