

**Bath and North East Somerset
Local Plan DPD**

Sustainability Appraisal Scoping Report

Date: April 2017

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Consultation

The scoping report has been submitted to the consultation bodies with environmental responsibilities. Consultation bodies are;

- Historic England
- Environment Agency
- Natural England

Other stakeholders likely to have an interest in the Sustainability Appraisal of the Development Plans are also consulted. These stakeholders include;

- Wessex Water
- Bath & North East Somerset Primary Care Trust
- Bath Chamber of Commerce
- Highways

Further and wider consultation with stakeholders will take place when the draft Sustainability Appraisal Report is made available with the draft Development Plan Documents.

The Council welcomes any general comments, also the Council is also interested if you have any information relating to baseline information about the District and would be grateful if this information could be supplied.

The Consultation will run for 5 weeks from Tuesday 21st April 2017 to 5pm on 25th May 2017
Please send or e-mail your responses to the address below.

Email: planning_policy@bathnes.gov.uk

Planning Policy, Planning Services, Bath & North East Somerset Council, Manvers Street,
Bath, BA1 1JG

If you have any questions or would like clarification on any aspect of the report, please contact Kaoru Jacques on 01225-477548 or e-mail: planning_policy@bathnes.gov.uk

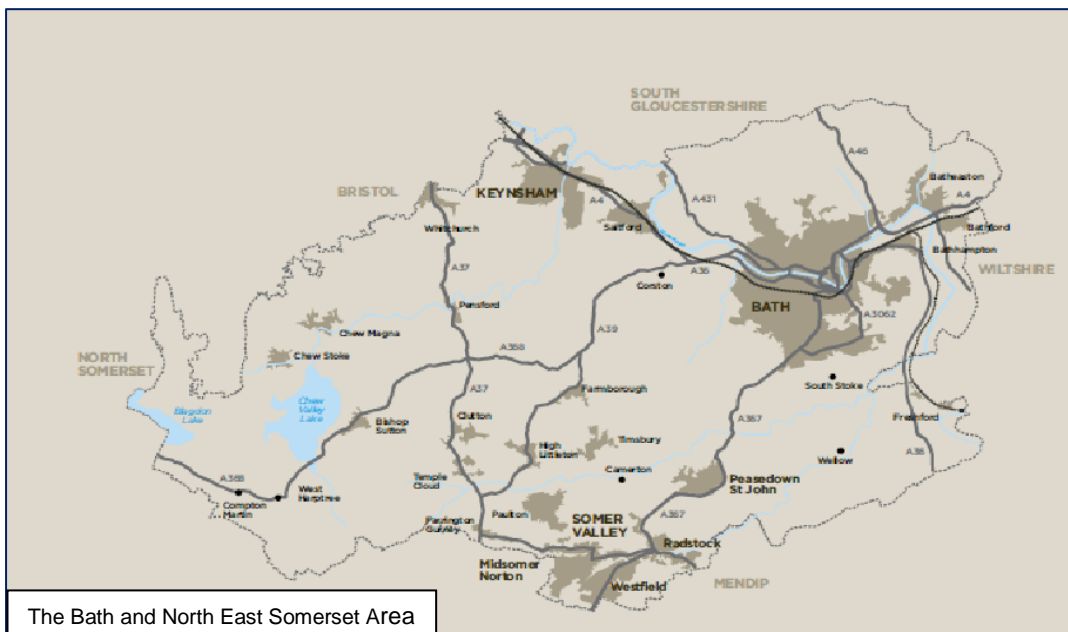
1.0. Introduction

Purpose of this report

- 1.1. The purpose of the Sustainability Appraisals (SA) is to ensure that environmental, social and economic considerations have been integrated into the preparation of the Development Plans. This Scoping Report sets out the SA framework which will be used to test the spatial objectives and options of the new Local Plan and help identify the most sustainable options available.
- 1.2. This report has been prepared for consultation on the scope and level of detail that should be included in the SA. This Scoping Report is the first stage of a SA and incorporates the requirements for a Strategic Environmental Assessment (SEA).

Background

- 1.3. Bath and North East Somerset Council (B&NES) is a richly varied District in the south west of England. It stretches from the edge of Bristol, south into the Mendip Hills and east to the southern Cotswold Hills and Wiltshire border. It covers a total area of 570 km² and is home to about 178,000 people.



- 1.4. Its main urban centre is the city of Bath complemented by a range of towns and villages. It contains a series of outstanding historical, cultural and environmental assets, with a tradition of innovation and enterprise.
- 1.5. The District forms part of the West of England sub-region which has a population of just over 1.1 million. With a working population of 510,000, the West of England has the second highest economic productivity outside of London
- 1.6. In addition to being part of the West of England sub-region the District has close functional and physical links with places within Wiltshire and Mendip. For example Bath acts as an employment and services and facilities centre for surrounding populations evidenced by journey to work patterns and public transport provision, the Somer Valley area transcends the administrative boundary between B&NES and Mendip and important Green Infrastructure corridors link B&NES and the neighbouring areas.

Bath

- 1.7. Bath's population is around 90,000, of which around 20% are students. Bath is well known as an international visitor destination, due to its cultural and built heritage, thermal springs and landscape – encapsulated in its inscription as a World Heritage site.
- 1.8. Bath is a key economic centre in the West of England and is also one of the most important places of learning in the South West. The city also serves as a regional shopping centre, characterized by independent and boutique shops.

Keynsham

- 1.9. Keynsham has retained its own identity and is surrounded by countryside which is protected by the Bristol/Bath Green Belt. The population is about 15,500 people with a high proportion of adults aged 65 and over. The town's dominant employer is the public sector. The town centre is characterized by local independent retailers, some large nationals, and charity shops.

The Somer Valley

- 1.10. The Somer Valley covers the urban areas of Midsomer Norton, Westfield and Radstock, together with a rural hinterland containing the principal villages of Peasedown St John and Paulton. The area houses around 25% of the population of Bath and North East Somerset and is located 12 miles south west of Bath and 16 miles south east of Bristol. Midsomer Norton, Westfield and Radstock together make up the second largest urban area in the District, with a combined population of about 21,000.
- 1.11. The Somer Valley was formerly part of the North Somerset coalfield and retains a rich industrial heritage. It has an engineering skills base and has been an important centre for the printing and packaging industry. However a number of recent factory closures have increased the already high level of out-commuting.

Rural Areas

- 1.12. Over 90% of the District is rural and it has 47 rural parishes. The Government's vision for the countryside is a living, working, protected and vibrant countryside.
- 1.13. The character of villages and landscape varies distinctly across the District, with almost a third of the District lying within the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty (AONBs).
- 1.14. The District's varied geology, topography and soils have given rise to a rich biodiversity, with some wildlife sites such as Chew Valley Lake being of international importance.

The policy context The Local Plan

- 1.15. The existing planning policy documents (Core Strategy and Placemaking Plan) within Bath & North East Somerset (B&NES) covers up to 2029. The Placemaking Plan allocates development sites in the context of the requirements established through the adopted Core Strategy and outlines an up to date set of detailed Development

Management policies. The Placemaking Plan was submitted for examination in April 2016; the hearings took place in September and October; and adoption is anticipated early in 2017.

- 1.16. The Core Strategy, adopted in July 2014, includes a commitment to an early review of the housing requirement. The review of the B&NES Core Strategy is being undertaken alongside the other authorities in the West of England through a new development plan document, the Joint Spatial Plan (JSP) which will cover all four UA areas (Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council). This will provide a new strategic planning context for B&NES to 2036.

- 1.17. The JSP will establish a new housing requirement for B&NES covering the period 2016 to 2036 and will identify the strategic locations. The production of the JSP requires work to progress in parallel on reviewing the Core Strategy, in order to ensure that an updated local policy context, including site allocations, is brought forward at the earliest possible opportunity to meet the new development needs to 2036. The new Local Plan will seek to deliver the vision and objectives of the JSP by identifying and allocating as appropriate any strategic sites required, as well as establishing a strategy for and allocating sites to provide non-strategic development.

2.0. Sustainability Appraisal Process and Methodology

- 2.1. Sustainability Appraisal (SA) is a requirement of the Planning and Compulsory Purchase Act 2004, with Strategic Environmental Assessment (SEA) deriving from the European Union Directive 2001/42/EC. It is common practice in the UK to combine the two processes into one, which is referred to as Sustainability Appraisal (SA). This process incorporates the requirements of the SEA Directive.
- 2.2. SA will be undertaken to inform all stages of the plan preparation together with an Appropriate Assessment (AA). The SA will be carried out in line with the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment Directive) and the UK Environmental Assessment of Plans and Programmes Regulations (2004).
- 2.3. This scoping report informs the SA process by outlining the scope of the assessment in terms of relevant plans, programmes and policies; key environmental, social and economic evidence base and sustainability issues. It will then set out the framework for undertaking the SA of the plan. This SA framework will be used to examine the sustainability impact of implementing the plan.
- 2.4. The purpose of the Sustainability Appraisal is to ensure that environmental, social and economic considerations have been integrated into the preparation of the plan. This scoping report sets out the SA framework which will be used to test the plan and will help to identify the most sustainable options available. SA is the systematic identification and appraisal of the potential sustainability impacts of a plan or programme before it is implemented. Although planning authorities aim to address these issues, it is easy to miss opportunities for better supporting social, economic and environmental objectives, and for reducing conflicts. SA offers a logical and robust way to check and improve plans as they are being developed. Ideally, as a result of the appraisal, conflicts with sustainability objectives will be removed, but this is not always possible. The conflicts and the decisions taken must be explained in the SA reports and as a result the public and other stakeholders will find it easier to understand the implications of the plan and the reasons for decisions made by the local planning authorities.

Sustainable Development and the National Planning Policy Framework

2.5. The national planning policy framework sets out the Government's view of what sustainable development in England means in practice for the planning system. It identifies three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of mutually dependent roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy

The Purpose of SA

2.6. SA involves the systematic identification and assessment of the potential sustainability impacts of plans and programmes. One of the aims of SA is to aid in the selection of plan options which are the most sustainable and to provide direction for individual policies and proposals within plans. The SA provides a clear audit trail of how a plan has been revised to take into account the results of the assessment.

2.7. In 2001, the European Union produced Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (The SEA Directive). The SEA Directive aims to increase the level of protection for the environment, integrate the consideration of the environment into the preparation and adoption of

plans and to promote sustainable development. The SEA Directive was transposed into UK law via the Environmental Assessment of Plans and Programmes Regulations (EAPP) (2004) and applies to a range of English plans and programmes.

- 2.8. Within England and Wales it is accepted practice to integrate the requirements of SA and SEA in to a single assessment process. The SA must however incorporate the requirements within the EAPP Regulations.
- 2.9. Part 3 of the EAPP Regulations includes the relevant requirements for the environmental assessment (regulation 12):

Stages in the SA Process

- 2.10. Table 2.1 sets out the different stages of the SA process. This report is the culmination of stage A, scoping.

Table 2.1: Stages in the SA process	
SA Stages	SA Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	A1: Identifying other relevant policies, plans and programmes, and environmental protection objectives
	A2: Collecting baseline information
	A3: Identifying sustainability issues and problems
	A4: Developing the SA objectives and framework
	A5: Consulting on the scope of the SA
Stage B: Developing and refining options and assessing effects	
Stage C: Preparing the SA reports	
Stage D: Consulting on the draft plans and the SA reports	
Stage E: Monitoring the significant effects of implementing the plans	

Review of other plans and programmes (Task A1)

- 2.11. The planning authority must take account of relationships between the plan and other policies, plans, programmes and sustainability objectives. The purpose of this review is to highlight the key influences on the plan and the SA.
- 2.12. Annex A records the detailed review of policies and plans undertaken for the SA. The main points highlighted in the review are described in chapter 3. This review is

based on the review that was undertaken for the Core Strategy and Placemaking Plan SA but has been updated to take into account new policies, plans and programmes. Annex A has been updated following the review of the SA Framework in January 2017.

Collecting baseline information (Task A2)

2.13. Baseline information establishes the current state of the area covered by the Local Plan and identifies the key environmental, social and economic trends likely to be affected by the plan. Together with the review of relevant policies, plans, programmes and sustainability objectives established in Section 4, the baseline presented in this Section provides the basis for identifying key sustainability issues and for predicting and monitoring the effects of implementing the plan.

2.14. Government guidance states that sufficient information about the current and future state of the area needs to be collected to allow effects to be adequately predicted, focusing on the characteristics of the area that relate to the issues to be tackled in the plan. Baseline data should address the following key questions:

- How good or bad is the current situation? Do trends show that it is getting better or worse?
- How far is the current situation from any established thresholds or targets?
- Are particularly sensitive or important elements of the receiving environment affected (e.g. people, resources, species, habitats)?
- Are the problems reversible or irreversible, permanent or temporary?
- How difficult would it be to offset or remedy any damages?
- Have there been significant cumulative or indirect effects over time? And
- Are there expected to be such effects in the future?

Identifying sustainability issues and problems (Task A3)

2.15. In order to assist the identification of key issues and use these to establish SA objectives, the policy reviews and the baseline information are grouped and presented under the following topics:

- Air quality and noise;

- Biodiversity, flora and fauna;
- Climate change;
- Cultural heritage, archaeology and landscape;
- Economic development;
- Housing
- Natural resources, water and soil;
- Safer and stronger communities;
- Transport
- Waste

2.16. This section also sets out clearly what the scope of the Local Plan has with relation to its influence over each issue and concludes with a list of key issues that should be addressed as part of the SA.

Developing the SA objectives and framework (Task A4)

2.17. SA is based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. The SA Framework – as the Guidance refers to it – consists of objectives and associated targets (where these exist) as well as indicators. It should be noted that the SA objectives are distinct from the Local Plan objectives though they may in some cases overlap with them. SA objectives should focus on outcomes (or ends), not on how the outcomes will be achieved (inputs or means), as Local Plan objectives will often tend to do.

2.18. The SA framework will be used to assess the relative performance of each option and objective of the plan using positive, negative or neutral symbols. Possible mitigation measures will be proposed accordingly.

Consulting on the scope of the SA (Task A5)

Details on the consultation process for this stage of the SA are provided in section 5.

SA of Reasonable Alternatives

- 2.19. Reasonable alternatives should be identified and considered at an early stage in the Local Plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach, as advised in paragraph 152 of the NPPF. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in each Local Plan document.
- 2.20. The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals.
- 2.21. The appraisal of alternatives at each stage will also involve considering ways of mitigating any adverse effects, maximising beneficial effects and ways of monitoring likely significant effects. For instance in the assessment of sites it will be possible to identify where policy criteria will be needed to ensure sites are delivered in a sustainable way e.g. landscaping requirements, addressing any flooding etc.
- 2.22. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach set out in the Draft Plan).
- 2.23. It is important that any alternatives presented for appraisal by the Local Plan makers are sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. Also, essential is the alternatives must be realistic and deliverable.
- 2.24. There are various types of alternatives that will need to be considered and this will be informed by the choices made when initiating work on the Local Plan.

Difficulties encountered

- 2.25. There are unavoidable differences in the extent of baseline information available for the different topic areas. This is due to the differences in scale and availability of data. In some cases information was only available at a regional / sub-regional level.

Information on past or predicted future trends is also not available across all topic areas.

3.0. Baseline- Air Quality and Noise

Introduction- Air Quality

- 3.1.1. Air quality is defined as the condition of the air with respect to the presence (or absence) of pollutants, including oxides of nitrogen (NO_x), carbon monoxide (CO), hydrocarbons, carbon dioxide (CO_2) and particulate matter. The presence of such pollutants in the air can have wide ranging consequences from an environmental and health perspective.
- 3.1.2. Air with a high concentration of pollutants can exacerbate respiratory conditions such as asthma and bronchitis. From an environmental point of view, pollutants such as NO_x , CO and CO_2 can have significant global warming potential. In sufficient concentrations, NO_x can also lead to deposition of nitrogen in sensitive habitats, contributing to eutrophication or otherwise degrading the habitat.

Context- International

- 3.1.3. The EU Air Quality Framework and Daughter Directives (2008) seeks to define and establish objectives for ambient air quality to avoid reduce or prevent harmful effects on human health and the environment as whole. The Framework contains legally binding limits for ambient concentrations of certain pollutants in the air. For NO_2 there are two limit values for the protection of human health. These require Member States to ensure that:
- (i) annual mean concentration levels of NO_2 do not exceed $40\mu\text{g}/\text{m}^3$; and
 - (ii) hourly mean concentration levels of NO_2 do not exceed $200\mu\text{g}/\text{m}^3$ more than 18 times a calendar year

National

- 3.1.4. The NPPF requires that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

- 3.1.5. The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment.

Local

- 3.1.6. Bath & North East Somerset Council has declared Air Quality Management Areas (AQMAs) in Bath, Keynsham and Saltford. The Air Quality Action Plan (2011) sets a target of 45% reduction for all emissions across the district by 2026.

Noise

- 3.1.7. Generally, noise can be defined as any unwanted sound. Noise can occur unexpectedly, or be too loud or repetitive. At certain decibels, it can be hazardous to health, with low frequency noise as damaging as loud noise. Noise is a major source of stress which can cause long term illnesses.

Context- International

- 3.1.8. The European Directive on the Noise 2002/49/EU (2002) has four main objectives:
- Monitor the environmental problem by drawing up strategic noise maps
 - Informing and consulting the public about noise exposure, its effects and the measures considered to address noise
 - Addressing local noise issues by requiring authorities to draw up action plans to reduce noise where necessary and maintain environmental noise where it is good
 - Developing a long term EU strategies

National

- 3.1.9. National Planning Policy Framework, paragraph 109 states that:” The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put

at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Local

- 3.1.10. Placemaking Plan policies D.6, PCS2 and PCS3 would apply to any development and would ensure that noise issues are considered.

Baseline review

- Poor air quality can have serious impact on people's health, as well as on habitats and species. In particular elevated levels of nitrogen dioxide (NO₂) can lead to respiratory diseases and can be particularly harmful to vulnerable groups such as the very old or young. Air Quality in Bath City Centre has been poor mainly due to emissions from vehicular traffic. In conjunction with this, the city's topography restricts dispersion and results in higher pollutant concentrations
- There are three AQMAs identified in the district, all related to exceedance of NO₂. These are:
 - Bath Air Quality Management Area
 - Keynsham Air Quality Management Area
 - Salford Air Quality Management
- In these areas further action is needed to ensure air quality in the district is constantly improving. Such measures include reducing idling engines; promoting non-car transport; and controlling the air quality impact from new developments.
- particulate matter is also a concern for health (although we do meet the standards)
- There are data gaps in relation to noise data

Recent changes and trends

- Monitoring results of NO₂ in 2015 were on average slightly lower than in 2014.

Key issues

- The Air Quality Action Plan (2011) sets a target of 45% reduction for all emissions across the district by 2026.
- There are three AQMA identified in the plan area. The need to avoid further deterioration in these areas is an essential consideration for new development, with the particular importance of considering cumulative effects.
- The Local Plan should help to address air and noise pollution issues through sensitive site selection and good site design to ensure problems do not get worse. The plan should also make efforts to try to reduce car traffic and encourage sustainable transport where possible.
- There remain data gaps in relation to noise data
- There is the potential for adverse impacts on wellbeing if inappropriate new development is located near a major source of noise, for example new roads.

Scope of the New Local Plan

- 3.1.11. It is important to consider the influence that the Local Plan DPD can have on the issues. The Local Plan DPD can influence air quality and noise in the following way:

Sensitive location of development sites in order to:

- Avoid noisy areas or areas of poor air quality.
- Avoid locating development in noise sensitive areas.
- Minimise dependence on cars and reduce congestion.
- Maximise access by sustainable transport means.

Appropriate development management policies in order to:

- Encourage good design of sites to reduce noise impacts
- Provide on-site services and access to public transport where appropriate

- 3.1.12. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan.

Baseline	SA Objective
Air Quality	<ul style="list-style-type: none"><li data-bbox="587 309 1302 405">• Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking<li data-bbox="587 412 1262 472">• Objective 9: Reduce land, water, air, light, noise pollution
Noise	<ul style="list-style-type: none"><li data-bbox="587 483 1262 544">• Objective 9: Reduce land, water, air, light, noise pollution

Fig 3.1.2: Map to show the Bath Air Quality Management Area 2013

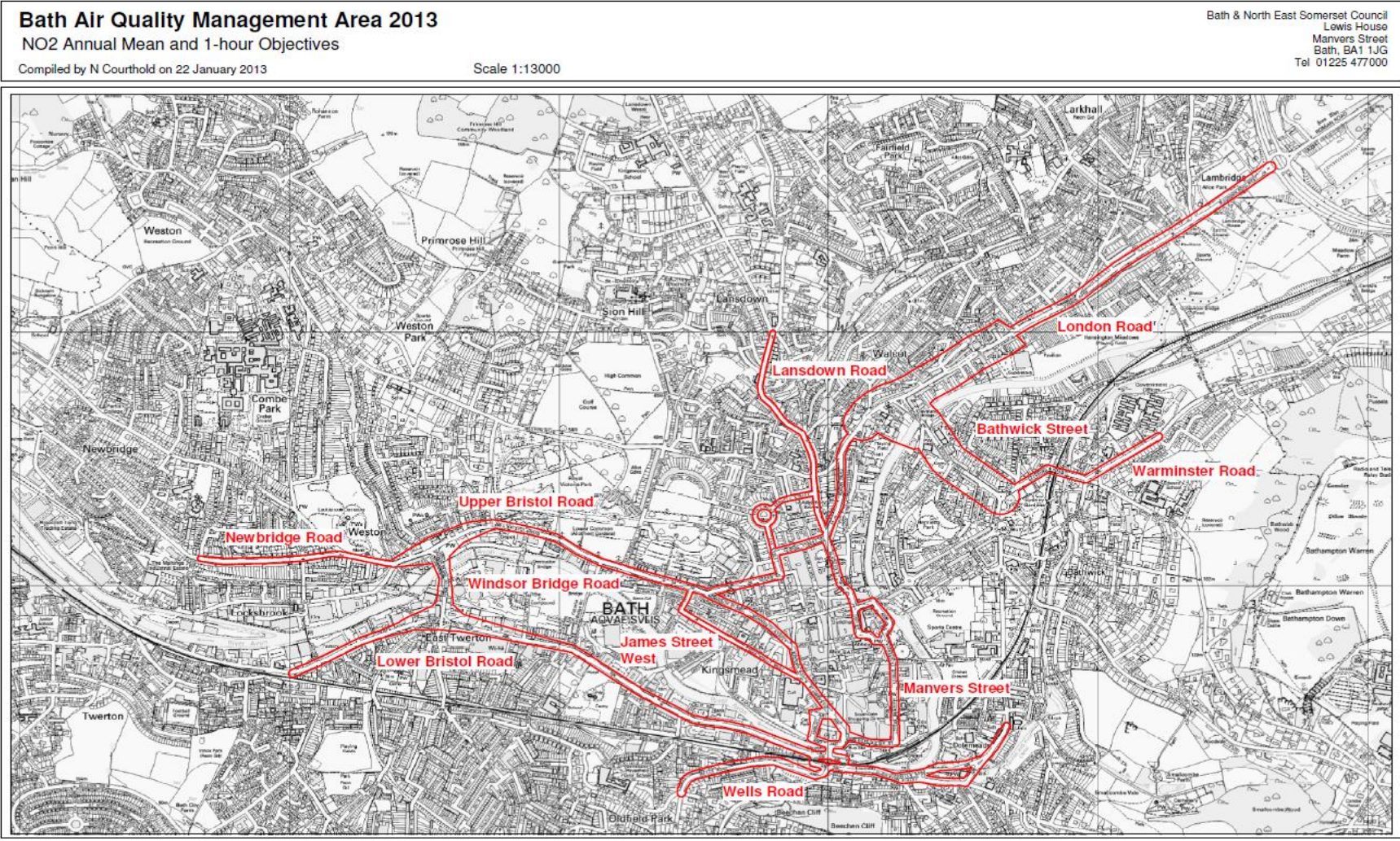


Fig 3.1.3: Map to show the Keynsham Air Quality Management Area 2010

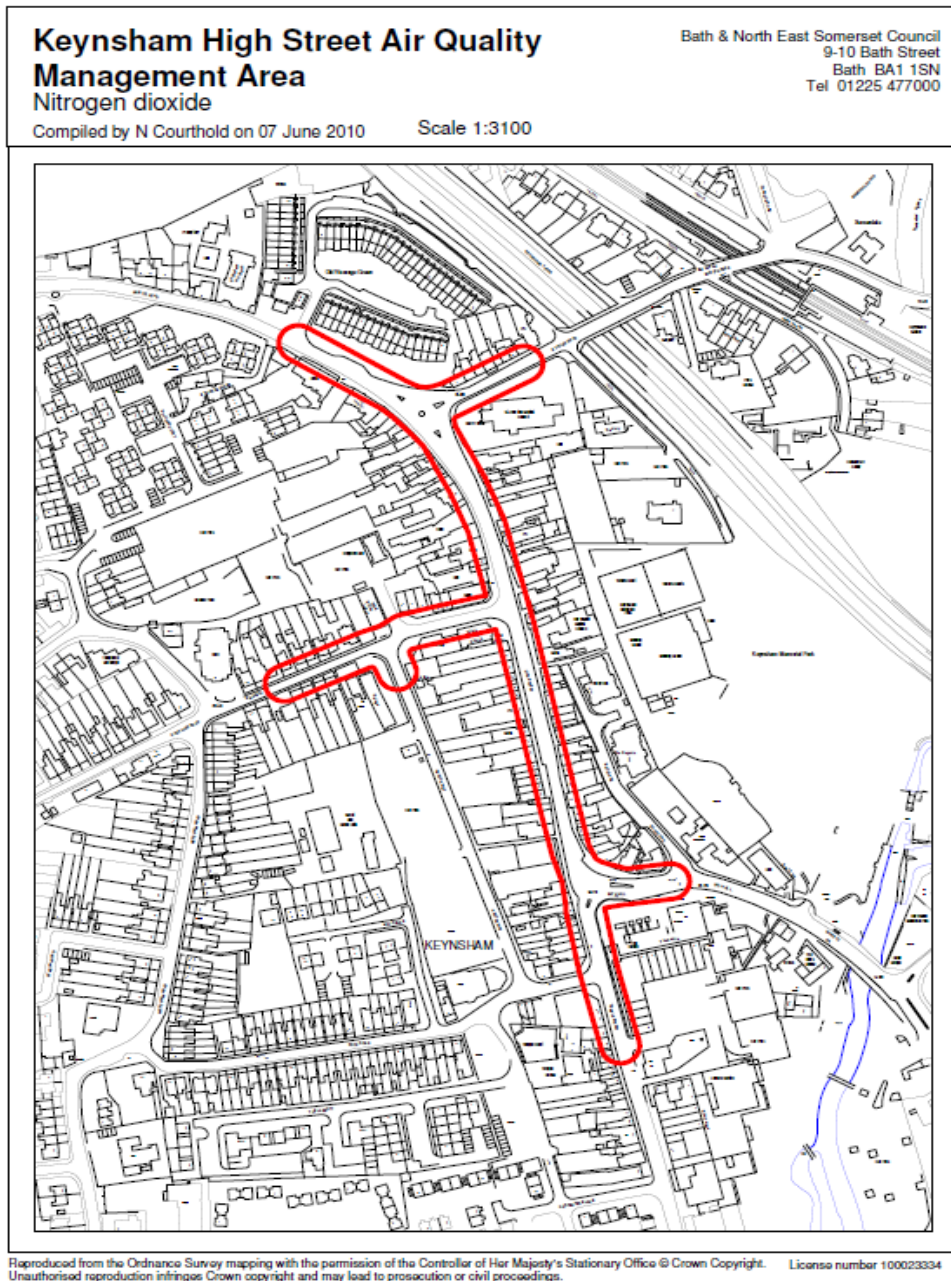
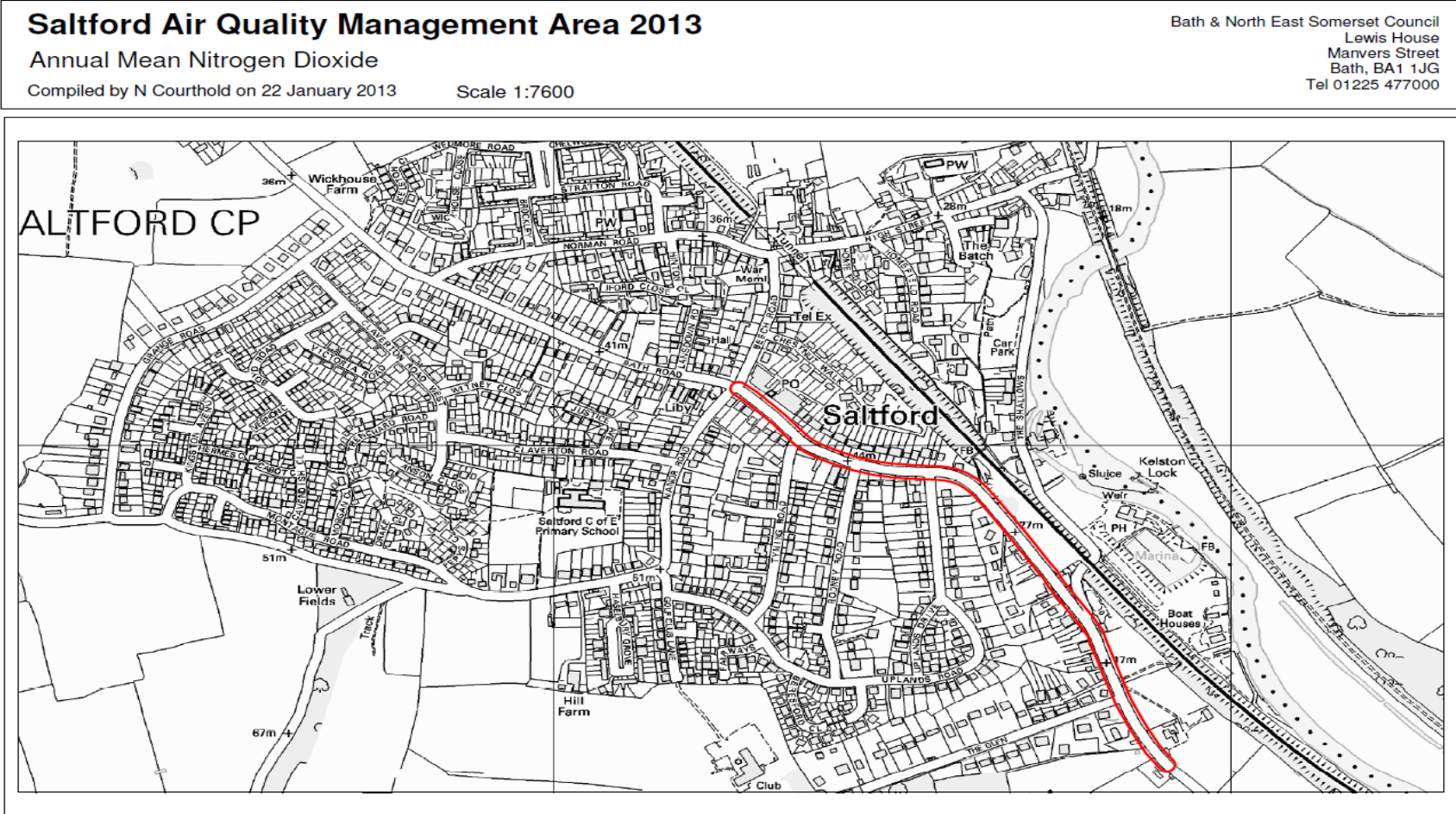


Fig 3.1.4. Map to show the Salford Air Quality Management Area 2013



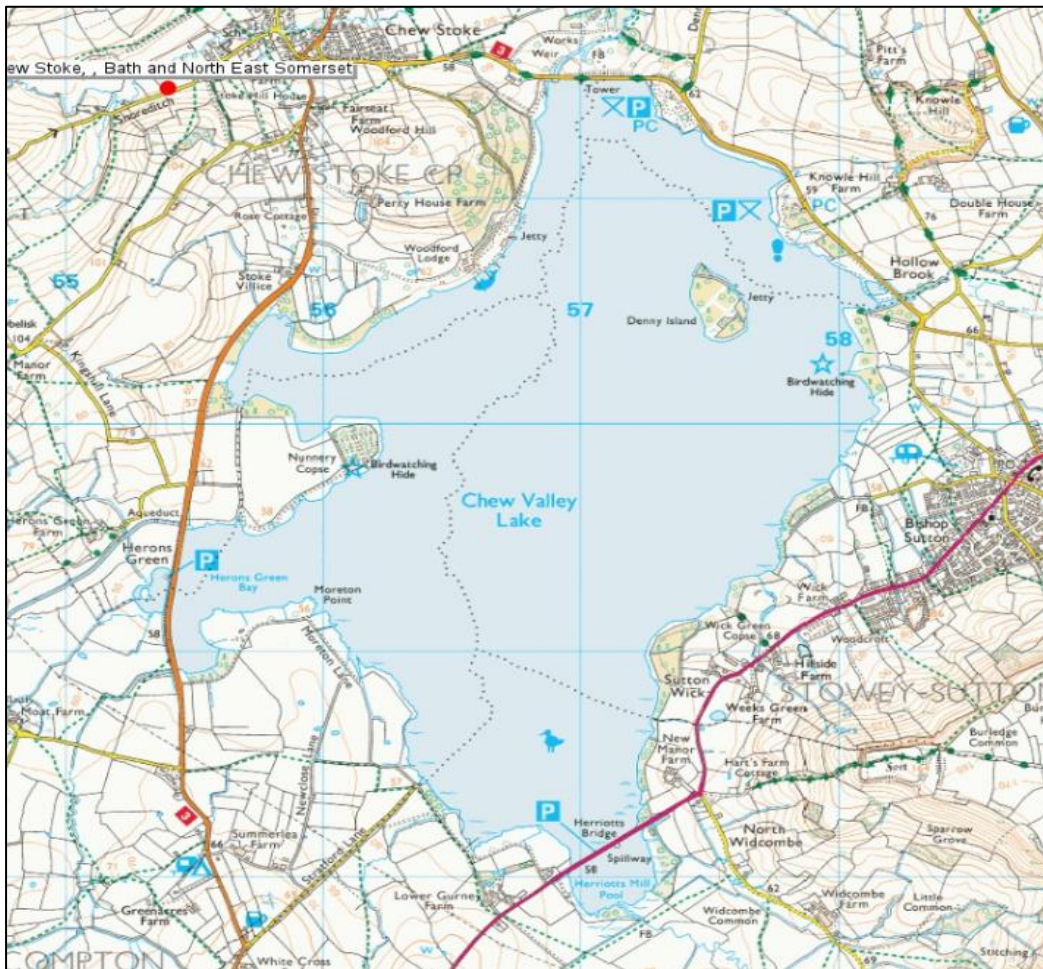
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3.2. Biodiversity, Flora and Fauna

Introduction

- 3.2.1 B&NES is notable for its ancient woodlands and networks of ancient hedgerows. It hosts nationally important calcareous and neutral grasslands, and supports horseshoe bat populations of international importance. The main rivers support otters, kingfishers and some important migratory fish. The post-industrial landscape support rich mosaics of habitat supporting notable botanical and invertebrate interests. Areas of farmland and domestic gardens support important bird life.
- 3.2.2 B&NES includes the Chew Valley Lake which is designated as a SSSI, a Special Protection Area, and is one of Britain's most important sites for wintering wildfowl including the Shoveler (*Anas clypeata*).



3.2.3 Further, B&NES supports a number of European Protected Species and locally important priority species* including:

- All bat species
- Bath Asparagus-*Ornithogalum pyrenaicum*
- Bee-fly *Villa-cingulata (Meigen)*
- Blue Carpenter Bee-*Xylocopa Caerulea*
- Chalk Hill Blue butterfly-*Polyommatus coridon*
- Dormouse-*Muscardinus avellanarius*
- Great Crested Newt-*Triturus cristatus*
- Red Hemp-nettle-*Galeopsis angustifolia*
- Skylark-*Alauda arvensis*
- Water Vole-*Arvicola amphibius*
- White-clawed Crayfish-*Austropotamobius pallipes*

*Please note that this is not an exhaustive list

3.2.4 In addition to the Chew Valley Lake SPA, there are two Special Areas of Conservation (SAC), the Combe Down and Bathampton Mines SAC and Brown's Folly.



The Bathampton Mines and Combe Down SAC (left on map) and Browns Folly (right on map)

3.2.5 There are also 24 Sites of Special Scientific Interest (SSSI) and several strategic nature areas in B&NES including large woodland areas north and south of Bath (particularly around Combe Down and Dunkerton) and large areas of neutral grassland in the Chew Valley area.

Context-International

3.2.6 European Union Habitats Directive (92/43/EEC) requires Member States to create an ecological network to protect threatened habitats and species. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) form part of this network.

3.2.7 The European Commission Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment (2013) suggests that an SEA should focus on ensuring ‘*no-net-loss of biodiversity*’ before considering mitigation and compensation. The assessment should also take account of ‘ecosystem services’ and the links between natural environment and economy.

3.2.8 The EU Directive which was adopted in 1992 aims to “*contribute towards ensuring biodiversity through the conservation of natural habitats and of wild faunal and fauna in the European territory of member states to which the Treaty applies*”. It was implemented into UK law by the Conservation of Habitats and Species Regulations 2010.

National

3.2.9 The Natural Environment White Paper (2012) states that there is a need to halt the overall decline in biodiversity and the degradation of ecosystem services; and restore them in so far as feasible and seek to deliver net gains in biodiversity where possible.

3.2.10 Biodiversity 2020 is the Government’s Strategy for England’s wildlife and ecosystem services. It encapsulates the aims of the EU Biodiversity Strategy and seeks to achieve the following outcomes by 2020:

- More, bigger and less fragmented areas for wildlife. No net loss of priority habitat and a net increase in priority habitats
- Restoring at least 15% of degraded ecosystems as a contribution to climate change mitigation and adaptation

- An overall improvement in the status of species and prevention of further human-induced extinctions
- Improved engagement in biodiversity issues

3.2.11 NPPF, paragraph 109 recognises the need for planning to “*contribute to and enhance the natural and local environment*”. The NPPF sets out the requirement for minimising the impact on, enhancing and reversing the decline in biodiversity, in line with the Government’s target. Ecological networks are identified as measures enhance the resilience and ecosystem services to recognise the value of biodiversity.

Local

3.2.12 The Local Biodiversity Action Plan for B&NES has seven key themes and various targets were set for each theme:

- Species and Habitats
- Monitoring Change
- Council Owned Land
- Tracking Wildlife
- Communication
- Farming
- Education

3.2.13 The B&NES Green Infrastructure Strategy (2014) provides a framework to work with partners and the community to make the most of the benefits that the natural environment can and should be providing for people, places and nature within and beyond the district.

Baseline review

- There are a number of designated sites in the area including a SPA: Chew Valley Lake; SAC: Combe Down and Bathampton Mines forming part of the ‘Bath & Bradford-on-Avon Bats SAC’ and SAC: Compton Martin Ochre Mine which is a component site of the North Somerset and Mendip Bats SAC.
- There are also 24 SSSIs and the majority of them are in mainly favourable condition. There are several strategic nature areas in B&NES including large

woodland areas north and south of Bath (particularly around Combe Down and Dunkerton) and large areas of neutral grassland in the Chew Valley area.

- The Forest of Avon is one of 12 Community Forests in England. In B&NES the boundary was extended in 2006 to include the whole of the District except for those parts designated as Mendip Hills and Cotswolds AONBs.
- There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends.

Recent changes and trends

- The NATURA 2000 Standard Data Forms were updated in 2015; the information for the Chew Valley Lake Special Protection Area was updated.
- The Avon River Bat Project (2016) has produced detailed night time surveys to study the pattern of Bat activity up and down Bath River Avon. The report indicates what numbers of bats are present.
- Trend data does still not appear to be available in relation to priority species and habitats.

Key Issues

- There are a number of designated sites in the area including the Chew Valley Lake SPA, SAC: Combe Down and Bathampton Mines forming part of the 'Bath & Bradford-on-Avon Bats SAC' and SAC: Compton Martin Ochre Mine which is a component site of the North Somerset and Mendip Bats SAC.
- There are also 24 SSSIs and the majority of them are in mainly favourable condition. There are several strategic nature areas in B&NES including large woodland areas north and south of Bath (particularly around Combe Down and Dunkerton) and large areas of neutral grassland in the Chew Valley area.
- The Forest of Avon is one of 12 Community Forests in England. In B&NES the boundary was extended in 2006 to include the whole of the District except for those parts designated as Mendip Hills and Cotswolds AONBs.
- There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends.
- External lighting of buildings and the impact on light sensitive species including bats needs to be reflected in local policy

- Policies should promote the maintenance and increase of populations of key species in the South West in line with UK Species Action Plan targets.
- B&NES is a district rich in biodiversity with a range of sites designated internationally as well as locally for their ecological value. These require protection.
- There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends and therefore a precautionary approach must be taken to development.
- Although there are notable internationally important sites in the district which demand considerable regard in terms of planning, the success of habitats and species depends upon an ecosystem approach. Therefore the value of habitats not designated and habitat networks needs consideration and protection. This is particularly pertinent in the light of climate change.

Scope of the New Local Plan

3.2.14 The plan should help to address biodiversity issues through sensitive site selection to reduce impacts on habitats and species and through encouraging biodiversity on site.

Sensitive location of development sites in order to:

- Avoid impacts on habitats, species and sites, especially those designated; irreplaceable habitats and priority habitats and species; greenspace networks and habitat connectivity, including river and stream corridors by employing the avoidance-mitigate-compensate hierarchy.

Appropriate development management policies in order to:

- Encourage biodiversity on site

3.2.15 These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> • Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change).

3.3. Climate Change

Introduction

- 3.3.1 There is a need to tackle the causes and effects of climate change through lower carbon lifestyles; limiting our use of increasingly scarce resources; reducing our dependency on fossil fuels especially in light of 'peak oil' concerns; making sure that our area is resilient to climate change, particularly the potential for flooding. The District will need to adopt environmentally friendly practices such as making buildings more energy efficient, increase the use of renewable energy, reduce car use and grow more local food.
- 3.3.2 The UK government is committed to tackling the causes and effects of climate change, setting challenging targets to reduce the production of the polluting gases that cause the problem. The main gas is carbon dioxide, which is released from the burning of various fossil fuels to create energy.
- 3.3.3 The nature of climate change will vary at a regional level. In the UK projections of future climate change indicate that more frequent short-duration, high-intensity rainfall and more frequent periods of long-duration rainfall of the type responsible for the 2000 floods could be expected. These changes will have implications for surface water flooding.
- 3.3.4 To help organisations (including local authorities and regional planning bodies) to assess their vulnerability to climate change and plan appropriate adaptation strategies, the Government established the UK Climate Impacts Programme (UKCIP).
- 3.3.5 Recommended precautionary sensitivity ranges for climate change are provided in the Defra document 'FCDPAG3 Economic Appraisal Supplementary Note to Operating Authorities – Climate Change Impacts'. Global sea level will continue to rise, depending on greenhouse gas emissions and the sensitivity of the climate system.
- 3.3.6 The suggestion is that winters will become wetter over the whole of the UK, by as much as 20% in the 2050s. A shift in the seasonal pattern of rainfall is also expected, with summer and autumn becoming much drier than at present. Snowfall amounts

will decrease significantly throughout the UK, but the number of rain-days and the average intensity of rainfall are expected to increase.

- 3.3.7 The UK's targets are to reduce the production of these gases by 34% by 2020 and by 80% by 2050.

Context-National

- 3.3.8 The NPPF seeks to secure “*radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change*”. To support a move to a low carbon future, local authorities are required to plan for new development in locations and ways which reduce greenhouse gas emissions. Further, to facilitate the increase and use and supply of renewable and low carbon energy, the Government requires all communities to contribute to energy generation from renewable or low carbon sources.

Local

- 3.3.9 Bath & North East Somerset Council has made a commitment to providing the leadership to help our communities to reduce carbon emissions across the area by 45% by 2026, in line with the national targets.
- 3.3.10 B&NES will plan to reduce carbon emissions and adapt to climate change and will be more efficient and resilient and will be better placed to tackle other social and economic problems such as traffic congestion, community health and well-being and fuel poverty.
- 3.3.11 The B&NES the Environmental Sustainability & Climate Change Strategy (2016-2020) sets out how ‘Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of well-being, where everyone is invited to think big – a ‘connected’ area ready to create an extraordinary legacy for future generations.’

3.3.12 The B&NES Food Strategy 2014-2017 seeks to reduce the local environmental impacts of food production and supply including its contribution to climate change, increase food security and support a strong and prosperous food economy.

Baseline review

- 17.3% of B&NES households are living in fuel poverty; cold homes cost the local NHS an estimated £3.8m every year
- £153million spent on energy per year, by residents and businesses, which leaves the local economy
- Domestic food expenditure in Bath and North East Somerset is around £382m/yr. More of this could be retained in the local economy
- The UK imports 46% of its food and 77% of fruit and vegetables, potentially leaving us vulnerable to disruptions in global food supply
- Expenditure on local food generates an economic return of £3 for every £1 spent for the local economy

Recent changes and trends

- B&NES potential for renewable energy generation by 2026:
 - 165MW of renewable heat
 - 110 megawatts (MW) of installed renewable electricity capacity
- Since 2014 until 2016 there have been 102 homes in B&NES retrofitted for energy efficient measures
- Inspired by the Civic Centre's standards, Avon Fire and Rescue have built a new fire station in Keynsham to high energy performance standards
- Improvements to walking and cycling routes have been made across the District, for example: the 12.5 mile Two Tunnels shared path from Radstock to Bath; and improved walking and bike access to Bath Spa University
- B&NES were the first council in the country to switch to LED street-lighting on main highways – 4000 street lights now converted – saving £200k each year on the electricity bill, £50k a year on the maintenance bill and reducing Council carbon emissions by 3%
- The wider Water Space Study looking at the River Avon and Kennet and Avon Canal corridor will take into account environmental sustainability issues, such as

biodiversity, energy generation opportunities and flood defences alongside the drive for regeneration and growth

Key issues

- Carbon emissions have been in decline in B&NES but are still higher than target.
- The plan should help to address climate and energy issues through requiring consideration of energy efficiency and use of low carbon technologies and measures to improve adaptation to future climate change
- The plan could require the provision of electric car charging points
- The plan could improve resilience to a future climate of increased extremes of heat, cold and rainfall, e.g. passive cooling measures such as deciduous trees and blue infrastructure to adapt to hotter summers
- The establishment and growth of the environmental & low carbon business sector as a business sector in its own right which can in turn help to facilitate:
 - The opportunity to encourage businesses and business supply chains to adopt efficiency measures which will use fewer resources and boost profits through associated cost savings
 - The opportunity to encourage businesses to explore their exposure and risk to problems associated with climate change, and to undertake appropriate mitigation and adaptation. It is important to consider the influence that the Local Plan DPD can have on the issues.

Scope of the New Local Plan

3.3.13 The Local Plan DPD can influence climate change and energy in the following way:

Appropriate development management policies in order to:

- Improve energy efficiency and use of low carbon technologies
- Encourage sustainable construction
- Encourage use of renewable energy
- Encourage the transition to a smart low carbon energy system (e.g. electric cars, power storage)
- Improve adaptation to future climate change
- Protect allotments and encourage local food production

3.3.14 These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Climate change	<ul style="list-style-type: none"> • Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking • Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change) • Objective 11 Increase resilience to climate change

3.4. Heritage, Archaeology and Landscape

Introduction

- 3.4.1. Bath is a UNESCO World Heritage Site due to its '*outstanding universal value*'. Bath was designated because of its Roman remains, 18th century architecture and town planning, social setting, hot springs and landscape setting.
- 3.4.2. Across the district there are:
- Over 6,000 Listed Buildings, including 663 Grade I and 212 Grade II* Listed Buildings
 - 35 Conservation areas
 - 59 Scheduled Ancient Monuments
 - Over 4,000 archaeological sites on the Historic Environment Record
 - 16 registered parks and gardens have been designated
 - 71 Avon Gardens Trust locally designated parks and gardens
 - In Keynsham, partial remains of the Roman town of TRAIECTVS (Trajectus) have been discovered

Context-International

- 3.4.3. UNESCO World Heritage Convention 1972 states that are parties to the Convention agree to not only identify, protect, conserve, and present World Heritage properties, but also to protect its national heritage. They are encouraged to integrate the protection of the cultural and natural heritage into regional planning programmes, set up staff and services at their sites, undertake scientific and technical conservation research and adopt measures which give this heritage a function in the day-to-day life of the community.
- 3.4.4. The Convention on the Protection of Archaeological Heritage contains provisions for the identification and protection of archaeological heritage. Its objectives include the integration of the conservation and archaeological investigation of archaeological heritage in urban and regional planning policies; and the dissemination of information.

National

- 3.4.5. The National Planning Policy Framework (NPPF), Section 12 sets out the measures for ‘*Conserving and Enhancing the Historic Environment*’.
- 3.4.6. The NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

Local

- 3.4.7. The aims of the City of Bath World Heritage Site Management Plan (2016-2022) are to:
- I. promote sustainable management of the Site
 - II. ensure that the Outstanding Universal Value of the Site and its setting is understood, protected and sustained
 - III. maintain and promote Bath as a living and working city which benefits from World Heritage Site status;
 - IV. improve physical access and interpretation encouraging all people to enjoy and understand the Site;
 - V. improve public awareness of, and interest and involvement in, Bath’s heritage, achieving a common local, national and international ownership of the Site’s management.

Landscape

- 3.4.8. Bath & North East Somerset has a rich and diverse range of landscapes. Some landscapes in the District, like the Cotswolds and Mendip Hills, are recognised as being of national importance and are granted the status of Areas of Outstanding Natural Beauty (AONB).
- 3.4.9. The City of Bath World Heritage Setting recognises the importance of the distinctive landscape setting of Bath in a bowl formed by the River Avon valley as it cuts through the Cotswolds.

- 3.4.10. Each landscape is closely related to the evolution of agriculture, communications, industry and settlement. Although some landscapes are defined by physical appearance and activities occurring within them, others are valued for their levels of tranquillity. All are living working landscapes and as such they change and develop according to the demands placed upon them.

Context- International

- 3.4.11. The European Landscape Convention (ELC) (2000) promotes the planning, management and protection of landscapes, and is the first international convention with a specific focus on landscape.
- 3.4.12. The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe.

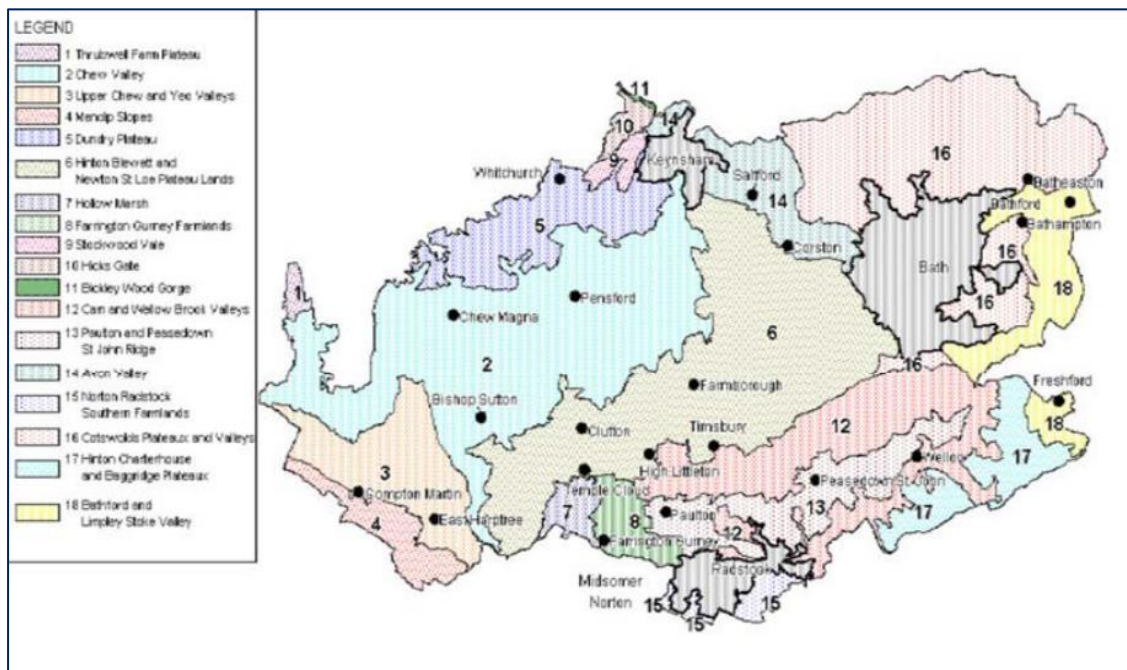
National

- 3.4.13. The NPPF aims to protect and enhance valued landscapes, stating that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- 3.4.14. The Government's Statement on the Historic Environment for England (2010) sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Local

- 3.4.15. The NPPF aims to protect and enhance valued landscapes, stating that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

- 3.4.16. The district has a varied landscape represented by 18 Landscape Character Areas.



- 3.4.17. B&NES Green Space Strategy develops local standards for the quantity, distribution and quality of green space along with a comprehensive action plan to address all of the major issues that arose during the strategy development process.

Baseline review

- Bath was designated as a World Heritage site in 1987
- There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&NES (of which 5,000 lie within the City of Bath)
- There are 3 conservation areas, 8 Scheduled Monuments, grade I / II* listed buildings entries on the national heritage at risk register
- Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views
- The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas

- 59 Scheduled Ancient Monuments
- More than 4,000 archaeological sites on the Historic Environment Record
- Approximately 61% of the district is within the Green Belt
- There are 18 landscape character areas
- There are two Areas of Outstanding Natural Beauty (AONB), the Mendip Hills and Cotswolds AONBs
- There are two significant waterways, the River Avon and the Kennet and Avon Canal
- The Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses
- The Chew Valley Lake is an important landscape feature and wildlife habitat within the Mendip Hills AONB

Recent changes and trends

- In accordance with the latest guidance from Historic England, every conservation area in the district will have a 'Conservation Area Appraisal'. In 2016, the Keynsham Conservation Area Appraisal was completed. Further appraisals are being drafted
- The landscape designations and the general landscape and townscape character of the District have not changed although there are still threats to the character of the District for example, from development
- There are currently 4 conservation areas listed on the Heritage at Risk Register 2016, this has fallen from 10 in 2012
- There are now 8 Scheduled Ancient Monuments listed on the Heritage at Risk Register 2016, this has increased by 2 from 2012
- There are 4 grade I and Grade II* listed building entries on the national heritage at risk register
- There is a growing national interest in twentieth-century heritage and English Heritage outlined the need to assess and value the more recent past in the May-September 2011 Progress Report for the 2011-2015 National Heritage Protection Plan (published October 2011). Measure 4 (out of 8 progress measures) was 'Assessment of Character and Significance', and includes emphasis on the need to assess our twentieth-century heritage

Key issues

- The Local Plan must recognise that heritage assets are an irreplaceable resource and need to be conserved in a manner appropriate to their significance. There are threats to the character of the District from the cumulative impact of development proposals and associated infrastructure requirements
- Ensure development in or adjacent to conservation areas or listed buildings (and their settings) respects the character and context and enhances the quality of the built environment
- The district has a varied landscape and development should respect its landscape setting and make a positive contribution to the relationship of rural and urban areas
- The landscape setting of the City of Bath, including landscape views, is also an important characteristic that requires protection

Scope of the New Local Plan

- 3.4.18. The Local Plan DPD can influence climate change and energy in the following way:

Sensitive location of development sites in order to:

- Reduce impacts on the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, registered Historic Parks and gardens, registered battlefields, listed buildings and conservation areas or their settings
- Avoid harmful impacts on protected landscapes (Cotswolds and Mendip Hills AONBs) by employing the avoidance-mitigate-compensate hierarchy
- Reduce impacts on the quality, character and local distinctiveness of the landscape and townscape, and the features within it

Appropriate development management policies in order to:

- Encourage design that ensures new development fits with the surrounding landscape, townscape and heritage

3.2.16 These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Heritage, Archaeology and Landscape	<ul style="list-style-type: none"><li data-bbox="587 436 1347 499">• Objective 6: Protect and enhance local environmental distinctiveness<li data-bbox="587 504 1347 566">• Objective 7: Protect and enhance the district's historic, environmental and cultural assets

3.5. Economic Development

Introduction

3.5.1 The economy has the potential to deliver an improvement to living standards and social well-being through more employment opportunities, and will contribute to improved services to all communities.

National

3.5.2 The importance of the economy in achieving sustainable development is one of the three golden threads running throughout the National Planning Policy Framework (NPPF). Paragraph 7 states the economic role of the planning system is:

“Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”

3.5.3 The NPPF sets out that that the planning system should contribute towards ‘*building a strong, competitive economy*’. This includes setting criteria for the delivery of strategic employment sites and support of existing business sectors (paragraph 21 of the NPPF).

3.5.4 Additionally the NPPF, paragraph 23 states that town centres should be promoted to provide a diverse retail offer and should be the focus of retail activity and office development should also be focused in town centres.

3.5.5 With regards to the rural areas the NPPF is clear that Local Plans should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

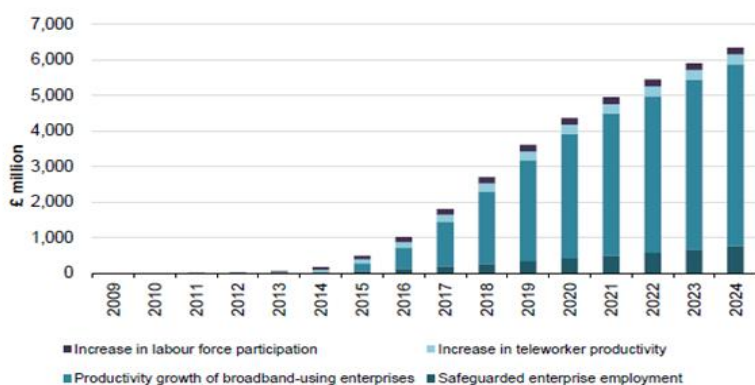
- support the sustainable growth and expansion of all types of business and enterprise in rural areas
- promote the development and diversification of agricultural and other land-based rural businesses;

- support sustainable rural tourism and leisure developments that benefit businesses in rural areas
- promote the retention and development of local services and community facilities in villages

3.5.6 The UK Broadband Impacts Study (2013) addresses what economic, social and environmental impacts could be improved as a result of substantial public funds going into upgrading the UK's broadband infrastructure. These impacts could include:

- approximately £20 in net economic impact for every £1 of public investment
- total net employment impacts from faster broadband to rise to about 56,000 jobs at the UK level by 2024, with about 20,000 jobs are attributable to the publicly funded intervention
- A material impact on reducing the digital divide for both households and businesses;
- 60 million hours of leisure time through teleworking facilitated by faster broadband per annum in the UK with total household savings rising to £270 million p.a. by 2024 by avoiding commuting costs (£45 million of which are attributable to intervention); and
- 1.6 million tonnes of carbon dioxide equivalent (CO₂e) savings per annum, by 2024, through reduction in predominant car usage due to increased telework, video and online collaboration tools, and more energy efficient public cloud platform data storage

Total net annual GVA impact attributable to intervention – by type of impact (£ million, 2013 prices)



Source: UK Broadband Impact Model, SQW 2013

Local

- 3.5.7 Economic activity is centred around Bath, Keynsham and the Somer Valley (particularly Midsomer Norton, Radstock, and the village of Paulton and Peasedown St John), but villages in the more rural areas (for example, the Chew Valley) also contribute to our overall economic output.
- 3.5.8 The Bath and North East Somerset economy has a predominance of employment in education, health, , retail and tourism. With education providing over 13% of employment.¹
- 3.5.9 There has been a rebalancing in the composition of the economy in B&NES, with the traditional employment sectors of printing and manufacturing experiencing job losses and being replaced with employment in office based sectors such as ICT, business administration and professional scientific and technical services.
- 3.5.10 There were 114,6222 people of working age resident in B&NES according to the 2011 Census. . Most recent mid-year population estimates suggests the working age population has risen from 113,900 in 2011 to 119,000 in 2015 an increase of 4.5%.² with an economic activity rate of 78.5% This is lower than the regional rate 80.8% and higher than the national average (77.8%).
- 3.5.11 The total benefit claimant count remains below both national and regional levels at 6.7% of the total working age population.³ Conversely B&NES experiences relatively high levels of economic inactivity at 21.5% which is lower than the national average (22.2%) but higher than the South West total of 19.2%. The level of economic inactivity can be explained by the high numbers of students in B&NES. Students now represent 42% of all those who are economically inactive in B&NES (over 10,000 economically inactive students).⁴

¹ NOMIS BRES 2015

² NOMIS Annual Population Estimates.

³ NOMIS DWP Benefit Claimants

⁴ NOMIS Annual Population Survey

3.5.12 As of 2015, 37.8% of employee jobs in B&NES were part-time compared to 34.1% regionally and 30.9% nationally. The proportion of economically active persons who are self-employed was 12.9% from Oct 2015 to September 2016. This is higher than the South West rate of 11.9% and the national rate of 10%.

3.5.13 Job density represents the ratio of total jobs to the working age population and includes employees, self-employed, government-supported trainees and HM forces. A job density of 1.0 would mean that there is one job for every resident aged 16-64. The job density in B&NES is 0.85, lower than the south west figure of 0.86 and higher than the national figure of 0.83.

3.5.14 The workforce in B&NES is generally highly educated with 47.8% educated to NVQ4 level or above, compared to 37% regionally and nationally, there is also a low level of working age persons with no qualifications at all (2.5% locally compared to 5.5% in the South West and 8.6% nationally).⁵

3.5.15 The Economic Strategy for Bath and North East Somerset 2010-2026 sets out the objectives for how the economy of B&NES will look in 2026:

- A more environmentally sustainable economy with increased local employment, less overall commuting and a reduction in the contribution made by commerce and industry to the carbon footprint of the area, and a strong low carbon business sector
- A socially inclusive economy with continuing high levels of economic participation, a focus on lifelong learning, and increased and relevant work force skills
- An economy which is more diverse, productive and resilient thanks to an increase in the availability of knowledge-based jobs
- A place where knowledge-based workers (including graduates) can find jobs and where the innovation being developed at our leading education establishments can grow commercially

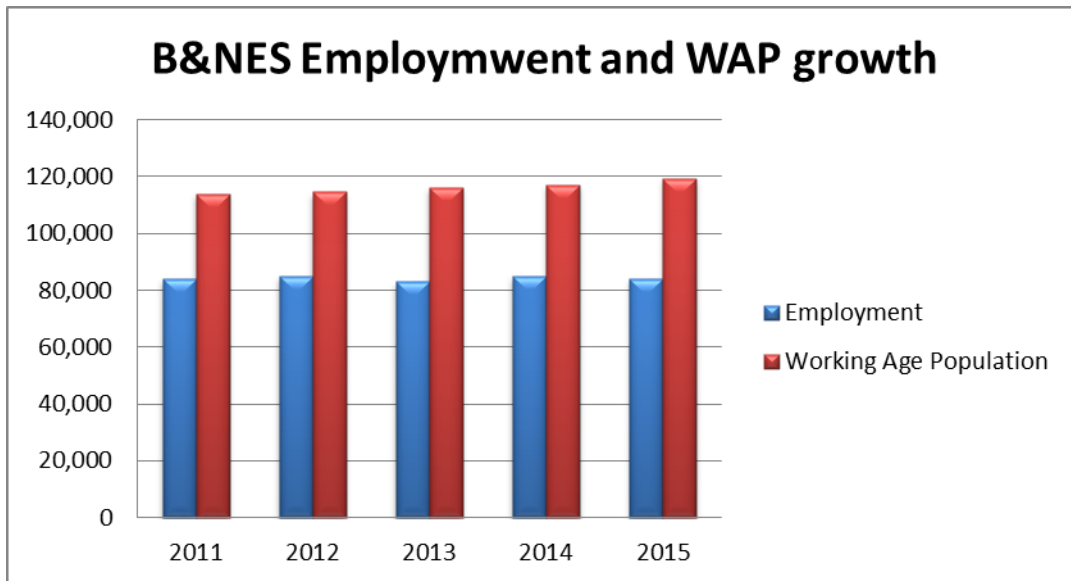
3.5.16 The table below shows that the highest numbers of employment can be found in health, education and retail accounting for over 42% of employment. The size of the health sector is largely due the Royal United Hospital and strong education presence

⁵ NOMIS Annual Population Survey

is due to Bath being home to two universities and a FE college. The success of retail and employment is no surprise, given Bath's World Heritage Status and international reputation as a tourist destination providing very high levels of footfall.

Sector	Employment	%
Health	15,000	17.8
Education	11,000	13.0
Retail	10,000	11.9
Professional, scientific & technical (M)	9,000	10.7
Accommodation & food services (I)	8,000	9.5
Manufacturing (C)	4,000	4.7
Arts, entertainment, recreation & other services (R,S,T and U)	4,000	4.7
Construction (F)	3,500	4.1
Information & communication (J)	3,500	4.1
Business administration & support services (N)	3,500	4.1
Wholesale (Part G)	2,500	3.0
Financial & insurance (K)	2,250	2.7
Transport & storage (inc postal) (H)	2,000	2.4
Public administration & defence (O)	2,000	2.4
Property (L)	1,750	2.1
Mining, quarrying & utilities (B,D and E)	1,500	1.8
Motor trades (Part G)	1,500	1.8
Agriculture, forestry & fishing (A)	45	0.1
Total Employment	84,000	

3.5.17 Bath and North East Somerset has experienced continued levels of low unemployment with no more than 2.2% of the working age population claiming Job Seekers Allowance since 1999, which is over half the national average. However the diagram below indicates that the total level of employment in Bath and North East Somerset has actually reduced over time, whereas the total working age population has increased.



3.5.18 The structure of the economy is inextricably linked with the volumes of traffic on our roads. A prevalence of lower-wage jobs across the District (and relatively high house prices) are contributing to in-commuting to jobs in the District. Statistics show that incommuting mostly comprises of people working in health and social care, public administration and defence.

3.5.19 Although the District has a good base of more highly-paid business services or “knowledge-based” activities, research shows that levels of out-commuting in senior roles is relatively high—and particularly in financial, transport and communication roles

Baseline

Employment and business

- There are targets for net jobs growth of 10,1500 jobs across the Bath and North East Somerset by 2030
- Total Employment fell by nearly 1% between 2011 – 2015
- Job Seekers allowance claimant rate has remained less than half the national average for over 10 years.
- Weekly work place wages in B&NES is lower than the national average at £535 & £544 respectively, however weekly resident wages were in excess of the national averages at £566.

- The City of Bath has particular specialisms in Advanced Engineering, Creative and Information Communication.

Office space in Bath

- In Bath the current level of vacant space equates to approximately 1.4 years of supply, which taking into account the range of stock, is beginning to show the signs of a general under supply of space. Of the 143,881sqft of available office space in the Bath central area only 30% is classified as grade A and only 10% of the total 1,095,966sqft of office stock is considered to be of a similar.

Keynsham and the Somer Valley

- Keynsham and the Somer Valley area provide two-thirds of the employment outside of Bath
- New Enterprise Zone is designated in the Somer Valley at Old Mills
- Keynsham and the Somer Valley suffer from high levels of out-commuting which is in excess of 60%
- This situation has been exacerbated by major factory closures including Cadbury in Keynsham and Polestar, Alcan and Welton Bibby Baron in the Somer Valley
- Keynsham has been particularly affected by the closure of Cadbury which has seen the town's relatively small employment base reduce by 11%
- The Somer Valley remains heavily reliant on manufacturing which accounts for 20% of total employment compared with just 5% overall in B&NES
- The recovery in the Somer Valley is largely as a result of the availability and development of employment land at Westfield Industrial Estate and the Bath Business Park at Peasedown St John
- There is a need to bring forward new strategic employment locations in the market towns to enable future local economic growth
- There are some wards in Radstock and Peasedown St John which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation

Rural Areas

- Estimates suggest that self-employed people account for 32% of the total number of employees in the rural areas

Recent changes and trends

- Weekly workplace wages have increased by 8.5% since 2011 to £535. There are wards in Peasedown St John which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation
- Total benefit claimants in B&NES continue to reduce and are now at approximately 6%.

Key issues

- Economic growth should maintain B&NES as a unique and desirable location to attract and grow quality businesses; and should promote a balanced, stable and sustainable range of economic sectors providing a variety of employment opportunities
- Maintain Bath's role as a successful and sustainable international visitor destination
- Improve the quality of the overall office stock and the available floor space in Bath
- There is a need to diversify the employment base
- The plan should help to address economic development issues through site selection to help maximise access to existing employment and correct imbalances between residential and employment development to reduce in/out commuting
- The Local Plan must ensure the Market Towns retain their role as sustainable local service and employment centers.
- There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 20% of local jobs are accounted for in manufacturing, a declining sector
- Increasing future competition from other areas of England, such as Oxfordshire, Birmingham and the Northern Powerhouse as well as international competition and the effects of globalisation, mean that the Local Plan should be positive and proactive in encouraging economic development

Scope of the New Local Plan

3.5.20 It is important to consider the influence that the Local Plan DPD can have on the issues. The Local Plan DPD can influence economic development in the following way:

Sensitive location of development sites in order to:

- Maximise access to existing employment
- Correct imbalances between residential and employment development to reduce in / out commuting

3.5.21 These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Economic Development	Objective 4: Build a strong, competitive economy and enable local businesses to prosper

3.6. Housing

Introduction

- 3.6.1. New housing development in B&NES, both market and affordable should provide for a variety of housing types and size to accommodate a range of different households, including families, single people and low income households.
- 3.6.2. The mix of housing should contribute to providing choice in tenure and housing type, having regard to the existing mix of dwellings in the locality and the character and accessibility of the location.
- 3.6.3. Housing developments will also need to contribute to the provision of homes that are suitable for the needs of older people, disabled people and those with other special needs (including supported housing projects), in a way that integrates all households into the community. In B&NES there is a real issue in the quality of older social housing stock, particularly the sheltered provision. In future, there may be losses to provision in order to secure a modern fit for purpose housing offer as there is no other way of funding major refurbishment programmes or redelivery.
- 3.6.4. The delivery of affordable homes for those in housing need in Bath & North East Somerset is a key strategic priority, and the Council is committed to maximising delivery through planning obligations as well as encouraging our developer and housing association partners to deliver schemes for 100% affordable housing.
- 3.6.5. The Council is committed to securing the delivery of homes for local people that are affordable, adaptable, safe and sustainable. These homes will be integrated into the wider development and shall be part of places where people want to live.

National

- 3.6.6. In November 2011 the Government launched a national housing strategy entitled 'Laying the Foundations: A Housing Strategy for England'. This sets out measures to support the delivery of new homes and aspirations, support choice

and quality for tenants, tackling empty homes and providing better quality homes and housing support. The Strategy included the following:

- Establishment of the Growing Places Fund to support infrastructure that unblocks stalled housing and economic growth
- Putting in place incentives for housing growth through the New Homes Bonus, Community Infrastructure Levy and proposals for local business retention
- Supporting choice and quality for tenants through supporting growth and investment in the private rented housing market
- Reform of social housing through the Localism Act 2011
- Support, protections and opportunities for struggling households, including prioritisation for vulnerable people

3.6.7. The National Planning Policy Framework (NPPF) sets out to deliver housing, based on an evidence base to ensure that enough housing is identified for development that will meet housing needs, both for market and subsidised *'affordable'* homes.

3.6.8. The NPPF, para 7 focuses on sustainable development and the need for the planning system to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations.

3.6.9. Para. 47 of the NPPF sets out the need to boost significantly the supply of housing and it requires local planning authorities to:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing

requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

- Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15

3.6.10. Para 50 of the NPPF seeks to support the delivery of a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time

Housing Need

- 3.6.11. The NPPF requires local planning authorities to plan for all objectively assessed need for all types of housing, including both market housing and affordable housing.
- 3.6.12. The Planning Practice Guidance: Assessment of housing and economic development needs (March 2014) Paragraph 023 states that the following households are considered in need:
- Homeless households or insecure tenure (e.g. housing that is too expensive compared to disposable income)
 - Households where there is a mismatch between the housing needed and the actual dwelling (e.g. overcrowded households)
 - Households containing people with social or physical impairment or other specific needs living in unsuitable dwellings (e.g. accessed via steps) which cannot be made suitable in-situ
 - Households that lack basic facilities (e.g. a bathroom or kitchen) and those subject to major disrepair or that are unfit for habitation
 - Households containing people with particular social needs (e.g. escaping harassment) which cannot be resolved except through a move

Local- Indices of Multiple Deprivation (2015)

- 3.6.13. The Indices of Multiple Deprivation identify the most deprived areas across the country. They combine a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. The indices identified Bath and North East Somerset as one of the least deprived authorities in the country, ranking 247 out of 326. Despite these relatively low levels of deprivation, pockets of high deprivation

remain within the area. The following five areas are within the most deprived 20% of the country:

- Twerton West
- Whiteway
- Twerton
- Fox Hill North
- Whiteway West

3.6.14. There are also a number of areas which fall within the most deprived 30% of the country including areas in Radstock and in Peasedown St John.

Baseline review

- There were 73,515 households recorded in the 2011 Census
- In 2016, the average property price (houses) in Bath and North East Somerset was £349,391,000, compared to England £282,011 and South West £256,054
- In 2016 the ratio of house prices to average earnings was 11.9 in B&NES and higher than the ratio for England (10.3)
- The average gross income in B&NES is £29,458 for a 80% mortgage a person would need to earn £79,861
- High house prices and a lack of affordable housing in the District make it difficult to attract people to the area and to retain key workers

Recent changes and trends

- In 2015/2016 there were 809 housing competitions
- 2011-2016 there were 3026 net competitions, which 2162 were market homes and 864 were affordable houses
- There are now approximately 1,490 licensed houses of multiple occupation
- In 2015-2016, 62 empty properties in B&NES were brought back into use
- Since the spare room under occupancy subsidy has been removed, there has been an increasing demand for smaller accommodation. The highest demand for council properties is for one bedroom properties, at over 58%
- The South West Joint Spatial Plan housing evidence base documents have been published:

- [B&NES SHMA](#)
- [B&NES Strategic Housing Market Assessment](#)
- [Towards the Emerging Spatial Strategy West of England Housing Target The basis for the Housing Requirement in the Joint Spatial Plan](#)

Key issues

- The Local Plan must provide homes to meet identified needs, guided by a growth strategy for the area taking into account affordable housing needs and economic growth objectives
- Delivering affordable housing which is appropriate to the local housing market and income profile
- There is a need for more affordable housing in all parts of the district, with particular need in areas where housing prices are highest, such as in the City of Bath
- An aging population requires smaller homes as these are more likely to be characterised as single person households, as well as maintaining a stock of family homes

Scope of the New Local Plan

- 3.6.15. It is important to consider the influence that the Local Plan DPD can have on the issues. The Local Plan DPD can influence housing in the following way:

Sensitive location of development sites in order to:

- Maximise access to existing services.

Appropriate development management policies in order to:

- Ensure appropriate contribution towards market and affordable housing requirements.
- Ensure appropriate contribution towards appropriate community services

- 3.6.16. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
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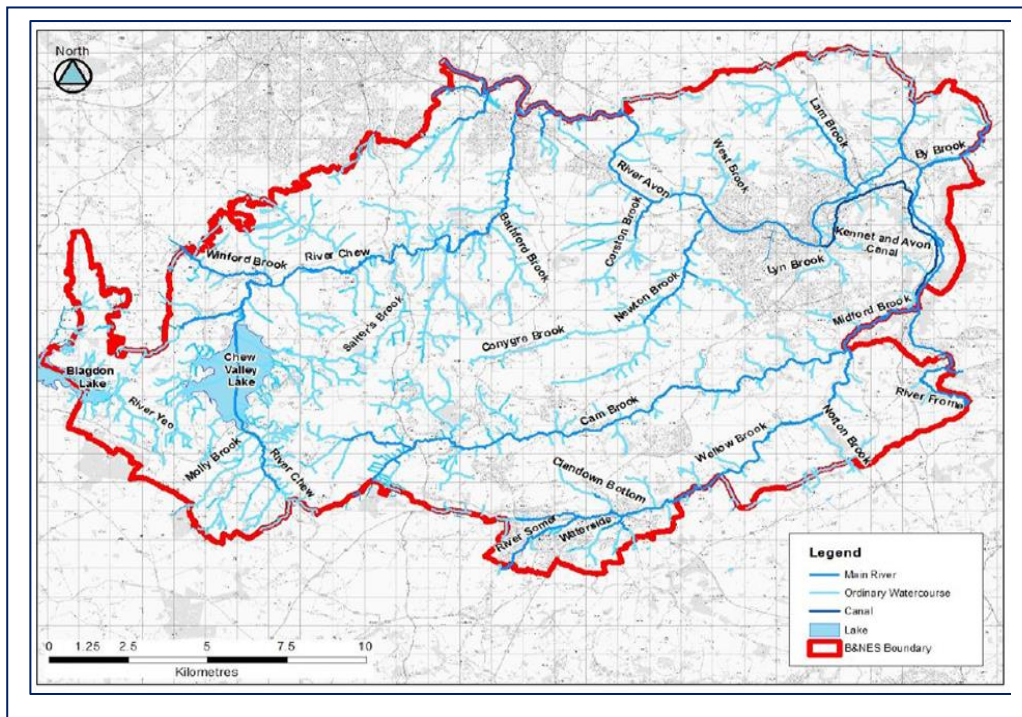
Housing	<ul style="list-style-type: none">• Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing
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3.7. Natural Resources- Water and Soils

Introduction-Water

3.7.1. The River Avon enters the district at Dundas Aqueduct to the east of Bath and leaves west of Keynsham. B&NES has a large number of water courses and tributaries, including the Bybrook, the Frome, the Mells, the Somer, The Chew, The Boyd, the Newton and the Sistor.

Fig 3.7.1: A map of area covered by the surface water flood risk quantification analysis



3.7.2. Further the City of Bath is located directly above three natural hot springs which springs have been, and continue to be, at the centre of economic, social and cultural developments in the City.

Context-International

3.7.3. The European Water Framework Directive (WFD) (2000/60/EC) promotes an integrated and coordinated approach to water management at the river basin

scale. One of its key objectives is the requirement to prevent deterioration in status and achieve at least 'Good Ecological Status' in inland and coastal waters. The WFD also requires all Artificial or Heavily Modified Water Bodies to achieve Good Ecological Potential.

- 3.7.4. The NPPF states that Local Planning Authorities should set out strategic policies to provide infrastructure for water supply, waste water and flood risk (paragraph 156). Paragraph 100 of the NPPF states that new development should be strategically located away from areas of high flood risk, not act to increase flood risk elsewhere and seek opportunities to reduce flood risk where possible.

Flooding

- 3.7.5. The NPPF, paragraph 103 states that new and existing development should be prevented from contributing to water pollution, and that Development should give "*priority to the use of sustainable drainage systems*".

Local

- 3.7.6. Under the Flood and Water Management Act (2010), Bath & North East Somerset Council is designated as the Lead Local Flood Authority for the area and has certain responsibilities for managing flood risk from 'local' sources. In the Act, 'local' sources of flooding are defined as flooding from:

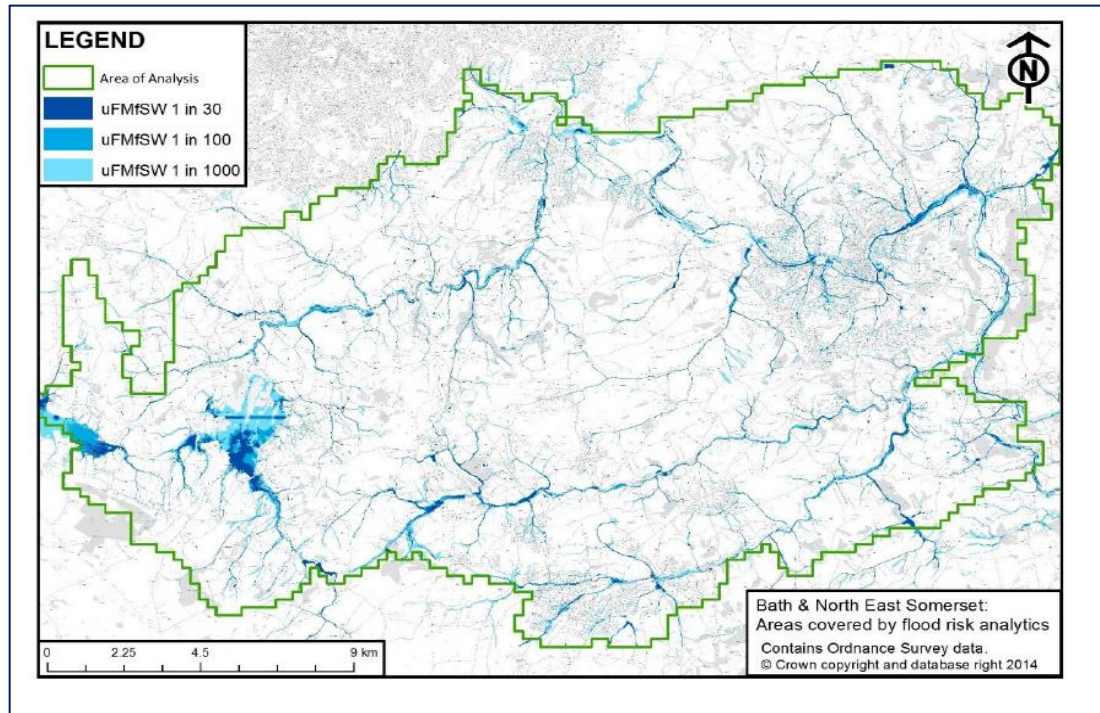
- surface water
- groundwater
- ordinary watercourses

- 3.7.7. In Bath, the incidents of surface water flooding are located close to watercourses, particularly the River Avon, indicating that Main River flooding may also contribute to these incidents. Sewer flooding incidents also occur in relatively high numbers within the city centre and near the River Avon, indicating the sewer infrastructure plays an important role in surface water flooding in Bath. Locations of sewer flooding include; central Bath, Larkhall, Walcot, Locksbrook, Weston Park and Southdown.

- 3.7.8. Keynsham and Midsomer Norton/Radstock are both considered to be prone to surface water flooding based on topography and soil characteristics, however there are no recorded incidents of surface water flooding in these areas. This

may be due to a lack of reporting rather than a lack of surface water flooding. Sewer flooding also represents a higher than average number of recorded incidents.

Fig 3.7.2: A map to identify the location of all the watercourses in Bath and North East Somerset (BANES SWMP FINAL, 2015)



Source Protection Zones

3.7.9. Source Protection Zones (SPZs) have been defined by the Environment Agency for nearly 2000 groundwater sources (wells, boreholes and springs) used for public drinking water supply across England. SPZs are a tool to aid the decision making process when assessing risks to groundwater supplies posed by potentially polluting activities and release of contaminants. Generally the closer the activity or release is to a groundwater source, the greater the risk. Three zones are usually defined, and their size, shape and orientation is dependent on the hydrogeological characteristics of the aquifer and groundwater flow direction.

Soil-National

3.7.10. The NPPF states that the planning system should protect and enhance valued soils and prevent the adverse effects of unacceptable levels of pollution. This is

because soil is an essential finite resource that provides important ‘ecosystem services’, for example as a growing medium for food and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. Also, the NPPF expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

Local

- 3.7.11. Three main geological series underlie the District. The western area is characterised by the red soils and generally low relief of the Triassic formation, while the eastern part of the District consists largely of the plateaus and valleys of the Jurassic series. The Carboniferous series outcrops in the centre of the District.
- 3.7.12. The hard Carboniferous limestone which characterises the Mendip Hills lies mainly to the south of the district, but the Upper Coal Measures underlie much of the District as well as outcropping in an area stretching from Hallatrow northwards to Clutton, Pensford and Compton Dando. The series is made up largely of sandstones, shales and mudstones but banded with coal seams.
- 3.7.13. The Triassic forms areas of low relief stretching from the slopes of the Mendips northwards across the Chew Valley to Dundry Hill. To the east the Triassic floors the valleys of the Somer, Wellow Brook and Cam before disappearing beneath the newer Jurassic rocks.

Baseline review

- The ecological status of water quality in North East Bath is ‘good’ and in the rest of the district it is ‘moderate’. Radstock and Midsomer Norton rivers are identified as being ‘poor’.

- The River Avon has been designated as a 'sensitive watercourse' under the Urban Waste Water Treatment Directive which requires phosphorus removal to defined consent levels of 2mg/l and 1mg/l in Salford.
- Parts of the south of Bath to North Stoke, Bathampton, Combe Hay, Monkton Combe and Upper Swainswick and Chew Magna are Groundwater Source protection Zones.
- There are a total of 67 structures - 55 bridges, 9 culverts and 3 screens located close to a recorded flood incident and could potentially exacerbate flooding in these areas if the structures became blocked.
- There is a strong angling interest on many of the rivers in the catchment.
- The River Avon is predominantly a coarse fishery but some tributary streams support game fishing for brown trout, notably the Midford (Wellow and Cam Brooks), By Brook and the Upper Avon that are currently stocked to support viable fisheries.

Recent changes and trends

- By 2050 average annual temperatures will increase by over 2%, summer rainfall will decrease by 20% and winter rainfall will increase by 17%.
- There is thought to be 4,078 properties within B&NES at risk of surface water flooding.
- The B&NES Surface Water Management Plan has noted that no recent and relevant flood incidents have been directly attributed to groundwater. There is likely to be some interaction between Ordinary Watercourses, surface water runoff, and groundwater for a number of flood incidents (e.g. as has previously occurred in Chew Magna when fluvial flooding infiltrated into the ground and caused properties to suffer from groundwater flooding).
- In the Bath & North East Somerset regional Surface Water Management Plan, Wessex Water identified postcode locations for 44 occurrences of sewer flooding incidents for the period 2013-2014, including those attributable to surface water flooding.
- As part of the B&NES regional Surface Water Management Plan additional surface water modelling was undertaken to assess the impact of climate change on surface water flood risk in B&NES. The results show that climate change is likely to have a notable impact on flood risk across the B&NES. Flood outlines for an event with a 1 in 100 chance of occurring in any given

year being slightly larger than present day outlines. Increases in flood extents are generally more pronounced in flatter valleys where water would spread further at lower depths. In steep-sided valleys flood extents do not increase significantly, however flooding becomes deeper.

- Further analysis indicated that with allowing a 30% increase in peak rainfall intensity due to climate change, an additional 656 residential properties, 22 critical infrastructure locations and two emergency responders may be at risk of surface water flooding following an event with a 1 in 100 chance of occurring in any given year.
- The Agricultural Land Classification Regional Maps produced by the Ministry of Agriculture, Fisheries and Food (MAFF) provide provisional guidance on agricultural land quality. The South Western Region map indicates that, outside of the urban districts of Bath, Keynsham Salford and Midsomer Norton, the agricultural land is generally Grade 3. There are some areas of Grade 1 land in the west of the District, extending from north of Nempnett Thrubwell, and across the Stanton Drew and Chew Stoke areas. Grade 1 and 2 areas also are represented in West and East Harptree, and around Hallatrow and Clutton.

Key issues

- There are 53 wet-spots' (key flooding locations) were identified in the 2015 B&NES regional Surface Water Management Plan.
- According to the Environment Agency there are approximately 5,255 properties within Bath and North East Somerset at risk of fluvial (river) flooding, 21% at high risk, 19% at medium risk, and 60% at low risk.
- The Plan should prioritise the remediation of and redevelopment of previously developed land
- Urban creep throughout the District (urban creep is the conversion of permeable surfaces to impermeable surfaces)
- Urbanisation and climate change have the potential to significantly impact surface water flood risk within the B&NES area.
- Climate change is likely to increase surface water flood risk throughout the B&NES area, particularly in those areas that are already at risk and identified as flooding wet-spots.

- Future development also has the potential to increase flood risk. It is therefore important that surface water flood mitigation measures are included in any development plans, following B&NES Sustainable urban drainage systems policy.
- Appropriate development management policies are already in place to minimise the potential impact of urbanisation and climate change and it will be important for these to continue to be implemented for all new developments within the B&NES area.

Scope of the New Local Plan

3.7.14. It is important to consider the influence that the Local Plan DPD can have on the issues. The Local Plan DPD can influence natural resources in the following way:

Sensitive location of development sites in order to:

- Contribute towards the remediation of contaminated sites.
- Maximise the use of brownfield sites.
- Minimise impact on surface and groundwater networks.
- Reduce flooding.
- Minimise impact on drainage and water supply infrastructure.

Appropriate development management policies in order to:

- Reduce water use.
- Encourage appropriate contributions towards drainage and water supply infrastructure.

3.7.15. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Natural Resources- water and soils	<ul style="list-style-type: none"> • Objective 9: Reduce land, water, air, light, noise pollution • Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change) • Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

3.8. Safer and Stronger Communities

- 3.8.1 Bath & North East Somerset is a diverse area which includes the World Heritage Site of Bath as well as vibrant towns, villages and rural communities.
- 3.8.2 Bath and North East Somerset generally has healthy, safe communities with levels of deprivation that are significantly below the national average. It has some pockets of persistent relative deprivation, particularly in south-west Bath, Radstock, and Keynsham. There are also areas of rural isolation.

Context-National

- 3.8.3 National planning policy is clear that one of the roles of a development plan is to help create sustainable inclusive and mixed communities. The NPPF states that “The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities” (paragraph 69). In particular, Paragraph 50 states that there is a need to plan for a mix of housing based on current future demographic trends.

Local

- 3.8.4 A key priority for B&NES Joint Health and Wellbeing Strategy (2015) is to “Increase the resilience of people and communities, including action on loneliness”. It notes that *“Our local surroundings and social environment play an important part in our health and wellbeing. There is a link between loneliness and isolation and a range of health and wellbeing issues such as high blood pressure, depression and heart disease, particularly amongst the aging population”*.
- 3.8.5 Overall crime rates are low, but the reality and perception of crime and antisocial behaviour can be seen across a range of themes and areas, including:
- “Hotspot” issues in Bath City Centre, particularly relating to retail crime, public concerns over street drinking and begging and alcohol-related violent crime and disorder concentrated in the Night Time Economy

- Issues of concern raised in local communities, particularly anti-social behaviour and speeding traffic
- Domestic abuse, particularly under-reporting and support for victims

3.8.6 Fair Society, Healthy Lives (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is ‘overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities particularly amongst the aging population’.

Scope of the New Local Plan

3.8.7 It is important to consider the influence that the Local Plan DPD can have on the issues. The Local Plan DPD can influence communities in the following way:

Sensitive location of development sites in order to:	
<ul style="list-style-type: none"> • Maximise access to facilities such as leisure facilities for young people. • Maximise access to community services including by sustainable modes of transport. 	
Appropriate development management policies in order to:	
<ul style="list-style-type: none"> • Design out crime and the fear of crime such as through improvements to street layouts, public space, passive surveillance, lighting etc. • Provide contributions to community services where appropriate. • Improve the quality of new development. 	

3.8.1. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

3.8.2. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Safer and stronger communities	<ul style="list-style-type: none"> • Objective 1: Improve the health and well-being of all communities • Objective 3: Promote stronger more vibrant and

	cohesive communities and reduce anti-social behaviour, crime and the fear of crime
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3.9. Transport

Introduction

- 3.9.1. Transport is fundamental to the successful economy and wellbeing of the bath and north-east Somerset, its residents and visitors. It also contributes to the unique environment of the city but the volume and impacts of vehicles are undermining the fabric of buildings and air quality. Consequently, the historic core of Bath and key arterial routes are suffering from the intrusion of cars and the quality of life throughout the city is being adversely affected.

Context-National

- 3.9.2. The National Planning Policy Framework, paragraph 29 states that ‘transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel.’
- 3.9.3. Paragraph 30 of the NPPF states that there is not only the need to find transport solutions that support reductions in greenhouse gas emissions and reduce congestion, but also in preparing Local Plans that support a pattern of development which facilities the use of sustainable modes of transport.
- 3.9.4. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.

Local

- 3.9.5. The vision of the Joint Local Transport Plan (JLTP) 2011-2026 (Progress Report) is of an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which we can achieve a more competitive economy and better connected, more active and healthy communities. This is complemented by the Public Transport Strategy (2011) looks at the current and

future role of public transport services and the infrastructure needed to support them.

- 3.9.6. The Cycling Strategy supplementary planning document (2011) contains the vision of a safe and attractive road environment across the network for cycling, supplemented by quality off-road routes, will contribute to establishing a vibrant cycling culture throughout the area.

Baseline review

- On average nearly 50,000 cars enter Bath every day and the Government expects this to increase by 15% over the next 10 years
- There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links
- The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City
- Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303
- Bath is well served by conventional bus services, with good penetration to most parts of the City. These services have difficulty in keeping to timetable due to congestion.
- High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.

Recent changes and trends

- There have been increases to the capacity of the Parks and Rides in Bath from 1,990 to 2,860. An additional 230 spaces have been provided in Odd Down Park and Ride (completed in 2012), an additional 390 spaces in Landsdown Park and Ride (completed February 2013) and an extra 248 spaces in Newbridge (completed July 2015)
- To encourage more people to use public transport, nine main bus routes in and around Bath have seen improvements including:
 - Raised pavements at 375 stops to ease access on and off buses for older disabled people, and those with prams;

- The addition of 169 electronic Real Time Information displays at busy stops;
 - Complete replacement of existing shelters and the addition of new bus shelters at other popular stops
- Variable Message Signs (VMS) have been installed on primary routes into the city at Lansdown, on the A4 at Saltford and the A39 at Corston. More signs are being installed on the A36 and A4 this spring 2016. The signs provide a range of allowing motorists to make informed decisions on their journeys
- There has been a 14.7% increase in rail passenger numbers in 2015 after a slight decrease of 2.4% in 2014
- For the first time since 2007 there has been a slight rise in CO2 levels however the target of a 16% by 2012 is still achievable
- In 2015/2016 there was a 7% growth in bus passengers across the west of England transport plan area
- There has been a 30% reduction in the number of people killed or seriously injured across the West of England transport plan area. The number has reduced from 358 deaths and serious injuries to 250 by 2020

Key Issues

- The Joint Local Transport Plan (JLTP) 2011-2026 promotes an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which we can achieve a more competitive economy and better connected, more active and healthy communities
- Large areas of the District suffer from traffic congestion. Congestion and journey time delays affect rural communities as well as urban areas.
- There are still high levels of out-commuting from Midsomer Norton and Radstock
- The Local Plan should help to address transport issues through locating development sites in order to maximise access to community facilities particularly by sustainable modes of transport
- The Local Plan can also help to ensure appropriate contribution towards appropriate community services and encourage provision of on-site services and access to public transport where appropriate

Scope of the New Local Plan

3.9.7. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Transport	<ul style="list-style-type: none"> • Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking • Objective 9: Reduce land, water, air, light, noise pollution

3.10.Waste

Introduction

- 3.10.1. There are many different types of waste, the word waste is a generic term given to describe many different materials which are dealt with at the local and regional level. The exception is radioactive waste which is dealt with at a national level.
- 3.10.2. The aim of European, national and regional policy is to move waste management practices away from landfill, reduce waste production, encourage recycling and composting and focus on recovering value from any residual waste remaining. A network of facilities is sought, operating without endangering human health or the environment and without adversely affecting the countryside or places of special interest.
- 3.10.3. The European Waste Framework Directive³ (WFD) provides the overarching legislative framework governing for the collection, transport, recovery and disposal of waste across Europe. This important piece of legislation requires all EU Member States to make sure that waste is recovered or disposed of without harming human health or the environment. The WFD's overarching requirements are supplemented by other Directives that concern specific types of waste, such as:
- Electrical and electronic equipment
 - Hazardous waste
 - Packaging waste
 - End-of-life vehicles (ELVs)
 - Batteries

Baseline Review

- In 2015-16, over 45,000 tonnes of Bath & North East Somerset residents waste was reused and recycled

- In total B&NES exported just over 17% of the 45,000 tonnes diverted away from landfill. The majority of this exported waste has been removed from residents' weekly bin waste at a facility in Avonmouth
- In B&NES, 24,350 tonnes of waste was sent to a waste facility in Avonmouth (2015-16) and after all the recyclable and compostable waste has been taken out, the rest is exported for used in energy recovery
- In 2015-16, over 27,500 tonnes of CO₂ equivalent in emissions were avoided as a result of efforts made by residents of Bath & North East Somerset residents in diverting waste from landfill
- B&NES is a high performing recycling authorities within the country, recycling 52.6% of household waste in 2015/16

Recent changes and trends

- B&NES is still 50th (up from 100th in 2013) of the 351 local authorities in the UK in terms of recycling

Key issues

- The Regional Waste Strategy for the South West aims to ensure that by the year 2020 over 45% of waste is recycled and reused and less than 20% of waste produced in the region will be landfilled
- Ensure new development incorporates space for waste sorting and storage to aid recycling
- Encourage sustainable construction making use of recycled and recyclable building materials
- Promote development of more sustainable waste treatment facilities, including sorting, recycling and reuse
- There is a need to reduce waste generation and to continue with increases in recycling and composting.
- The Local Plan should help to address waste issues through ensuring appropriate provision of waste management services, for example space for recycling and through encouraging good design that minimises waste.

Scope of the New Local Plan

- 3.10.4. These issues have been taken into account in the review of the SA framework that will be used to assess the Local Plan DPD.

Baseline	SA Objective
Waste	Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

4.0. Developing the SA Framework

Introduction

4.1. The SA framework provides a way in which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan.

Development of the framework

4.2. The SA framework is based on that used for the Core Strategy SA but has been amended to ensure that it is relevant to the scope of the Local Plan DPD. These are shown in Table 4.2.1. The framework is therefore broadly consistent with the core strategy, following a similar structure and bringing in key themes where appropriate.

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
Objective 1: Improve the health and well-being of all communities	<ul style="list-style-type: none"> • Provision of adequate supporting health services and improved access to healthcare including through sustainable transport means? • Make it easy to reach everyday destinations (e.g. schools, workplaces, homes, shops, community facilities) by “active” travel e.g. through high quality cycling and walking infrastructure? • Opportunities to engage in structured sport? • Opportunities to engage in play, leisure and informal recreation? • Support local sustainable food production, including the provision of allotments and community gardening? • Maintaining or increasing access to existing open space and in areas of deficiency, the provision of new open or natural space? • Inclusive design which supports social interaction for all ages, including the needs of those with sensory and mobility impairments?

Table 4.2.1: Local Plan DPD SA Framework	
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<ul style="list-style-type: none"> • Provide viable and deliverable good quality housing and affordable housing to meet identified needs? • Maybe worth referring to Para 50 of the NPPF? • Deliver a suitable mix of housing types and tenures
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<ul style="list-style-type: none"> • Provision of appropriate and accessible community social and cultural facilities? • Design out crime and promote a feeling of security through better design? • Promotion of public spaces that might support civic, cultural, recreational and community functions? • Design of the public realm which maximises opportunities for social interaction and connections within and between neighbourhoods?
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<ul style="list-style-type: none"> • Provide an adequate supply of land diverse range of employment opportunities to meet the requirements of growth sectors? • Correct imbalances between residential and employment development to help reduce travel distances to work
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	<ul style="list-style-type: none"> • Prioritising access to good public transport and safe walking and cycling infrastructure (including segregated cycle lanes), over facilities for private cars? • Incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted? • Access to major employment areas?
Objective 6: Protect and enhance local environmental distinctiveness	<ul style="list-style-type: none"> • Protection of areas of valued landscape and townscape? • Avoidance of harmful impacts of development on all landscapes including AONB landscape character and its statutory purpose? • Development which values and protects diversity and local distinctiveness including rural ways of life?
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	<ul style="list-style-type: none"> • Development that affects cultural and historic assets? • Well-designed development that is well related to the surrounding townscape?
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	<ul style="list-style-type: none"> • Avoidance of potential impacts of development on designated sites (international, national, local)? • Avoidance of potential impacts or loss of ancient woodland and aged or veteran trees • Avoidance of net loss, damage to, or fragmentation and positive enhancement of

Table 4.2.1: Local Plan DPD SA Framework	
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
	<p>designated and undesignated wildlife sites protected species and priority species?</p> <ul style="list-style-type: none"> • Conservation, restoration and re-creation of priority habitats? • Development which enhances the ecological services of the wider area? • Development which incorporates biodiversity into the design e.g. green corridors, linking open space etc?
Objective 9: Reduce land, water, air, light, noise pollution	<ul style="list-style-type: none"> • Minimise increase in traffic congestion? • Development that minimises exposure to poor air quality and noise pollution? • The remediation of contaminated sites? • Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity? • Development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<ul style="list-style-type: none"> • Development which supports and corresponds with appropriate flood risk management guidance including applying a sequential approach and policies for any form of flooding including surface water flooding?
Objective 11 Increase resilience to climate change	<ul style="list-style-type: none"> • Development designed to be resilient to future climate of increased extremes of heat, cold and rainfall in line with latest guidance, e.g. passive cooling measures such as deciduous trees and blue infrastructure to adapt to hotter summers?
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<ul style="list-style-type: none"> • Development on brownfield sites? • Development which incorporates SUDS? • Water efficient design and reduction in water consumption? • Development that demonstrates sustainable design and construction including efficient use of materials? • Utilisation of renewable energy opportunities, including low carbon community infrastructure such as district heating? • Development that maximises energy efficiency? • Protection of grades 1- 3a agricultural land from development? • Adequate provision of waste management facilities and where possible include measure to help to reduce the amount of waste generated by development?

5.0. Next Steps

- 5.1. The scoping report will now be subject to consultation with the statutory bodies and others. If consultees suggest changes to the scope of the assessment these changes will be considered by the council.

- 5.2. The next stage of the SA will be an assessment of the options papers and this will begin in Summer 2017. Once the options papers have been assessed the SA will assess pre-submission versions of each plan and at this stage a formal SA report will be produced.