

**Bath & North East Somerset  
Local Plan Partial Update**

**Options Consultation  
January 2021**

# **Interim sustainability appraisal**

**integrating the requirements of the Strategic  
Environmental Assessment (SEA) Regulations**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

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## Appendix 1: Appraisal Matrices

## 1. Introduction

- 1.1 This report has been produced alongside the Bath and North East Somerset Local Plan Partial Update Options document (January 2021) and is published for consultation. This report constitutes the first interim sustainability appraisal report (interim SA report) integrating the requirements of the Strategic Environmental Assessment (SEA) regulations. In order to ensure sustainability considerations are integrated fully into plan making it is necessary for plan makers to be aware of the implications of their decisions as early as possible in the planning process. Therefore, this report outlines these sustainability effects of the options considered and mitigation/enhancement measures are recommended (where possible) to inform the preparation of the Local Plan Partial Update. The SA objectives include consideration of health and wellbeing and the report incorporates a Health Impact Assessment.
- 1.2 Please note that this is not a formal SA report. The formal SA report will be published for the Publication Draft Plan.
- 1.3 The Options document has been reviewed in terms of the requirements of the **Habitat Regulations**. All options and policy areas have been screened for Likely Significant Effects to identify any areas of significant potential concern and any policy amendments that may be required. The Screening Report is available from [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan).
- 1.4 The Options document has been subject to Equality Impact Assessment (EqIA) which is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. The EqIA report is also available from [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan).

## 2. How to comment on the report

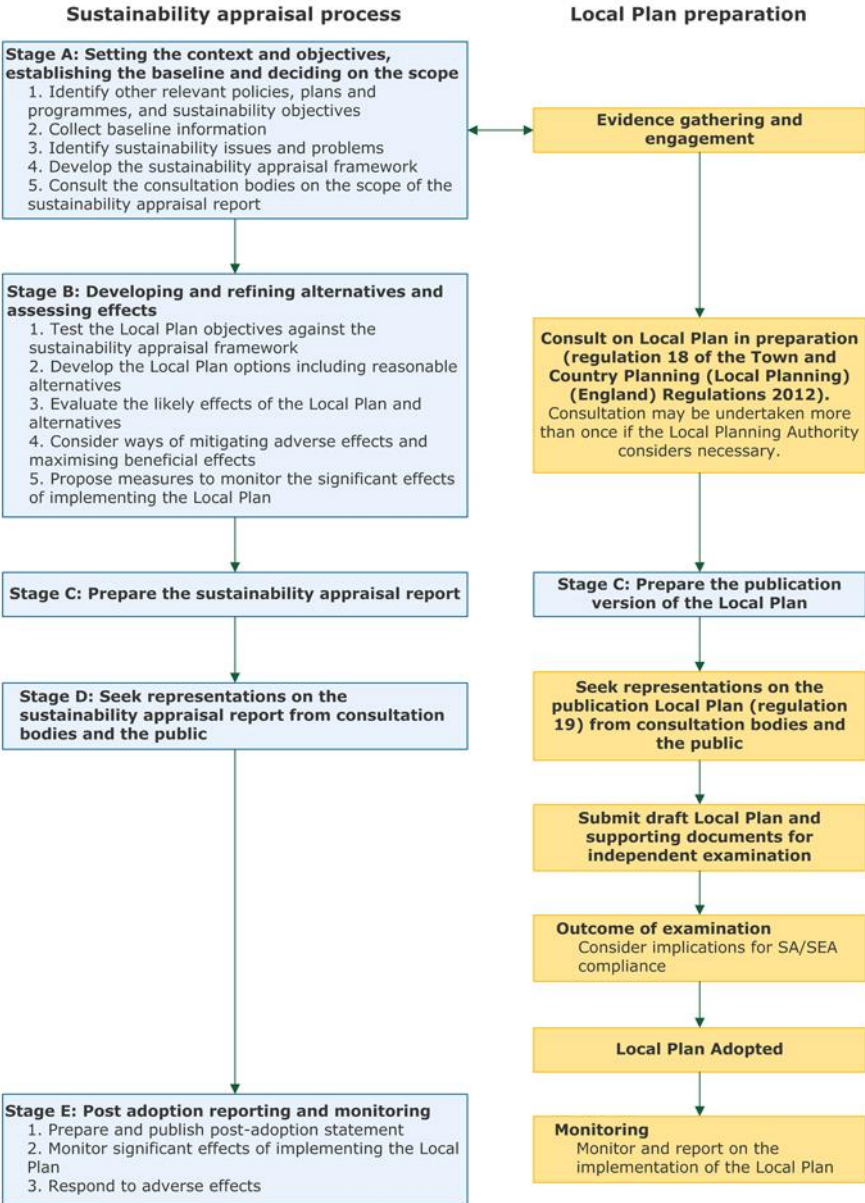
- 2.1 The Local Plan Partial Update options document and this interim SA report are available for comment from **7<sup>th</sup> January to 18<sup>th</sup> February 2021**. The purpose of this consultation is to provide the statutory environmental bodies and other interested parties, as well as the general public the opportunity to express their opinion on the interim SA report.
- 2.2 All comments on this report should be sent either by email to [local\\_plan2@bathnes.gov.uk](mailto:local_plan2@bathnes.gov.uk) or by post to:

Planning Policy  
Bath and North East Somerset Council  
Lewis House  
Manvers Street  
Bath  
BA1 1JG

### 3. Sustainability Appraisal Process and Methodology

3.1 Sustainability appraisal has a number of set stages and is carried out as an integral part of Local Plan preparation. Stage A has already been completed via the Scoping Report and Stage B is currently being undertaken.

Table 1 Sustainability Appraisal Process (PPG)



3.2 The SA is a tool used in ensuring that decisions are made meeting the requirements of sustainable development. The integration of sustainability into the plan starts formally at the stage of issues and options. In keeping with SA guidance, the effects of the options have been assessed in broad terms with the aim of developing the Submission Draft. The appraisal matrices are set out in Table 3. Significance of effect has been defined within the appraisal of the Local Plan as follows:

Table 2 Significance Criteria

Score	Description	Symbol	Significance
Major positive effect	The option / plan achieves most of the applicable SA questions and has a major positive effect in relation to characteristics of the effect and the sensitivity of the receptors	++	Significant effect
Minor positive effect	The option / plan achieves some of the SA questions and has a positive effect in relation to characteristics of the effect and the sensitivity of the receptors	+	Non-significant effect
Neutral	The option / plan does not have an effect on the achievement of the SA Objective or SA questions	0	Non-significant effect
Minor negative effect	The option / plan conflicts with some of the SA questions and has a negative effect in relation to characteristics of the effect and the sensitivity of the receptors	-	Significant effect
Major negative effect	The option / plan conflicts with most of the applicable SA questions and has a major negative effect in relation to characteristics of the effect and the sensitivity of the receptors. In addition, the future baseline indicates a worsening trend in the absence of intervention	--	Significant effect
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objectives	?	Significant effect
Not applicable	The option/plan is not applicable to the SA Objectives	n/a	Non-significant effect

### Assessment techniques

3.3 Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Objectives and Questions). The framework of SA Objectives and SA Questions is presented in Table 3. The matrix for the assessment of the options allows for a discussion and comparison of each of the options under consideration.

Table 3 Local Plan DPD SA Framework

Table 4.2.1: Local Plan DPD SA Framework	
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<ul style="list-style-type: none"> <li>• Provision of adequate supporting health services and improved access to healthcare including through sustainable transport means?</li> <li>• Provision of communal spaces that are safe and appealing, to support social cohesion e.g communal allotments, play areas, neighbourhood centres?</li> <li>• 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?</li> <li>• Streets and the public realm are safe, attractive and accessible for all ages and levels of disabilities?</li> <li>• Range of sports, leisure facilities and pitches designed and maintained for use by the whole community?</li> <li>• Support local sustainable food production, including the provision of allotments and community gardening?</li> <li>• What actions are being taken to mitigate against the differential impact of COVID-19 on health inequalities?</li> <li>• Maintaining or increasing access to existing open/natural/green space, the provision of new open/natural/green space?</li> </ul>

**Table 4.2.1: Local Plan DPD SA Framework**

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
	<ul style="list-style-type: none"> <li>• Planned network of high-quality green and blue spaces that can also be used for walking and cycling?</li> <li>• Inclusive design which supports social interaction for all ages, including the needs of those with sensory and mobility impairments?</li> </ul>
<p><b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b></p>	<ul style="list-style-type: none"> <li>• Provide viable and deliverable good quality housing and affordable housing to meet the full objectively assessed housing needs?</li> <li>• Help boost significantly the supply of housing?</li> <li>• Deliver a suitable mix of housing types and tenures that cater for all population groups?</li> <li>• Address housing needs of older people i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes?</li> </ul>
<p><b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>	<ul style="list-style-type: none"> <li>• Connection with existing communities? Prevention of community severance e.g. new road or development dividing a community in two?</li> <li>• Provision of a range of appropriate and accessible community, social and cultural facilities-e.g. neighbourhood centres, play areas, green &amp; blue spaces? Amenities and facilities are accessible for all e.g. people with mobility problems or a disability, parents with young children, older people?</li> <li>• Design out crime and promote a feeling of security through better design e.g. well-lit spaces, natural surveillance, limit non-overlooked areas?</li> <li>• Promotion of public spaces that might support civic, cultural, recreational and community functions?</li> </ul>
<p><b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b></p>	<ul style="list-style-type: none"> <li>• Provide an adequate supply of land and diverse range of employment opportunities to meet the requirements of growth sectors?</li> <li>• Address imbalances between residential and employment development to help reduce travel distances to work</li> <li>• Contribute to the regions' ambition to be a driving force for clean and inclusive growth?</li> <li>• Access to local training, work experience and apprenticeship opportunities for local people?</li> </ul>
<p><b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	<ul style="list-style-type: none"> <li>• Prioritising access to good public transport and safe walking and cycling infrastructure (including segregated cycle lanes, secure bike storage and parking), over facilities for private cars?</li> <li>• New cycle and pedestrian paths are linked with existing / wider networks to ensure connectivity?</li> <li>• Traffic management and calming measures to help people feel safe &amp; confident to walk and cycle, whilst helping to reduce and minimise road injuries?</li> <li>• Incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted?</li> <li>• Access to major employment areas?</li> </ul>

**Table 4.2.1: Local Plan DPD SA Framework**

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
<p><b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<ul style="list-style-type: none"> <li>• Protection of areas of valued landscape and townscape?</li> <li>• Avoidance of harmful impacts of development on all landscapes including AONB landscape character and its statutory purpose?</li> <li>• Development which values and protects diversity and local distinctiveness including rural ways of life?</li> </ul>
<p><b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<ul style="list-style-type: none"> <li>• Development that affects cultural and historic assets and their settings?</li> <li>• Well-designed development that is well related and provides physical connection to the surrounding townscape/landscape?</li> </ul>
<p><b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<ul style="list-style-type: none"> <li>• Has the mitigation hierarchy been used to avoid and minimise impacts</li> <li>• Development delivers biodiversity net gain.</li> <li>• Avoidance of potential impacts of development on designated sites (international, national, local)?</li> <li>• Avoidance of potential impacts or loss of ancient woodland and aged or veteran trees</li> <li>• Avoidance of net loss, damage to, or fragmentation and positive enhancement of designated and undesignated wildlife sites protected species and priority species?</li> <li>• Conservation, restoration and re-creation of priority habitats?</li> <li>• Development which incorporates biodiversity into the design e.g. green corridors, linking open space etc?</li> <li>• Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced.</li> <li>• Enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery network.</li> </ul>
<p><b>Objective 9: Reduce land, water, air, light, noise pollution</b></p>	<ul style="list-style-type: none"> <li>• Minimise increase in traffic congestion?</li> <li>• Development that minimises exposure to poor air quality and noise pollution?</li> <li>• measure to encourage the use of public transport, cycling and walking?</li> <li>• The remediation of contaminated sites?</li> <li>• Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity?</li> <li>• Development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?</li> <li>• Minimise increase in light and water pollution?</li> <li>• Protect the natural thermal spring under County of Avon Act 1982?</li> </ul>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<ul style="list-style-type: none"> <li>• Development which supports and corresponds with appropriate flood risk management guidance including applying natural solitons and a sequential approach and policies for any form of flooding including surface water flooding?</li> <li>• Development which incorporates SUDS?</li> </ul>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions?</li> <li>• Development designed to be resilient to future climate of increased extremes of heat, cold and rainfall in line with latest</li> </ul>

Table 4.2.1: Local Plan DPD SA Framework	
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)
	<p>guidance, e.g. use of green infrastructure to include cooling measures such as deciduous trees, green space and blue?</p> <ul style="list-style-type: none"> <li>Facilitate the supply of local food and increase provision of food growing space. i.e. allotments, community farms and farmers markets?</li> </ul>
<p><b>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)</b></p>	<ul style="list-style-type: none"> <li>Encourage the effective use of brownfield land, provided that it is not of high environmental value?</li> <li>Water efficient design and reduction in water consumption?</li> <li>Development that demonstrates sustainable design and construction including efficient use of materials?</li> <li>Facilitates low carbon community infrastructure such as district heating?</li> <li>Development that increases renewable energy generation?</li> <li>Development that maximises energy efficiency?</li> <li>Protection of grades 1- 3a agricultural land from development?</li> <li>Adequate provision of waste management facilities and where possible include measure to help to reduce the amount of waste generated by development?</li> </ul>

3.4 Sustainability appraisal relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. A 'precautionary approach' is taken, especially with qualitative judgements and mitigation is suggested if there is any doubt as to the likely effect of the plan.



## 4. B&NES Local Plan Partial Update

- 4.1 The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029. Together these documents form the Local Plan for B&NES. The Council is required to review the Local Plan every five years in order to determine whether it remains fit for purpose or whether all or part of it needs to be revised and updated.
- 4.2 A full review of the Local Plan will be undertaken alongside the WECA Spatial Development Strategy (SDS) which is scheduled for publication in 2023. Therefore, in the interim, B&NES is undertaking a Partial Update of the Local Plan to address a number of issues in the short term.
- 4.3 In summary the key proposed elements or scope of the partial update are set out below.
- a) Policies to deliver on the Council’s declaration of climate and ecological emergencies, including those on renewable energy generation, retrofitting, sustainable construction and biodiversity net gain,
  - b) Transport polices including reviewing the parking standards
  - c) The approach to Houses in Multiple Occupation (HMOs), student accommodation, development on the University campuses
  - d) The district’s housing land supply and type available to meet the Housing Requirement to 2029
  - e) The supply of employment land in light of green recovery objectives
  - f) The role of City & Town centres
  - g) Review of some existing allocated development sites
  - h) Ensuring the efficient and effective use of the Bath Park & Ride sites
- 4.4 The partial update also includes some minor changes to existing development management policies to ensure it reflects changes to the NPPF and latest case law and provides greater certainty and clarity over the delivery of the Core Strategy Spatial Priorities/Strategy. The SA should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. Therefore, the minor amendments are screened and not considered to have likely significant effects.

Table 4 Local Plan Partial Update key stages

Launch	April – May 2020
Options	January -February 2021
Draft Plan	Spring 2021
Examination	Winter 2021
Adoption	Spring 2022

## 5. Summary appraisals

<b>Development Management Policies</b>	
DM1 and 2 Zero Carbon policy (amendments to Policies CP2 and SCR1)	Option 1 will help to secure more sustainable methods of construction using the energy hierarchy for all new buildings whereas option 2 will only apply to major developments. For objective 1 the proposed policy will result in warmer, more fuel efficient homes. For objective 2 an energy efficient homes is more affordable to live in and financial contributions can help to alleviate fuel poverty. For objective 4 the proposed policy will encourage investment in sustainable construction and renewable energy industry. For objective 5 development will be sited close to public transport and local amenities. For objectives 6 and 7 the provision of renewable energy will impact on the landscape and heritage assets. However, development will also be subject to development management policies NE.2 and HE.1 which seek to protect the historic and natural environment. For objective 9 a reduction in CO <sub>2</sub> emissions will improve air quality. For objective 10 the reduction in carbon emissions will help slow climate change, which would reduce the vulnerability to flood risk. For objectives 11 and 12 a fabric first approach and renewable energy provision will reduce emissions and help to slow climate change.
DM 3 Retrofit Policy (amendments to CP1)	The proposed policy changes will see positive effects to objectives 2, 9, 10, 11 and 12. Overall there is a more positive impact from option 2 as this will increase the threshold for carbon reduction. This results in a more positive impact to the stated objectives. Available evidence suggests that HMOs are more often in poor condition than other types of housing in the same area therefore requiring to achieve Energy Performance Certificate “C” rating or above has a positive effect on objective 1 by improving the health and well-being of the HMO occupiers.
DM4 New policy Whole Life Cycle Carbon Assessment	Both options different thresholds will work towards zero carbon construction and a Whole Life Cycle Carbon Assessment will allow for the provision of the most sustainable form of construction and therefore results in a more positive impact to objectives 11 (Climate Change) and 12 (Natural Resources). However, the requirement for a Whole Life Cycle Carbon Assessment does not yet include a specific threshold which development will need to meet. Therefore, it will be difficult to use for development management purposes.
DM5 Renewable energy (amendments to CP3)	In order to facilitate an increase in the level of renewable energy generation and the transition to realising the Council’s 2030 goal to achieve 100% clean energy across all sectors, Option 1 proposes to amend Policy CP3 to require energy/grid balancing plants to contribute to the Core Strategy targets for Renewable Electricity and Heat generation. The policy approach would have

	<p>positive effects on objective 4 (economy), objective 9 (pollution), objective 11 (climate change) and objective 12 (natural resources). There are negative or uncertain effects that have been identified for environmental objectives.</p> <p><u>Mitigation and enhancement</u></p> <p>Site specific mitigation and enhancement measures should be included in the policies and addressed through the development management process.</p>
<p>DM6/DM7 New Policy Harnessing wind energy</p>	<p>The current policy approach does not specifically make an allowance for wind energy. The provision of wind energy will contribute towards renewable energy targets and zero carbon development. A criteria based policy as proposed would encourage the provision of wind energy by identifying areas of search for suitable sites that also seek to minimise the impact on the landscape resulting in positive effects on objective 1 (health), objective 2 (housing), objective 4 (economy), objective 9 (pollution) objective 11 (climate change) and objective 12 (natural resources). Option 2 which allows a wider area for consideration would have major positive effects on objective 4 (economy), objective 11 (climate change) and objective 12 (resources). However, there are negative or uncertain effects that have been identified for environmental objectives.</p> <p><u>Mitigation and enhancement</u></p> <p>A policy for wind energy development would allow for the identification of suitable sites. Site specific mitigation and enhancement measures should be included in the policies.</p>
<p>DM8 New Policy Electric Vehicle</p>	<p>The current policy approach under ST.7 does not provide a robust requirement to provide electric vehicle (EV) charging infrastructure as part of new development. Options 2b and 3b will require EV charging points to be installed as part of new development which will provide access to sustainable travel options and contribute towards reducing air pollution. Options 2a and 3a have similar benefits, but the provision of passive charging will reduce the cost of development and allow for the most up to date chargers to be installed when needed. Options 2 and 3 have significant positive effects on objective 5 (promoting sustainable transport) and objective 9 (air pollution). There are also positive effects on objective 3 (community), objective 4 (economic objective), objective 11 (climate change) and objective 12 (sustainable energy). Options 2 and 3 would only apply the policy to major developments; whilst there would be positive effects similar to option 1, the effects would be limited when only installed in major development. Option 1 to require the provision of EV infrastructure in minor residential development as well as major development will have significant positive effects on objectives 1, 3, 4, 5, 9, 10,11 and 12.</p>

<p>DM9- 13 (amendments to Policies NE3, NE5, CP7 and NE1 and New Policy Biodiversity Net Gain)</p>	<p>The proposed policy amendments and new policy seek to strengthen policies as relates to biodiversity and green infrastructure supporting the climate and ecological emergency. The policies will have a positive effect on a number of SA objectives and a major positive impact on SA objectives to conserve, enhance and restore the condition and extent of Biodiversity in the district and reduce negative contributions to and increase resilience to climate change.</p> <p><u>Mitigation and enhancement</u></p> <p>The policy will be viability tested. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p>
<p>DM14-16 amendments to Policy 1: Pollution and Nuisance, Policy PCS5 and LCR6 New and replacement sports and recreation facilities</p>	<p>Proposed changes to Policies PCS1 and PCS5 to avoid potential sources of pollution and contamination of land and requiring a management plan outlining materials used, potential sources of pollution and adequate remediation measures have positive effects on objectives 1 (health and well-being), 3 (stronger communities), 8 (biodiversity), 9 (pollution), 11 (climate change) and 12 (waste).</p> <p><u>Mitigation and enhancement</u></p> <p>Use of natural and recyclable materials should be considered and encouraged.</p> <p>Further guidance setting out on what the management plan should include would be helpful.</p>
<p>DM17 amendments to Policy CP9 (Affordable rent)</p>	<p>The proposed approach (option 1) will have a major positive impact in terms of improving the affordability of rents in the District, particularly in Bath, where existing rental costs are very high. A minor positive impact shall also occur in terms of creating more mixed communities, by introducing population groups to areas within the District where they would otherwise be unable to afford to rent.</p> <p><u>Mitigation and enhancement</u></p> <p>The policy will be viability tested. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p>
<p>DM18, 19 and 20 amendments to Policy H2 and new policy (Houses in Multiple Occupation)</p>	<p>The proposed approach (option 1) will fill the current policy gap relating to new build Houses in Multiple Occupation (HMOs), change of use from other uses such as shops, and the intensification of existing HMOs. The proposed approach will have a major positive impact in terms of boosting the supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation. Potential minor negative impacts relating to issues arising in areas with higher concentrations of HMOs will be mitigated by policy wording requiring new</p>

	<p>build HMOs to be assessed against threshold tests set out in the HMO SPD. A minor negative impact remains in relation to cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties. Future updates to the HMO SPD / provision of a new parking standards SPD will provide cycle storage standards for HMOs.</p>
DM21 -24 Purpose Built Student Accommodation	<p>Option 1 will have a positive impact in terms of meeting identified need for provision of student housing, through policy wording allowing for the provision of new accommodation off-campus, where need is demonstrated by an educational establishment. This requirement for evidence of need will ensure that an oversupply does not occur. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by policy wording requiring a Management Plan to be submitted through the planning application process. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping will be mitigated by policy wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 2 will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of Purpose Built Student Accommodation (PBSA) district wide, in any areas where the concentration of HMOs is over 10%, no PBSA will be considered to be acceptable. This may lead to the dispersal of both PBSA and HMOs to other areas of the city, in some cases further away from educational facilities. Not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by the inclusion of PBSA in the 10% HMO threshold test, which would prevent provision in areas where the HMO threshold is close to being met. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping will be mitigated by policy wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 3 will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of PBSA district wide, not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment.</p>
DM25 amendments to H7 Housing Accessibility	<p>Option 1 meeting accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings will provide a major positive impact in terms of providing a larger number of accessible homes across a range of housing types, sizes and tenures. This will provide a major positive impact in relation to health, community cohesion and</p>

	<p>housing stock. Issues relating to viability and feasibility of providing the required accessibility standards for new dwellings will be mitigated by policy wording allowing for developers to provide justification where viability or feasibility issues mean that it is not possible to meet the requirements.</p>
<p>DM26 (amendments to ED2A) and DM27(amendments to ED2B9 and DM28 (new site allocation for Bath Spa University)</p>	<p>Option 1 to strengthen the protection of existing industrial land by adding more industrial sites/estates under Policy ED2A and protecting other industrial sites with clear policy expectations would have a significant positive effect on objective 4 (employment) by maintaining the mix of employment offers in the district, particularly in Bath. It also has positive effects on objectives 3 (community) and 5 (sustainable transport).</p> <p>Option 2 to strengthen the protection of existing industrial land as per option 1 and identify and allocate a site to facilitate the expansion of the Bath Spa University (BSU) Locksbrook Campus has mixed (positive and negative) effects on objectives 1 (health and well-being), 3 (community), 4 (employment), 5 (sustainable transport), 9 (pollution) and 11 (climate change).</p> <p><u>Mitigation and enhancement</u></p> <p>The site selection and potential uses need to be carefully considered to ensure it contributes to wider economic benefits and maintains employment opportunities close to where people live.</p>
<p>DM29-35 Transport</p>	<p>The proposed policy amendments seek to strengthen policies relating to sustainable transport, encouraging development in accessible locations and providing access to public transport and active travel methods. The policies will have a positive effect on the majority of the SA objectives. Where new multi-modal P&amp;R sites are proposed, numerous issues will need to be considered, and further work carried out. Please see separate SA relating to these sites (Bath6 Park and Ride).</p>
<p>DM36 amendment to Policy GB2 (Development in Green Belt Villages)</p>	<p>Options 1 and 2 will both bring the Local Plan in line with national policy by adding reference to residential development being permitted where it is limited to infill development, a replacement dwelling, or redevelopment of previously developed land. Option 1 will provide a strong indication of where infill development would be considered appropriate in Green Belt villages, so as to avoid potential for new housing severed from an existing community and located in areas considered to be inappropriate in Green Belt terms. Option 2 will potentially provide more flexibility to applicants, to justify sites for infill which are located in areas not within existing Housing Development Boundaries (HDBs).</p> <p><u>Mitigation and enhancement</u></p> <p>For Option 1, further work is required to ensure that HDBs fully reflect the role of an infill boundary and that such boundaries are clearly defined for all villages within the Green Belt. Concern relating to Option 2 leading to more</p>

	<p>applications for infill in inappropriate locations will be mitigated by clear policy wording or supporting text clarifying a suitable definition of infill development and where this would be considered appropriate on a site-by-site basis.</p>
<p><b>Addressing Housing Supply</b></p>	
<p>Potential housing allocations addressing the shortfalls from the Core Strategy and the Standard Methodology 2014</p>	<p>Option 1 to allocate about 1,300 dwellings identifies 6 sites in Bath, 3 sites in Keynsham and 1 site in Westfield. All sites have good access to a variety of existing community, social and health facilities as well as employment centres by sustainable modes of transport. They also have good access to established footpaths and countryside. All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land. Therefore, it has major positive effects on objective 1 (health), 2 (housing), 3 (community), 4 (employment), 5 (sustainable travel) and objective 12 (resources). Individual site appraisals undertaken identified specific constraints based on the evidence available for objective 6 (landscape), 7 (heritage), 8 (ecology) and 9 (pollution) and further assessments are required to finalise the draft Plan with site specific development requirements and design principles.</p> <p>Option 2 to allocate housing sites (even though less than option 1) under the Standard Methodology would have a positive effect on a number of objectives, but it does not take into account locally specific circumstances including growth strategies for the area. The PPG encourages Local Authorities to make as much use as possible of previously-developed (PDL) or brownfield land and take this into account when considering whether it is appropriate to plan for a higher level of need than the standard methodology suggests. All sites selected are PDL or brownfield land apart from the Safeguarded Land (Policy KE3b) in Keynsham. In general uncertain effects are identified on a number of objectives as it depends on which sites would be allocated. Careful selection is needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.</p>
<p>Policy SB8 BWR</p>	<p>The proposed options for this site are more nuanced approaches that evolve and bring up-to-date the current site allocation which may result in significant positive effects on objective 1 (health), 2 (homes), 3 (community), 4 (economy), 5 (sustainable travel), 6 (landscape), 7 (heritage), 8 (ecology), 11 (climate change) and 12 (natural resources). Some elements are not detailed in the options document but will need to be set out in the Draft Plan and in possible updates to the Supplementary Planning Document (SPD).</p>
<p>Policy SB14 Twerton Park</p>	<p>The policy wording updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies.</p>

	Further assessments are required to finalise the development requirements and design principles.
SB18 RUH	<p>The RUH is a major healthcare provider within the district and sub-region. The RUH is revising its Estate Strategy which will set out the future clinical and operational needs as well as increasing staff, patient numbers, forecast population growth and associated healthcare demands. Revising the allocation for the RUH facilitating new staff accommodation would have a major positive effect on objectives 1 (health and well-being), 2 (housing), 3 (community) and 4 (economy).</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>
SB10 Roseberry Place	<p>This site was granted planning permission in 2015 (ref: 15/01932/EOUT) for a mixed use scheme comprising Build to Rent housing, retailing on the ground floor and an office development of up to 4,500 sqm. The key change with the policy approach is to explore a range of land use options from full residential to a mixed use scheme in order to enable development.</p> <p>Providing more homes in the area along a frequent bus route, with very good links to cycling and walking infrastructure it will have major positive effects on objective 2 (housing) and objective 5 (sustainable transport).</p> <p>The site is located within Flood Zone 2 and partly Flood Zone 3 therefore it requires further consideration to inform the draft Plan.</p>
New: Depot site, Station Road, Newbridge, Bath	<p>The policy allocates the site for housing and for the delivery of part of the safeguarded Sustainable Transport Route. The policy wording also updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies.</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles.</p>
New: Sion Hill site	<p>The site allocation would help meet the housing shortfall identified including affordable housing, therefore it has a major positive effect on objective 2 (housing). The allocation also has a number of positive effects by locating housing close to key facilities, services, employment and open countryside.</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>
Policy KE2a Fire Station	<p>Revising the allocation for the former Fire Station would have minor positive effects on a number of objectives.</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>



New Treetops Nursing Home	<p>Allocating the site for new care home facility with clear development and design requirements would have major positive effects on objective 1 (health) and 2 (housing).</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>
Land at north and east Keynsham (including Policy KE3b)	<p>Option 2 will incorporate the wider area into the proposed strategy. This will allow for the provision of improved infrastructure to be incorporated into proposed developments. The approach will make provision for a new local centre and services at north Keynsham which can be accessed from existing and proposed development sites. The approach will also have improvements to aspects such as health and wellbeing, the economy and air quality. These Options would deliver net zero carbon developments and biodiversity net gain. Therefore, it has major positive effects on objective 1 (health), 2 (housing), 3 (community), 4 (economy), 5 (sustainable travel), 8 (ecology) and 11 (climate change).</p> <p><u>Mitigation and enhancement</u></p> <p>Further evidence work including a viability assessment is needed to inform the draft Plan.</p> <p>It is unclear without further assessment whether building 300 dwellings under Option 1 would deliver new highways infrastructure sufficient to prevent a severe impact on the highway network. Therefore, traffic could increase to an unacceptable level resulting in some uncertain effects on a number of objectives particularly on objective 5 (sustainable travel).</p>
<b>Other opportunity sites</b>	
Policy SB2 Bath Recreation Ground	<p>The policy options relate to the recent judgement confirming that the legal covenant relating to use of the land remains capable of being enforced by the beneficiaries of it. The various options proposed will have different effects but these remain uncertain until the policy wording has been reviewed.</p>
New Milsom Quarter	<p>The Milsom Quarter is an area that is in decline, shown by falling footfall and increasing vacancy rates. Both options facilitate a greater balance in the mix of uses, activity and increased residential development in this well connected area and have major positive effects on objective 2 (housing), objective 5 (sustainable transport) and objective 12 (resources). Option 1 with mixed uses on ground floor and residential on upper floors only, helps maintain active ground floor uses which results in a major positive effect on objective 4 (economy). In comparison, option 2 with residential uses on ground floor may have a negative effect on the same objective.</p> <p><u>Mitigation and enhancement</u></p>

	Further evidence work is required to support the draft Plan with site specific development requirements and design principles, particularly taking into account the long-term effects.
Bath 5 University of Bath	<p>The University of Bath is one of the key employers in Bath and is preparing the masterplan for the Claverton Down Campus. This proposes further improvements to teaching facilities and provides more purpose built student accommodation. Revising Policy SB19 with clear capacities and development requirements will have major positive effects on objectives 1 (health and well-being) and 4 (community) as there are good ranges of services and facilities available on campus. It will also have major positive effects on 2 (housing) and 5 (economy) as it will help prioritise general housing and jobs in the city.</p> <p><u>Mitigation and enhancement</u></p> <p>Further discussion with the University and assessments are required to finalise the development requirements and design principles including the site capacity.</p>
Bath 6 Park and Ride	There is scope for option 1 (allocating for mixed use development) to achieve a major positive impact in terms of climate change, through the use of brownfield land for solar infrastructure, and a minor positive impact in relation to provision of household waste facilities located in sustainable locations, accessible by public transport, foot and bike. However, as the sites are located in the green belt, close to and within the Cotswold AONB and within the setting of the World Heritage Site, further assessment work is required at the draft plan stage in order to establish the impact that the proposals might have on these sensitive issues. Further assessment work is also required in relation to noise impact on local residents, traffic congestion and flood risk (Newbridge Park and Ride). There is potential for development to play a beneficial role in supporting nature recovery.
Bath 7 Bath Community Academy	Option 1 (allocating solely for educational and community uses) will provide a major positive impact in terms of providing community and educational facilities, supporting the local economy and being located in a sustainable location. Option 2 (allocating primarily for educational and community uses with a minor residential element) also provides positive impacts in relation to these issues, though inclusion of residential units on the site may reduce the floorspace available for community / educational uses. To mitigate this, careful consideration of site layout options is required, to maximise community and educational use, with provision of residential only where necessary to fund other uses. There is potential for redevelopment of the site to provide a positive impact on landscape, heritage, biodiversity, traffic congestion, and resilience to climate change. However, further work is required in these areas.
Bath 8 Weston	The policy will enable the relocation and retention of employment uses

Island	<p>from elsewhere within the city, unlocking existing site allocations for redevelopment, including residential. The policy also requires the improvement of walking and cycle routes across Weston Island. Therefore, allocating the site for industrial uses and builders merchants (as per sites in Policy ED2A) will have a major positive effect on objective 3 (community), objective 4 (jobs) and objective 5 (sustainable transport). The river is designated as a 'Site of Nature Conservation Interest' (Policy NE3) and the edges of the island form an important associated habitat. Therefore, further evidence work is needed to inform the draft Plan.</p> <p>B&amp;NES Strategic Flood Risk Assessment indicates that the entire site is within Flood Zone 3 and the NPPF sets out clear requirements regarding development in flood risk areas entailing the sequential and exceptions tests.</p>
SV1 (Policy SSV9) Somerset valley Enterprise Zone	<p>This approach proposes to include a wider range of commercial uses including eating/drinking establishments, hotel and retail uses subject to not harming the town centre. Including higher value uses, with a road frontage, would improve the site's viability and help facilitate its delivery. Therefore, it has major positive effects on objective 3 (community), 4 (economy) and 5 (sustainable travel).</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles.</p>
SV2 (Policy SSV2) South Road Car Park	<p>Option 1 (Redevelopment of the site as allocated by Policy SSV2 for retail) would make it easier to reach everyday destinations (such as shops) for local people by active travel as it is located within the town centre and would provide employment opportunities and natural surveillance, improving sense of safety. Therefore, there are positive effects on a number of objectives. However, despite some interest in the site from operators it has not come forward for retail/food store redevelopment and retaining significant public car parking has proven difficult to deliver, therefore some uncertain effects are identified.</p> <p>Option 2 could provide the opportunity to utilise parts of the car park for other beneficial uses including solar energy generation and provide an element of residential development which would be well connected within this Town Centre location. New proposals will be subject to other Development Management policies but without any specific allocation with development requirements and principles set out, there will be some uncertainty in achieving some objectives.</p>

## 6. Next Steps

- 6.1 The next stage of the SA will be an assessment of the pre-submission draft Local Plan document which is anticipated to be published in Spring 2021