

**Bath and North East Somerset**

**Local Plan (Core Strategy/Placemaking Plan) Partial Update**

**Sustainability Appraisal Scoping Report**

**October 2020**

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## 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 Local Plan Partial Update 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). The consultation bodies with environmental responsibilities were consulted for 5 weeks from 28th April to 3rd June 2020. Consultation bodies consulted are;
  - Historic England
  - Environment Agency
  - Natural England
- 1.3. The comments received and Council's responses including the changes made to the documents are set out in the Schedule of Consultation Response.

### Policy context

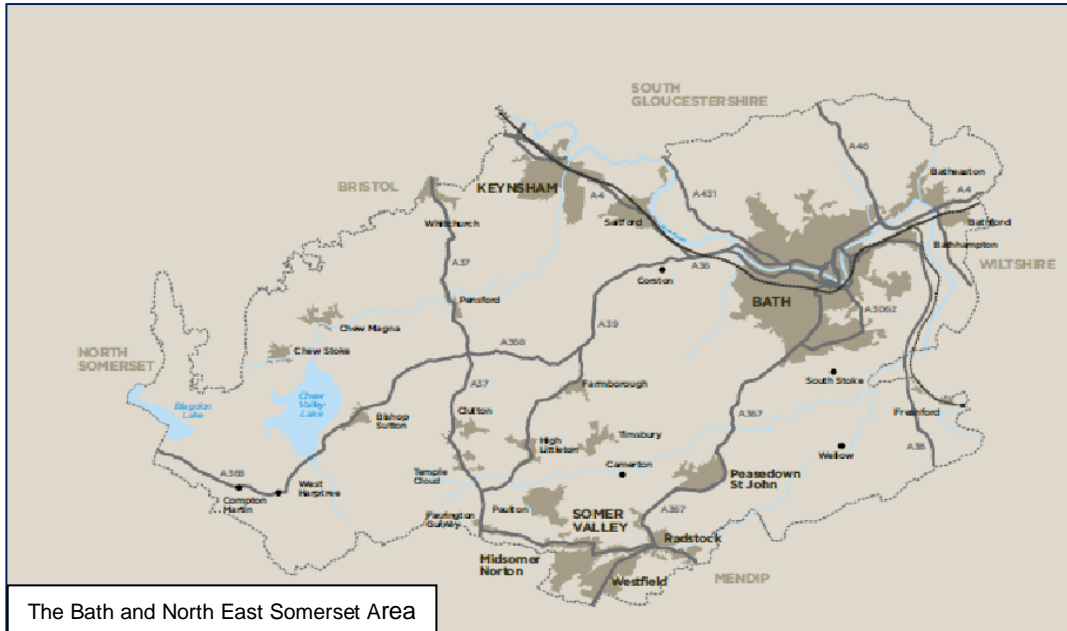
- 1.4. The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029. Together these documents form the Local Plan for B&NES. The Core Strategy sets out the long term strategic planning framework for Bath & North East Somerset and includes a spatial objectives and a spatial vision looking ahead 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.

### Partial Update

- 1.5. 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. The Core Strategy, adopted in July 2014, includes a commitment to an early review of the housing requirement. The Council was preparing a new Local Plan (2016-2036) within the context of, and to deliver, the West of England Joint Spatial Plan (JSP). However, following the withdrawal of the JSP, preparation of the new Local Plan (2016-2036) has been paused.
- 1.6. In the shorter term, a programme is needed for changes to planning policies to respond to the climate and nature emergency, regulatory changes such as those in the Environment Bill and a select number of other issues. The plan period for the Update is the same as the Core Strategy and Placemaking Plan (2011-2029) and may consider:
  - ensuring a continuous housing land supply to meet the Core Strategy housing requirement
  - maximising the sustainability of the construction of new development
  - updating the policy on Houses in Multiple Occupation (HMO)
  - facilitating the provision of new renewable energy generation infrastructure
  - enabling the provision of walking and cycling infrastructure including safe walking and cycling routes
  - reviewing car parking standards including provision of electric vehicle charging points
  - a review of the approach to Student Accommodation.

## Background

- 1.7. 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 km<sup>2</sup> and is home to over 190,000 people.



- 1.8. 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. 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.
- 1.9. 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, 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 connects B&NES and the neighbouring areas.

## Bath

- 1.10. Bath's population is around 90,000, of which over 25% 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. 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 with two universities. The city also serves as a regional shopping centre, characterised by independent and boutique shops.

## Keynsham

- 1.11. 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 characterised by local independent retailers, some large nationals, and charity shops.

## The Somer Valley

- 1.12. 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.
- 1.13. 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 factory closures have increased the already high level of out-commuting.

## Rural Areas

- 1.14. Over 90% of the District is rural and it has 47 rural parishes. 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). The District's varied geology, topography and soils have given rise to a rich biodiversity, with some sites such as Chew Valley Lake being of international importance for wildlife.

## 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 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. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
  - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting 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 a 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. Part 3 of the EAPP Regulations includes the relevant requirements for the environmental assessment (regulation 12).

**Stages in the SA Process**

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

<b>Table 2.1: Stages in the SA process</b>	
<b>SA Stages</b>	<b>SA Tasks</b>
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)**

- 2.10. 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.
- 2.11. 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.

**Collecting baseline information (Task A2)**

2.12. 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.

2.13. 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)

2.14. 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;
- Heritage, archaeology and landscape;
- Economic development;
- Housing;
- Natural resources, water and soil;
- Safer, stronger and healthier communities (including health and well-being);
- Transport;
- Waste

2.15. This section also sets out clearly what the scope of the Local Plan is 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)

2.16. 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.

2.17. 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)

2.18. 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. 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. landscape and green infrastructure 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.
- 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

#### 3.1 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<sub>x</sub>), carbon monoxide (CO), hydrocarbons, carbon dioxide (CO<sub>2</sub>) 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 pollution is the largest environmental risk to public health. Short term exposure can exacerbate asthma and respiratory conditions, and exposure over several years can contribute to the development of cardiovascular disease and lung cancer. From an environmental point of view, pollutants such as NO<sub>x</sub>, CO and CO<sub>2</sub> can have significant global warming potential. In sufficient concentrations, NO<sub>x</sub>, 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<sub>2</sub> 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<sub>2</sub> do not exceed 40µg/m<sup>3</sup>; and
  - (ii) hourly mean concentration levels of NO<sub>2</sub> do not exceed 200µg/m<sup>3</sup> more than 18 times a calendar year

#### National

- 3.1.4. The National Planning Policy Framework 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. There are 5 Air Quality Management Areas (AQMAs) in Bath and North East Somerset (B&NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre (µg/m<sup>3</sup>). The AQMA maps are shown below and links to Air Quality Action Plan documents are provided in the table below:

Table

AQMA	Declaration Date	Air Quality Action Plan
Bath	2002	<a href="#">Clean Air Plan</a>
Keynsham	2010	<a href="#">Keynsham Air Quality Action Plan</a>
Saltford	2013	<a href="#">Saltford Air Quality Action Plan</a>
Temple Cloud	2018	<a href="#">Draft Temple Cloud Air Quality Action Plan</a>
Farrington Gurney	2018	<a href="#">Draft Farrington Gurney Air Quality Action Plan</a>

Fig 3.1. Map to show the Bath Air Quality Management Area 2013

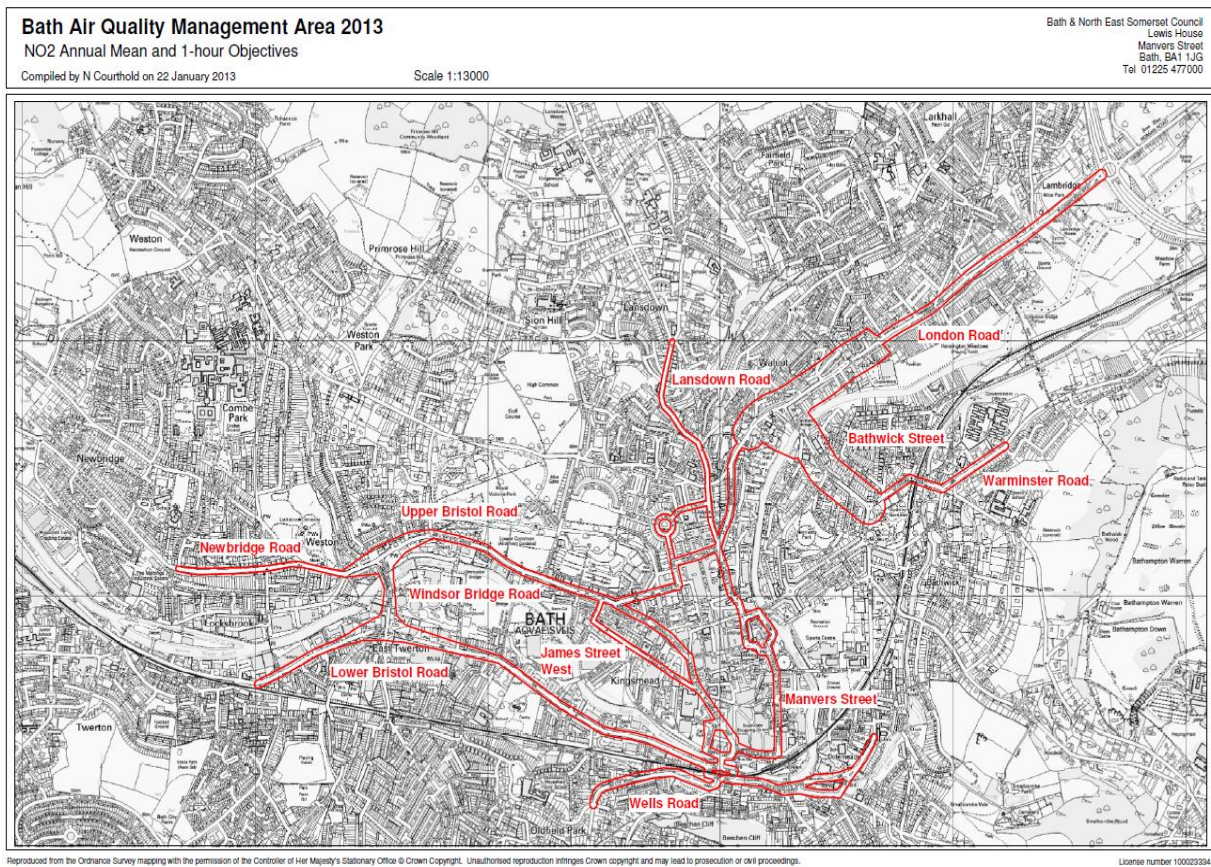


Fig 3.2. Map to show the Keynsham Air Quality Management Area 2010

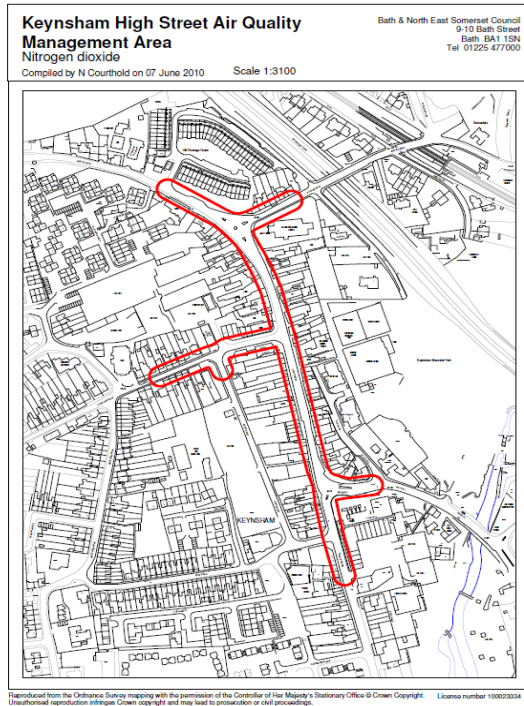


Fig 3.3. Map to show the Salford Air Quality Management Area 2013

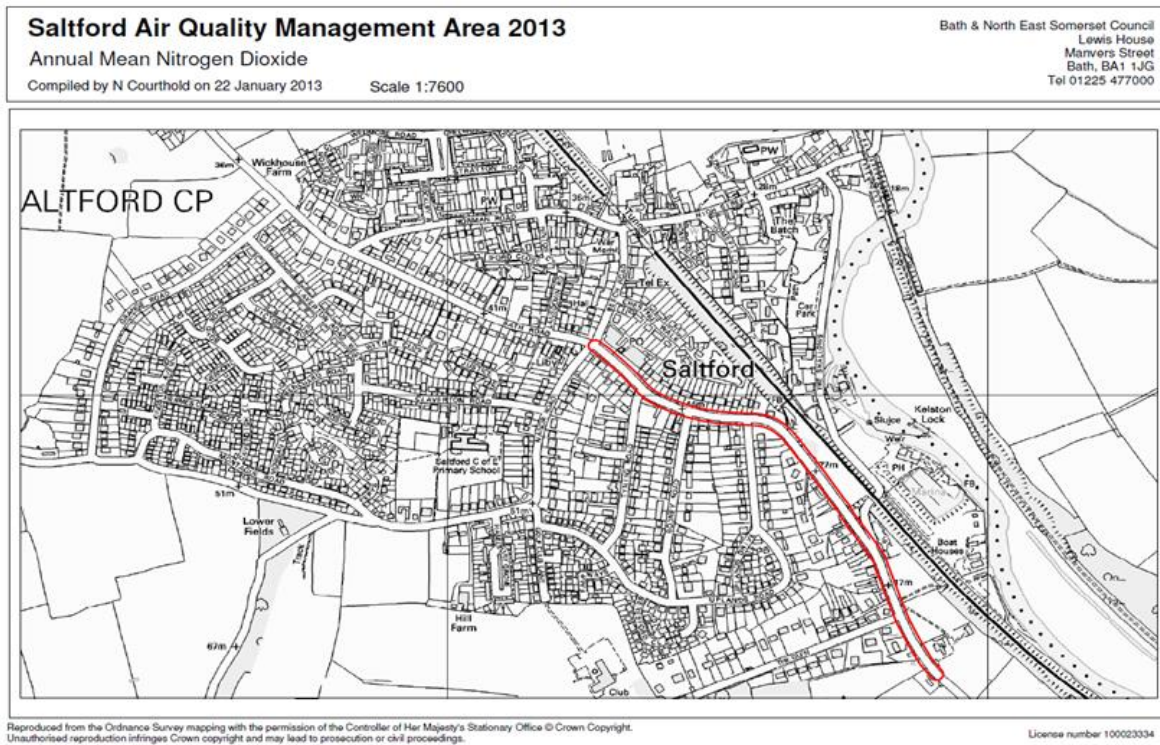


Fig 3.4. Map to show the Temple Cloud Air Quality Management Area 2018

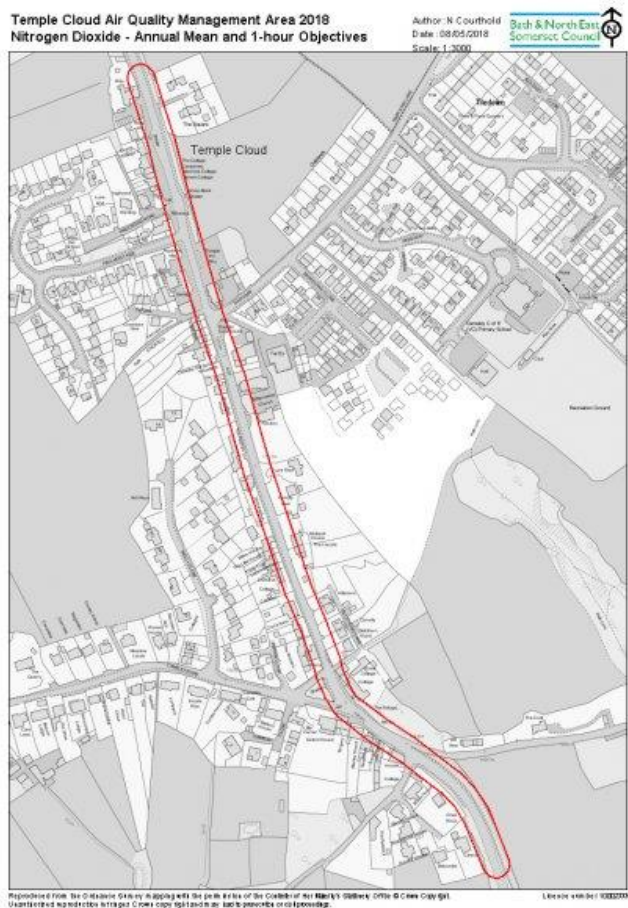
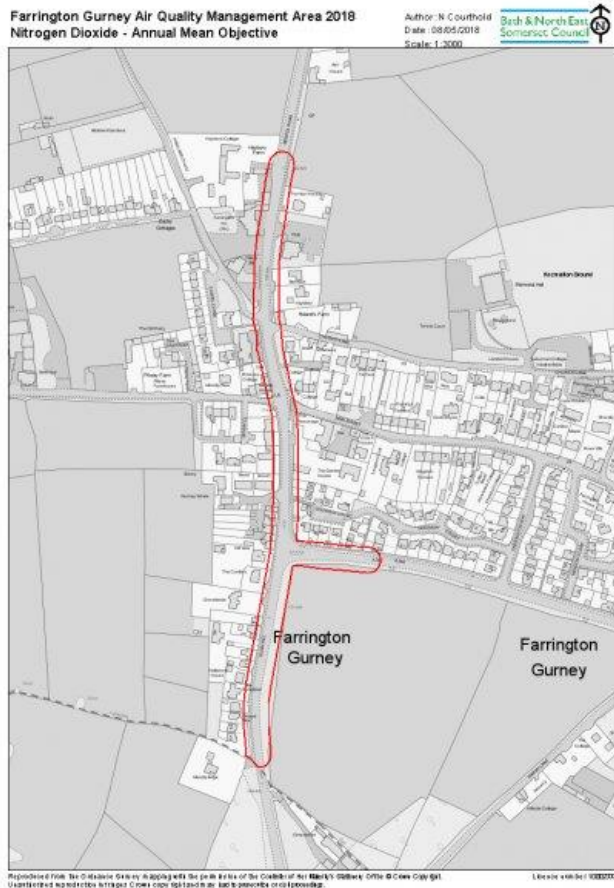


Fig 3.5. Map to show the Farrington Gurney Air Quality Management Area 2018



## Noise

3.1.7. Generally, noise pollution can be defined as any unwanted sound. Noise can occur unexpectedly, or can be too loud or repetitive. At certain decibels, it can be hazardous to health, with low frequency noise as damaging as loud noise. Exposure to noise pollution causes increased levels of stress hormones, which have been linked to long-term negative effects on cardiovascular disease and blood pressure. Excessive environmental noise has also been linked to impaired cognitive performance in children.

## 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 long term EU strategies

## National

3.1.9. National Planning Policy Framework, paragraph 170 states that: "Planning policies and decisions should contribute to and enhance the natural and local environment by preventing 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

3.1.11. 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 (NO<sub>2</sub>) can lead to respiratory diseases and can be particularly harmful to vulnerable groups such as the very old or young, the sick and the poor, further exacerbating health inequalities. 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. The Clean Air Zone scheme takes effect on 15<sup>th</sup> March 2021.

3.1.12. There are 5 Air Quality Management Areas (AQMA) in Bath and North East Somerset (B&NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre (µg/m<sup>3</sup>) as set out in paragraph 3.1.6.

3.1.13. In the 5 AQMA in B&NES, 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

- Bath Clean Air Zone is due to be introduced late 2020.
- Temple Cloud and Garrington Gurney AQMA were added in 2018.

## Key issues

- The Air Quality Action Plan (2011) sets a target of 45% reduction for all emissions across the district by 2026.
- There are five 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 aim 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 health and wellbeing if inappropriate new development is located near a major source of noise, for example new roads or locations of high traffic flow and/or congestion.
- Consideration should be given to construction impacts such as exposure to land contamination, deterioration in air quality from noise, dust and vibration. Use of construction management plans can lessen these impacts, particularly relating to hours of working and construction traffic movements.

## Scope of the Local Plan Partial Update

3.1.14. 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 ways:

### **Sensitive location of development sites in order to:**

- Avoid locating development in noise sensitive areas.
- Avoid noisy areas or areas of poor air quality.
- Minimise dependence on cars and reduce congestion.
- Maximise access by sustainable transport means by enhancing facilities and making walking, cycling and travel by public transport the easy option.

### **Appropriate development management policies in order to:**

- Encourage good design of sites to reduce noise impacts.

- Encourage good design of sites that help minimise local air pollution e.g. trees planted close to streets.
- Provide on-site services and access to public transport where appropriate.
- Provide sufficient secure bike storage and safe cycling routes throughout the site.
- Ensure an appropriate level of parking spaces are provided to encourage walking, cycling and use of public transport.

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

	SA Objective	Appraisal questions/prompts (would the policy/option lead to...)
Air Quality	<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<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> </ul>
Air Quality	<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<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> </ul>
Noise	<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<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>• Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity?</li> </ul>

### 3.2. Biodiversity, Flora and Fauna

#### Introduction

3.2.1 B&NES is notable for a variety of important semi-natural habitats including its ancient woodlands and networks of ancient hedgerows. It hosts nationally important calcareous and neutral grasslands, and supports a number of bat species, including lesser and greater horseshoe bats, and sites of international importance. The waterways – rivers and canals support a variety of wildlife including otters, kingfishers, water voles and some important migratory fish. The post-industrial coalmining landscapes support rich mosaics of habitat supporting notable botanical and invertebrate interests. In addition, some arable farmland, woodlands and domestic gardens support important bird life.

3.2.2 B&NES also includes key water bodies including the Chew Valley Lake which is of international significance designated a Special Protection Area (SPA), and a Site of Special Scientific Interest (SSSI). It is one of Britain's

most important sites for wintering wildfowl including the Shoveler (*Anas clypeata*). Part of Blagdon Lake is also a Site of Special Scientific Interest (SSSI).



Map showing Chew Valley Lake

3.2.3 B&NES environment 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 The bat sites of international importance include components of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC) and the North Somerset and Mendips Bat SAC. Semi natural grasslands, permanent pasture, woodlands and linear habitats around these sites are of critical importance for the bat populations using them. These features can comprise key flight lines or foraging areas for these international sites. Some of these features relate to SAC components outside of the authority boundary.





The Combe Down and Bathampton Down Mines 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 (SNAs) 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. Many areas of local interest are designated as Sites of Nature Conservation Importance. The West of England Nature Partnership has identified a number of grassland, woodland and water networks that could be the focus for habitat restoration and enhancement.

### 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 Government's 25 Year Environment Plan (2018) sets out ambitious goals for the natural environment and seeks to ensure that better account is taken of its value to our health and prosperity. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.
- 3.2.10 The Environment Bill (2019 - 2021) has been drafted to support delivery of the 25 Year Environment Plan. It also sets out the Government's approach to some of the key issues around climate change, loss of biodiversity

and environmental risks to public health. It aims to improve air and water quality, tackle plastic pollution, restore wildlife, and protect the climate. It appears set to introduce a mandatory requirement of 10% Biodiversity Net Gain from new development with 30 years of management and requires local authorities to produce Local Nature Recovery Strategies. The Public Bill Committee is currently considering and scrutinising the Bill and is expected to report to the House by 1st December 2020.

- 3.2.11 CIEEM and CIRIA have published 10 Good Practice Principles for delivering BNG. NPPF, paragraph 170 states that planning decisions should contribute and enhance the natural and local environment by: *inter alia* Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 3.2.12 In addition, the NPPF clarifies that development resulting in the loss of or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy.

## Local

- 3.2.13 In B&NES, the Nature Emergency is part and parcel of the Climate Emergency declared by the Council in March 2019 and recognises issues such as species extinction, loss of habitat and the connectivity of habitats, decline in the pollinators that are crucial to food supply, and the loss of and decline in the health, fertility and quantity of soil, on which we all depend for food. Both emergencies are the result of the over-exploitation of the earth's resources coupled with poor land management, intensive, industrialised agriculture, and land take for development.
- 3.2.14 The Government's Climate Change Committee has set a target of doubling tree cover in the UK by 2050 to help increase carbon sequestration. The West of England Nature Recovery Network (NRN), has an ambition of doing so by 2060. The West of England Nature Partnership that developed the methodology for the NRN, is currently developing a Tree and Woodland Strategy to assist its partners (including B&NES) achieve this ambition by 2050.
- 3.2.15 Through the Bathscape HLF funded programme, led by the Council, work is underway on a woodland project to look at better management of existing woodland and new opportunities for woodland creation in the Bathscape area. The Council will also produce a B&NES Tree and Woodland Plan that will include identifying tree planting opportunities that will deliver multiple benefits including for recreation, wildlife, flood management and landscape enhancement.
- 3.2.16 The B&NES Green Infrastructure Strategy (2013) identifies the benefits of well planned and managed green infrastructure and sets out the current assets and opportunities in B&NES. This Strategy is being reviewed as part of the Local Plan Framework to provide a delivery framework with actions to addressing the nature emergency, benefitting people, place and nature. WaterSpace Design Guidance 'Protecting bats in waterside development' provides guidance for use by developers and the Planning Department when dealing with planning applications in close proximity to the River Avon and Kennet and Avon Canal.

## Baseline review

- There are a number of designated sites in the area including a Special Protection Area (SPA): Chew Valley Lake; Combe Down and Bathampton Mines forming part of the 'Bath & Bradford-on-Avon Bats Special Area of Conservation (SAC)' and SAC: Compton Martin Ochre Mine which is a component site of the North Somerset and Mendip Bats SAC. Important flight lines and foraging habitat associated with these SACs and with other Bat SACs occur just outside of the district. Grazed permanent pastures, woodlands and linear features such as waterways and hedgerows are important and prevalent around Bath, and to the south west of the District.
- There are also 24 SSSIs across the district, and the majority of them are in mainly favourable or recovering 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 to date has not been sufficient to determine recent trends, though plans are being developed to analyse species distribution data to improve our understanding of trends and also to establish a new baseline for phase 1 habitat and priority habitat maps.

### Recent changes and trends

- The NATURA 2000 Standard Data Forms were updated in 2015; the information for the Chew Valley Lake SPA was updated.
- The Avon River Bat Project (2016) undertook detailed night-time surveys to study the pattern of bat activity on the River Avon in Bath. The project report indicates the numbers of bats present.
- Trend data for species abundance and distribution may be reviewed to aid development of the Local Plan Review. Plans are underway to update and renew baseline habitat data and priority habitat data for the WoE.

### Key Issues

- The Environment Bill sets out the Government's approach to some of the key issues raised around climate change, loss of biodiversity and environmental risks to public health. There will be new opportunities and obligations to the Council. One of the key requirements will be to achieve a 10% biodiversity net gain from new development, with 30 years positive habitat management. This will require appropriate planning policy. In addition, there is the requirement to produce and report on a B&NES Local Nature Recovery Strategy.
- There is a government toolkit and calculation metric to calculate net gain within development proposals. The approach demands adoption of the mitigation hierarchy to ensure impacts are first avoided and then minimised before residual habitat losses and gains are calculated. Policy will need to be reviewed to ensure use of the mitigation hierarchy and the government metric is used in all major and minor developments.
- Statutory and non-statutory sites need to be protected and enhanced. Where possible sites should be enlarged and buffered with supporting habitat, and habitat connections and networks should be enhanced.
- There is a need to safeguard protected species and to restore priority habitats.
- External lighting of buildings and the impact of light spill from new developments on light sensitive species including bats needs to be addressed through local policy and site allocations.
- Policies should promote the maintenance and increase of populations of key species in the South West in line with UK Species Action Plan targets.
- 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, though as part of the need to deliver BNG, data is to be updated.
- The 25yr Environment Plan and Environment Bill require the identification, protection and restoration of Nature Recovery Networks. The WENP has mapped a Nature Recovery Network for the WoE and measures will be required to protect, restore and enhance these networks.
- Up to date habitat mapping, including irreplaceable habitat and priority habitat will be needed to be included within the Local Plan.

### Scope of the Local Plan Partial Update

3.2.18 The Local Plan should help to address biodiversity issues including addressing loss of species and habitats, the delivery of Biodiversity Net Gain, and the need to increase habitat connectivity through sensitive site selection.

#### **Sensitive location of development sites in order to:**

- Avoid impacts on key habitats, species and sites, especially designated sites; irreplaceable habitats; priority habitats and species; greenspace networks and habitat connectivity, including river and stream corridors by employing the avoidance-mitigate-compensate hierarchy. In addition, development site locations should facilitate maximum on-site delivery of BNG and

compliance with the 10 BNG Good Practice Principles.

**Appropriate development management policies in order to:**

- Encourage biodiversity enhancements on-site, in all new developments, through use of the mitigation hierarchy. Creation of new habitats or features that will attract species eg swift boxes.
- Ensure the 10 BNG Good Practice Principles are adopted at site selection and project design stages.
- Facilitate a 10% biodiversity net gain from all major and minor developments using the DEFRA Metric and BNG toolkit.
- Secure the implementation of 30 year management plans for BNG habitat.
- Ensure current ecological networks are not compromised, and future improvements in habitats connectivity are maximised.
- Contribute to the enhancement and maintenance of a resilient and thriving ecological network, particularly linking through to nature recovery network.
- Contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.

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

	SA Objective	Appraisal questions/prompts (would the policy/option lead to...)
Biodiversity, Flora and Fauna	<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<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>

### 3.3. Climate Change

#### Introduction

3.3.1 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. The UK's targets are to reduce the production

of these gases by 34% by 2020 and by 80% by 2050. Around 45% of the UK's carbon dioxide emissions come from the energy we use every day at home and when we travel.

- 3.3.2 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.
- 3.3.3 There is definitive link between climate change and health and wellbeing. Climate Change has been described as the '*greatest public health threat of our time*'. The World Health Organisation (WHO) states that '*Climate change affects the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter*'. Climate change effects human health and disease in various ways, some existing health conditions will worsen, and new health threats will arise.
- 3.3.4 It is important to note that not everyone is at risk in the same way. Age, economic resources, and location will all play a role. Those with less resources have less capacity to mitigate the damaging effects of climate change and so inequalities may be magnified as it gets worse. The Marmot Review emphasises that local areas should prioritise policies that reduce health inequalities and mitigate climate change, due to the fact that those with the poorest health would be hit hardest by the impacts of climate change.
- 3.3.5 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).
- 3.3.6 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, and 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, increasing the use of renewable energy, reducing car use, and enhancing opportunities for local food growing.
- 3.3.7 The Council declared a Climate Emergency in March 2019 and pledged to provide the leadership to enable carbon neutrality in the district by 2030. Tackling the Climate Emergency means creating a different vision for all parts of Bath and North East Somerset, including the World Heritage Site of Bath. The Council is committed to providing the leadership to enable this scale of ambition to be realised and recognises that this requires a significant and fundamental shift within all sectors of the community.

## 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 B&NES Climate and Nature Emergency Action Plan sets out the priority areas for action including:
- Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build;
  - Transport: a major shift to mass transport, walking and cycling to reduce transport emissions;
  - A rapid and large-scale increase in local renewable energy generation.
- 3.3.10 B&NES will plan to reduce carbon emissions and adapt to climate change, 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. Tackling the causes and effects of climate change can deliver an array of co-

benefits to health and wellbeing, including improved air quality, improved physical health, safer and stronger communities, job creation and improved equity.

3.3.11 Taking into account current national policy and nationally led decarbonisation of the electricity grid, which assumes some local action, the Action Plan calculates that the business as usual pathway would reduce carbon emissions in the district by 38% by 2030 from 2016. Based on present day evidence and judgment, the Action Plan has calculated how action in B&NES across both energy demand reduction and local energy supply could reduce carbon emissions further. Using the SCATTER modelling tool, it has produced a 'Stretch Pathway' for B&NES showing how a 72% cut in emissions can be made by 2030 from 2016.

#### Baseline review

- Current Bath and North East Somerset district-wide direct emissions (eg from gas, oil, petrol, diesel) and indirect emissions (ie electricity) are: 766,876 tCO<sub>2</sub>e (tonnes of carbon equivalent) per year.
- B&NES district consumption emissions, based on an analysis of what local people spend on goods and services bought and used in the district, including outsourced emissions from goods and services manufactured or created outside the district and abroad are: 1,271,578 tCO<sub>2</sub>e (tonnes of carbon equivalent) per year.
- The direct and indirect emissions break down as follows: Energy use in buildings: 66%, (of which homes produce 38% and industry, commerce and institutions 28%); Transport: 29%; and Other 5%, of which waste is 4% and agriculture, forestry and other land use is 1%. 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.
- Total capacity of renewable energy technologies in operation in the district: 20.9 MWe (Target 110MWe by 2026) and 7.4 MWth (Target 165MWth by 2026) in August 2018.
- 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.
- Currently the renewable energy generated across the district amounts to 32,454 MWh, the majority of which is generated from photovoltaic installations. There is an installed capacity of 21.3 MW. 6 As of the end of this monitoring year no district heating schemes have been implemented. For this monitoring year, 11 applications which included renewable energy were permitted. Of this, 9 applications were householder applications. Two commercial applications were approved. No combined heat and power schemes have been granted permission.

#### Key issues

- Carbon emissions have been in decline in B&NES but are still higher than target.

- Significant under achievement of the renewable energy targets.
- The plan should help to address climate and energy issues through requiring consideration of energy efficiency, 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 can have on the issues.

**Scope of the Local Plan Partial Update**

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

**Sensitive location of development sites in order to:**

- Minimise dependence on cars and reduce congestion
- Maximise access by sustainable transport means, through the provision of safe and attractive walking and cycling routes that are well connected to services and amenities
- Facilitate more renewable energy development

**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)
- Provide sufficient secure bike storage and safe cycling routes throughout the site
- Improve adaptation to future climate change
- Protect allotments and encourage local food production, by providing opportunities to own or have access to space to grow food e.g. roof or communal gardens and community orchards

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

	SA Objective	Appraisal questions/prompts (would the policy/option lead to...)
Climate change	<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<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>• Incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted?</li> </ul>
Climate change	<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account</b>	<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</li> </ul>

	<b>of climate change)</b>	<p>(international, national, local)?</p> <ul style="list-style-type: none"> <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>
Climate change	<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<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 guidance, e.g. use of green infrastructure to include cooling measures such as deciduous trees, green space and blue?</li> <li>• Facilitate the supply of local food and increase provision of food growing space. i.e. allotments, community farms and farmers markets?</li> </ul>
Climate change	<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>	<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. 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, 18<sup>th</sup> 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
- 74 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 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 16 sets out the measures for '*Conserving and Enhancing the Historic Environment*'. 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

3.4.6. The aims of the City of Bath World Heritage Site Management Plan (2016-2022) are to:

- a) promote sustainable management of the Site
- b) ensure that the Outstanding Universal Value of the Site and its setting is understood, protected and sustained
- c) maintain and promote Bath as a living and working city which benefits from World Heritage Site status;
- d) improve physical access and interpretation encouraging all people to enjoy and understand the Site;
- e) 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.

3.4.7. The development of a positive strategy for the conservation and enjoyment of the historic environment, as required by the National Planning Policy Framework, informed by [the topic paper](#) provides an opportunity to consider the importance of the historic environment in the Council's area and how it can be conserved, enhanced and enjoyed by all.

**Landscape**

- 3.4.8. Bath & North East Somerset has a rich and diverse range of landscapes. Two landscapes in the District, the Cotswolds and Mendip Hills, are recognised as being of national importance and are designated 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. Most landscapes are defined by physical appearance and activities occurring within them. Many landscapes are valued for their recreational use and others are valued for their tranquillity.

**Context- International**

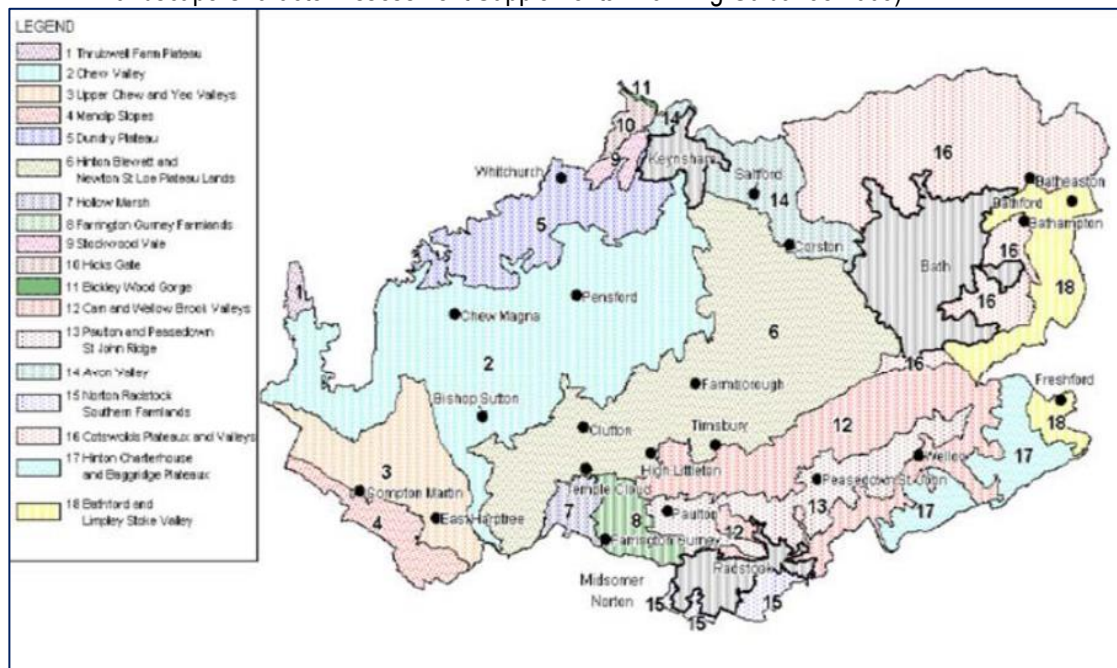
- 3.4.11. The European Landscape Convention (ELC) (2000) promotes the planning, management and protection of landscapes, and is the first international convention with a specific focus on landscape. The European Landscape Convention aims to encourage public authorities to adopt policies and measures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

**National**

- 3.4.12. 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.
- 3.4.13. 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**

- 3.4.14. The district has a varied landscape represented by 18 Landscape Character Areas. (Please see B&NES Landscape Character Assessment Supplemental Planning Guidance 2003)



### 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 4 conservation areas, 8 Scheduled Monuments, 4 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
- 74 Scheduled Monuments
- More than 4,000 archaeological sites on the B&NES 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 international 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'. Since 2016, the Keynsham, Midsomer Norton & Welton, Queen Charlton and Salford Conservation Area Appraisal were completed. Further appraisals are being drafted
- A character appraisal for Bath Conservation Area is being undertaken by the Council with input from Bath Preservation Trust, Historic England and other local organisations. The conservation area has been divided into 16 character areas which frame a spatial approach to the project. A framework for a character appraisal as a whole has been developed and work has started on appraising the individual character areas. So far, appraisals for 8 of these character areas have been completed, with another 5 in progress
- 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 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 Historic England 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 WHS City of Bath, including landscape views, is also an important characteristic that requires protection.

**Scope of the Local Plan Partial Update**

3.4.15. The Local Plan DPD can influence heritage, archeology and landscape in the following way:

**Sensitive location of development sites in order to:**

- Protect and enhance heritage assets including their setting
- Make a positive contribution to, or better reveal the significance of, the heritage assets, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area
- 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)
- Sustain the Outstanding Universal Value of the City of Bath WHS.
- 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 protects and enhances sense of place and through GI provide connections with the surrounding landscape, townscape and heritage
- Research and analysis skills
- Report writing and presentation skills
- Evidence gathering behind planning policies

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

	<b>SA Objective</b>	<b>Appraisal questions/prompts (would the policy/option lead to...)</b>
Landscape	<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<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>
Heritage, Archaeology and Landscape	<b>Objective 7: To conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<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>

**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. Employment is generally

the most important means of obtaining adequate economic resources, which are essential for material wellbeing and full participation in today's society.

- 3.5.2 Employment and socio-economic status are one of the main drivers of social gradients in health. There is clear evidence that good work improves health and wellbeing across people's lives and protects against social exclusion. Conversely, unemployment is bad for health and wellbeing, as it is associated with an increased risk of mortality and morbidity.

## National

- 3.5.3 The importance of the economy in achieving sustainable development is one of the three overarching objectives set out in the National Planning Policy Framework (NPPF). Paragraph 8 states the economic role of the planning system is:

*"To help build 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, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"*

- 3.5.4 The NPPF sets out that the planning system should contribute towards 'building a strong, competitive economy' and requires strategic policies to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, employment, retail, leisure and other commercial development.
- 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.

## Local

- 3.5.6 The West of England Local Industrial Strategy sets out clear priorities to drive long-term growth in our regional economy. The strategy draws on the unique strengths of our region and sets out our ambition to be a driving force for clean and inclusive growth. The West of England Combined Authority and Local Enterprise Partnership have brought together businesses and organisations from across our region, working closely with government, to develop the Local Industrial Strategy. The strategy covers the four authorities in our Local Enterprise Partnership: Bath & North East Somerset, Bristol, North Somerset, and South Gloucestershire. Four key priorities at the heart of the West of England's approach are:
- fostering cross-sectoral innovation from research through to commercialisation;
  - ensuring that growth is inclusive, with a focus on opportunities for employment and progression for all;
  - addressing the productivity challenge, including adopting new technology and management practices and
  - supporting businesses to trade; and capitalising on the region's innovative strengths to deliver the infrastructure necessary for future growth.

## Baseline

### Participation

- 3.5.7 B&NES had approximately 98,000 economically active residents aged 16-64 in 2018. The economic activity rate in B&NES (82%, 2018) has consistently been above that of the UK, but below the West of England average until 2018. The number of economically active residents in Bath and North East Somerset has been broadly increasing, in-line with the trend seen across the West of England.
- 3.5.8 The employment rate of residents aged 16-64 has also been rising in recent years and latest data indicates 80% are in employment. This is above both the West of England (79%) and UK (75%) levels. Overall, the economic activity and employment rate data indicates healthy levels of labour market participation in comparison to benchmark areas.

## Employment Characteristics

- 3.5.9 Rates of self-employment in B&NES (14% of all 16-64 years residents in employment) are higher than the West of England as a whole but below UK levels. The rate of self-employment has been falling steadily in B&NES over the last five years. This is a marked difference to a broadly flat or rising trend across the benchmark areas. With self-employment falling as share of total employment, the share that are employees has been rising.
- 3.5.10 The proportion of those in employment that are working part time has been rising. Latest data for 2018 indicates 32% of all 16-64 years residents in employment as working part time. This compares to 27% across the West of England and 25% at the UK level.

## Occupations

- 3.5.11 In 2018 approximately a quarter of B&NES residents worked in Professional Occupations, marginally below the West of England average but well ahead of the UK average. When Managers, Directors and Senior Officials, and Associate Professional and Technical Occupations are included this accounts for just over half (53%) of B&NES employed residents. This is a larger proportion than the West of England (51%) and UK (46%).

## Travel to Work

- 3.5.12 B&NES overall experiences a net inflow of approximately 5,000 workers based on the 2011 Census. A total of 29,300 workers travel into the UA area for work each day, with approximately 24,000 leaving B&NES to work elsewhere. The top five local authority areas that provide and receive commuters are: Bristol, South Gloucestershire, Wiltshire, Mendip and North Somerset. B&NES is a net recipient of commuters from all but Bristol.
- 3.5.13 When looking at travel to work patterns by sub-area it is evident that Keynsham has the greatest proportion of its jobs filled by residents from outside the B&NES area (55%), with South Gloucestershire and Bristol being the main areas of residence for workers, after Keynsham itself. This compares with the rural area (46%), Bath City (40%) and Somer Valley (31%). This may indicate the potential for Keynsham to play an important role in meeting the employment needs of a wider geography. At present the inflow and outflow of workers is broadly balanced, with a slight net outflow.
- 3.5.14 In Somer Valley, 55% of jobs are filled by residents of Somer Valley. The primary location for in-commuting workers is Mendip. This highlights some of the issues relating to transport connectivity which affect Somer Valley raised by attendees at the stakeholder consultation event for this research, with a much more local market area centred functional economy. At present there is a substantial net outflow of workers from Somer Valley.
- 3.5.15 In purely volume terms Bath, as the main employment centre within B&NES, has the greatest numbers of in-commuters by some distance. Particularly notable are the significant flows of workers in from Wiltshire and Somer Valley. At present there is a substantial net inflow of workers to Bath for work, highlighting its role as an employment hub.
- 3.5.16 The rural area has a net outflow of workers. Whilst not as pronounced as Somer Valley it is much greater than Keynsham. There are flows into the rural area from all areas, most notably Bath City and Bristol. However, because the rural area borders each of the other sub areas and neighbouring authorities it is not surprising to see a broad range of origins and destinations in the travel to work data. The major outflows of rural area residents are to Bath City and Bristol.

## Employment

- 3.5.17 There are a number of different measures of employment in an area. The most comprehensive is that taken from the ONS Jobs Density analysis. In 2017, B&NES accommodated approximately 104,000 jobs (ONS, Jobs

Density). According to this measure employment has been rising over the last 10-years, however, the rate of growth in jobs in B&NES has not been as high as across the West of England and UK.

- 3.5.18 In 2017 B&NES accounted for approximately 15% of West of England jobs (cf. 17% of the population). This share has been gradually declining from 16% in 2007. In the 10-year period 2007-17 B&NES accounted for just 10% of West of England employment growth (9,000 of 91,000 additional jobs). This shows a weakening of the area's role as an employment location.
- 3.5.19 Discussion as to why B&NES has failed to capture a share of employment growth aligned to its share of total employment, particularly when population growth has remained strong, was a feature of a stakeholder consultation workshop as part of this research. The discussion in the workshop identified two primary issues.
- 3.5.20 The failure to bring forward a sufficient supply of employment sites and premises in Bath, in terms of both offices and industrial. This has particularly limited the role of Bath to retain and attract office occupiers with notable losses to Bristol; and Issues of transport (and to some extent digital) connectivity, meaning parts of B&NES are in a less competitive position to other parts of the West of England as well as parts of Swindon and Wiltshire to the east.

#### Sub Area Analysis

- 3.5.21 Analysis of employment trends across the four sub-areas is based on the ONS Business Structure Database<sup>3</sup> (BSD). This source is not as exhaustive as (and therefore not consistent with) the Jobs Density measure. The BSD identifies approximately 88,600 jobs across B&NES for 2017 on a likefor like basis (approximately 85% of the larger Jobs Density figure)<sup>4</sup>. Data has been made available for the period 2008-2018.
- 3.5.22 Analysis of the BSD data shows a significant concentration of employment within the Bath City subarea (65%), 15% is located within Somer Valley area, 13% in the Rural Area, and 7% in Keynsham. However, the recent pattern of employment change has been markedly different to the historic distribution of employment. In particular, Bath City has, in terms of total employment, seen modest losses since 2008. Bringing the analysis in line with population data, between 2011–2017 the Rural Area (38%), Somer Valley (17%), and Keynsham (15%) have contributed more than their overall shares towards employment growth. Compared to overall employment distribution, Bath has significantly underperformed over the same period.
- 3.5.23 The relatively poor performance of Bath aligns to the views expressed by stakeholders at the consultation workshop i.e. that a failure to retain and deliver appropriate employment floorspace has led to losses of existing occupiers and a failure to attract new occupiers. The growth in rural areas is believed to be driven by rising homeworking and small businesses within agricultural conversions as well as the development of available sites.

#### *Bath City*

- 3.5.24 Information & Communication, Finance & Insurance and Public Administration and Defence are the three most concentrated sectors for employment in Bath City relative to Bath and North East Somerset. Recent employment growth in Bath City has been concentrated within Accommodation and Food Services, Professional, Scientific and Technical, Administrative and Support Services and Human Health and Social Work. There has been substantial decline in Public Administration and Defence employment within Bath City, as well as declines in the Education and Wholesale & Retail.

#### *Keynsham*

- 3.5.25 Manufacturing, Other Services, Transport and Storage and Construction are the most concentrated sectors for employment in Keynsham relative to Bath and North East Somerset. Keynsham's absolute employment numbers in Wholesale & Retail, Administrative & Support Services, Public Administration & Defence, and Human Health and Social Work have increased over the period, with Manufacturing and Construction decreasing substantially.

#### *Somer Valley*

- 3.5.26 Manufacturing, Construction and Transport & Storage are the most concentrated sectors for employment in Somer Valley relative to Bath and North East Somerset. Somer Valley's absolute employment numbers in Construction, Professional, Scientific & Technical, Administrative & Support Services, and Human Health and Social Work have increased notably over the study period, and there has been growth in other sectors as well. There has been significant employment losses in Manufacturing in Somer Valley.

#### *Rural Area*

- 3.5.27 Agriculture, Construction, Art, Entertainment & Recreation and Accommodation and Food Services are the most concentrated sectors for employment in the Rural Area relative to Bath and North East Somerset, The Rural Area's absolute employment numbers in Wholesale & Retail, Accommodation & Food Services, Professional, Scientific & Technical, Administrative & Support Services and Education sectors have increased over the study period, with no sectors showing significant losses.

### Recent changes and trends

#### Office Floorspace

- Bath - Policy B1, 2 (c) of the Core Strategy seeks to achieve the net additional increase of office premises of 40,000sqm between 2011 & 2029 by enabling the development of 50,000sqm of new space, linked to a managed release of 10,000sqm. As of March 2019 there has been a net reduction of 14,713sqm since 2011.
- Keynsham - Policy KE.1, 3, (b) of the Core Strategy seeks to achieve an increase in office floorspace from 13000sqm in 2011 to 20200sqm in 2029, an increase of 7200sqm. This figure has been exceeded with a net increase of 9,589sqm since 2011.
- Somer Valley - Policy SV1, 3, (b) of the Core Strategy seeks to increase office floorspace from 31,000sqm in 2011 to 33,700sqm in 2029. There has so far been a net decrease of 894sqm since 2011.

#### Industrial floorspace

- Bath - Policy B1 2, (e) of the Core Strategy plans for a contraction in the demand for industrial floorspace from 167,000sqm in 2011 to 127,000sqm in 2029, a reduction of 40,000sqm. There has been a reduction of 44,241sqm since the start of the plan period.
- Keynsham - Policy KE.1, 3, (b) of the Core Strategy plans for an increase in industrial floorspace in Keynsham from 52,000sqm in 2011 to 60,300sqm in 2029. An increase of 8,300sqm. There has been a reduction of 35480sqm since 2011.
- Somer Valley - Policy SV.1, 3, (b) of the Core Strategy plans for a reduction in industrial floorspace in the Somer Valley from 126,400sqm in 2011 to 112,000sqm in 2029, a reduction of 14,400. At present 5,789sqm has been lost since 2011 (40% of the planned loss in the Core Strategy).
- As of March 2019 there are 17 permissions for industrial floorspace within the rural areas which have not yet been implemented. In total these will result in an additional 2,345 sqm of industrial floor space. 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
- A net loss of office floorspace of over 8,000 m<sup>2</sup> (largely through permitted development), but the plan is still on track to deliver 40,000 m<sup>2</sup> of new office floorspace by 2029. However, this assumes implementation of all existing planning permissions and local plan allocations.
- Continuing buoyant demand for office space and greater demand for industrial space in the city (than was anticipated at the time of preparing the Core Strategy).
- Visitor Accommodation Study shows reduced market potential for further hotel development in Bath. Some limited capacity for budget hotels but not before 2021 and no more market capacity for high end hotels during the plan period (low growth) or until the second half of the Local Plan period (high growth).

#### 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.
- Need to investigate whether and how demand for office and industrial space in the city can be met within the context of competing land uses delivering higher values. Limited opportunities to make further provision for



employment space in Bath, therefore protecting both existing and committed office and industrial space in the city will be of high importance.

- Maintain Bath’s role as a successful and sustainable international visitor destination.
- Ensuring the delivery of the employment objectives of the Economic Strategy review are achieved where possible, including delivering more Higher Value Added jobs in Keynsham.
- There is a need to diversify the employment base.
- 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.
- Need to demonstrate that commercial growth and clean growth can go hand-in-hand as set out in the Local Industrial Strategy.

**Scope of the Local Plan Partial Update**

3.5.28 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.

**Appropriate development management policies in order to:**

- Facilitate a strong and competitive economy by protecting existing office and industrial land in appropriate locations.
- Facilitate new employment land in appropriate locations.
- Contribute to the region’s ambition for clean growth

3.5.29 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	Appraisal questions/prompts (would the policy/option lead to...)
Economic Development	<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<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>

**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, low income households, older and disabled people, responding to local housing needs. Some areas might require an increased provision for a particular population group e.g. supported living for older people.

- 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. A home is where most people spend most of their life; and both the physical building itself and location affects almost every aspect of person's life. Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. It is important that housing design and quality are provided to a high standard (appropriate size, daylight, ventilation and warmth standards) and that housing is in an appropriate location; close to services and amenities; access to green and open spaces; away from noise and air pollution.
- 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 e.g. assisted living, lifetime homes, wheelchair accessible. 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, which support the health and wellbeing of residents and help to reduce inequalities. 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. It also highlights the importance of developing a well-designed and safe built environment, with accessible services and open spaces that support communities' health, social and cultural well-being.
- 3.6.9. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed, and that land with permission is developed without unnecessary delay. (para 59).

## Housing Need

3.6.10. 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. The Planning Practice Guidance (Housing and economic needs assessment) sets out how to assess housing need including the application of the standard method.

### Local- Indices of Multiple Deprivations (2015)

3.6.11. 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

3.6.12. 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. It is important to recognise the inextricable link between where a person lives and their health and wellbeing. By improving housing provision in the more deprived areas highlighted above, this will in turn help improve health and wellbeing, whilst reducing inequalities.

### Baseline review

- There were 73,515 households recorded in the 2011 Census
- In March 2019, the average house price in Bath and North East Somerset was £337,606.
- 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 an 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, 62 empty properties in B&NES were brought back into use
- In 2018/2019 the total of 1,040 dwellings were completed (762 market housing and 278 affordable housing)
- 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%. Continued demand for HMOs (student & non-student). More properties that are suitable for families (some of which are close to schools) are being converted to HMOs. This is due to affordability and students preference for living in the city.
- HMO Additional Licensing was extended to the whole city in January 2019 i.e. all small and large HMOs will require a license. The licensing regime will help address the safety and quality of HMO properties, as well as help the Council to better understand exact locations and number of the HMO properties.

### 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.
- Respond to housing shortages including affordable housing and bring forward a suitable mix of housing types and sizes to meet the range of needs, including from an ageing population, in a timely manner.
- Need to consider accessibility standards to support independence.
- Delivering affordable housing which is appropriate to the local housing market and income profile.

- Ensure appropriate types of accommodation are provided to address student and other needs, and contribute towards reducing the pressure on HMOs.

**Scope of the Local Plan Partial Update**

3.6.13. 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:**

- Plan for objectively assessed need for all types of housing, including market housing and affordable housing.
- Ensure the sustainable location of development sites
- Maximise access to existing services and plan for provision of new services where required

**Appropriate development management policies in order to:**

- Ensure appropriate contribution towards market and affordable housing requirements.
- Ensure appropriate contribution towards appropriate community services
- Facilitate appropriate accessibility standards for both affordable and market housing

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

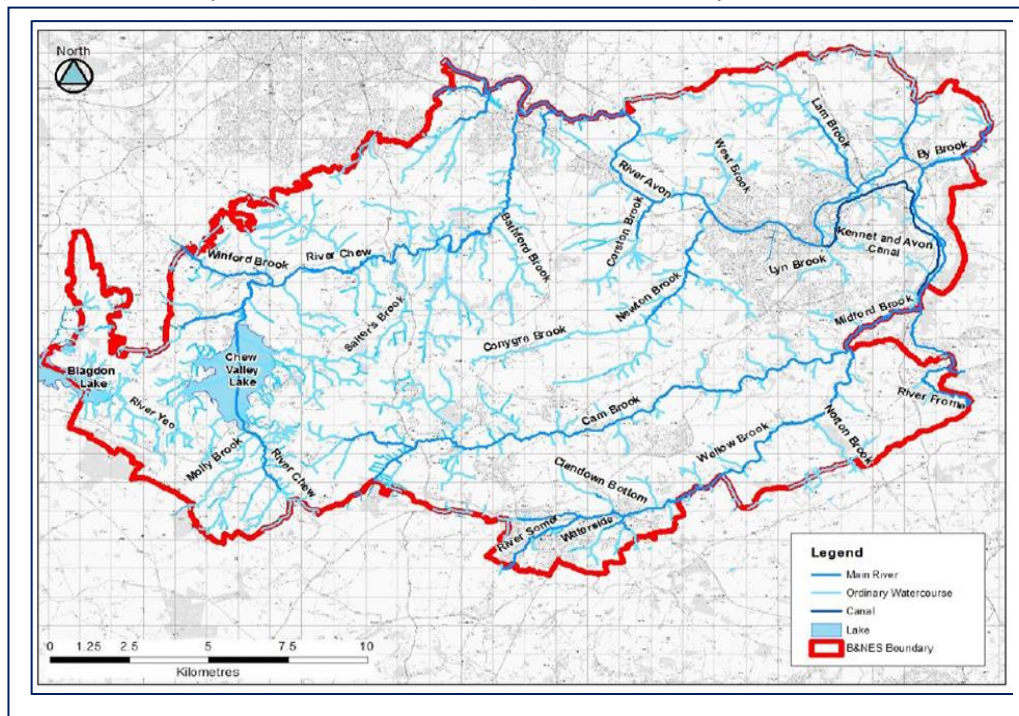
	SA Objective	Appraisal questions/prompts (would the policy/option lead to...)
Housing	<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<ul style="list-style-type: none"> <li>• Provide viable and deliverable good quality housing and affordable 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>

**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 Furthermore, the City of Bath is located directly above three natural hot springs. These springs have been, and continue to be, at the centre of economic, social and cultural developments in the City. The County of Avon Act gives the B&NES Council powers to protect the natural thermal springs that arise under artesian pressure in the centre of Bath, from damage that could result from excavations, piling operations or bore holes in the Bath area.

### 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 natural topography and flow of the water system makes it essential that all stakeholders work together on a catchment basis, across political boundaries. The Catchment Based Approach (CaBA) was developed to enable us to do this. CaBA is an inclusive, civil society-led initiative that works in partnership with Government, Local Authorities, Water Companies, businesses and others, to maximise the natural value of our environment. It facilitates good planning and management of the water environment by taking account of the whole water network and land area that contribute to the water flow and quality. This approach supports achievement of the targets under the Government's 25 Year Environment Plan.

3.7.5 **The Bristol Avon Catchment Partnership (BACP)** was formed in 2012, bringing together a range of organisations and local communities who work together using the Catchment Based Approach to improve the water environment and provide wider benefits for people and nature at a catchment scale. BACP is one of over 100 catchment partnerships across England.

### Flooding – National

3.7.6 The NPPF states that Local Planning Authorities should set out strategic policies to provide infrastructure for water supply, waste water and flood risk (paragraph 20B). Paragraph 155 of the NPPF states that new development should be strategically located away from areas of high flood risk, and where development is

necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

- 3.7.7 The NPPF, paragraph 170E states that new and existing development should be prevented from contributing to water pollution, and paragraph 165 requires major developments to incorporate sustainable drainage systems.

**Local**

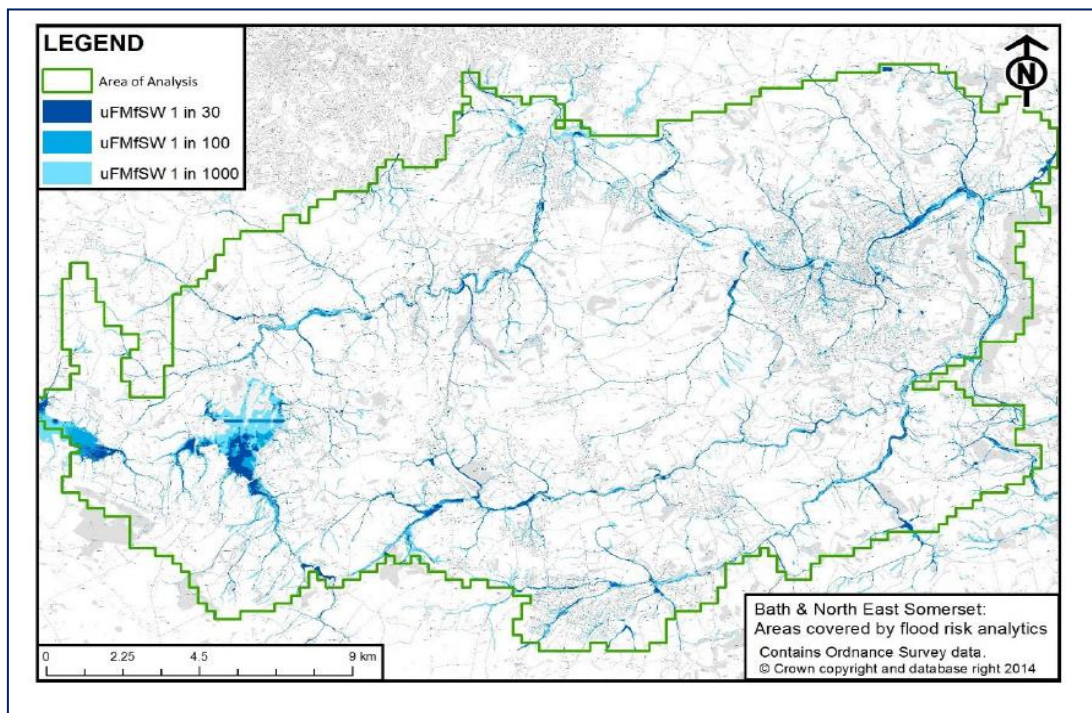
- 3.7.8 Under the Flood and Water Management Act (2010), Bath & North East Somerset Council is designated as the Lead Local Flood Authority for the area and has certain responsibilities for managing flood risk from 'local' sources. In the Act, 'local' sources of flooding are defined as flooding from:

- surface water
- groundwater
- ordinary watercourses

- 3.7.9 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.

- 3.7.10 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**

- 3.7.11 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 are dependent on the hydrogeological characteristics of the aquifer and groundwater flow direction.

### Soil - National

3.7.12 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

- 3.7.13 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.
- 3.7.14 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.
- 3.7.15 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.
- 3.7.16 West of England Sustainable Drainage Developer Guide (2015) was prepared by the West of England authorities. A sustainable approach to drainage mitigates the impact of new development on flood risk and builds our resilience to flooding. It also provides opportunities to remove pollutants from urban runoff at source, and combines water management with green space with benefits for amenity, recreation and wildlife. It provides information on the planning, design and delivery of attractive, high quality and well-integrated SuDS schemes which should offer multiple benefits to the environment and community alike.

### 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'.
- BACP Hydrological report for the Joint GI Strategy identifies issues and opportunities for all the sub catchments in B&NES, including issues caused by urbanisation and transport drainage.
- 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

- 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.
- Sub catchments heavily modified due to flood protection and urbanisation – need more natural solutions to avoid impact further downstream, impact on ecology (barriers to fish passage, fisheries and pollution) and sense of place.



**Scope of the Local Plan Partial Update**

3.7.17 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 and water pollution.
- Promote best practice for SuDs and 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. Seek natural solutions to address flooding and deliver improved management of water environment.

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

	<b>SA Objective</b>	<b>Appraisal questions/prompts (would the policy/option lead to...)</b>
Natural Resources- water and soils	<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<ul style="list-style-type: none"> <li>• The remediation of contaminated sites?</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>
Natural Resources- water and soils	<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<ul style="list-style-type: none"> <li>• Development which supports and corresponds with appropriate flood risk management guidance including applying natural solutions and a sequential approach and policies for any form of flooding including surface water flooding?</li> <li>• Development which incorporates SUDS?</li> </ul>
Natural Resources- water and soils	<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>	<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>• Protection of grades 1- 3a agricultural land from development?</li> </ul>

### 3.8 Safer, Stronger and Healthier 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. However, there is significant variation within Bath and North East Somerset, in some areas inequality is widening and deprivation remains significant. There are now two small areas within the most deprived 10% nationally and as highlighted in section 6, there are 5 areas that fall within the most deprived 20% nationally. There are also a number of areas of rural isolation.
- 3.8.3 Some people in our community have worse health than others. Although some of these differences arise from chance, from genetics or individual decisions, international research shows that most health inequalities are determined by people's social and economic status over the course of their lives. These differences are seen across different levels of wealth, between men and women, different ethnic groups, people with and without disability and between other discriminated-against groups. For example, there are significant variations in life expectancy related to socio-economic inequality. For someone living in the most deprived area of B&NES, they can expect to die at a younger age than someone in the most affluent area of B&NES. The COVID-19 pandemic and how the government and society have responded, has put the spotlight on health inequalities. The effects of the pandemic are likely to impact more on some groups, communities and places than others, resulting in further increases in health inequalities. These impacts are likely to be seen for many years to come.

#### Context-National

- 3.8.4 National Planning Policy Framework (NPPF) requires the planning system to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 3.8.5 Many of the things that influence health and wellbeing, and the likelihood of developing long term health conditions, are the everyday circumstances we live in. Economic, social and environmental factors influence the health of individuals and populations and are described in the NPPF. These factors are known as the social or 'wider' determinants of health and determine the extent to which a person has the ability to achieve their goals, meet their needs and deal with changes to their circumstances. New development has the potential to positively or negatively affect these wider determinants ('the causes of the causes') of health in our neighbourhoods. Where new development occurs, it is therefore important that the implications of the proposals upon health and the wellbeing of the affected communities are considered.
- 3.8.6 The COVID-19 pandemic has further exacerbated health inequalities and as highlighted the importance of the wider determinants of health in addressing in health inequalities. Inequalities arise from the unequal distribution of social, environmental and economic conditions within societies, and these conditions play a crucial role in a person's ability to prevent illness and access treatment. Therefore, a wide range of measures need to be put in place to mitigate the impact of the virus on more deprived and excluded groups.
- 3.8.7 The NHS, Public Health England and local governments across the country are committed to driving a 'whole person' approach to health that considers the wider determinants of health and wellbeing, The NHS' Long Term Plan notes that the NHS is shaping the future of the built environment, recognising the importance of well-designed development to people's health and wellbeing. This approach to integrated care is adopted more locally through Sustainability Transformation Partnerships (STPs) including the Bath and North East Somerset, Swindon and Wiltshire CCG's STP.

## Local

- 3.8.8 The B&NES Joint Health and Wellbeing Strategy (2015) is the overarching plan for improving health and wellbeing and reducing health inequalities in the area. Through this strategy, the Health and Wellbeing Board leads on a joined-up approach that supports and protects people's health and wellbeing. Its focus is on encouraging people to stay healthy, improving the quality of people's lives and on making sure that everyone has a fair chance of living well. A key priority 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"*.
- 3.8.9 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
- 3.8.10 Fair Society, Healthy Lives ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. It highlights that *'Health inequalities result from social inequalities. Action on health inequalities requires action across all the social determinants of health'* and one of the 6 policy objectives of the review is *'Create and develop healthy and sustainable places and communities'*. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis 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'*.
- 3.8.11 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.

## Scope of the Local Plan Partial Update

- 3.8.12 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:**

- Maximise access to local facilities and access to the natural environment for all population groups.
- Ensure adequate provision of community services and facilities, and maximise access by sustainable modes of transport.
- Provide accessible healthcare services and other social infrastructure to support population growth.

### **Appropriate development management policies in order to:**

- 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.
- Increase connectivity to places, facilities and open countryside to increase options for people for work, living and recreation use.
- Put in place relevant actions outlined in the national Community Resilience Development Framework.

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

	SA Objective	Appraisal questions/prompts (would the policy/option lead to...)
Safer and stronger communities	<b>Objective 1: Improve the health and well-being of all communities</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>• 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>• Opportunities to engage in structured sport?</li> <li>• Opportunities to engage in play, leisure and informal recreation?</li> <li>• Support local sustainable food production, including the provision of allotments and community gardening?</li> <li>• Maintaining or increasing access to existing open space and in areas of deficiency, the provision of new open and or access to natural space?</li> <li>• Inclusive design which supports social interaction for all ages, including the needs of those with sensory and mobility impairments?</li> </ul>
Safer and stronger communities	<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<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>

### 3.9 Transport

#### Introduction

3.9.1 Transport is fundamental to the successful economy and health and wellbeing of Bath and North East Somerset, both 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 quality of life throughout the city is being adversely affected.

- 3.9.2 Promotion of sustainable travel modes by providing safe opportunities for walking and cycling, and combining active travel and public transport, can help in the prevention of chronic diseases, reduce risk of premature death and improve mental health and wellbeing. A range of measures including connectivity with wider networks, safe junctions, traffic calming measures and secure cycle parking can all help increase participation of sustainable transport modes.

## Local

- 3.9.3 The Joint Local Transport Plan 4 (JLTP4) is a joint plan prepared by the West of England Combined Authority (WECA), working with Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire councils. The JLTP4 sets out the vision for transport investment in the West of England and the policy framework within which the West of England authorities will work. The JLTP4 builds on the two previous Plans, 2006 to 2011 and 2011 to 2026 and uses the West of England Joint Transport Study, October 2017 as its evidence base. The JLTP4 builds upon its findings and seeks to enshrine into policy the work previously carried out. The document covers all aspects of transport policy including (but not limited to) public transport, sustainable transport development, low traffic neighbourhoods, road safety, highways maintenance and technological advances in the transport sector.
- 3.9.4 The long-term aspiration for transport in the West of England is encompassed in the vision statement for the JLTP4: ***'Connecting people and places for a vibrant, inclusive and carbon neutral West of England'***
- 3.9.5 Accompanying documents to the JLTP4 and requirements of devolution are the Key Route Network and the Bus Strategy. Under devolution WECA is the transport authority for concessionary travel, community transport and bus information with supported bus services as a joint power with the constituent councils.
- 3.9.6 The West of England councils are working with the Combined Authority to prepare a new Bus Strategy for our area. Buses have a major role to play in helping us tackle poor air quality and traffic congestion, reduce dependency on the private car and improve accessibility for everyone. The Bus Strategy will set out how the West of England will increase investment in infrastructure, new vehicles, simplified ticketing, interchanges and information. We will also assess new opportunities to structure and deliver bus services fit for the West of England for the next twenty years.
- 3.9.7 In addition to the Bus Strategy the West of England authorities are currently consulting on a new Local Cycling and Walking Investment Plan (LCWIP). This will set out a programme of cycling and/or walking infrastructure improvements and the scale of investment that would be required to bring preferred routes up to a suitable standard. It will focus on ensuring key local destinations are connected by a comprehensive walking and cycling network.

## 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 which has a negative impact on air quality levels and is perceived to have a negative impact on businesses in the City
- Midsomer Norton, Westfield and Radstock are 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 the timetables which is mainly due to traffic congestion.

- High levels of out-commuting from Midsomer Norton and Radstock means that the road south of Bath to Midsomer Norton and Radstock experiences high levels of commuter traffic.

### Recent changes and trends

- Feasibility studies have been carried out to investigate the impacts and extent of charging in Clean Air Zones in Bath and Bristol. Final plans are likely to include introducing charges or restrictions for the most polluting vehicles entering these areas. This could help contribute towards improving air quality in our most congested areas.
- The Bath Transport Strategy gives a direction to transport initiatives in the city that seeks to address current and future needs. The strategy provides the basis for initiatives to make the city function effectively and sustainably. This will enable it to grow, absorbing new demands into the established and unique city. The targets in the Bath Transport Strategy have now been delivered with increases in public transport usage, walking and cycling levels. To progress the delivery of the Getting Around Bath Transport Strategy from 2020 onwards an updated Transport Delivery Action Plan is needed to include the aim for a step change in public transport taking into account recent developments. The plan will identify the short, medium, and long-term schemes and policies that should be implemented.
- There have been increases to the capacity of the Park and Ride sites 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 Lansdown 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 Salford and the A39 at Corston. More signs have also been installed on the A36 and A4. The signs provide a range of information 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 CO<sub>2</sub> 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.

### Key Issues

- 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 address transport issues by ensuring new development sites are designed and built with the appropriate walking and cycling infrastructure, to ensure people feel safe and confident to access local services and facilities by active travel
- 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
- Managing parking provision within the city. The PMP set parking standards for various uses but the standards for Residential, Purpose Built Student Accommodation and Houses in Multiple Occupation need to be reviewed. (Please see Chapter 8)
- The B&NES highway network remains heavily trafficked, highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement particularly in areas of historic significance.

- The need for new development is balanced with minimising traffic congestion and making places more accessible by sustainable modes of transport.

**Scope of the Local Plan Partial Update**

3.9.8 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	Appraisal questions/prompts (would the policy/option lead to...)
Transport	<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<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>
Transport	<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<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>• Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity?</li> </ul>

**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 Directive (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 Local Plan Partial Update**

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	Appraisal questions/prompts (would the policy/option lead to...)
Waste	<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>	<ul style="list-style-type: none"> <li>• Water efficient design and reduction in water consumption?</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>



## 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. Scoring

Score	Description	Symbol	Significance
<b>Major positive impact</b>	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	<b>++</b>	Significant effect
<b>Minor positive impact</b>	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	<b>+</b>	Non-significant effect
<b>Neutral</b>	The option / plan does not have an effect on the achievement of the SA Objective or SA questions	<b>0</b>	Non-significant effect
<b>Minor negative impact</b>	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	<b>-</b>	Significant effect
<b>Major negative impact</b>	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	<b>--</b>	Significant effect
<b>Uncertain</b>	It is unclear whether there is the potential for a negative or positive effect on the SA Objectives	<b>?</b>	Significant effect
<b>Not applicable</b>	The option/plan is not applicable to the SA Objectives	<b>n/a</b>	Non-significant effect

- 4.3. 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 partial update. 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...)
<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> </ul>

<b>Table 4.2.1: Local Plan DPD SA Framework</b>	
<b>SA Objectives</b>	<b>Appraisal questions/prompts (would the policy/option lead to...)</b>
	<ul style="list-style-type: none"> <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> <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>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<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>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<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>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<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>
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<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>

<b>Table 4.2.1: Local Plan DPD SA Framework</b>	
<b>SA Objectives</b>	<b>Appraisal questions/prompts (would the policy/option lead to...)</b>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<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>
<b>Objective 7: To conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<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>
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<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>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<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>• Measures 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>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<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>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<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 guidance, e.g. use of green infrastructure to include cooling measures such as deciduous trees, green space and blue?</li> <li>• Facilitate the supply of local food and increase provision of food growing space. i.e. allotments, community farms and farmers markets?</li> </ul>

<b>Table 4.2.1: Local Plan DPD SA Framework</b>	
<b>SA Objectives</b>	<b>Appraisal questions/prompts (would the policy/option lead to...)</b>
<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>

## 5.0. Next Steps

- 5.1. The next stage of the SA will be an assessment of the options papers and this will begin in Winter 2020. Once the options papers have been assessed, the SA will assess submission version of the Plan and at this stage a formal SA report will be produced.