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# Bath & North East Somerset Council

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**Improving People's Lives**

**Bath and North East Somerset  
Adopted Local Plan Partial Update Plan**

**Sustainability Appraisal Report**

**Date  
January 2023**



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## 1. Introduction

### Background

- 1.1. The preparation of the Bath & North East Somerset (B&NES) LPPU has been subject to a fully integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of:
- the SEA Regulations (*Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004*) which requires an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment;
  - The Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework which requires sustainability appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents;
  - Applicable Government guidance including *A Practical Guide to the Strategic Environmental Assessment Directive* (Office of the Deputy Prime Minister, 2005) and Sustainability Appraisal section of the Plan Making Manual (<http://www.pas.gov.uk/pas/>).
- 1.2. The integrated process is therefore termed Sustainability Appraisal (SA), and it incorporates the requirements of the SEA Regulations. This report is the main output of the SA and records the results of the whole SA. This report has been produced alongside the production of the LPPU and is published alongside the adopted Plan.

### Structure of this Report

- 1.3. This SA report includes the elements of an environmental report as required by the SEA Regulations. Table 1 signposts the relevant sections of the SA report that represent the required contents of the environmental report.

**Table 1: Contents of the SA report**

<b>SEA Regulations – requirement for an environmental report</b>	<b>Where covered in the SA Report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
a)An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	The contents and main objectives of the plan are presented in Section 2. The plan's relationships to other plans and programmes are addressed in Appendix A.
b)The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and	Section 5 and Appendix B
c)The environmental characteristics of areas likely to be significantly affected.	Section 5 and Appendix B

d)Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Sections 4 and 5 and Appendix B
e)The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4 and Appendix A
f)The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Section 6 and 7 and Appendixes C, D, E, F, G and I (the definition of significance is addressed in Section 3).
g)The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 6 and Appendix C, D and F.
h)An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 6 and 7. Appendix C, D and E. Difficulties are addressed in Section 3.
i)A description of measures envisaged concerning monitoring in accordance with regulation 17.	Section 10 and Appendix G.
j)A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	The whole report does this.
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies. (Regulation 12(3))	Scoping Report for 5 weeks from 28th April to 3rd June 2020 Interim SA Report 7 <sup>th</sup> January to 18 <sup>th</sup> February 2021
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).	Interim SA Report 7 <sup>th</sup> January to 18 <sup>th</sup> February 2021 Draft SA Report 27 <sup>th</sup> August to 8 <sup>th</sup> October 2021 Main Modifications consultation 21 <sup>st</sup> September to 2 <sup>nd</sup> November 2022.
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	The Local Plan Review is not expected to have significant effects on other EU Member States.
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	

<p>Provision of information on the decision:</p> <ul style="list-style-type: none"> <li>- When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</li> <li>- The plan or programme as adopted;</li> <li>- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>- The measures decided concerning monitoring</li> </ul>	<p>The Adoption Statement and notification letter sent to the statutory consultees.</p>
<p><b>Monitoring</b></p>	
<p>The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))</p>	<p>Section 10 and Appendix G describes the measures that should be taken to monitoring the likely significant effects of the Partial Update.</p>

- 1.4. This chapter provides an introduction to the LPPU and related SA process. The rest of this report is structured as follows:
- Section 2 describes the B&NES Development Plan Framework;
  - Section 3 outlines the methodology used in the SA;
  - Section 4 describes the plan's relationship with other plans, programmes and environmental / sustainability objectives
  - Section 5 sets out the sustainability baseline and likely evolution without implementation of the LPPU;
  - Section 6 sets out the reasons for selecting the alternatives dealt with and the results of the appraisal of options considered in the development of the draft LPPU;
  - Section 7 sets out the results of the appraisal of the policies within the draft LPPU;
  - Section 8 sets out the cumulative effect on the draft Local Plan as a whole
  - Section 9 sets the in combination effects with other local plans.
  - Section 10 outlines initial proposals for monitoring the sustainability effects of the options;
  - Section 11 outlines the next steps.

**Habitats Regulations Assessment**

- 1.5. The LPPU has been subject to a parallel Habitats Regulations Assessment (HRA). HRA of plans is a requirement of the Habitats Regulations 2010 and relates to the protection of European designated nature conservation sites.
- 1.6. The findings of the HRA can be found within the report entitled 'Habitat Regulation Assessment for the Bath & North East Somerset LPPU draft document available from [www.bathnes.gov.uk](http://www.bathnes.gov.uk).

## 2. B&NES Development Plan – Planning Framework

- 2.1. The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029. Together these documents form the Local Plan for B&NES. The Council is required to review the Local Plan every five years in order to determine whether it remains fit for purpose or whether all or part of it needs to be updated.
- 2.2. On 9th May 2022 the West of England Combined Authority (WECA) Mayor wrote to the Secretary of State for Levelling Up, Housing and Communities to advise him that he had halted work on the WECA Spatial Development Strategy (SDS). The Council is committed to progressing preparation of a full replacement Local Plan as swiftly as possible. In the absence of a response from the Secretary of State and the lack of any indication from the WECA Mayor that work will be re-started on the SDS, the three WECA UAs are of the view that the Local Plans for B&NES, Bristol and South Gloucestershire will now provide the strategic planning framework for the West of England Combined Authority area. Work on the full replacement Local Plan for B&NES has been formally launched in September 2022. It is now anticipated the Local Plan will be adopted by summer 2025. Therefore, in the interim, B&NES is undertaking a Partial Update of the Local Plan to address a number of urgent issues. The scope of the review will be set out below.
- 2.3. A full SA has been carried out on the B&NES Core Strategy and Placemaking Plan 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). The final report can be accessed from:
- The SA report for the Core Strategy ([Link](#))
  - The SA report for the Placemaking Plan ([link](#))

### Purpose and scope of the partial update

- 2.4. As this is a partial update to the existing Plan, and not a new Plan, the scope of the changes is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy & Placemaking Plan. The scope of the LPPU therefore needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the full replacement Local Plan or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period. The Core Strategy and Placemaking Plan Objectives are as below.

Table 2 Core Strategy and Placemaking Plan Objectives

<b>Objective 1</b>	SCS Driver: Climate Change
<p><b><i>Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate</i></b></p> <ul style="list-style-type: none"> <li>• reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services</li> <li>• ensuring the location and layout of new development enables and encourages people to make the fullest possible use of public transport, walking and cycling</li> <li>• encouraging and supporting the increased generation and use of renewable and low carbon energy, including through the delivery of community led schemes</li> <li>• promoting sustainable and energy efficient design and construction</li> <li>• shaping places so as to minimise vulnerability and provide resilience to impacts arising from climate change including increased flood risk</li> </ul>	

<ul style="list-style-type: none"> <li>• facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals</li> <li>• maintaining and enhancing a network of connected and multifunctional green spaces for people and wildlife serving climate change adaptation and mitigation purposes</li> </ul>		
<b>Objective 2</b>		SCS Driver: Growth
<p><b><i>Protect and enhance the District's natural, built and cultural assets and provide green infrastructure</i></b></p> <ul style="list-style-type: none"> <li>• ensuring that growth and development takes place within the environmental capacity of the District</li> <li>• making optimum use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible</li> <li>• helping to conserve and enhance the quality and character of our built and natural heritage</li> <li>• maintaining and enhancing an accessible and multifunctional network of well linked green spaces</li> <li>• helping to conserve, enhance and restore the diversity and resilience of the District's wildlife</li> <li>• helping to avoid water, air, light and noise pollution and the contamination of land</li> <li>• capitalising on the role our heritage has in promoting local distinctiveness, place-making and supporting regeneration</li> <li>• maintaining an outstanding built and natural environment by ensuring that new development responds appropriately to the locally distinctive context and meets high standards of design</li> <li>• facilitating continuing and wide participation in cultural activities</li> </ul>		
<b>Objective 3</b>		SCS Driver: Economy Inequalities Locality
<p><b><i>Encourage economic development, diversification and prosperity</i></b></p> <p>The Council's Economic Development Strategy seeks to stimulate a more productive, competitive and diversified economy across the District and promotes a higher value added economy (smart growth) where indigenous companies are retained and able to grow, other knowledge based sectors are attracted to the area and the industrial sector continues to contribute to the local economy.</p> <ul style="list-style-type: none"> <li>• increasing the availability of modern office and unit space in Bath thereby enabling indigenous companies to expand and the city to better respond to external demand</li> <li>• maintaining an appropriate supply of land in Bath for industrial processes and services to ensure the city retains a mixed economy</li> <li>• enabling tourism to continue to make an important contribution to the economy of Bath and promoting the tourism potential of other parts of the District e.g. by facilitating the provision of visitor accommodation</li> <li>• capitalising on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge based sectors and retaining those skills and talents in the city and wider area</li> <li>• repositioning Keynsham as a more significant business location enabling it to attract new employers to compensate for the closure of Cadbury Somerdale</li> <li>• ensuring that a sufficient and responsive supply of appropriate land and premises is available and improvement of skills is facilitated at Midsomer Norton and Radstock to help strengthen their roles as employment centres for the southern part of the District</li> <li>• enabling small scale local employment development, including those related to innovation opportunities, in the rural areas</li> </ul>		
<b>Objective 4</b>		SCS Driver: Growth Inequalities Demographic Change
<p><b><i>Invest in our city, town and local centres</i></b></p> <ul style="list-style-type: none"> <li>• Bath city centre and Keynsham, Midsomer Norton and Radstock town centres need to be improved as centres for social and economic activity and as places for entertainment, culture and shopping. The local and neighbourhood centres across the urban and rural parts of the District need to be sustained, so they continue to play an important role in meeting the day to day needs of their local residents.</li> <li>• enhancing Bath's central shopping area, to maintain its competitiveness, diverse offer and reputation for independent and niche retailing</li> <li>• introducing more commercial space, suitable for a range of enterprises, as part of new mixed use</li> </ul>		

<p>developments on underperforming sites in and close to Bath city centre</p> <ul style="list-style-type: none"> <li>• improving the quality and capacity of shops within the core of Keynsham and Midsomer Norton town centres</li> <li>• introducing more office and residential floor space into Keynsham, Midsomer Norton and Radstock town centres</li> <li>• improving the quality of the public realm in the city, town and local centres</li> <li>• providing better pedestrian and cycle routes into and within the city, town and local centres</li> <li>• ensuring existing and proposed parks are well integrated into and play a central role in the centres of Bath, Keynsham and Midsomer Norton</li> <li>• enabling appropriate tourism opportunities in the city and town centres</li> <li>• protecting and enhancing the range of services and facilities provided in local, neighbourhood and village centres, encouraging the provision of efficient, low carbon energy for example from District heating or combined heat and power systems.</li> </ul>		
<b>Objective 5</b>		SCS Driver: Economy Inequalities Locality
<p><b>Meet housing needs</b></p> <ul style="list-style-type: none"> <li>• enabling the delivery of new homes needed to respond to expected demographic and social changes and as far as possible to support the labour supply to meet our economic development objectives</li> <li>• ensuring that the new homes provided are of high quality design and reflect and cater for a range of incomes and types of household, including those in need of affordable housing</li> <li>• addressing the accommodation needs of gypsies and travellers</li> <li>• ensuring the accommodation needs of any increase in the number of students can be met sustainably</li> <li>• ensure that the development of new homes is aligned with the provision of all the necessary infrastructure</li> </ul>		
<b>Objective 6 (landscape)</b>		SCS Driver: Inequalities
<p><b>Plan for development that promotes health and well being</b></p> <ul style="list-style-type: none"> <li>• enabling more opportunities for people to lead healthier lifestyles and have a greater sense of well-being through facilitating active modes of travel, encouraging social interaction and designing high quality, safe streets and spaces</li> <li>• Promoting and delivering local employment, training and regeneration opportunities that can contribute to a reduction in the health and social inequalities across the District encouraging and facilitating increased local food production</li> <li>• ensuring the timely provision of social and physical infrastructure, including health, welfare, spiritual, recreational, leisure and cultural facilities</li> </ul>		
<b>Objective 7 (heritage)</b>		SCS Driver: Economy & Growth
<p><b>Deliver well connected places accessible by sustainable means of transport</b></p> <p>In conjunction with the Joint Local Transport Plan, the Local Plan will deliver this by:</p> <ul style="list-style-type: none"> <li>• locating and designing new development in a way that reduces the need and desire to travel by car and encourages the use of public transport, walking and cycling</li> <li>• ensuring that development is supported by high quality transport infrastructure which helps to increase the attractiveness of public transport, walking and cycling</li> <li>• promoting improved access to services especially for rural and more remote areas</li> </ul>		



- 2.5. In March 2019 the Council declared a climate emergency and pledged to enable carbon neutrality in the district by 2030. An ecological emergency has also been declared in response to the escalating threat to wildlife and ecosystems. The Council has also reviewed its corporate strategy. The Council's overriding purpose is to improve people's lives and its core policies are addressing the climate and nature emergency and giving people a bigger say.
- 2.6. The Council's planning policy framework needs to be updated in order to ensure that it is aligned with these priorities and that specifically it helps to facilitate solutions. The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the new Local Plan or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.
- 2.7. To ensure the sustainability effects are properly considered, screening of the policies was undertaken and is presented in Appendix E. The screening process allowed for policies with substantial amendments to be appraised individually through the SA (Appendix C and Appendix D) and policies with no changes to be screened out of detailed appraisal but were considered as part of the cumulative effects for the plan. Appendix F then considers the cumulative effects of both the LPPU amended policies and the unamended policies that will still be retained from the Core Strategy and Placemaking Plan.
- 2.8. The Draft LPPU was submitted to the Secretary of State to be examined by an independent Planning Inspector in December 2021. The Examination hearings took place in June/July 2022. Following receiving a letter from the Inspector confirm that the Examination can proceed to the consultation on the Main Modifications. The screening process has identified amendments which are considered to make a difference to the SA of the LPPU (i.e. that the previous assessment of the submitted LPPU requires amendments). Appendix I shows the screening of the Main Modifications to the submitted LPPU. Where further appraisals or updates are required, Appendix D (Policy appraisals) of the SA report have been updated.
- 2.9. A large number of the Core Strategy and Placemaking Plan policies are retained with no amendments. However, they will be reviewed through the new Local Plan.
- 2.10. In summary the key proposed elements or scope of the partial update are set out below and Table 3 provide a summary of new and revised policies.
- **Updating policies in order that they better address the climate and ecological emergency** - Direct linkages with SA Objective 5 (transport), Objective 8 (ecology) and Objective 9 (pollution), Objective 11 (climate change) and Objective 12 (resources)
  - **Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained** - Direct linkage with SA Objective 2 (housing)
  - **Addressing a limited range of other urgent local issues e.g. related to the 'green recovery'** - Direct linkages with SA Objective 3 (economy)
  - **Amending policies for clarity and to ensure they are aligned with up to date national policy**

**Table 3 Key policy changes**

Policies	Summary
<b>Updating policies to better address the climate and ecological emergency</b>	
Policy CP1 Retrofitting existing buildings	Amend the policy to require new houses in multiple occupation to achieve an Energy Performance Certificate 'C' rating.
Policy CP3 Renewable Energy	Maintain the overall targets for renewable electricity and heat generation and provide further guidance and requirements for renewable energy technology to facilitate more renewable energy schemes.
Policy SCR6(residential) and SCR7(non-residential) Sustainable Construction	Facilitate zero carbon development by: <ul style="list-style-type: none"> <li>• reducing space heating demand</li> <li>• reducing total energy use</li> <li>• requiring renewable energy to match total energy use</li> <li>• considering district heating networks</li> <li>• requiring a financial offset contribution for residual carbon emissions</li> </ul>
Policy SCR8 Embodied Carbon	Introduce a requirement to submit an Embodied Carbon Assessment and set a standard to be achieved by large scale new development.
Policy CP4 District Heating	Amend Keynsham Hight Street policy to an opportunity area rather than a district heating priority area as the majority of land allocated for development in Keynsham Town Centre has been completed.
Policy SCR9 EV charging	Require electric vehicle charging infrastructure for both residential and non-residential development. Further guidance will be provided by the Transport and Development Supplementary Planning Document.
Policy NE2 Conserving and Enhancing the Landscape And Landscape Character	Add new criterion to allow great weight to be afforded to conserving and enhancing landscape and scenic beauty within nationally designated Areas of Outstanding Natural Beauty (AONBs) and their setting, and with particular reference to their special qualities.
Policy NE3 Sites Species and Habitats	Strengthen the protection of protected sites, National Network Sites (SPAs and SACs) and internationally protected species and habitats as well as nationally important sites and species and their habitats.
Policy NE3a Biodiversity Net Gain	Require a Biodiversity Net Gain of a minimum 10% from major developments and secure in perpetuity (at least 30 years)
Policy NE5 Ecological Networks and Nature Recovery	Facilitate enhancement of Nature Recovery Networks and local ecological networks.
Policy NE6 Trees and woodland conservation	Strengthen the protection of veteran trees.
Policy CP7 Green Infrastructure	Facilitate nature recovery and introduction of the Bath River Line, a strategic green infrastructure project.
Policy NE1 Development and GI	Promote maximising opportunities for effective and functional Green Infrastructure (GI) within the desing of developments, focussing on the use of nature based solutions and linking to active travel routes.
Policy D8 Lighting	Require lighting to be designed to protect wildlife habitats best practice as set out in current guidance (inc. B&NES Waterspace Design Guidance and Bats and Lighting in the UK (ILP 2018)
Policy ST1 – ST7 Transport policies in general	Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency, linking with the Climate and Ecological Emergency Declarations and 2030 Carbon Neutrality
Policy ST1 Promoting Sustainable Travel	Increased recognition of the importance of location and design in the sustainability of development. Ensure that development transport choices e.g. access strategy and mitigation, are required to place sustainable modes first.

ST2A Active Travel Recreational Routes	Require developments to enhance active travel routes, rather than just maintaining them or avoiding harm. Onus placed on developer to provide, rather than Council to negotiate additional linkages.																								
ST3: Transport Infrastructure	Require infrastructure to be planned and designed to promote mode shift to sustainable transport as a priority over traffic capacity. Schemes which increase traffic capacity must demonstrate that opportunities to achieve mode shift as an alternative solution have been exhausted.																								
ST5: Traffic Management Proposals	Include additional requirements and detail reflecting Liveable Neighbourhoods Strategy																								
ST6: Park and Ride	Updated to expand its scope to include a new multi-modal interchange model.																								
ST7 Transport Requirements for Managing Development	Include strengthened requirement for development to offer genuine travel choice through opportunities to travel sustainably. include requirement for transport improvements and/or mitigation to maximise sustainable travel opportunities. Remove parking standards from the PMP (parking standards to be included in the new Transport and Development SPD)																								
<b>Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained</b>																									
DW1	Amend the policy to incorporate allocation of land previously safeguarded for development in Keynsham <u>and the Transport Interchanges at the Park and Ride sites.</u>																								
Spatial distribution of the Housing Requirement	<p>Monitoring (March 2021) shows that there is a housing supply shortfall of about 1,100 dwellings against the Core Strategy housing target (around 13,000 dwellings). This takes into account the annual requirement to deliver 722 dwellings for the rest of the plan period.</p> <p>In order to meet this shortfall, the LPPU allocates sites for housing in accordance with the spatial strategy set out in the Core Strategy.</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Capacity (homes)</th> </tr> </thead> <tbody> <tr> <td>Policy SB8 Bath Riverside</td> <td>250 additional (total 1,750)</td> </tr> <tr> <td>Policy SB18 RUH</td> <td>50 additional (total 100)</td> </tr> <tr> <td>Policy SB24 Sion Hill</td> <td>100</td> </tr> <tr> <td>Policy SB14 Twerton Park</td> <td>80</td> </tr> <tr> <td>Policy SB25 St Martin's Hospital</td> <td>50</td> </tr> <tr> <td>Policy KE2b Keynsham Fire Station</td> <td>20</td> </tr> <tr> <td>Policy KE5 Keynsham Treetops</td> <td>35</td> </tr> <tr> <td>Policies KE3C and KE3D Keynsham safeguard land (2 sites)</td> <td>280</td> </tr> <tr> <td>Policy SSV21 Midsomer Norton, Silver Street</td> <td>10</td> </tr> <tr> <td>SSV22Paulton (former printworks)</td> <td>80</td> </tr> <tr> <td><b>Total (allocations)</b></td> <td><b>955</b></td> </tr> </tbody> </table> <p>Taking into account sites in the Development Management process, it is expected to increase the housing supply by 1,205 homes.</p>	Site	Capacity (homes)	Policy SB8 Bath Riverside	250 additional (total 1,750)	Policy SB18 RUH	50 additional (total 100)	Policy SB24 Sion Hill	100	Policy SB14 Twerton Park	80	Policy SB25 St Martin's Hospital	50	Policy KE2b Keynsham Fire Station	20	Policy KE5 Keynsham Treetops	35	Policies KE3C and KE3D Keynsham safeguard land (2 sites)	280	Policy SSV21 Midsomer Norton, Silver Street	10	SSV22Paulton (former printworks)	80	<b>Total (allocations)</b>	<b>955</b>
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SB1 The Milsom Quarter including the Cattlemarket site	Seeking to create a more vibrant and diverse part of the city centre with a greater balance in the mix of uses																								
SB22 Locksbrook Creative Industry Hub	To provide a mixed use development comprised of employment space including incubator units and 'grow-on' space and teaching space.																								

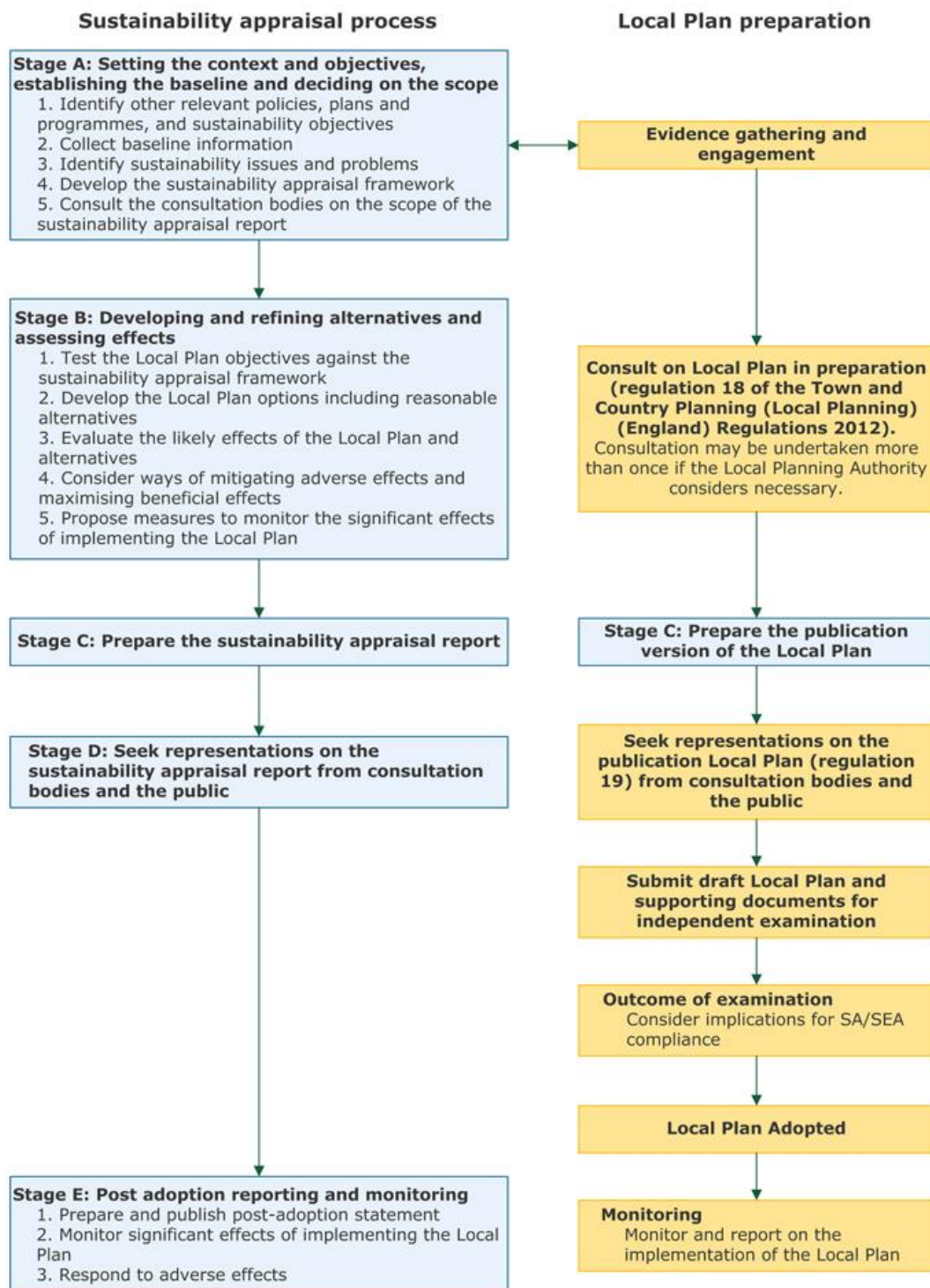
SB26 Bath Park & Ride sites	To ensure their efficient and effective use acting as a transport interchange rather than a traditional park & ride, plus potentially meeting objectives of providing waste recycling facilities, solar energy generation and nature recovery.
SB23 Western Island	To be redeveloped for industrial uses including requirements such as enhancing the ecological value of the river edge, ensuring lighting avoids harming ecological interest.
SSV9 Somer Valley Enterprise Zone	To amend the site boundary and broaden the mix of uses appropriate to be developed on site.
SSV2 Midsomer Norton South Road Car Park	In light of the new evidence from the car parking survey the allocation of South Road car park for provision of a retail store will be removed and policy SSV2 will be deleted and it will be retained as a car park.
SSV4 Former Welton Manufacturing	Amended to include a medium scale retail.
<b>Addressing a limited range of other urgent local issues</b>	
Policy PCS5	Amend the policy to avoid development resulting in the contamination of land.
Policy H2 Houses in multiple occupation (HMO)	Amend the policy to cover a change of use from non C3 uses to HMO (use class C4 and SG) and intensification (small to large HMO applications). Introduce a requirement for an Energy Performance Certificate.
Policy H2a PBSA	New policy to guide new Purpose Build Student Accommodation development.
Policy H7 Housing Accessibility	Set accessibility standards to be achieved by both new market and affordable housing.
Policy LCR6 New and replacement sports and recreational facilities	Require a management plan to be submitted with an application for a new artificial grass pitch to avoid potential harm and pollution.
Policy ED1B Change of use & redevelopment of office to residential use	Reflect the latest Use Class Order and include a change of use from office to Sui Generis (large HMO and purpose built student accommodation)
Policy ED2A Strategic Industrial Estates and ED2B Non-Strategic Industrial Premises	Strengthen the protection of non-strategic industrial sites and introduction of the Locksbrook Creative Industry Hub.
<b>Amending policies for clarity and to ensure they are aligned with up to date national policy</b>	
Policy D8	Require lighting to be designed to protect wildlife habitats best practice as set out in current guidance (inc. B&NES Waterspace Design Guidance and Bats and Lighting in the UK (ILP 2018))
Policy NE2 Conserving and enhancing the landscape and landscape character	Amend to give greater weight to conserving and enhancing landscape and scenic beauty of AONBs with particular reference to their special qualities.
Policy GB2 Development in Green Belt villages	Define the infill boundaries to guide new developments in villages in the GB.
Policy GB3 Extensions and alterations to buildings in the Green Belt	Include alteration to buildings.
Policy H3 Residential uses in existing buildings	Amend to include outbuildings in considering the sub-division of existing buildings.
Policy H5 Retention of existing housing stock	Amend 'residential accommodation' to 'residential units'.
Policy ED1C Change of use and redevelopment of office use to other town centre use	Remove the reference to change of use from office space to A1, A2 and A3 uses as they are all part of the new E use class.
Policy RE1 Employment uses in the Countryside	Include new employment on previously developed land.
Policy CR1 Sequential Test	Include the text 'expected to become available within a reasonable period' when considering the availability of alternative sites.
Policy CR2 Impact assessment Policy CR3 Primary shopping areas and primary shopping frontages	Remove the reference to use class A1-5 and the reference to the impact assessment for office development

### 3. Sustainability Appraisal Methodology

#### Approach adopted for this Sustainability Appraisal

- 3.1. The methodology for this appraisal was developed in accordance with guidance published by the ODPM (former MHCLG) as outlined in the Table 4 below. The SA is being carried out by B&NES Planning Policy Team in consultation with officers from Economic Development, Sustainability, Health and Wellbeing and Housing.

Table 4



## Stage A: Scoping

- 3.2. Stage A has been completed. An SA Scoping Report of the LPPU was produced and consulted in Oct 2020 to help ensure that the SA process covered the key sustainability issues for spatial planning in Bath & North East Somerset.
- 3.3. The Scoping Report presents the outputs of all the tasks in Stage A (the scoping phase of the SA) and includes baseline information, review of relevant plans and identification of significant sustainability issues for the district. A draft SA Framework was included in the Scoping Report (see Table 7 in this report) and has been updated following consultation on the Scoping Report. (Comments received in relation to the Scoping Report is presented in Appendix H)

### How the sustainability objectives have been identified'

- 3.4. In 2007, when the scoping stage of the SA was undertaken, a framework of SA Objectives was originally developed by B&NES to be used as a framework for appraising the DPDs of the B&NES LDF, including the Core Strategy and Placemaking Plan. This framework of SA Objectives was consulted upon in order to ensure that it addresses the key sustainability issues within B&NES.
- 3.5. A review of the SA Framework was undertaken in November 2014 prior to appraisal of Placemaking Plan options and in Oct 2020 prior to appraisal of LPPU. The review identified a number of areas for improvement and as a result the following changes were made to the SA Framework:
- Appraisal questions were inserted in order to guide the appraisals;
  - Following the integration of public health functions (from the NHS) into Local Authorities in April 2013, and subsequent joint work, health impact consideration is integrated into the SA process and additional detailed appraisal questions were included.
  - The framework was streamlined where there was repetition between objectives. Amendments were made to amalgamate some objectives which resulted in an overall reduction of the number of objectives to 13 from 20 Core Strategy SA Objectives. Then down to 12 objectives for the Partial Update. (See the Scoping Report)
- 3.6. This updated version of the SA Framework (Table 5) has been used to appraise the sustainability of the Options paper and the draft LPPU. The relationship between the SA objectives and the 'SEA topics', which are the specific topics that SEA is required to cover in line with Schedule 2 of the SEA Regulations, is shown in the final column of Table 5. It can be seen that a number of the SA objectives cut across SEA topics, reflecting their interrelationship.

**Table 5: Placemaking Plan Revised SA Framework**

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
<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>	Population; Human Health and Material Assets

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
	<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>	Population; Human Health; and Material Assets
<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>	Population; and Human Health
<b>Objective 4: Build a strong, competitive economy and enable</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> </ul>	Population; Material Assets

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
<b>local businesses to prosper</b>	<ul style="list-style-type: none"> <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>	Population; Material Assets
<b>Objective 6 (landscape): 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>	Biodiversity; Flora; Fauna; and Landscape
<b>Objective 7 (heritage): 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>	Cultural Heritage, including architectural and archaeological heritage
<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> </ul>	Air; Climatic Factors; and Human Health



SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
	<ul style="list-style-type: none"> <li>• Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced.</li> <li>• Enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery network.</li> </ul>	
<p><b>Objective 9: Reduce land, water, air, light, noise pollution</b></p>	<ul style="list-style-type: none"> <li>• Minimise increase in traffic congestion?</li> <li>• Development that minimises exposure to poor air quality and noise pollution?</li> <li>• measure to encourage the use of public transport, cycling and walking?</li> <li>• The remediation of contaminated sites?</li> <li>• Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity?</li> <li>• Development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?</li> <li>• Minimise increase in light and water pollution?</li> <li>• Protect the natural thermal spring under County of Avon Act 1982?</li> </ul>	<p>Biodiversity; Flora; Fauna; and Landscape Air; Climatic Factors; and Human Health</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<ul style="list-style-type: none"> <li>• Development which supports and corresponds with appropriate flood risk management guidance including applying natural solitons and a sequential approach and policies for any form of flooding including surface water flooding?</li> <li>• Development which incorporates SUDS?</li> </ul>	<p>Air; Climatic Factors; and Human Health</p>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions?</li> <li>• Development designed to be resilient to future climate of increased extremes of heat, cold and rainfall in line with latest 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>	<p>Air; Climatic Factors; and Human Health Water; Soil; Climatic F</p>
<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</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> </ul>	<p>Air; Climatic Factors; and Human Health</p>

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
(Reduce, Reuse and Recycle)	<ul style="list-style-type: none"> <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>	

### Stage B: Developing and refining options and assessing effects

- 3.7. Policies of the adopted Plan that were identified to require updating through the review process have been set out in the preceding section .
- 3.8. The effects of the options have been assessed in broad terms with the aim of assisting in the selection of the preferred options. The SA was led by officers in the Planning Policy Team undertaken in consultation with key multi-disciplinary officers, particularly ecologists, landscape architect and officers from the Health, Transport, Sustainability and Economic Development Teams.

### Assessment techniques

- 3.9. Matrices have been used to identify the sustainability effects of the draft Plan. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is relatively simple. It allows for a discussion and comparison of each of the options under consideration. The simplicity of the matrix is designed to reflect the fact that strategic options should (and in many cases can only be) assessed in broad terms due a lack of spatial expression. A combination of expert judgement and analysis of baseline data has been used to judge the effects of the issues and options.
- 3.10. A 'no plan or no policy' scenario has been tested where it is meaningful to do so as part of the options development (Appendix C). This has taken into account the current social, environmental and economic characteristics of the area and the likely future situation without the Partial Update policies, but relying on the current Core Strategy and Placemaking Policies as well as national policies and guidance.
- 3.11. Significance has been defined within the appraisal of the draft LPPU as follows:

**Table 6: Significance criteria**

Score	Description	Symbol
Major positive impact/effect	The option / plan achieves the majority of the applicable SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	++
Minor positive impact/effect	The option / plan achieves some of the SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	+
Neutral	The option / plan does not have an effect on the achievement of the SA Objective or SA questions	0
Minor negative impact/effect	The option / plan conflicts with some of the SA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors	-

Major negative impact /effect	The option / plan conflicts with the majority of the applicable SA questions and has a negative effect with 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	--
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective	?
n/a	The option / plan is not relevant to these objectives	n/a

- 3.12. On the basis of the criteria set out within Table 6, significant effects have been considered to be major positive, major and minor negative effects, plus uncertain effects. Uncertain effects are considered to be significant because they could potentially result in major positive or major negative effects.
- 3.13. Sustainability appraisal relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using a matrix enabling an expert, judgement-led qualitative assessment to be made in most cases.
- 3.14. A 'precautionary approach' is taken, especially where qualitative judgements have been made and mitigation is suggested if there is any doubt as to the effect of the plan. Only those sites proposed for consideration within the Partial Update have been appraised individually.
- 3.15. With regard to the likely impacts of proposed site allocations the assessment undertaken and recorded in the matrix relates to the development and design principles for each site set out in the draft Plan. There are also a number of retained and revised Development Management policies applies to all sites. These will also influence the sustainability credentials of development. Therefore the relevant Development Management policies are considered in appraising the sites.
- 3.16. As this report describes, alongside many positive effects, a number of potential negative effects arising from this new development have been identified in relation to some of the SA objectives. The SEA Regulations advocate an approach that negative effects should be addressed in line with the mitigation hierarchy: avoid effects where possible, reduce the extent or magnitude of effects, then seek to mitigate any remaining effects. Table 7 summarises the key policies of the adopted Local Plan and the LPPU which could mitigate potential negative effects of delivering a high level of growth over the plan period in relation to each of the SA objectives.

**Table 7: Development Management Policies relevant to SA objectives**

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
<b>Objective 1:</b> Improve the health and well-being of all communities, and reduce health inequalities	<ul style="list-style-type: none"> <li>Policy D1 and D3 require development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and ease to move around.</li> <li>Policy D5 requires developments to provide for appropriate levels of amenity, including provision of adequate and usable private or communal amenity space, which relates to maintaining or increasing access to open space.</li> <li>Policy D8 provides guidance on lighting.</li> <li>Policy LCR5 requires development involving the loss of open space, land and buildings used for sport and recreation to demonstrate no longer a demand or evidence of future use; or that development only affects land that is incapable of being used for sport; or suitable replacement facilities are provided in accessible locations.</li> </ul>

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<ul style="list-style-type: none"> <li>• Policy LCR9 requires all major developments to incorporate opportunities for informal food growing wherever possible which relates to supporting local sustainable food production, including the provision of allotments and community gardening.</li> <li>• Policies ST1, ST2 and ST2A require well-connected places accessible by sustainable means of transport; relates to making it easy to reach everyday destinations by active travel</li> <li>• Policy SCR9 requires all dwellings to demonstrate secure and accessible cycle storage facilities, which relates to making it easy to reach everyday destinations by active travel measures</li> <li>• Policy SU1 requires SuDS. Good quality SuDS can also provide recreational areas which relates to providing opportunities to engage in informal recreation</li> <li>• Policies H2 requires and CP1 encourage retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and require HMOs to achieve an Energy Performance certificate 'C' rating</li> <li>• Policy H7 sets the requirements for housing accessibility.</li> <li>• Policies PCS1-PCS 5 manage pollution, contamination and safety.</li> </ul>
<p><b>Objective 2:</b> Meet identified needs for sufficient, high quality housing including affordable housing</p>	<ul style="list-style-type: none"> <li>• Policy DW1 sets the spatial strategy and housing requirements</li> <li>• Policies RA1 and RA2: facilitate development in the rural villages.</li> <li>• Policy CP9 and 10 sets out affordable housing requirements and housing mix.</li> <li>• Policy RA4 allows residential development of 100% affordable housing in rural area.</li> <li>• Policy CP11 provides guidance on Gypsies, Travellers and Travelling showpeople.</li> <li>• Policies CP1, SCR6, SCR7, SCR8 and SCR9 improve the sustainability of the existing and new development</li> <li>• Policies D1, D3, D5, D6 and D7 require development to be designed for people, and to be safe and attractive. The requirement for attractiveness relates to the delivery of good quality housing.</li> <li>• Policy D3 requires development to be designed with appropriate frontages, including active frontages and continuity of street frontage. This relates to the delivery of good quality housing.</li> <li>• Policy D5: requires developments to be well detailed which relates to the delivery of good quality housing.</li> <li>• Policy D6: requires development to provide for appropriate levels of amenity.</li> <li>• Policy D7: guides infill and backland development</li> <li>• Policy H1: facilities housing and facilities for the elderly, people with other supported housing or care needs.</li> <li>• Policy H2 allows a change of use from residential to a large HMO providing that it meets the requirements.</li> <li>• Policy H2a provides guidance on new Purpose Built Student Accommodation.</li> <li>• Policy H7 provides guidance on moorings.</li> <li>• Policy H8 sets housing accessibility.</li> </ul>
<p><b>Objective 3:</b> Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</p>	<ul style="list-style-type: none"> <li>• Policy CP13 requires new development to be supported by the timely delivery of the required infrastructure</li> <li>• Policy D1 requires development to be designed for people, and to be safe and attractive. The requirement for safety relates to designing out crime and promoting a feeling of security through better design.</li> <li>• Policy D2 requires development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and easy to move around. This relates to designing public realm which maximises opportunities for social interaction and connections within and between neighbourhoods.</li> <li>• Policy D3 requires development to be designed for ease of walking and cycling and provide safe and quality routes; be permeable, connected with the existing street network, making new connections and avoiding severance; and designed not to prejudice existing/future development on adjoining sites.</li> <li>• Policy D4 requires development with open spaces to be defined positively, with clear definition of public and private, appropriate enclosure and no ambiguous left over space.</li> </ul>

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<ul style="list-style-type: none"> <li>• Policy D5: requires developments to provide for appropriate levels of amenity, including provision of defensible space, which relates to designing out crime and promoting a feeling of security through better design.</li> <li>• Policies LCR1, LCR1A, LCR2 and LCR6 protect community, social and cultural facilities.</li> <li>• Policy LCR3 safeguards land for primary school use.</li> <li>• Policy LCR5 protects open spaces.</li> <li>• Policy LCR6 protects the local green space.</li> <li>• Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also enhance the public realm which relates to the design of public realm which maximises opportunities for social interaction</li> <li>• Policy ST7 requires development to provide if appropriate a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; facilities for public transport; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking.</li> </ul>
<p><b>Objective 4:</b> Build a strong, competitive economy and enable local businesses to prosper</p>	<ul style="list-style-type: none"> <li>• Policy DW1 Strategic Framework for new employment provision</li> <li>• Policy CP12 sets out the hierarchy of shopping centres</li> <li>• Policy D1 requires places to be mixed use and respond to context, which will contribute to providing an adequate supply of land to meet a diverse range of employment opportunities and to correct imbalances between residential and employment development to help reduce travel distances to work.</li> <li>• Policy D3 requires development to be mixed use where possible, particularly at public transport nodes and at local, district, city and town centres, which will contribute to providing an adequate supply of land to meet a diverse range of employment opportunities and to correct imbalances between residential and employment development to help reduce travel distances to work.</li> <li>• Policy ED.1A supports proposals for office development within city and town centre boundaries.</li> <li>• Policy ED.1B provides guidance on change of use and redevelopment of B1 office to residential use.</li> <li>• Policy ED.1C provides guidance on change of use and redevelopment of B1 office to other town centre use</li> <li>• Policy ED.2A protects strategic and other primary industrial estates and identifies the Locksbrook Creative Industry Hub.</li> <li>• Policy ED2B protects non-strategic industrial land</li> <li>• Policy RE1 facilitates employment development in RA1 and RA2 villages.</li> <li>• Policies RE2, RE3, RE4, RE5, RE6 and RE7 provide guidance on development in the rural area.</li> <li>• Policies CR1, CR2, CR3 and CR4 ensure the vitality and viability of the city and town centres.</li> <li>• Policies ST1-7: Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency.</li> </ul>
<p><b>Objective 5:</b> Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</p>	<ul style="list-style-type: none"> <li>• Policies D1 and D3 require development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and easy to move around. This relates to prioritising access to good public transport and safe walking and cycling infrastructure, over facilities for private cars.</li> <li>• Policies ST 1-7 Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency.</li> <li>• Policy ST1, ST2 and ST2A require well-connected places accessible by sustainable means of transport; relates to prioritising access to good public transport and safe walking and cycling infrastructure over facilities for private cars</li> <li>• Policy ST6 allows transport interchange.</li> </ul>

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<ul style="list-style-type: none"> <li>• Policy ST7 requires development to provide if appropriate a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; facilities for public transport; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking.</li> <li>• Policy SCR9 requires all dwellings to demonstrate secure and accessible cycle storage facilities which relates to prioritising access to cycling infrastructure</li> </ul>
<p><b>Objective 6 (landscape):</b> Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	<ul style="list-style-type: none"> <li>• Policy CP6: requires high quality design, protect and enhance historic environment, landscape and nature conservation.</li> <li>• Policies GB1, GB2 and GB3 provide guidance on development in the Green Belt.</li> <li>• Policy D1 requires development to enrich the character and qualities of places and contribute positively to local distinctiveness.</li> <li>• Policy D2 prevents development that harms local character and distinctiveness.</li> <li>• Policy D3 requires development to be of an appropriately fine urban fabric.</li> <li>• Policy D4 requires development to be well connected respecting streets and spaces.</li> <li>• Policy D5 provides guidance on building scale design and materials</li> <li>• Policy D8 provides guidance on lighting.</li> <li>• Policies NE2, NE2A and NE2B require development to protect and enhance local landscape character and distinctiveness, incorporating green space to enhance the sense of place, and preserve and enhance important views.</li> <li>• Policy CP3 guides new renewable energy development.</li> </ul>
<p><b>Objective 7 (heritage):</b> Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<ul style="list-style-type: none"> <li>• Policy GB1 only allows development within or visible from the Green Belt to proceed if it is not visually detrimental to the Green Belt by reason of siting, design or materials used. This ensures development that is well related to the surrounding landscape.</li> <li>• Policy D1 requires development to enrich the character and qualities of places and contribute positively to local distinctiveness.</li> <li>• Policy D2 prevents development that harms local character and distinctiveness; requiring development to positively respond to the site context and local character, locally characteristic architectural styles, patterns, rhythms and themes, and reflects materials, colours, textures and boundary treatments appropriate to the area.</li> <li>• Policy D3 requires development to be of an appropriately fine urban grain.</li> <li>• Policy D4 requires signage, lighting and street furniture associated with new development to respond to the local context which leads to development that is well related to the surrounding townscape.</li> <li>• Policy NE6 requires development to include the appropriate retention and new planting of trees and woodlands, and not have an adverse impact on a veteran tree.</li> <li>• Policy HE1 requires development to enhance or better reveal any heritage assets' significance and setting and avoid substantial harm to any heritage assets.</li> <li>• Policy HE2 protects remains and/or historic routs of the Wansdyke or Somersetshire Coal Canal.</li> </ul>
<p><b>Objective 8:</b> Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<ul style="list-style-type: none"> <li>• Policy CP7 protects, enhances and manages the strategic Green Infrastructure network and introduces the Bath River Line project.</li> <li>• Policy D2 prevents development that harms local character and distinctiveness;</li> <li>• Policy D8 supports a variety of techniques to facilitate development that will minimise and/or compensate for light spill, including providing functional dark routes and provision of roosting opportunities on site.</li> <li>• Policy NE1 requires development to make provision for green infrastructure, ensuring suitable links to existing networks are provided and maintained; does not adversely affect the integrity and value of green infrastructure assets; and that major developments are accompanied by an audit of existing green infrastructure and how green infrastructure has been incorporated into the scheme.</li> <li>• Policy NE3 prevents development that would adversely affect internationally or nationally protected species and/or their habitats.</li> <li>• Policy NE3a requires a Biodiversity Net Gain.</li> <li>• Policy NE4 protects and enhance ecosystem services</li> </ul>

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<ul style="list-style-type: none"> <li>• Policy NE5 requires development to make a positive contribution to the creation, protection, enhancement, restoration and management of robust ecological networks. This relates to avoiding potential impacts on designated sites; avoidance of damage to and positive enhancement of wildlife sites; conservation, restoration and re-creation of priority habitats; development which enhances the ecological services of the wider area; and development which incorporates biodiversity into the design.</li> <li>• Policy NE6 protects trees and woodland.</li> <li>• Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also create new habitats leading to an increase in the biodiversity of the area, which relates to enhancing the ecological services of the wider area and incorporating biodiversity into the design.</li> </ul>
<p><b>Objective 9:</b> Reduce land, water, air, light, noise pollution</p>	<ul style="list-style-type: none"> <li>• Policy D1 requires development to make connections by foot, cycle, public transport and by car (in that order),</li> <li>• Policy D8 requires external lighting to not give rise to an unacceptable level of illumination into the sky, open countryside or in villages, which relates to the objective of reducing light pollution.</li> <li>• Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Natural processes break down pollutants leading to an improvement in the quality of the water discharge, which relates to the reduction in water pollution</li> <li>• Policy PCS1 only allows development if there is no unacceptable risk from existing or potential sources of pollution or nuisance on development, and no unacceptable risks of pollution to other existing or proposed land uses.</li> <li>• Policy PCS2 only allows development where it does not give rise to unacceptable increases in levels of noise that has an adverse impact on health and quality of life, which relates to development that minimises exposure to noise pollution and avoidance of locating potentially noisy activities in areas that are sensitive to noise.</li> <li>• Policy PCS3 only allows development which does not give rise to polluting emissions which have an adverse impact on air quality and health; is not located where it would be at unacceptable risk from existing sources of odour/dust/other forms of air pollutant; and is consistent with the local air quality action plan if applicable.</li> <li>• Policy PCS5 only allows development on contaminated land provided the proposal will not cause significant harm to health or environment, and that remediation measures are put in place as appropriate. This relates to the remediation of contaminated sites</li> <li>• Policy PCS6 does not allow development on the land may be unstable.</li> <li>• Policies PCS7 and PCS7A do not allow development that would adversely affect the quality or quantity of water resources by means of pollution which relates to reducing water pollution</li> <li>• Policy PCS does not allow development that would have an adverse impact on the quality or yield of the Bath Hot Springs which relates to reducing water pollution.</li> <li>• Policy LCR6 requires a management plan for new artificial pitches.</li> </ul>
<p><b>Objective 10:</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<ul style="list-style-type: none"> <li>• Policy CP5 requires a sequential approach to flood risk management and sustainable drainage.</li> <li>• Policy NE4 allows development which considers ecosystems services and addresses flood prevention. This relates to reducing the vulnerability to and managing of flood risk.</li> <li>• Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. This relates to reducing the vulnerability to and managing of flood risk.</li> </ul>
<p><b>Objective 11</b> Reduce negative contributions to and Increase resilience to climate change</p>	<ul style="list-style-type: none"> <li>• Policies CP1 and H2 encourages retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and requires HMOs to achieve an Energy Performance certificate 'C' rating.</li> <li>• Policy NE1 requires development to make provision for green infrastructure, ensuring suitable links to existing networks are provided and maintained; does not adversely affect the integrity and value of green infrastructure assets; and that major</li> </ul>

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<p>developments are accompanied by an audit of existing green infrastructure and how green infrastructure has been incorporated into the scheme.</p> <ul style="list-style-type: none"> <li>• Policy NE3a requires a Biodiversity Net Gain.</li> <li>• Policy NE4 protects and enhance ecosystem services</li> <li>• Policy NE5 requires development to make a positive contribution to the creation, protection, enhancement, restoration and management of robust ecological networks.</li> <li>• Policy NE6 protects trees and woodland.</li> <li>• Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also create new habitats leading to an increase in the biodiversity of the area, which relates to enhancing the ecological services of the wider area and incorporating biodiversity into the design.</li> <li>• Policy D1: requires buildings and spaces to be energy efficient which leads to development designed to be resilient to future climate of increased extremes of heat, cold and rainfall.</li> <li>• Policy D3 requires development to provide natural light, passive solar gain and passive ventilation, and avoid pockets of cold, areas of overheating, dazzle, wind or shade which leads to development designed to be resilient to future climate of increased extremes of heat, cold and rainfall.</li> <li>• Policy SCR2 requires all major non-domestic development to achieve BREEAM Excellent or DEC Level 'A'; relates to development being resilient to future climate change</li> <li>• Policy SCR3 allows implementation of allowable solutions in order to meet the national zero carbon requirements for dwellings from 2016; this relates to development designed to be resilient for future climate change</li> <li>• Policies ST1-7 Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency, linking with the Climate and Ecological Emergency Declarations and 2030 Carbon Neutrality.</li> <li>• Sustainability Policies CP1, CP3, SCR1, SCR2, SCR4 SCR6, SCR7, SCR8, SCR9 and CP4 contribute reduce carbon emission.</li> </ul>
<p><b>Objective 12:</b> 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)</p>	<ul style="list-style-type: none"> <li>• Policy CP4 encourages district heating</li> <li>• Policy D1 requires buildings and spaces to be energy efficient which relates to development that demonstrates sustainable design and construction and maximises energy efficiency.</li> <li>• Policy D3 requires development to provide natural light, passive solar gain and passive ventilation, and avoid pockets of cold, areas of overheating, dazzle, wind or shade which relates to development that demonstrates sustainable design and construction and maximises energy efficiency.</li> <li>• Policies SCR6 and 7 require on-site renewable energy</li> <li>• Policy CP3 sets the renewable energy targets and provide guidance on renewable energy development</li> <li>• Policy SCR3: sets the requirements for ground mounted solar arrays</li> <li>• Policy SCR4 supports community renewable energy schemes</li> <li>• Policy SCR5 encourages water efficiency</li> <li>• Policy SCR8 requires applicants to meet local water efficiency requirements which relates to water efficient design and reduction in water consumption</li> <li>• Policy PCS8 protects the quality or yield of the Bath Hot Springs.</li> <li>• Policies M1 – M5 provide guidance on facilitating the sustainable use of minerals.</li> <li>• Joint Waste Core Strategy requires waste prevention and promote the waste hierarchy.</li> </ul>



### **Stage C: Preparing the SA Report**

- 3.17. The draft SA Report (i.e. the 'environmental report' required by the SEA Regulations) was published alongside the LPPU Draft Reg 19 document. It outlines the significant effects on the environmental, social and economic factors of the draft Plan and the reasonable alternatives considered as part of the options assessment. It describes the process that has been undertaken to date in carrying out the SA of the Partial Update. It outlines the reasons for selecting the preferred option and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the plan. The SA Report has focussed on the identification of significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), in accordance with the SEA Regulations. The 'environmental report' is intended to meet all the reporting requirements of the SEA Regulations, as already set out in Table 1.

### **Stage D: consulting on the SA Report**

- 3.18. Consultation on the Scoping Report for 5 weeks from 28th April to 3rd June 2020 and the Interim SA Report was undertaken for 5 weeks from 7th January to 18th February 2021 and comments received are published in Appendix H alongside the council's responses to these.
- 3.19. The draft SA Report alongside the Draft LPPU was consulted on from 27<sup>th</sup> August to 8<sup>th</sup> October before submitted the Secretary of State.
- 3.20. Then alongside the Main Modifications, the draft SA report was updated and consulted from 21st September to 2nd November 2022.

### **Stage E: Monitoring and implementation of the LPPU**

- 3.21. Section 10 recommends indicators to monitor the effects of implementing the LPPU.

### **Difficulties encountered in compiling information or carrying out the appraisal Baseline Data**

- 3.22. Some data gaps have been identified within Appendix B. Where there are gaps in the baseline, this has made it difficult to predict the future evolution of the baseline characteristics without the LPPU. There is no 'noise map' for the district and no other information is available relating to the noise baseline. Much of the baseline data will have been based on Census 2011 data sources. This is a limitation for all SA work until the most recent census data is released.

#### 4. The plan's relationship with other plans and programmes

##### Relationship with other Plans and Programmes and Baseline

What the SEA Regulations say...

*Information for Environmental Reports:*

1. *An outline of the plan's relationship with other relevant plans and programmes; and*
5. *The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation (N.B. National Planning Practice Guidance) extends this to include other sustainability objectives).*

- 4.1. As identified in Section 3 the purpose of this stage is to document how the plan is affected by outside factors and suggest ideas for addressing any constraints. In order to fulfil the requirements of the SEA Regulations (above), a review has been undertaken of other relevant plans, policies, programmes (PPPs) and objectives. The B&NES Development Plans need to conform with the NPPF and the West of England Combined Authority Spatial Development Strategy once adopted, but it in turn will inform subordinate DPDs/SPDs and Neighbourhood Plans.
- 4.2. Reviews of relevant plans and programmes were presented in the Scoping Report. The review has been updated to take account of publications since the last update of the review undertaken in July 2021 and this is presented in Appendix A.
- 4.3. It should be noted that the policy context within which the LPPU and its SA are being prepared is inherently uncertain given the following key factors:
  - Brexit - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. For completeness relevant EU legislation has still been referred to in this report where UK legislation is yet to be amended.
  - COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, notably the success of the ongoing vaccination programme to combat the disease. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.
  - Planning for the Future White Paper – The August 2020 consultation sets out proposals for the reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan period to 10 years; a move towards a zonal planning system with areas of England allocated as either Growth Areas; Renewal Areas or Protected Areas; and the abolition of Community Infrastructure Levy (CIL) and Section.106.

4.4. Many of the plans, policies and programmes that have been reviewed pick up on some aspect of the “sustainable development” agenda but this may not be their primary purpose. Some of the key “sustainable development” messages coming out of the review of plans, policies and programmes that help meet the SA objectives are presented in Table 8. The table also shows the link between the review of plans, policies and programmes and the SA objectives included in the SA framework (Table 5).

**Table 8: Sustainable Development Messages Identified in the Review of Plans, Policies and Programmes**

Topic	Sustainable Development messages which have informed the SA objectives
<b>Air quality and noise</b>	<ul style="list-style-type: none"> <li>• The National Planning Policy Framework (NPPF) requires that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</li> <li>• 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.</li> <li>• There are 5 Air Quality Management Areas (AQMAs) in Bath and North East Somerset (B&amp;NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre (<math>\mu\text{g}/\text{m}^3</math>)</li> <li>• NPPF requires “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.”</li> </ul> <p><b>Met through the inclusion of SA Objective 9: Reduce land, water, air, light, noise pollution</b></p>
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>• 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. Provide a Biodiversity Net Gain</li> <li>• Facilitate maximum on-site delivery of BNG and compliance with the BNG Good Practice Principles.</li> <li>• 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.</li> </ul> <p><b>Met through the inclusion of SA Objective 8 Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>
<b>Climate change and flood risk</b>	<ul style="list-style-type: none"> <li>• Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change;</li> <li>• Minimise dependence on cars and reduce congestion</li> <li>• 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</li> <li>• Facilitate more renewable energy development</li> <li>• Promote best practice for SuDs and minimise impact on drainage and water supply infrastructure.</li> </ul> <p><b>Met through the inclusion of SA Objective 10 Reduce vulnerability to, and manage flood risk (taking account of climate change) and Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>

<p><b>Community, health and well-being</b></p>	<p>Improve peoples' health and reduce health inequalities;          Improve access to health and well-being facilities          Protect and provide access to appropriate levels of open space and community facilities;          Create mixed, safe communities and promote social inclusion;          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.</p> <p><b>Met through the inclusion of SA Objective 1: Improve the health and well-being of all communities, and reduce health inequalities and SA Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>
<p><b>Employment</b></p>	<ul style="list-style-type: none"> <li>• Promote high quality and sustainable tourism</li> <li>• Ensure a resilient and economically sustainable food system</li> <li>• Facilitate building competitive economy and improve access to employment and training opportunities</li> <li>• Maximise access to existing employment and create more jobs</li> <li>• Correct imbalances between residential and employment development to reduce in / out commuting.</li> <li>• Contribute to green recovery</li> </ul> <p><b>Met through the inclusion of SA Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b></p>
<p><b>Energy and carbon emissions</b></p>	<ul style="list-style-type: none"> <li>• Support low carbon economies</li> <li>• Achieve successful and competitive businesses both urban and rural;</li> <li>• Promote energy efficiency;</li> <li>• Promote and provide for renewable energy and energy storage</li> <li>• Encourage the use of electric car and facilitate such infrastructure</li> <li>•</li> </ul> <p><b>Met through the inclusion of SA Objective 11 Reduce negative contributions to and Increase resilience to climate change and 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>
<p><b>Historic environment</b></p>	<ul style="list-style-type: none"> <li>• Protect and enhance heritage assets including their setting</li> <li>• 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</li> <li>• 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</li> <li>• Avoid harmful impacts on protected landscapes (Cotswolds and Mendip Hills AONBs)</li> <li>• Sustain the Outstanding Universal Value of the City of Bath WHS.</li> <li>• Reduce impacts on the quality, character and local distinctiveness of the landscape and townscape, and the features within it</li> </ul> <p><b>Met through the inclusion of SA Objective 7 (heritage): Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>

<p><b>Housing</b></p>	<ul style="list-style-type: none"> <li>• Plan for objectively assessed need for all types of housing, including market housing and affordable housing.</li> <li>• Provide affordable housing to meet identified need</li> <li>• Improve the accessibility standards.</li> <li>• Promote good design and sustainable construction</li> <li>• Incorporate the principles of sustainable development</li> <li>• Ensure the sustainable location of development sites</li> <li>• Maximise access to existing services and plan for provision of new services where required</li> <li>• Manage future growth in HMOs and student accommodation</li> </ul> <p><b>Met through the inclusion of SA Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b></p>
<p><b>Natural resources</b></p>	<ul style="list-style-type: none"> <li>• Make the best use of previously developed land;</li> <li>• Promote higher densities of development in accessible locations;</li> <li>• Protect soil resources including high quality agricultural land;</li> <li>• Promote water efficiency;</li> <li>• Promote local food production</li> <li>• Promote waste management hierarchy</li> </ul> <p><b>Met through the inclusion of SA 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>
<p><b>Landscape</b></p>	<ul style="list-style-type: none"> <li>• Protect and enhance heritage assets including their setting</li> <li>• 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</li> <li>• 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</li> <li>• Avoid harmful impacts on protected landscapes (Cotswolds and Mendip Hills AONBs)</li> <li>• Sustain the Outstanding Universal Value of the City of Bath WHS.</li> <li>• Reduce impacts on the quality, character and local distinctiveness of the landscape and townscape, and the features within it</li> <li>• Follow the Government Tree Strategy and the Tree Action Plan to enhance the treescape in the district</li> </ul> <p><b>Met through the inclusion of SA Objective 6 (landscape): Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>

## Transport

- Reduce the need to travel
- address impacts of car dependency and deliver a transformational rebalancing of our transport network to address the Climate Emergency, support sustainable travel and healthier lifestyle
- Encourage walking and cycling and public transport
- Support sustainable and inclusive economic growth;
- Enable equality and improve promote accessibility
- support measures that enhance the liveability of our neighbourhoods by reducing traffic volumes and speeds, making walking and cycling the mode of choice for local trips, and offering a range of choices for longer distance trips.
- Improve air quality especially the area identified as the Air Quality management Area
- Facilitate an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which we can achieve a more competitive economy and better connected, more active and healthy communities.

**Met through the inclusion of SA Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure**

## 5. The Sustainability Baseline

What the SEA Regulations say...

*Information for Environmental Reports...*

2. *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*
3. *The environmental characteristics of those areas likely to be significantly affected*
4. *Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Habitats Directive.*

- 5.1. The comprehensive baseline information which describes the B&NES area is presented in the Scoping Report which can be obtained from B&NES Council or from the following [link](#).
- 5.2. The baseline data has been updated and is presented in Appendix B of this report and Table 9 presents a summary of the updated baseline data. In addition, trend information reported in the Scoping Report has been used to identify the “future baseline”, i.e. the potential evolution of the baseline in the absence of the plan.
- 5.3. The SEA Regulations lists specific topics (the SEA Topics) that need to be considered. These are: biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. These topics are covered by the full baseline review.
- 5.4. As an integrated SA and SEA is being carried out, baseline information relating to other sustainability topics has also been included; for example, information about housing, transport, energy, waste and economic growth.

**Table 9: Summary of the Sustainability Baseline Data**

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p><b>Air quality</b></p> <p>There are currently 5 Air Quality Management Areas (AQMAs) in Bath and North East Somerset (B&amp;NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre (<math>\mu\text{g}/\text{m}^3</math>)</p> <p>The Clean Air Zone scheme was introduced in Bath in March 2021.</p> <p>There are no AQMAs in Midsomer Norton, Radstock or elsewhere in the district.</p> <p>41% of Bath &amp; North East Somerset’s carbon emissions come from domestic properties, 34% from commercial premises and the rest from transport.</p>	<p>Improving air quality is continuing to be challenging.</p> <p>The LPPU was undertaken specifically to respond to the climate and ecological emergency and facilitate the carbon neutrality by 2030. The LPPU offers an opportunity to mitigate poor air quality by promoting sustainable development locations and active transport.</p> <p>The LPPU policies, particularly new sustainability policies such as zero carbon development and updated transport policies focusing on sustainable travel, providing genuine travel choice and reducing car dependence would present the opportunities to reduce carbon emissions and improve air quality.</p> <p>The Placemaking Plan Policy PCS3 continue to apply to manage air quality even without the LPPU.</p>

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p><b>Noise</b></p> <p>There is a gap in the baseline data regarding noise levels within the District.</p>	<p>Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.</p> <p>However electric vehicles are quieter than petrol or diesel vehicles and the LPPU Policy SCR8 facilitates electric vehicles charging infrastructure from new development which indirectly contributes to addressing noise associated with traffic.</p> <p>The Placemaking Plan Policies D6 (residential amenity), PCS2 (noise pollution), and LCR6 (sports facilities) and ST3 (transport) continue to apply to manage noise levels and pollution even without the LPPU.</p>
<p><b>Biodiversity</b></p> <p>The following sites are designated for nature conservation:</p> <p>SPA: Chew Valley Lake</p> <p>SAC: Combe Down and Bathampton Mines, part of the 'Bath &amp; Bradford-on-Avon Bats SAC'.</p> <p>SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC.</p> <p>There are 59 SSSIs in B&amp;NES and 300 locally designated sites. 71% of SSSI units are in favourable condition.</p> <p>There are 300 locally designated sites.</p> <p>A BAP priority habitat is mapped in the Scoping Report.</p>	<p>The Council declared a nature emergency. The district's biodiversity is at threat from development; human activities such as pollution, roads, disturbance, farming practices; loss of habitat; loss of food sources and a changing climate and pressures on the natural environment are likely to continue regardless of the LPPU.</p> <p>Prior to the mandatory Biodiversity Net Gain (BNG) requirements coming into effect the LPPU BNG policy (Policy NE3a) will reflect the proposed mandatory measures, including use of the DEFRA metrics and emerging national guidance. The LPPU updated policies would present opportunities to guide new development to protect and enhance biodiversity and to minimise the impact where necessary.</p> <p>The Placemaking Plan already includes policies (inc. Policy NE3 Sites, Species and Habitats) seeking to address these issues and these would continue to apply even without the LPPU.</p>
<p><b>Climate change and flood risk</b></p> <p>The areas prone to flooding tend to follow the main rivers.</p> <p>The areas most at risk of flooding are:</p> <p><b>Bath</b> - at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Level 2 SFRA has shown that large proportions of the central area and areas closest to the River Avon are in Flood Zone 3a and 3b (the highest risk). The Black and Veatch Bath Flood Risk Management Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes and implement compensatory flow conveyance schemes. Bath Waterside Project is being progressed.</p>	<p>Climate change is likely to have on-going effects regardless of the LPPU. The Core Strategy Policy CP5 to manage flood risk and Policy SU1 to facilitate sustainable drainage are retained, and these would continue to apply even without the LPPU.</p> <p>One of the purposes of the LPPU is to replenish housing supply in order to meet the Core Strategy housing requirement and the necessary supply of housing land maintained. The sequential approach is taken to select new allocation in terms of flood risk This will avoid potential development in the areas of higher flood risk.</p>



Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
<p><b>Keynsham</b> -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. A level 2 SFRA has shown that a small area to the north of the Somerdale site is in Flood Zone 2. A small area to the South East of the town centre may also be Flood Zone 3a.</p> <p><b>Midsomer Norton</b> -at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that the town centre is in Flood Zone 1. Small areas are at higher risk of flooding. Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event.</p> <p>Radstock - at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that some of the central parts of the town centre are in Flood Zone 2 and 3a.</p> <p>Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources.</p>	
<p><b>Community and well being</b></p> <p>In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip.</p> <p>There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district.</p> <p>There are 115 LSOAs in the B&amp;NES Unitary Authority area. In 2019, 5 areas are within the most deprived 20% of the country (Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West). No areas in B&amp;NES are within the most deprived 10% nationally.</p> <p>Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&amp;NES.</p> <p>Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards.</p>	<p>The updated LPPU transport policies aim to enable and achieve transformational mode shift to more sustainable modes of transport and seek to deliver rural routes, both short distances within villages and longer routes, as well as additional urban routes.</p> <p>The Placemaking Plan has a number of policies managing development in the rural areas such as Policy RA4 to facilitate Rural Exceptions Sites with affordable housing, Policy RA3 to facilitate community facilities and Policy RE1 to facilitate employment uses in the Country sites.</p> <p>The updated Policies ED2A (including Creative Hub) and ED2B strengthen the protection of industrial land to ensure a balanced economy to continue to provide more employment in Bath and to wider area.</p> <p>The Core Strategy Policy CP 9 sets out the requirements for affordable housing which is retained and continue to apply.</p> <p>If not addressed, crime, deprivation and access to services are likely to remain problems.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>The Core Strategy and Placemaking Plan includes key regeneration site allocations to help avoid the market led development approach which may result in inappropriate uses take up key regeneration sites in Bath, thereby undermining the objective to create balanced community. These allocation sites were retained and continue to apply. The LPPU allocations further ensure to direct appropriate uses in the right locations.</p>

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p>There is a requirement to address health inequalities as well as specific health problems such as obesity in the District</p>	<p>Opportunities to consider access to healthcare, open spaces and other recreational were taken into account during identification and allocation of development sites through the Core Strategy and Placemaking Plan.</p> <p>The Local Plan Review presents further opportunities to allocate new housing development sites at locations which are in close proximity to existing healthcare facilities, open spaces and other facilities which might encourage healthier lifestyle choices including increased levels of physical activity. The identification of the Bath River Line as a key green infrastructure project in Bath would encourage more walking and cycling.</p>
<p><b>Economy and employment</b></p> <p>There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton and Radstock (the Somer Valley area).</p> <p>The percentage of the economically active population of B&amp;NES which are unemployed is lower than the UK and regional percentages.</p> <p>Wage rates are lower than the UK average and there are many low skill/wage jobs.</p> <p>There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation.</p> <p>There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector.</p> <p>In 2019, 5 areas are within the most deprived 20% of the country (Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West). No areas in B&amp;NES are within the most deprived 10% nationally.</p> <p>The rural areas generally feature in the least deprived areas in England. However, Bathavon North, Englishcombe, Corston, Hinton Blewet and Chew Valley are within 10% of most deprived areas with barriers to obtaining suitable housing and in accessing key local services. Whitchurch is within the 10% most deprived areas for Crime and Disorder.</p> <p>The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space.</p> <p>There are a number of Local Food Suppliers in the District and the North East Somerset &amp; Bath Local Food Partnership was set up in 2007 to encourage the production, sale, purchase and consumption of quality foods produced in the local area. The Partnership</p>	<p>The updated Policies ED2A (including Creative Hub) and ED2B strengthen the protection of industrial land to ensure a balanced economy to continue to provide more employment in Bath and the wider area.</p> <p>Policy SSV9 The Old Mills Industrial Estate was allocated through the Placemaking Plan to provide a long term supply of new employment land and to boost jobs in the Somer Valley area. The northern area was designated as an Enterprise Zone in 2018 and the Local Development Order is in preparation, therefore it is likely that the site would come forward for development without the LPPU, however the LPPU updates Policy SSV9 to improve development viability to support its delivery.</p> <p>The Placemaking Plan includes allocations for key employment sites in the district and these allocations are retained and Policies continue to apply, however the LPPU updates some of the key sites such as the Royal United Hospital(SB18) and University of Bath (SB19) which helps increase the provision of employment.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>The Placemaking Plan Policy RE1 to facilitate employment uses in the countryside is retained and continue to apply.</p> <p>There are some uncertainties about how the new use class E and MA will affect the provision of office floorspace in the district. However Bath is excluded from permitted development class MA as a World Heritage Site. They are governed nationally and will apply even without the LPPU.</p> <p>Local food producers may continue to experience barriers to expansion.</p>

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p>commissioned a survey in to local food production in the B&amp;NES area. Key findings included a need for the planning system to support barriers to expansion of local food producers.</p>	
<p><b>Historic environment</b></p> <p>Bath was designated a World Heritage site in 1987 and European Spa Town in 2021.</p> <p>There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&amp;NES (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register.</p> <p>The area which was formerly part of the Somerset coalfield retains a rich industrial heritage.</p> <p>There is a requirement to protect and enhance the district's historic, environmental and cultural assets.</p>	<p>The Core Strategy and Placemaking Plan already have a number of policies to protect and enhance the historic environment especially Policy HE1. They are retained and will continue to apply even without the LPPU.</p>
<p><b>Housing</b></p> <p>The Core Strategy sets the housing requirements, and the latest monitoring shows some shortfall (around 1,100 homes)</p> <p>High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers.</p> <p>Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the overall need for affordable housing in B&amp;NES is concentrated in Bath City.</p> <p>Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath &amp; North East Somerset. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals.</p> <p>Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials.</p> <p>Houses in Multiple Occupation (HMO) are HMOs are an important part of the local housing market, particularly within Bath, providing affordable accommodation for student, professionals and migrant workers among others. HMOs have traditionally been more concentrated in certain areas of the city,</p>	<p>One of the purposes of the LPPU is to replenish housing supply in order to meet the Core Strategy housing requirement and the necessary supply of housing land maintained (and continue to meet the 5 year land supply). By allocating more sites through the Partial Update, it could avoid development in unsustainable locations.</p> <p>The LPPU additional allocation sites also provide some affordable housing.</p> <p>Without the pro-active planning represented by the LPPU, it is unlikely that B&amp;NES will be able to provide enough affordable housing to satisfy future requirements.</p> <p>Without the LPPU, the market led development approach may result in inappropriate uses taking up key regeneration sites in Bath resulting in not meeting the Council's housing objectives.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve.</p> <p>The Placemaking Plan Policy H2 provides guidance on a change of use from residential (use class C3) to HMO (use class C4 and Sui Generis) and it will continue to apply without the LPPU. However the LPPU presents an opportunity to update Policy H2 to expand the remit to cover</p>

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<p>particularly in the wards of Oldfield, Westmoreland and Widcombe. There is a need to create more balanced communities. Recently more purpose built student accommodations were built on former industrial land resulting a shortage of industrial land in Bath.</p>	<p>a change of use from other uses such as office and intensification from small to large HMOs.  The LPPU also presents a new policy to manage new purpose built student accommodation and update the policy for Claverton Campus. Without the LPPU it is likely to lead to further loss of industrial land.</p>
<p><b>Land</b> B&amp;NES has prepared a Remediation Statement relating to contaminated land located in Keynsham. This land has been remediated, including the removal of all material, contaminated and uncontaminated, from the site and, therefore, permanently removing the pollutant linkage. No further land is registered as contaminated under Part 2A of the Environmental Protection Act 1990. 82% of new or converted dwellings in the District completed during 2008/09 were built on previously developed land.</p>	<p>As developments occur on contaminated land they will be remediated. Therefore, the amount of contaminated land will decrease over the next 5-10 years.  The amount of development that is built on brownfield land should remain high in the district.  Without the LPPU, the market led development approach may result in inappropriate uses taking up key regeneration sites in Bath resulting in not making efficient use of brownfield land within the settlement boundaries.</p>
<p><b>Landscape</b> There are 2 AONBs in the District – Mendip and Cotswolds AONBs.  The district has a varied landscape represented by 18 LCAs. Large areas of B&amp;NES are Green Belt (61%).  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.  Large areas of Radstock are covered by a Conservation Area.</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.  Without the LPPU, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.  The LPPU indicates the areas potentially suitable for renewable energy linking with the land sensitivities. It also provides further guidance to avoid, minimise and mitigate the impact on landscape.</p>
<p><b>Transport</b>  Over 50% of residents travel out of the area to work. The average journey to work is 13.23km (comparatively high). JLTP 2020 states: 2 of 3 commutes by car, 25% increase in trips by 2036, Over 300 premature deaths a year linked to NO2 and 2 in 5 commutes are less than 2km.  There is no direct link to the motorway network in B&amp;NES and Bath suffers particularly from the sub-region's poor internal transport links. Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very</p>	<p>The high proportion of the district's population recorded in 2001 who travel to work by car will continue unless alternative and more attractive modes of transport are provided.  Increased traffic would exacerbate all of the existing problems outlined in the baseline data.  The Plan facilitates the implementation of the Transport Strategy. Without the Plan, traffic congestion and air quality are likely to remain the same or will be worsen.</p>

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p>high level of through traffic. This includes large numbers of HGVs e route to or from the Channel ports.</p> <p>Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads.</p> <p>The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City.</p> <p>High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.</p> <p>Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303.</p> <p>Problems with congestion are experienced in Bath, Keynsham and Radstock.</p> <p>Any proposals for the further development of the area will need to address this by bringing relief from current congestion, and promoting more sustainable forms of transport.</p> <p>Across the West of England, Joint Local Transport Plans over ten years have seen the number of cycling trips more double, and bus passenger trips increase by more than one third, in the context of a national 1% fall</p>	
<p><b>Waste</b></p> <p>B&amp;NES is one of the top recycling authorities within the country, recycling 41% of household waste in 2009/10.</p> <p>Waste infrastructure: 2 x waster transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots.</p> <p>Every day B&amp;NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset.</p> <p>In 2018-19 over 48,000 tonnes of Bath &amp; North East Somerset residents waste was reused and recycled.</p> <p>In total B&amp;NES exported just over 14% of the 66,906 tonnes diverted away from landfill. The majority of this exported waste has been removed from residents' weekly bin waste at different facilities within the region.</p> <p>In B&amp;NES 19,705 tonnes of black bag waste was sent to these facilities in 2018-19</p>	<p>Levels of recycling have been increasing and there is no reason to believe that this trend will change.</p> <p>However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.</p>
<b>Energy and carbon emissions</b>	The LPPU policies, particularly new sustainability policies such as zero carbon development and updated transport

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<p>Indicating that the main sources of greenhouse-gas emissions across the district are energy use in buildings (66%), and transport (29%)</p> <p>Energy use in buildings: 66% and 507,808t/CO2e/yr, consisting of emissions from</p> <ul style="list-style-type: none"> <li>- Homes: 38% of the total and 293,585t/CO2e/yr</li> <li>- Non-domestic buildings: 28% of the total and 214,223t/CO2e/yr.</li> </ul> <p>Transport: 29% and 216,110t/CO2e/yr.</p> <p>There is no record of any major renewable energy schemes within the district. There are a few small scale schemes undertaken on an individual basis but no comprehensive survey of existing installations has been undertaken and this may be a gap in baseline information.</p> <p>The Core Strategy Policy CP3 sets renewable energy targets (Electricity 110MWe and Heat 165MWth) by 2029. The latest monitoring in the district shows that only 21.7 MW electricity and 7.4 MW heat are available as of 2019. A renewable energy research study has been undertaken.</p> <p>Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings.</p>	<p>policies focusing on sustainable travel, providing genuine travel choice and reducing car dependence would present opportunities to reduce carbon emissions.</p> <p>The Core Strategy and Placemaking Plan already have policies aiming to reduce carbon emissions, however the LPPU presents the opportunity to build on this policy approach and provide stronger requirements.</p> <p>The Core Strategy and Placemaking Plan already have policies aiming to facilitate renewable energy projects (CP3 renewable, SCR1 on-site renewable, SCR2 Roof-mounted solar, SCR3 Ground-mounted Solar and SCR4 Community Renewable), these will continue to apply without the LPPU. However the LPPU present the opportunity to build on this policy approach and provide further guidance. The NPPF states that '<i>A proposed wind energy development involving one or more wind turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan.</i>' The LPPU revised CP3 identifies the suitable areas for wind energy development. Therefore it is unlikely that wind energy development come forward without the LPPU.</p> <p>The LPPU policies, particularly new sustainability policies such as zero carbon development policy encourage energy efficiency and uptake of renewable energy.</p> <p>Historic buildings may be difficult to make more energy efficient. The Energy Efficiency, Retrofit and Sustainable Construction Supplementary Planning Document provides further guidance in relation to historic buildings.</p> <p>With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years.</p>
<p><b>Water/Soil</b></p> <p>The river chemical and biological quality is generally Very Good to Fairly Good.</p> <p>Nitrate is regularly found in groundwater in some areas.</p> <p>The far east and far west of the district is covered by Ground Source Protection Zones (including a part of Bath).</p>	<p>The Core Strategy and Placemaking Plan already have policies aiming to protect water quality such as Policy PCS7 (Water Source Protection Zones). They continue to apply without the LPPU.</p> <p>With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.</p> <p>The Core Strategy and Placemaking Plan Policies LCR6 (new and replacement sports and recreational facility) and</p>

<b>Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected</b>	<b>Likely evolution without the LPPU (LPPU)</b>
<p>There are some concerns regarding impact on people's health resulting from exposure to contaminated granular material used for artificial pitches and through the contamination of soil and water.</p>	<p>PCS5 (contamination) already provide guidance to avoid such contamination, however the LPPU presents the opportunity to strengthen the policies, particularly revised LCR6 requires a management plan to be submitted with new artificial pitches applications.</p>

## 6. Reasons for Choosing Options and Alternatives and Results of the Appraisals of Options

What the SEA Regulations say...

*Information for Environmental Reports:*

6. *The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).*
7. *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*
8. *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.*

6.1. The SEA Regulations require that the Environmental Report outlines the reasons for selecting the alternatives dealt with NPPG states that to adhere to this requirement the Environmental Report should outline:

- The main strategic options considered, how they were identified and the reasons for selecting the options
- A comparison of the social, environmental and economic effects of the options and how social, environmental and economic issues were considered in choosing the preferred options; and
- Other options considered, and why these were rejected.

### **Options Appraisals for the LPPU(LPPU) Options document (January 2021)**

6.2. As explained in section 2, this is a partial update to the existing Plan, and not a new Plan, the scope of the changes is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy & Placemaking Plan. The scope of the LPPU therefore needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the new or full replacement Local Plan or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.



- 6.3. To ensure the sustainability effects are properly considered, screening of the policies was undertaken and is presented in Appendix E. The screening process allowed for policies with substantial amendments to be appraised individually through the SA. Options considered in the LPPU were tested against the SA objectives and the matrices are presented in Appendix C. The table below sets out the key appraisal results of the options considered and explains how these appraisals have informed the selected options which form the part of the Pre-Submission Draft and why some options were rejected. Significant effects are considered to be those which are potential major positive, major negative, and uncertain.
- 6.4. The LPPU Option document can be accessed from [www.bathnes.gov.uk](http://www.bathnes.gov.uk).

**Table 10 Summary appraisal results of the Options (full details provided in Appendix C)**

Options document reference	Key results of sustainability appraisal of alternative options	How this informed the preparation the LPPU and other reasons for selection and discounting the option to be taken forward
<p><b>DM1 Net Zero Carbon Policy</b></p> <p><b>Option 1:</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.</p> <p><b>Option 2</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.</p> <p><b>Option 3</b> Retain current policies SCR1, CP2 and CP1</p>	<p>Option 1 will help to secure more sustainable methods of construction using the energy hierarchy for all new buildings whereas option 2 will only apply to major developments. For objective 1(health) the proposed policy will result in warmer, more fuel efficient homes. For objective 2(housing) an energy efficient home is more affordable to live in and financial contributions can help to alleviate fuel poverty. For objective 4 the proposed policy will encourage investment in sustainable construction and renewable energy industry. For objective 5(transport) development will be sited close to public transport and local amenities. For objectives 6 and 7 the provision of renewable energy will impact on the landscape and heritage assets.</p> <p>However, development will also be subject to development management policies NE.2 and HE.1 which seek to protect the historic and natural environment. For objective 9 a reduction in CO<sub>2</sub> emissions will improve air quality. For objective 10 the reduction in carbon emissions will help slow climate change, which would reduce the vulnerability to flood risk. For objectives 11 and 12 a fabric first approach and renewable energy provision will reduce emissions and help contribute to tackle climate change.</p>	<p>Option 3 retaining the current policies is rejected as the overriding priority for the LPPU is to align the planning policies with the Council's declaration of Climate Emergency and reduce carbon emissions.</p> <p>Option 1 requiring all new development to be zero carbon reflecting the energy hierarchy would have major (significant) positive effects on a number of objectives. The LPPU Options document considered how the policy could be amended to work alongside the Future Home Standards (the update on Part L of the Building Regulations). The government has stated their intention to bring in the Future Homes Standards in 2025 but the exact method of how carbon reduction will be enacted is still subject to future consultation. Due to the uncertainty of the Future Homes Standard, the plan will continue to pursue a zero carbon construction standard but to change the metric from carbon</p>

		reduction to energy use in the draft Plan. Option 2 is rejected as it would not achieve the benefits likely though Option 1.
<p>DM 3 Retrofit Policy (amendments to CP1) <b>Option 1</b> Introduce a requirement that regulated carbon emissions are reduced by 10% from a baseline of Part L through use of renewable energy as set out in the sustainable construction checklist.</p> <p><b>Option 2</b> Introduce a requirement that regulated carbon emissions are reduced by 20% from a baseline of Part L through use of renewable energy</p>	<p>The proposed policy changes will see positive effects to objectives 2, 9, 10, 11 and 12. Overall there is a more positive impact from option 2 as this will increase the threshold for carbon reduction from 10% (current requirement) to 20%. This results in a more positive impact to the stated objectives.</p> <p>Available evidence suggests that HMOs are more often in poor condition than other types of housing in the same area therefore requiring to achieve Energy Performance Certificate “C” rating or above has a positive effect on objective 1 by improving the health and well-being of the HMO occupiers.</p>	<p>The current Sustainable Construction SPD requires regulated carbon emissions to be reduced by 10% from a baseline of Part L. Requiring 20% reduction would have more positive effects on a number of objectives. However it is proposed that the current requirement of 10% will be maintained in the draft Plan as there is not enough evidence to require a higher requirements. This will be reviewed through the new Local Plan.</p> <p>The EPC option was raised though the stakeholders discussions. Requiring a EPC ‘C’ helps improve the health and well-being of the HMO occupiers as well as improving the sustainability of the buildings therefore this requirement is included in the draft Plan.</p>
<p>DM4 New policy Whole Life Cycle Carbon Assessment <b>Option 1</b> Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm) <b>Option 2</b> Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm) <b>Option 3</b> No specific policy and rely on Sustainable Construction Policies</p>	<p>Both options with different thresholds will work towards zero carbon construction and a Whole Life Cycle Carbon Assessment will allow for the provision of the most sustainable form of construction and therefore results in a more positive impact to objectives 11 (Climate Change) and 12 (Natural Resources). However, the requirement for a Whole Life Cycle Carbon Assessment does not yet include a specific threshold which development will need to meet. Therefore, it will be difficult to use for development management purposes.</p>	<p>The Options document discussed requiring a Whole Life Carbon Assessment however such assessment is not quite yet integrated in the application process and currently no in-house expertise available. Therefore it has been decided to require large scale new build developments to submit an Embodied Carbon Assessment that demonstrates a score of less than 900kg/sqm of carbon can be achieved within the development through Policy SCR8.</p>
<p>DM5 Renewable energy</p>	<p>In order to facilitate an increase in the level of renewable energy generation and the transition to realising the Council's 2030 goal to achieve 100% clean energy across</p>	<p>Energy balancing plants</p>

<p>(amendments to CP3) Add reference to grid balancing plant encouraging the energy hierarchy and avoid fossil fuels.</p> <p><b>Option 2 – No change</b></p>	<p>all sectors, Option 1 proposes to amend Policy CP3 to require energy/grid balancing plants to contribute to the Core Strategy targets for Renewable Electricity and Heat generation. The policy approach would have positive effects on objective 4 (economy), objective 9 (pollution), objective 11 (climate change) and objective 12 (natural resources). There are negative or uncertain effects that have been identified for environmental objectives.</p> <p><b>Mitigation and enhancement</b> Site specific mitigation and enhancement measures should be included in the policies and addressed through the development management process.</p>	<p>Energy installations to balance electricity demand and supply in order to assist the transition to 100% renewable electricity must be met by:</p> <ol style="list-style-type: none"> <li>1. Energy storage plant co-located with renewable energy generation plant; or</li> <li>2. Freestanding energy storage plant</li> </ol> <p>Balancing plant, or other freestanding energy generation plant, that increases the district's carbon emissions, for example those that burn fossil fuels directly, such as gas or fuels derived from oil, will be refused unless it can be demonstrated by the applicant that the proposal is required for the purposes of temporarily supporting energy needs for a specified and limited temporary period of time.</p> <p>Applications for energy plant utilising virgin plant feedstocks will need to robustly demonstrate that the feedstock will be sourced sustainably.</p>
<p>DM6/DM7 New Policy Harnessing wind energy (amendments to Policy CP3)</p>	<p>The current policy approach does not specifically make an allowance for wind energy. The provision of wind energy will contribute towards renewable energy targets and zero carbon development. A criteria based policy as proposed would encourage the provision of wind energy by identifying areas of search for suitable sites that also seek to minimise the impact on the landscape resulting in positive effects on objective 1 (health), objective 2 (housing), objective 4 (economy), objective 9 (pollution) objective 11 (climate change) and objective 12 (natural resources). Option 2 which allows a wider area for consideration would have major positive effects on objective 4 (economy), objective 11 (climate change) and objective 12 (resources). However, there are negative or uncertain effects that have been identified for environmental objectives.</p> <p><b>Mitigation and enhancement</b> A policy for wind energy development would allow for the identification of suitable sites. Site specific mitigation and enhancement measures should be included in the policies.</p>	<p>Identifying the areas suitable for wind energy has a positive effect on achieving more renewable energy. Clearly including the moderate-high landscape sensitivity area will increase potential locations and opportunities. However a number of uncertain effects are identified on natural and historic environmental objectives. Reflecting this further evidence (landscape sensitivity assessment) was prepared and Policy CP3 includes detailed development requirements in considering wind energy proposals.</p> <p>Consultation comments identified the important contribution from solar energy. Therefore a Land Sensitivity Assessment for ground mounted solar was prepared and Policy CP3 sets out a positive strategy for and development requirements for ground mounted solar energy proposals.</p>
<p>DM8 New Policy</p>	<p>The current policy approach under ST.7 (option 4) does not provide a robust requirement to provide electric vehicle (EV) charging infrastructure as part of new</p>	<p>Electric Vehicle Infrastructure is best provided at the construction stage in order to best influence future residents</p>

<p>Electric Vehicle Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development Option 2a and 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development</p> <p>Option 1a and b Require the provision of EV infrastructure in minor residential development</p> <p>Option 4 Rely on reference to charging infrastructure in Policy ST.7</p>	<p>development. Options 2b and 3b will require EV charging points to be installed as part of new development which will provide access to sustainable travel options and contribute towards reducing air pollution. Options 2a and 3a have similar benefits, but the provision of passive charging will reduce the cost of development and allow for the most up to date chargers to be installed when needed. Options 2 and 3 have significant positive effects on objective 5 (promoting sustainable transport) and objective 9 (air pollution). There are also positive effects on objective 3 (community), objective 4 (economic objective), objective 11 (climate change) and objective 12 (sustainable energy). Options 2 and 3 would only apply the policy to major developments; whilst there would be positive effects similar to option 1, the effects would be limited when only installed in major development. Option 1 to require the provision of EV infrastructure in minor residential development as well as major development will have significant positive effects on objectives 1, 3, 4, 5, 9, 10,11 and 12.</p>	<p>behaviour. Therefore the draft Plan Policy SCR9 seeks to provide electric vehicle infrastructure within new residential and non-residential development where parking is provided. The policy will complement the aims set out in the councils On Street Electric Vehicle Charging Strategy and Transport and Development SPD.</p>
<p>DM9- 13 (amendments to Policies NE3, NE5, CP7 and NE1. New Policy Biodiversity Net Gain) to strengthen the protection of sites, species and habitats, to introduce a biodiversity net gain (10% or 20%) and to enhance the green infrastructure.</p>	<p>The proposed policy amendments and new policy seek to strengthen policies as relates to biodiversity and green infrastructure supporting the climate and ecological emergencies. The policies will have a positive effect on a number of SA objectives and a major positive impact on SA objectives to conserve, enhance and restore the condition and extent of Biodiversity in the district and reduce negative contributions to and increase resilience to climate change.</p> <p><b>Mitigation and enhancement</b> The policy will be viability tested. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p>	<p>Following the consultation, these policies are strengthened to protect biodiversity and revised to provide further guidance to assess development.</p> <p>At the options stage, a Biodiversity Net Gain of 10% which is in line with the emerging Environment Bill and 15% are considered. The Viability Assessment also tested these options. A 15% BNG would have more benefits however it potentially puts more pressure on the deliverability, therefore it is rejected at this stage.</p> <p>The viability test concluded that the main impact of a requirement for a net gain on residual land values is relatively</p>

		modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available. Therefore the Policy requires 10% through the Partial Update as a stepping stone to consider 15% through the new Local Plan.
DM14-16 amendments to Policy 1: Pollution and Nuisance, Policy PCS5 and LCR6 New and replacement sports and recreation facilities	Proposed changes to Policies PCS1 and PCS5 to avoid potential sources of pollution and contamination of land and requiring a management plan outlining materials used, potential sources of pollution and adequate remediation measures have positive effects on objectives 1 (health and well-being), 3 (stronger communities), 8 (biodiversity), 9 (pollution), 11 (climate change) and 12 (waste). <b><u>Mitigation and enhancement</u></b> Use of natural and recyclable materials should be considered and encouraged. Further guidance setting out on what the management plan should include would be helpful.	The precautionary approach is taken. The draft Policy requires a management plan to be submitted with an application for new artificial 3G pitches. This would have a positive effect managing the potential risks on health and water/soil quality.
DM17 amendments to Policy CP9 (Affordable rent)	The proposed approach to require affordable units as part of a Build to Rent scheme to be discounted with a minimum of 30% (option 1) will have a major positive impact in terms of improving the affordability of rents in the District, particularly in Bath, where existing rental costs are very high. A minor positive impact shall also occur in terms of creating more mixed communities, by introducing population groups to areas within the District where they would otherwise be unable to afford to rent. <b><u>Mitigation and enhancement</u></b> The policy will be viability tested. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.	There is currently not enough information and evidence available to amend the policy to require a minimum of 30% discount in isolation from also reviewing other elements of the approach to affordable housing. Therefore this approach was not taken forward through the Partial Update, however this will be reviewed through the new Local Plan.
DM18, 19 and 20 amendments to Policy H2 and new policy (Houses in Multiple Occupation)	The proposed approach (option 1) will fill the current policy gap relating to new build Houses in Multiple Occupation (HMOs), change of use from other uses such as shops, and the intensification of existing HMOs. The proposed approach will have a major positive impact in terms of boosting the supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation.	The policy is amended responding to the mitigation measures identified through the Options appraisal. The amended policy includes new HMOs and change of use from other uses.  The new Transport and Development Supplementary Planning Document sets out new parking standards and cycle storage standards for HMOs.

	<p>Potential minor negative impacts relating to issues arising in areas with higher concentrations of HMOs will be mitigated by policy wording requiring new build HMOs to be assessed against threshold tests set out in the HMO SPD. A minor negative impact remains in relation to cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties.</p> <p><b>Mitigation</b> Future updates to the HMO SPD / provision of a new parking standards SPD will provide cycle storage standards for HMOs.</p>	
DM21 -24 Purpose Built Student Accommodation	<p>Option 1 (Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated) will have a positive impact in terms of meeting identified need for provision of student housing, through policy wording allowing for the provision of new accommodation off-campus, where need is demonstrated by an educational establishment. This requirement for evidence of need will ensure that an oversupply does not occur. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by policy wording requiring a Management Plan to be submitted through the planning application process. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping will be mitigated by policy wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 2 ( Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test) will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of Purpose Built Student Accommodation (PBSA) district wide, in any areas where the concentration of HMOs is over 10%, no PBSA will be considered to be acceptable. This may lead to the dispersal of both PBSA and HMOs to other areas of the city, in some cases further away from educational facilities. Not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by the inclusion of PBSA in the 10% HMO threshold test, which would prevent provision in areas where the HMO threshold is close to being met. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping will be mitigated by policy</p>	Option 1 introducing a new policy for PBSA performed better in managing new PBSA. Option 2- including PBSA in the HMO concentration test could lead to the dispersal of both PBSA and HMOs to other areas of the city, in some cases further away from educational facilities. Therefore Option 1 with a new policy for PBSA is chosen.

	<p>wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 3 will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of PBSA district wide, not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment.</p>	
DM25 amendments to H7 Housing Accessibility	<p>Option 1 meeting accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings will provide a major positive impact in terms of providing a larger number of accessible homes across a range of housing types, sizes and tenures. This will provide a major positive impact in relation to health, community cohesion and housing stock. Issues relating to viability and feasibility of providing the required accessibility standards for new dwellings will be mitigated by policy wording allowing for developers to provide justification where viability or feasibility issues mean that it is not possible to meet the requirements.</p>	<p>The viability assessment was undertaken and the policy was amended with specific % requirements for both market and affordable housing</p>
DM26 (amendments to ED2A) and DM27(amendments to ED2B) and DM28 (new site allocation for Bath Spa University)	<p>Option 1 to strengthen the protection of existing industrial land by adding more industrial sites/estates under Policy ED2A and protecting other industrial sites with clear policy expectations would have a significant positive effect on objective 4 (employment) by maintaining the mix of employment offers in the district, particularly in Bath. It also has positive effects on objectives 3 (community) and 5 (sustainable transport).</p> <p>Option 2 to strengthen the protection of existing industrial land as per option 1 and identify and allocate a site to facilitate the expansion of the Bath Spa University (BSU) Locksbrook Campus has mixed (positive and negative) effects on objectives 1 (health and well-being), 3 (community), 4 (employment), 5 (sustainable transport), 9 (pollution) and 11 (climate change).</p> <p><u>Mitigation and enhancement</u></p> <p>The site selection and potential uses need to be carefully considered to ensure it contributes to wider economic benefits and maintains employment opportunities close to where people live.</p>	<p>Policy ED2A is amended to include the specific area to encourage the creative industry business linking with the expansion of Bath Spa University. The options appraisals have informed the site requirements for the Locksbrook Creative Industrial Hub (Policy SB22).</p> <p>Policy ED2B is amended to strengthen the protection of industrial land which has a major positive effects to achieve the economic objective.</p>
DM29-35 Transport	<p>The proposed policy amendments seek to strengthen policies relating to sustainable transport, encouraging development in accessible locations and providing access to public transport and active travel methods. The policies will have a positive effect on the majority of the SA objectives. Where new multi-model P&amp;R sites are proposed,</p>	<p>The declaration of the Climate and Ecological Emergency (2019) with a target of carbon neutrality by 2030, coupled with the adoption of JLTP4 (2020), identifies and supports the need for substantial transport improvements to deliver a</p>

	numerous issues will need to be considered, and further work carried out. Please see separate SA relating to these sites (Bath6 Park and Ride).	step-change in enabling sustainable transport and movement. The options appraisals identified a number of major positive effects by updating the transport policies.
DM36 amendment to Policy GB2 (Development in Green Belt Villages)	Options 1 and 2 will both bring the Local Plan in line with national policy by adding reference to residential development being permitted where it is limited to infill development, a replacement dwelling, or redevelopment of previously developed land. Option 1 will provide a strong indication of where infill development would be considered appropriate in Green Belt villages, so as to avoid potential for new housing severed from an existing community and located in areas considered to be inappropriate in Green Belt terms. Option 2 will potentially provide more flexibility to applicants, to justify sites for infill which are located in areas not within existing Housing Development Boundaries (HDBs). <u>Mitigation and enhancement</u> For Option 1, further work is required to ensure that HDBs fully reflect the role of an infill boundary and that such boundaries are clearly defined for all villages within the Green Belt. Concern relating to Option 2 leading to more applications for infill in inappropriate locations will be mitigated by clear policy wording or supporting text clarifying a suitable definition of infill development and where this would be considered appropriate on a site-by-site basis.	Policy GB2 is proposed to be amended following the Option 1 approach. The boundary of the GB villages were defined which will help avoid potential for new housing severed from existing communities and located in areas considered to be inappropriate in GB terms.
<b>Addressing Housing Supply</b>		
Potential housing allocations addressing the shortfalls from the Core Strategy and the Standard Methodology 2014	Option 1 to allocate about 1,300 dwellings identifies 6 sites in Bath, 3 sites in Keynsham and 1 site in Westfield. All sites have good access to a variety of existing community, social and health facilities as well as employment centres by sustainable modes of transport. They also have good access to established footpaths and countryside. All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land. Therefore, it has major positive effects on objective 1 (health), 2 (housing), 3 (community), 4 (employment), 5 (sustainable travel) and objective 12 (resources). Individual site appraisals undertaken identified specific constraints based on the evidence available for Objective 6 (landscape) (landscape), 7 (heritage), 8 (ecology) and 9 (pollution) and further assessments are required to finalise the draft Plan with site specific development requirements and design principles.	Option 1, allocating enough sites to meet the shortfall under the Core Strategy housing requirements is taken forward through the draft Plan. New sites for housing were selected following the locational sequential approach and spatial strategy set by the Core Strategy.  Option 2 to allocate housing sites in accordance with the Standard Methodology would have positive effects on a number of objectives but it does not take into account locally specific circumstances including growth strategies for the area.



	<p>Option 2 to allocate housing sites (even though less than option 1) under the Standard Methodology would have a positive effect on a number of objectives, but it does not take into account locally specific circumstances including growth strategies for the area. The PPG encourages Local Authorities to make as much use as possible of previously-developed (PDL) or brownfield land and take this into account when considering whether it is appropriate to plan for a higher level of need than the standard methodology suggests. All sites selected are PDL or brownfield land apart from the Safeguarded Land (Policy KE3b) in Keynsham. In general uncertain effects are identified on a number of objectives as it depends on which sites would be allocated. Careful selection is needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.</p>	
Policy SB8 BWR	<p>The proposed options for this site are more nuanced approaches that evolve and bring up-to-date the current site allocation which may result in significant positive effects on objective 1 (health), 2 (homes), 3 (community), 4 (economy), 5 (sustainable travel), 6 (landscape), 7 (heritage), 8 (ecology), 11 (climate change) and 12 (natural resources)</p> <p>Some elements are not detailed in the options document but will need to be set out in the Draft Plan and in possible updates to the Supplementary Planning Document (SPD).</p>	<p>The site is brownfield land in Bath. Further assessments were undertaken and Development Requirements under Policy SB8 were updated.</p>
Policy SB14 Twerton Park	<p>The policy wording updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies.</p> <p>Further assessments are required to finalise the development requirements and design principles.</p>	<p>The site is brownfield land in Bath. Further assessments were undertaken and Development Requirements under Policy SB14 were updated.</p>
SB18 RUH	<p>The RUH is a major healthcare provider within the district and sub-region. The RUH is revising its Estate Strategy which will set out the future clinical and operational needs as well as increasing staff, patient numbers, forecast population growth and associated healthcare demands. Revising the allocation for the RUH facilitating new staff accommodation would have a major positive effect on objectives 1 (health and well-being), 2 (housing), 3 (community) and 4 (economy).</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>	<p>The site is brownfield land in Bath. Further assessments were undertaken and Development Requirements under Policy SB18 were updated.</p>
SB10 Roseberry Place	<p>This site was granted planning permission in 2015 (ref: 15/01932/EOUT) for a mixed use scheme comprising Build to Rent housing, retailing on the ground floor and an office development of up to 4,500 sqm. The key change with the policy approach is</p>	<p>The site is brownfield land in Bath. The existing Policy is retained. Further evidence is required to justify departing from the current strategy of providing</p>

	to explore a range of land use options from full residential to a mixed use scheme in order to enable development. Providing more homes in the area along a frequent bus route, with very good links to cycling and walking infrastructure it will have major positive effects on objective 2 (housing) and objective 5 (sustainable transport). The site is located within Flood Zone 2 and partly Flood Zone 3 therefore it requires further consideration to inform the draft Plan.	employment (office) use on the site and will be reviewed through the new Local Plan.
New: Depot site, Station Road, Newbridge, Bath	The policy allocates the site for housing and for the delivery of part of the safeguarded Sustainable Transport Route. The policy wording also updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies. <u>Mitigation and enhancement</u> Further assessments are required to finalise the development requirements and design principles.	The site is brownfield land in Bath. This site is not allocated through the Partial Update. Further evidence is required, and it will be reviewed through the new Local Plan.
New: Sion Hill site	The site allocation would help meet the housing shortfall identified including affordable housing, therefore it has a major positive effect on objective 2 (housing). The allocation also has a number of positive effects by locating housing close to key facilities, services, employment and open countryside. <u>Mitigation and enhancement</u> Further assessments are required to finalise the development requirements and design principles including the site capacity.	The site is brownfield land in Bath. Further assessments were undertaken and informed new Policy SB24.
Policy KE2a Fire Station	Revising the allocation for the former Fire Station would have minor positive effects on a number of objectives. <u>Mitigation and enhancement</u> Further assessments are required to finalise the development requirements and design principles including the site capacity.	The site is brownfield land in Bath. Further assessments were undertaken and Development Requirements under Policy KE2a were updated.
New Treetops Nursing Home	Allocating the site for new care home facility/residential dwellings with clear development and design requirements would have major positive effects on objective 1 (health) and 2 (housing). <u>Mitigation and enhancement</u> Further assessments are required to finalise the development requirements and design principles including the site capacity.	The site is brownfield land in Bath. Further assessments were undertaken and informed new Policy KE5.
Land at north and east Keynsham (including Policy KE3b)	Option 2 will incorporate the wider area into the proposed strategy. This will allow for the provision of improved infrastructure to be incorporated into proposed developments. The approach will make provision for a new local centre and services at north Keynsham which can be accessed from existing and proposed development	Further assessments including transport were undertaken and informed new Policies KE3c and KE3d.

	<p>sites. The approach will also have improvements to aspects such as health and wellbeing, the economy and air quality. These Options would deliver net zero carbon developments and biodiversity net gain. Therefore, it has major positive effects on objective 1 (health), 2 (housing), 3 (community), 4 (economy), 5 (sustainable travel), 8 (ecology) and 11 (climate change).</p> <p><u>Mitigation and enhancement</u> Further evidence work including a viability assessment is needed to inform the draft Plan.</p> <p>It is unclear without further assessment whether building 300 dwellings under Option 1 would deliver new highways infrastructure sufficient to prevent a severe impact on the highway network. Therefore, traffic could increase to an unacceptable level resulting in some uncertain effects on a number of objectives particularly on objective 5 (sustainable travel).</p>	
<b>Other opportunity sites</b>		
Policy SB2 Bath Recreation Ground	The policy options relate to the recent judgement confirming that the legal covenant relating to use of the land remains capable of being enforced by the beneficiaries of it. The various options proposed will have different effects but these remain uncertain until the policy wording has been reviewed.	The existing Policy SB2 is retained and will be reviewed through the new Local Plan.
New Milsom Quarter	<p>The Milsom Quarter is an area that is in decline, shown by falling footfall and increasing vacancy rates. Both options facilitate a greater balance in the mix of uses, activity and increased residential development in this well connected area and have major positive effects on objective 2 (housing), objective 5 (sustainable transport) and objective 12 (resources). Option 1 with mixed uses on ground floor and residential on upper floors only, helps maintain active ground floor uses which results in a major positive effect on objective 4 (economy). In comparison, option 2 with residential uses on ground floor may have a negative effect on the same objective.</p> <p><u>Mitigation and enhancement</u> Further evidence work is required to support the draft Plan with site specific development requirements and design principles, particularly taking into account the long-term effects.</p>	No specific site allocation as further evidence and assessments are required at this stage. But it is acknowledged in Policy B5 as a potential development/improvement area. This will be reviewed through the new Local Plan.
Bath 5 University of Bath	The University of Bath is one of the key employers in Bath and is preparing the masterplan for the Claverton Down Campus. This proposes further improvements to	The site is brownfield land in Bath.

	<p>teaching facilities and provides more purpose built student accommodation. Revising Policy SB19 with clear capacities and development requirements will have major positive effects on objectives 1 (health and well-being) and 4 (community) as there are good ranges of services and facilities available on campus. It will also have major positive effects on 2 (housing) and 5 (economy) as it will help prioritise general housing and jobs in the city.</p> <p><u>Mitigation and enhancement</u></p> <p>Further discussion with the University and assessments are required to finalise the development requirements and design principles including the site capacity.</p>	<p>Further assessments were undertaken and Development Requirements under Policy SB19 were updated.</p>
Bath 6 Park and Ride	<p>There is scope for option 1 (allocating for mixed use development) to achieve a major positive impact in terms of climate change, through the use of brownfield land for solar infrastructure, and a minor positive impact in relation to provision of household waste facilities located in sustainable locations, accessible by public transport, foot and bike. However, as the sites are located in the green belt, close to and within the Cotswold AONB and within the setting of the World Heritage Site, further assessment work is required at the draft plan stage in order to establish the impact that the proposals might have on these sensitive issues. Further assessment work is also required in relation to noise impact on local residents, traffic congestion and flood risk (Newbridge Park and Ride). There is potential for development to play a beneficial role in supporting nature recovery.</p>	<p>Further assessments were undertaken and informed new Policy 26 and revised Policy ST6.</p>
Bath 7 Bath Community Academy	<p>Option 1 (allocating solely for educational and community uses) will provide a major positive impact in terms of providing community and educational facilities, supporting the local economy and being located in a sustainable location. Option 2 (allocating primarily for educational and community uses with a minor residential element) also provides positive impacts in relation to these issues, though inclusion of residential units on the site may reduce the floorspace available for community / educational uses. To mitigate this, careful consideration of site layout options is required, to maximise community and educational use, with provision of residential only where necessary to fund other uses. There is potential for redevelopment of the site to provide a positive impact on landscape, heritage, biodiversity, traffic congestion, and resilience to climate change. However, further work is required in these areas.</p>	<p>No specific site allocation as further evidence and assessments are required at this stage. This will be reviewed through the new Local Plan.</p>
Bath 8 Weston Island	<p>The policy will enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for redevelopment, including residential. The policy also requires the improvement of walking and cycle routes across Weston Island. Therefore, allocating the site for industrial uses and</p>	<p>The site is brownfield land in Bath. Further assessments were undertaken and informed new Policy 23.</p>

	<p>builders merchants (as per sites in Policy ED2A) will have a major positive effect on objective 3 (community), objective 4 (jobs) and objective 5 (sustainable transport). The river is designated as a 'Site of Nature Conservation Interest' (Policy NE3) and the edges of the island form an important associated habitat. Therefore, further evidence work is needed to inform the draft Plan.</p> <p>B&amp;NES Strategic Flood Risk Assessment indicates that the entire site is within Flood Zone 3 and the NPPF sets out clear requirements regarding development in flood risk areas entailing the sequential and exceptions tests.</p>	
SV1 (Policy SSV9) Somer valley Enterprise Zone	<p>This approach proposes to include a wider range of commercial uses including eating/drinking establishments, hotel and retail uses subject to not harming the town centre. Including higher value uses, with a road frontage, would improve the site's viability and help facilitate its delivery. Therefore, it has major positive effects on objective 3 (community), 4 (economy) and 5 (sustainable travel).</p> <p><u>Mitigation and enhancement</u></p> <p>Further assessments are required to finalise the development requirements and design principles.</p>	Further assessments were undertaken and Development Requirements under Policy SSV9 were updated
SV2 (Policy SSV2) South Road Car Park	<p>Option 1 (Redevelopment of the site as allocated by Policy SSV2 for retail) would make it easier to reach everyday destinations (such as shops) for local people by active travel as it is located within the town centre and would provide employment opportunities and natural surveillance, improving sense of safety. Therefore, there are positive effects on a number of objectives. However, despite some interest in the site from operators it has not come forward for retail/food store redevelopment and retaining significant public car parking has proven difficult to deliver, therefore some uncertain effects are identified.</p> <p>Option 2 could provide the opportunity to utilise parts of the car park for other beneficial uses including solar energy generation and provide an element of residential development which would be well connected within this Town Centre location. New proposals will be subject to other Development Management policies but without any specific allocation with development requirements and principles set out, there will be some uncertainty in achieving some objectives.</p>	Policy SSV2 was deleted. But Policy SSV4 Former Welton manufacturing site is updated to include medium scale retail.

## 7. Results of the Appraisal of the LPPU

What the SEA Regulations say...  
Information for Environmental Reports...

6. The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage) and landscape (and the inter-relationship between the issues above).

7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information.

- 7.1. This chapter presents the SA findings for the LPPU Plan incorporating the appraisals of the Main Modifications. Table 3 in Chapter 2 of this report has provided an overview of what the LPPU contains within the scope of the Update. This chapter presents the SA findings, following the same order as the Core Strategy/Placemaking Plan structure.
- 7.2. The appraisal of the Options document (Jan 2021) presented in Appendix C and summarised in Section 6 above have informed the formulation of the draft LPPU.
- 7.3. The appraisal findings of the LPPU are presented as follows:
- 1) Individual policy and site appraisals are summarised in Table 11 and detail in Appendix D. The individual effects recorded for each policy appraised in detail are presented graphically in Table 12 later in this section.
  - 2) Core Strategy and Placemaking Plan screening is presented in Appendix E and appraisals are presented in Appendix F. Appendix E shows which policies have been substantially updated in the LPPU and are therefore subject to individual appraisal in Appendix D. The effects of all policies in the draft Plan (including those substantially updated as part of the Partial Update and those which remain unchanged) have been considered as part of the cumulative effects presented in Appendix F.
  - 3) The screening of the Main Modifications is presented in Appendix I and policy appraisals in Appendix D is updated taking into account of the effects of the Main Modifications.
- 7.4. Table 11 presents the findings and significant effects of the LPPU. The summary SA findings for the site allocation policies are also presented in Table 11 as part of summary of appraisal of all policies. Significant effects are considered to be those which are potential major positive, major negative, and uncertain.

**Table 11 Summary appraisal results for the LPPU (see detailed assessment in Appendix D)**

Policy	Key findings significant effects
<b>CP1 Retrofitting Existing Buildings</b>	The policy will encourage the retrofitting of existing buildings and supplemented by the Energy Efficiency, Retrofitting and Sustainable Construction SPD. Energy efficient buildings and renewable energy will help to reduce carbon emissions and slow global warming / climate change. Available evidence suggests that HMOs are more often in poor condition than other

	<p>types of housing in the same area therefore requiring to achieve an Energy Performance Certificate “C” rating has major positive effects on objective 1 (health) and 2 (housing) by improve the health and well-being of the HMO occupiers and HMO building quality. The policy changes will see positive effects to objectives 3(communities), 4(economy), 8(biodiversity), 9 (air), 11(climate) and 12(sustainable construction).</p>
<p><b>CP3 Renewable Energy</b></p>	<p>Providing a positive policy context for renewable energy development will help provide a diverse range of employment opportunities and contribute to the regions’ ambition to be a driving force for clean and inclusive growth. Therefore, there is a major positive effect on objective 4(economy). The potential for provision of multi-function green infrastructure within proposals Clause 1) would also contribute to a minor positive effect. Clause 2) d) seeks to protect residential amenity as a result of noise, shadow flicker and visual intrusion which helps to achieve Objective 1.</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses which helps achieve a number of objectives.</p> <p>Some negative or uncertain effects have been identified on objectives 6(landscape), 7(heritage), 8(ecology) and (pollution). The significance of the negative impact will depend on the size and type of energy generation and how it protects areas of valued landscape and townscape. The Landscape Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with the ‘high’ landscape impact (indicated as the low potential area in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in areas with the ‘high’ landscape impact (indicated as low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants demonstrate that adverse impacts on the landscape can be satisfactorily mitigated. The amended supporting text through the Main Modifications provides further explanation of the landscape led approach for wind energy and ground-mounted solar PV to guide development to the most appropriate locations based on the landscape Sensitivity Assessment (LSA: LUC 2021). The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District Including information from the LSA in the Plan help clarify and make the policy more effective. This results in achieving better outcome for objective 6.</p> <p>The revised Policy requires an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath WHS. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused.</p> <p>The revised Policy for wind energy requires that Flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected.</p> <p>The policy seeks to provide a positive approach for determining applications for renewable energy projects, guiding solar and wind energy development to the right locations in terms of landscape capacity. Site specific mitigation and enhancement measures are included in the policies.</p> <p><b>Mitigation and enhancement</b> Any new development will also be subject to other Development Management policies.</p>
<p><b>Policy SCR6 and SCR7 Net Zero Carbon Policy for Residential and Non residential Buildings Supersede CP2 and SCR1 Residential</b></p>	<p>The policy approach for residential building expects to reduce heat and power demand by encouraging a fabric first approach then supplying all energy demand through on site renewable energy, with a preference for roof mounted solar PV. For non-residential major development, the Policy expects to achieve a 100% regulated operational carbon emissions reduction from Building Regs Part L 2013 (or future equivalent legislation). For major residential and non-residential developments that cannot meet their energy needs on site, off setting payments will be secured through a section 106 agreement. This will result in a major</p>

<p><b>and non Residential Development</b></p>	<p>positive effect on Objective 11(climate) and Objective 12(resources). The supporting text encourages all new development to undertake a CIBSE TM59 overheating assessment to evaluate how overheating can be mitigated. Even though this is not a policy requirement, it encourages exemplary development.</p> <p>A minor negative and uncertainty effect are identified for Objective 6 (landscape)(landscape) and 7(heritage) as the provision of on-site renewable energy generation would have potential to increase negative impacts on areas of valued landscape and townscape and the setting of heritage assets. However, any development will be subject to development management policies in particular HE.1, NE.3, NE.4 and NE.5 which seek to protect the landscape, historic and natural environments and therefore negative impacts could be mitigated. The Energy Efficiency Retrofitting and Sustainable Construction SPD will also provide guidance with regards to the design of renewable energy and sustainable construction on historic buildings.</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council’s planning requirements including zero carbon requirements. It concludes that the affordable housing requirements can be met across all areas of the District but the existing use value of sites is a critical factor in determining the outcome. It identifies that large high density flatted schemes are less viable in lower value areas, due to their higher build costs, but these types of schemes generally only come forward where values are higher (i.e. Bath City Centre).</p> <p><b>Mitigation</b> There may be some possible negative impacts for viability and affordability of setting additional requirements of house builders. In these circumstances, CIL exceptional circumstances relief could be applied, or the tenure mix or overall level of affordable housing could be changed to improve viability and deliverability.</p>
<p><b>Policy SCR8 Embodied Energy</b></p>	<p>Embodied carbon emissions are the carbon emissions resulting from the materials, production, demolition and disposal. An embodied carbon assessment provides details of a building’s materials used in the substructure, superstructure and finishes. This provides a true picture of a building’s carbon impact on the environment. Reducing embodied carbon helps reduce resource use and associated costs also alleviating longer term risks around resource availability. Therefore a major positive effect on Objective 12 (resource).</p>
<p><b>Policy CP4 District heating</b></p>	<p>The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions which has positive effects on Objective 1 (health), 9 (pollution) and 11(climate change)</p>
<p><b>Policy SCR9 Electric Vehicle Charging Infrastructure</b></p>	<p>The provision of electric vehicle infrastructure will increase the uptake in EV use and helps design new development to be resilient to future climate changes contributing to a zero carbon development, provide access to sustainable transport options and reduce emissions from car exhaust which will reduce greenhouse gas emissions. Electric vehicles also result in a reduction in traffic noise.</p> <p>The proposed policy will have significant positive effects on objective 5 (promoting sustainable transport), objective 9 (air pollution) and objective 11(climate change).</p> <p><b>Mitigation</b> On street parking infrastructure could have some impact on the design and layout of the development. The Policy requires any special characteristics of the area, the public realm or the mobility of other users are not compromised. New development is also subject to other Development Management policies. The Transport and Development SPD will set the standards for electric vehicle charging in development.</p>
<p><b>Policy NE2 CONSERVING AND ENHANCING THE LANDSCAPE AND LANDSCAPE CHARACTER</b></p>	<p>The original policy NE2 aims to conserve and enhance the landscape and landscape character. The proposed change to give great weight to conservation and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities, has a major positive effect on this objective.</p> <p>The original policy NE2 requires to incorporate green space within the scheme that positively contributes to creating a high quality environment by providing enhanced landscape features which could include some heritage and ecological destinations/assets. The proposed change</p>



	<p>to give great weight to conservation and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs) has a neutral effect on Objective 1(health), Objective 2(communities), Objective 7 (heritage)(heritage) and Objective 8(biodiversity) however they have minor positive effects on these objectives as a revised policy.</p>
<p><b>Policy NE3, NE3a and NE5 Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3afor Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery</b></p>	<p>An Ecological Emergency has been declared by B&amp;NES Council in response to ongoing threats to wildlife and ecosystems. Policy NE3 provides policy as relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs) and other protected species. Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitates to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. The amendments through the Main Modifications help avoid adverse impacts on European, UK protected species, UK Priority and locally important species.</p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. The proposed policy amendments and new biodiversity net gain policy seek to strengthen policies as relates to biodiversity requirements, thereby supporting the climate and ecological emergency. The policies will have a major positive effect on Objective 8(Biodiversity) and 11(climate change).</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including BNG requirements. It concludes that the main impact of a requirement for a net gain on residual land values through this option is relatively modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p><b>Mitigation</b> Minor negative effects are identified for Objective 2(housing) and Objective 4(economy) as the requirement on developers to provide 10% Biodiversity Net Gain in residential and non-residential developments could increase build costs and potentially reduce developable areas on sites. However, some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>
<p><b>Policy CP7 and Policy NE1 Amendment to Policy CP7: Green Infrastructure Amendment to Policy NE 1: Development and Green Infrastructure</b></p>	<p>Proposed amendments to Green Infrastructure policy will support the delivery of GI as a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities. Strategic GI projects, such as the Bath River Line project, will support opportunities for connection to wider GI networks further supporting the health and well-being of communities and providing active travel routes within GI. GI offering nature-based solutions such as natural flood management, reducing air and noise pollution and increasing the sustainability of food production will also offer increased resilience to climate change. Therefore, there are major positive effects on Objective 1(health) and Objective 5(sustainable transport – walking).</p>
<p><b>Policy GB2 Policy GB3 Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill</b></p>	<p>Defining infill boundaries and removing reference to HDB's will align policy GB2 more fully with national policy. The policy will reference that residential development is acceptable where it is limited to infilling within the defined infill boundary, replacement dwellings or redevelopment of previously developed land. The boundaries will give a clear indication of where infill development would be considered acceptable in principle within Green Belt (GB) villages. This policy approach will avoid proposals for new housing outside of the boundary which could be severed from the village and community and will only allow development in line with national GB policy. The amendments through the Main Modifications amendments</p>

<p><b>boundaries, which are not determinative, but do provide a strong indication.</b>  <b>Policy GB3 minor amendment to include proposals to alter a building in the GB</b></p>	<p>clarify and steer limited infilling in villages within the GB. This has a positive effect on this objective by facilitating appropriate limited infill development in rural areas. Therefore, positive effects are identified on Objective 2(housing), Objective 4(economy) and Objective6 (landscape)  <b>Mitigation</b>  Infill boundaries were defined using the existing HDB's as an indication. Some small amendments are made to better reflect infill opportunities. For villages without existing HDB's, opportunities for infill development were considered and several villages are proposed to have newly defined infill boundaries. These new boundaries are tightly defined around the village boundary to avoid possibility of encroachment (mitigating the impact on landscape). All proposals for infill development within the boundary will be considered on a case-by-case basis and will need to meet criteria for infill development.</p>
<p><b>Policy PCS5 Contamination</b>  <b>Policy LCR6 New and replacement sports and recreational facilities</b></p>	<p>Artificial pitches are useful mainly due to their ability to withstand inclement weather and provide significant benefits supporting active lifestyle and well-being by allowing people to play and exercise longer especially in winter.  These two revised policies aim to address the issues relating to artificial grass pitches. The crumb granules are typically styrene butadiene rubber (SBR) originating from shredded waste tyres. Even though the Construction (Design and Management) Regulations 2007 place additional duties on those designing artificial pitches to eliminate or reduce hazards and risks during design, there are some concerns regarding impact on people's health resulting from exposure to contaminated granular material and through the contamination of soil and water.  The revised Policies PCS5 and LCR6 avoid development that may result in the contamination of land. Also Policy LCR6 requires a management plan submitted with applications for new artificial pitches setting out the materials used and potential sources of pollution from the installation phase through to end of life. Therefore, major positive effects identified on Objective 1(health), Objective 3(communities) and Objective 9 (pollution).</p>
<p><b>Policy H2 Houses in Multiple Occupation (HMO) amendments to Policy H2</b></p>	<p>The revised policy would fill the current policy gap relating to new build HMOs, change of use from other uses such as shops, and the intensification of existing HMOs. Where intensification of existing HMO is proposed, it has potential for overcrowding contributing to poor living environment for occupiers. However, amended wording requires applications relating to intensification to be assessed against criteria relating to provision of a good standard of accommodation for occupants, and must also achieve an Energy Performance Certificate rating of C. Therefore, there is a minor positive effect on Objective 2(housing), Objective 3(community) and Objective 11(climate).    The policy aims to manage potential issues arising in areas with higher concentrations of HMOs by requiring new HMOs and intensification applications to be assessed against threshold tests set out in the HMO SPD. The intensification of HMOs to an extent further than assessable at planning stage will be restricted by policy wording allowing conditions to be attached to relevant permissions, controlling the number of occupiers. The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy, especially as they help avoid potential negative impact on fabric or structure (clause c) and unacceptable harm to the heritage significance of a heritage asset (clause d).    A minor negative impact remains in relation cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties. Future updates to the HMO SPD and new Transport and Development SPD will provide cycle storage standards for HMOs.</p>
<p><b>New Policy H2A Purpose Built Student Accommodation</b></p>	<p>Provision of PBSA shall increase the existing supply of housing for students to meet future demand, providing good quality, managed homes, linked directly to an educational facility. Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment or meeting the needs of second and third year students. This avoids an oversupply of PBSA in Bath outside allocated sites.</p>

	<p>Where follow on students (including 2<sup>nd</sup> or 3<sup>rd</sup> year students) decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and competitive with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes. Therefore, new policy H2A will have a positive effect on Objective 2(housing). New policy H2A requires the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect on objective 1(health). Also the new policy, with a more strategic approach towards location of PBSAs, would provide clarity and help maintain employment sites, unless a need could be demonstrated for PBSA in association with an education provider resulting in a positive effect on Objective 3(economy).</p> <p>Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance. Policy H2A requires submission of a Management Plan, in order to manage associated issues such as noise disturbance. The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced. However, these negative effects are minimised by requiring a Management Plan to be submitted through the planning application process.</p>
<p><b>Policy H7 Accessibility Standards</b></p>	<p>Policy to support housing accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwelling will provide a major positive impact in terms of providing a larger number of accessible homes across a range of housing types, sizes and tenures enabling people to remain within their local communities. This will provide a major positive impact in relation to health, community cohesion and housing stock. Issues relating to the feasibility of providing the required accessibility standards for new dwellings will be mitigated by policy wording allowing for developers to provide justification in exceptional circumstances where feasibility issues mean that it is not possible to meet required M4(2) and M4(3) standards.</p>
<p><b>ED1B Change of use &amp; redevelopment of office to residential use</b> <b>ED1C Change of use and redevelopment of office use to other town centre use (not within use class E)</b></p>	<p>The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 introduced a new Class MA – commercial, business and service uses to dwelling houses subject to a prior approval process. The Order sets out various limitations and exclusions including listed and buildings within a World Heritage Site. The amended policy will provide framework to assess change of use and redevelopment of office to use class C2, C3, C4 and Sui Generis (large HMO and Purpose Built Student Accommodation) and avoid loss of employment sites where strong economic reasons exist. Therefore, there are minor positive effects on Objective 3(communities), Objective 4(economy) and Objective 5(sustainable transport).</p>
<p><b>Policy ED2A Strategic Industrial Estate / Other Primary Industrial Estate</b> <b>Policy ED2B Non-Strategic Industrial Estate</b></p>	<p>A Locksbrook Creative Industry Hub has been designated within the Newbridge Riverside area particularly focusing on business development in the creative industry. This has a positive effect to encourage businesses in this specific sector. (also see the appraisals for Policy SB22). The original Policy ED2B was adopted in the context of the National Planning Policy Framework (NPPF) 2012 which sets out a presumption that employment land and premises should be redeveloped for housing, unless there are 'strong economic reasons' as to why this would be inappropriate. However, this paragraph was not carried over to the NPPF 2018, 2019 and 2021. Reflecting the latest national policy (NPPF 2021) and the significant losses of industrial land that have occurred since 2011; and the increased demand for industrial accommodation Policy ED2B has been strengthened to provide greater policy protection of non-strategic or other industrial sites. Therefore, this has a major positive effect on Objective 4(economy). However, this has a potential negative effect on Objective 2(housing) as it might not contribute to deliver a suitable mix of housing types and tenures that cater for all population groups and help boost the supply of housing.</p> <p>Mitigation: Sufficient housing sites should be allocated to meet the housing targets and provide both market and affordable housing.</p> <p>The sites within Strategic Industrial Estates/Primary Industrial Estate are likely located close to where people live and accessible to key social infrastructure. Protecting these employment sites has a positive effect on Objective 3(communities)</p>

<p><b>Policy RE1 Employment uses in the Countryside</b></p>	<p>The revised Policy allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities. Therefore, a major positive effect is identified on Objective 4(economy). The amendments through the Main Modification only allow redevelopment of previously developed land where it is not habitat functionally linked to a European site. This helps avoid harm to European sites.(Objective 8).</p>
<p><b>Policies CR1 Sequential Test (retail and other main town centre uses),CR2 Impact Assessments and CR3 Primary Shopping areas and primary shopping frontages</b></p>	<p>The amendments to Policy CR2 reflect the changes in the NPPF. The aim of the policies is to ensure that new development does not have an adverse impact on local town centres. The revised policies CR1 and CR2 protecting the viability and vitality of town centres has a positive effect on Objective 3(communities) and Objective 4(economy) The amendments to policy CR3 reflect the new Use Class Order and introduction of use class E and continue to protect active ground floor uses in the context of the new Use Class Order.</p>
<p><b>Policies ST1, ST2, ST3, ST4, ST5, ST6 and ST7 Transport</b></p>	<p>Proposed transport policy amendments reflect the Council’s Climate and Ecological Emergencies and the ambition to achieve carbon neutrality by 2030. The Council declared three priorities to achieve the carbon neutrality, including ‘a major shift to mass transit, walking and cycling to reduce transport emissions.’ Proposed policy amendments focus on sustainable travel, providing genuine travel choice and reducing car dependence, all supporting a reduction in carbon emissions. There is also an increased recognition of the importance of location and design in the sustainability of development, although context remains key with proposed policy reflecting requirements for development within more rural areas.</p> <p>Proposed policy amendments further encourage more accessible developments, closer to everyday destinations reachable by active travel through provision of high-quality cycling and walking infrastructure options. There is an increased emphasis on linkages between transport, health, equality and inclusivity, creating better places, climate and air quality and thus improving the health and well-being of all communities and reducing health inequalities. Proposed policy encourages provision of sustainable transport options and lessens reliance on car-use, therefore improving traffic congestion and air quality issues. Inclusive design principles are highlighted to support and promote stronger and more cohesive communities.</p> <p>Therefore, there are major positive effects on Objective 1(health), Objective 3(communities) and Objective 5(sustainable transport).</p> <p>There some uncertain effects are identified on Objective 6 (landscape) (landscape), Objective 7 (heritage)(heritage) and Objective 8(biodiversity) as the provision of new transport related infrastructure would have potential to increase negative impacts on areas of valued landscape, historic environment and natural environment.</p> <p>Existing Park and Ride sites at Odd Down, Newbridge and Lansdown are currently located on the edge of Bath, within the Green Belt. In order to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange, the sites will be removed from the Green Belt, and allocated for this use. The sustainability of the site allocation (Policy SB26) was assessed separately.</p> <p><b>Mitigation</b> Various mitigation measures /requirements are included in the amended policies and also new development will be subject to other relevant Development Management policies.</p>
<p><b>Spatial Policies</b></p>	
<p><b>Policy DW1 (Spatial Strategy)</b></p>	<p>Policy DW1 sets out the overarching spatial strategy for the district and is largely retained. The key amendment to the policy is to increase the development capacity at East Keynsham i.e. releasing the previously safeguarded sites for development through LPPU Policy KE3c</p>

	<p>and KE3d. The new site allocations prioritise previously developed land and follow the spatial sequential approach directing new development to existing urban settlements, Bath, Keynsham and Somer Valley. This helps encourage walking and cycling by locating new housing close to existing workforces, facilities and services. Therefore major positive effects on objective 1(health) and 2(housing). There is a minor negative effect on objective 12 as three of the sites are currently greenfield land, however the two sites at Keynsham were justified and safeguarded for development through the Core Strategy</p>
<p><b>Policy B2 (Bath Central Area Strategic Policy)</b></p>	<p>The amendments to Policy B2 include the Milsom Quarter as a key development opportunity area.</p> <p>The Milsom Quarter is located within the Bath Central Area. The overarching ambition is to transform and re-imagine the future of the Milsom Quarter, creating a more viable, vibrant and diverse part of the city with a greater balance of mix of uses, activity and increased residential development, all combining to redefine the sense of community and increased local purpose. This includes redeveloping underused upper floors to residential use. In general this will have positive effects on a number of Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12(natural resources).</p> <p>However, there are some uncertain effects on Objectives 6(landscape), 7(heritage) and 8(biodiversity) as this is not a site allocation with detailed development requirements, it is therefore not clear how this designation directly responds to the natural and built environment.</p> <p><b>Mitigation and enhancement</b></p> <p>The comprehensive masterplan will review and respond to the natural and built environment and will inform future development. Also any development proposals will be subject to other Development Management policies.</p> <p>Increasing the commercial offer and footfall and usage of the Milsom Quarter area could increase traffic congestion and impact on air quality, however this area has good access to sustainable modes of transport including public transport, walking and cycling. It is also intended to bring more residential uses which assists in reducing car usage. Therefore, mixed effects are identified for Objective 9(pollution)</p> <p>The evidence-based Vision and Masterplan for Milsom Quarter is in preparation alongside the Top of the City Access and Movement Strategy. This will inform future development connections to the existing and new cycle and walking infrastructure.</p>
<p><b>Policy SB1 Walcot Street /Cattlemarket</b></p>	<p>The site is located in a highly sustainable location with potential for day to day trips (including health and well-being facilities) to be made locally and on foot or by bicycle, encouraging active lifestyles. The site has good access to employment sites/opportunities in Bath. The amendments would encourage meanwhile and temporary uses responding to the history and complexity of the site which helps increase employment opportunities. Therefore, there are major positive effects on Objective 4(economy) and 5(sustainable transport).</p> <p>Providing new development including retail, workspace, food and drink uses could increase traffic congestion and impact on air quality, however this area has a good access to sustainable modes of transport including public transport, walking and cycling. It is also intended to bring more residential uses which helps reduce car usage. Therefore, mixed effects are identified for this objective.</p> <p><b>Mitigation and enhancement</b></p> <p>This site is part of the Masterplan for Milsom Quarter which will be informed by the Access and Movement Strategy. This will inform future development connections to the existing and new cycle and walking infrastructure. New development will be subject to other Development Management policies.</p>
<p><b>Policy SB8 Bath Riverside</b></p>	<p>The updated site allocation for Bath Riverside will have a major positive effect in terms of Objective 2(housing) boosting the supply of housing (including affordable housing), and Objective 5(sustainable transport) through the provision of improved walking and cycling infrastructure and routes within the local area.</p>

	<p>A positive impact will arise relating to the promotion of healthy lifestyles through the provision of a health related community facility, and through provision of improved walking and cycling infrastructure in the local area.</p> <p>Other positive impacts will arise through provision of local jobs relating to the provision of a <del>primary school</del>, an early years facility and a community hub, the protection and enhancement of existing habitats along the river line and within existing hedgerows, provision of 10% biodiversity net gain, and through the optimisation of sustainability innovations at the site.</p> <p>Potential negative impacts relating to heritage impact, landscape, views of the site, light spill and flooding will be mitigated through development requirements set out within the policy wording.</p> <p>Policy wording requires development to retain or reinstate riverside habitat to retain and enhance green infrastructure where possible. Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated. Built form is required to be set back from the existing riverside habitat infrastructure by a buffer of at least 10 metres where feasible. This helps mitigate potential negative effects on objective 8 (ecology).</p>
<p><b>Policies B3 Strategic Policy for Twerton and Newbridge Riverside and SB22 Creative Industry Hub</b></p>	<p>The Creative Industry Hub in partnership with Bath Spa University offers mixed use development with employment space including incubator units and 'grow on' space and teaching. It also provides opportunities to share the university's specialist equipment and facilities and become a focal point where universities and businesses work together. This will have a major positive effect on objective 3(communities) and 4(economy). Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. Also the Locksbrook Campus is well connected to Bath Spa Station, the city centre and Newbridge Campus by public transport. This helps reduce travel/movements between key campuses and satellite campuses limiting air pollution and reducing carbon emission. This results in a major positive effect on objective 5(sustainable transport).</p> <p>The policy SB22 sets out site specific requirements addressing Objective 6 (landscape) (landscape), 7(heritage) and 8 (biodiversity). The nature of the mixed-use development, in terms of character, scale, external appearance and intensity of use, will need to reflect existing development in the surrounding area. However, any new development will be subject to other Development Management policies including in particular new zero carbon and biodiversity net gain policies.</p> <p>New clause 10 requires to retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</p>
<p><b>Policy SB23 Weston Island</b></p>	<p>The site is located in a sustainable location, within walking distance to the city centre, and close to bus stops with services to the city centre. The policy will maintain the land for employment uses and enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for redevelopment. The policy requires the delivery of high quality improvements including safety improvement for pedestrians and cyclists and other users to the bridge linking the Island to Lower Bristol Road. This will make it easy to reach everyday destinations (jobs including at the Locksbrook employment area and facilities) by 'active' travel'. Therefore, allocating the site for industrial and builders merchants uses will have a major positive effect on objective 1(health), objective 4 (jobs) and objective 5 (sustainable transport).</p> <p>The improved path across the island will attract pedestrians and cyclist to use the path creating a vibrant and cohesive site and safe connections to the wider area. However, this could lead to increasing light spill close to the SNCI and bat corridor.</p> <p><b>Mitigation</b></p>

	<p>New development is subject to other Development Management policies and the need to respond the restrictions on light spill from development set out in the Waterspace Design Guidance.</p>
<b>Policy SB14 Twerton Park</b>	<p>The policy facilitates a mixed use development that supports the retention and regeneration of the Football club and further promotes its existing role as a community hub in Twerton. Development is to comprise a mix of residential accommodation, active 'Class E' uses on the ground floor fronting onto Twerton High and a new community hub which offers communal facilities to promote healthy lifestyles, community cohesion and employment spaces, including co-working options. The site is in an accessible, well-connected location with the A36 Lower Bristol Road close to the north of the site accessed via either end of Twerton High Street. Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities) and 4(economy).</p>
<b>Policy SB18 RUH</b>	<p>The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&amp;NES. Various projects to improve the facilities have been completed in accordance with their Estate Strategy (2014) and now the RUH is planning for further improvements tapping into the funding under the government's 'New Hospital Programme'. The updated policy would facilitate the improvement of essential healthcare facilities. The Trust is also the largest employer in Bath &amp; North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to 1,000). The policy supports the improvement to their facilities helping to create more employment opportunities to meet the requirements of this growth sector. The amended Policy refers to the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal. The site is a sustainable location accessible by public transport and brownfield land. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12 (natural resources)</p> <p>The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate necessary enhancements to ensure that walking and cycling are the natural choices for local trips. Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&amp;NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate</p> <p>New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</p> <p><b>Mitigation</b> New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>
<b>Policy SB24 Sion Hill</b>	<p>The site is brownfield land and expected to provide approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1and 2 bed flats) are based on emerging housing needs set out in WECA's draft housing needs assessment. Development of the site for residential use includes provisions to encourage active lifestyles for residents and surrounding communities. Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped gardens, for use by both residents and surrounding local community. The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project. Any new development will be subject to new zero carbon development requirements. The Policy requires demolition and rebuild of the existing buildings at the site should only be proposed where conversion is not considered feasible. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities) and 12 (natural resources)</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary</p>

	<p>planting within the site is substantial, and screens the site well from views across the city. Therefore, potential minor negative effect on Objective 6 (landscape)(landscape)</p> <p>Mitigation New development will be subject to other Development Management Policies particularly Policy NE2 with a requirement for a Landscape and Visual Impact Assessment and SPDs including Transport and Development SPD for parking standards.</p>
<p><b>Policy SB25 St Martins Hospital</b></p>	<p>The new site allocation for St Martins Hospital will have a major positive impact on Objective 2(housing) in terms of boosting the supply of housing (including affordable housing). Other positive impacts will arise through potential enhancement of the existing network of pedestrian footways throughout the site, delivery of measures to improve permeability and legibility for pedestrians and cyclists in the local area and access improvements to Odd Down playing fields.</p> <p>Potential negative impacts on Objective 4(economy) relating to the loss of surplus clinical floorspace will be mitigated by policy wording requiring evidence that clinical floorspace is surplus to the needs of the NHS. Other potential minor negative impacts relating to impact on heritage and biodiversity will be mitigated through development requirements set out within the policy wording. However, the amendment made to clause 8 will help conserve the heritage significance of the Chapel of St Martin.</p> <p>Mitigation New development will be subject to other Development Management policies and SPDs.</p>
<p><b>Policy SB19 University of Bath Claverton Campus</b></p>	<p>The revised Policy SB19 proposes further improvements to university related development including spaces for teaching, research and business incubation and provides more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. It also facilitates the further provision for sports and recreation and 3rd generation pitches which help facilitate longer play especially in winter. Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits. The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between accommodation and university facilities. The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</p> <p>The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires a campus wide approach including implementing an up to date Travel Plan. As the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. Policy Framework proposes an improved green corridor and encourages walking and cycling routes.</p> <p>Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities), 4(economy) and 5(sustainable transport).</p> <p>The campus is surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area. The Verified Views Appraisal has informed the siting, building heights and required buffers to minimise the impact. The Policy also requires the University Park area to remain undeveloped as it has an important landscape setting and green infrastructure function to the many developed parts of the campus.</p> <p>The main Claverton Down campus is within the City of Bath World Heritage Site. The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p> <p>Various area specific measures are included in the Policy such as buildings to be set back to reduce light spill and provision of space for additional tree planting to bolster the existing</p>



	<p>perimeter vegetation. The revised policy requires biodiversity to be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds. It also requires a minimum of a swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings. Also a wider green buffer was proposed around the new 3G pitch.</p> <p>Therefore there are some negative effects on Objective 6 (landscape)(landscape), 7(heritage) and 8(biodiversity).</p> <p><b>Mitigation and enhancement</b> New development will also be subject to other Development Management policies particularly HE1 Historic Environment, NE2 /NE2A (Landscape), NE3-NE6 (ecology) and new Biodiversity Net Gain policy. The site-specific policy requirements SB19 c), d), f) and j) are maintained and carried over to the new SB19. This helps ensure individual proposals address negative effects identified through the appraisal at this stage.</p>
<p><b>Policy ST6 and Policy SB26 Park and Ride Site Allocations</b></p>	<p>Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel, including into and out of key urban areas. By providing affordable, convenient and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in the existing public transport network. Interchanges do not need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place. The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. All 3 sites help access to major employment areas in Bath. This is likely to result in reduced greenhouse gas emissions, opportunities for improved health and well-being, reduced car dependency and congestion. The new site allocations for the three Park and Ride sites and the revised Policy ST6 will have a major positive impact in terms of improvements to health (objective 1), and access to high quality and affordable public transport, cycling and walking infrastructure (objective 5).</p> <p>New clause 11 requires exploring and delivering measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats. The amendments through the Main Modifications include the allocation site boundary which help improve its effectiveness in protecting environmental distinctives/landscape.</p> <p><b>Mitigation</b> Potential negative impacts relating to landscape, heritage, light spill and flood risk will each be mitigated by requirements set out in policy wording and any new development will also be subject to other Development Management policies.</p>
<p><b>Policy KE2B Riverside and Fire Station Site</b></p>	<p>The site is located close to community facilities and jobs in Keynsham. The policy requires to provide residential development (C3 use class) and <del>around 2,500sqm</del> of B1 office floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre with an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level. It also requires to respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it, and deliver the 'Market Walk' through the site. This helps contribute to design out crime and promote a feeling of security. The site also is within walking distance to Keynsham Rail Station and has good access to public transport to key employment areas (Bath and Bristol) and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew. Therefore, there are major positive effects on objective 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 6 (natural resources)</p>

	<p>New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.</p>
<p><b>Policy KE3C and Policy KE3d Safeguarded land</b></p>	<p>The sites are allocated for residential development of around 210 units (KE3c) and 70 units (KE3d) including affordable housing in the plan period. The provision of a replacement sports pitch in the north-west corner of the KE3c site will facilitate the expanded primary school located within the Hygge Park development. The policies prioritise pedestrians and cyclists with comprehensive networks of pedestrian and cycle routes including a new link between new development through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. Therefore, there are major positive effects on objective 1 (health), 2(housing), 3(communities), 5(sustainable transport) and 11(climate).</p> <p>The amendments through the Main Modifications require that Travel Plan and Transport Assessment assesses the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</p> <p>There is a minor positive effect on objective 8 (biodiversity) as the policy requires a minimum of 10% biodiversity net gain. The amendments through the Main Modifications provide some flexibility with regards to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</p> <p>There is a minor negative effect on objective 12 as the sites are currently greenfield land, however they were justified and safeguarded for development through the Core Strategy</p> <p>Mitigation New development will also be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>
<p><b>Policy KE5 Treetops</b></p>	<p>The policy requires to provide residential development (30 units) including affordable housing which helps boost the housing supply, therefore a major positive effect on objective 2(housing). Minor positive effects have been identified on a number of objectives as the policy requires to maximise sustainable transport opportunities for future residents, particularly in terms of capitalising on the active travel potential of its location and facilitates crossing points over St Clements Road and Albert Road along with a proportionate contribution to improvements to Keynsham Route 3 in the WoE LCWIP.</p> <p>Mitigation New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.</p>
<p><b>Policy SV2 and SSV2 Deletion of South Road Car Park Retail Allocation and retention of South Road car park as a car park</b></p>	<p>The revised plan will remove the allocation for a retail store at South Road car park and remove policy SSV2 from the plan. The evidence has demonstrated that the car park is important to support the vitality and viability of the existing town centre. The site is located close to public transport and revised policies, ST.1, ST2A, ST3 and ST7 will support and encourage the use of sustainable travel options. Policy SSV4 will be revised to allow for a medium scale retail store to be sited at the former Welton Manufacturing Site. This will allow for linked trips to the High Street which will support the viability of the High Street.</p> <p>As the site is already in use as a car park there will not be an increase in traffic to and from the site. In particular, the proposal will support the local economy and the aims of objective 3(community) and 4(economy).</p>
<p><b>Policy SSV4 Former Welton Manufacturing Site</b></p>	<p>The change to the allocation will allow for a medium scale retail store to be constructed on the site. The site sits to the north of the existing High Street and the proposed change is intended to support the High Street. The provision of a retail store at this site will allow for linked trips from the new site and the High Street, so that the change to the allocation will support the vitality of the High Street. The policy will include a requirement for a pedestrian connection from the development site to the High Street. The proposed changes will retain the existing</p>

	<p>allocation which will provide housing and economic uses. The allocation requires connection to existing walking and cycling networks. The site is located adjacent to the existing public transport network. Therefore, the amendments to the policy have a major positive effect on objective 4(economy)</p> <p>The amendments include medium scale retail up to around 1,300 sqm. This may lead to increase in traffic congestion and contributing to poor air quality and noise pollution, however the site is close to the existing public transport network.</p> <p><b>Mitigation</b> The amendments to the policy require that new development be well connected to existing walking and cycling routes. The policy will require pedestrian connection to the High Street. Any development will be subject to other development management policies.</p>
<b>Policy SSV21 Silver Street</b>	<p>The allocation of the site at Silver Street will increase housing supply and provide affordable housing. The site is close to pavement access into the town centre and is close to a local bus route. The policy requires to provide pedestrian/cycle connection to the recently delivered and committed active travel routes on Silver Street to allow for active travel access to existing shops, services, and facilities as well as making a financial contribution to the delivery of LCWIP walking and cycling routes between Norton Hill Primary School and Charlton Road. This will help make it easy to reach everyday destinations by active travel. The proposed concept diagram will retain the existing boundary planting and tree protection orders. Therefore, major positive effects on objectives 1(health) and 2(housing)</p> <p>Any development will be subject to other development management policies</p>
<b>Policy SSV9 Old Mills Industrial Estate</b>	<p>The Old Mills employment site was allocated in the B&amp;NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses such as retail, food &amp; drink and a hotel to enable delivery and investment in the site. This would also benefit to bring a greater mixed of uses to facilitate a more diverse range of employment opportunities. Therefore, a major positive effect on objective 4(economy). However, the retail development should be of a scale, type and format that does not harm the town centre (although policy requirements seek to ensure that retail development complements, rather than harms, the town centre).</p> <p>The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development. This has a major positive effect on objective 5(sustainable transport).</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies and Local Development Order.</p>

Policy	SA1 :Health	SA2:Housing	SA3:Communities	SA4:Economy	SA5:Transport	SA6:Landscape	SA7:Heritage	SA8:Ecology	SA9:Pollution	SA10Flood Risk	SA11:Climate Change	SA12: Natural resources
Policy CP1 Retrofitting Existing Buildings	++	++	+	+	n/a	0	0	+/0	+	0	+	+
Policy CP3 Renewable Energy	+	n/a	0/+	++	n/a	-/0	-/+	-/?	?/+	n/a	+	+

Policy	SA1 :Health	SA2:Housing	SA3:Communities	SA4:Economy	SA5:Transport	SA6:Landscape	SA7:Heritage	SA8:Ecology	SA9:Pollution	SA10Flood Risk	SA11:Climate Change	SA12: Natural resources
Policy SCR6 and Policy SCR7 Zero Carbon	0	+	0	+	n/a	-/?	-/?	+	+	n/a	++	++
Policy CP4 District Heating	0/+	n/a	n/a	0	n/a	n/a	n/a	0	0/+	n/a	0/+	0
Policy SCR8 Embodied Energy	n/a	n/a	n/a	0	n/a	n/a	0/+	n/a	+	n/a	+	++
Policy SCR9 Electric Vehicle Charging Infrastructure	0	0	+	+	++	-/0	-/0	0	++	n/a	++	+
Policy NE2 CONSERVING AND ENHANCING THE LANDSCAPE AND LANDSCAPE CHARACTER	0	n/a	0	0	n/a	++	0	0	0	n/a	0	-0
Policy NE3, NE3a and NE5 Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3afor Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery	+	-	+	+/-	n/a	+	n/a	++	n/a	+	++	n/a
Policy CP7 and Policy NE1 Amendment to Policy CP7: Green Infrastructure Amendment to Policy NE 1: Development and Green Infrastructure	++	n/a	+	+	++	+	n/a	+	+	+	+	n/a
Policy GB2 Policy GB3 Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB	n/a	+	+0	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Policy PCS5 Contamination Policy LCR6 New and replacement sports and recreational facilities	++	n/a	++	0	0	0	n/a	0	++	n/a	-/0	+
Policy H2 Houses in Multiple Occupation (HMO) amendments to Policy H2	0	+	+	0	-	0	0	0	0	0	+	0
New Policy H2A Purpose Built Student Accommodation	+	+	0	+	0	0	0	0	0	0	0	0
Policy H7 Accessibility Standards	++	++	++	n/a	n/a	n/a	0	n/a	n/a	0	0	0
ED1B Change of use & redevelopment of office to residential use ED1C Change of use and redevelopment of office use to other town centre use (not within use class E)	n/a	0	+	+	+	n/a	0	n/a	n/a	n/a	n/a	n/a
Policy ED2A Strategic Industrial Estate / Other Primary Industrial Estate Policy ED2B Non-Strategic Industrial Estate	n/a	0/-	+	++	+	n/a	n/a	n/a	0	n/a	n/a	n/a
Policy RE1 Employment uses in the Countryside	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a
Policies CR1 Sequential Test (retail and other main town centre uses),CR2 Impact Assessments and CR3 Primary Shopping areas and primary shopping frontages	n/a	n/a	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Policies ST1, ST2, ST3, ST4, ST5, ST6 and ST7 Transport	++	n/a	++	+	++	0/?	0/?	0/?	++/+	0	+	0
<b>Spatial Policies</b>												

Policy	SA1:Health	SA2:Housing	SA3:Communities	SA4:Economy	SA5:Transport	SA6:Landscape	SA7:Heritage	SA8:Ecology	SA9:Pollution	SA10:Flood Risk	SA11:Climate Change	SA12: Natural resources
Policy DW1 (Spatial Strategy)	++	++	0	+	+/0	0	0	0	0	0	0	+/-
Policy B2 (Bath Central Area Strategic Policy)	+	+	+	+	+	0/?	0/?	0/?	+/-	0	n/a	+
Policy SB1 Walcot Street /Cattlemarket	+	0	+	++	++	0	0	0	+/-	0	0	+
Policy SB8 Bath Riverside	+	++/+	+	+	++	0	0	0/+	0	0	+	+
Policies B3 Strategic Policy for Twerton and Newbridge Riverside and SB22 Creative Industry Hub	+	+	+	++	++	0	0	0	+	0	+	0
Policy SB23 Weston Island	++	0	+/-	++	++	0/+	0	0/+	0/+	0	+	+
Policy SB14 Twerton Park	++	++	++	++	+	0	0	0	0	0	0/+	+
Policy SB18 RUH	++	++	++	++	++	0/-	0	+	0	0	+	+
Policy SB24 Sion Hill	++	++	++	+	+	0/-	0	+	0	0	+	+
Policy SB25 St Martins Hospital	+/0	++	+	-/0	+	0	0	+	0	0	+	+
Policy SB19 University of Bath Claverton Campus	++	++	++	++	++/+	-/0	-/0	+/-	0	0	0	+
Policy ST6 and Policy SB26 Park and Ride Site Allocations	++	n/a	+	+	++	0	0	+/0	0	0	+	+
Kingswood School playing field *This site is not allocated through the LPPU but will be reviewed through the new Local Plan.	++/+	++	+	0	+	-	-	--	0	0	+	0
Policy KE2B Riverside and Fire Station Site	++	++/+	++	++/+	++	0	0	+	0	0	+	+
Policy KE3C and Policy KE3d Safeguarded land	++	++	++	0	++/+0	0	0	0/+	0	0	++	+/-
Policy KE5 Treetops	+	++	0	0	+	0	0	+/0	0	0	+	+
Policy SV2 and SSV2 Deletion of South Road Car Park Retail Allocation and retention of South Road car park as a car park	-/0	n/a	+	+/0	0	n/a	n/a	n/a	0	0	0	n/a
Policy SSV4 Former Welton Manufacturing Site	+	0	+	++	+	0	0	0	0/-	0	0	+
Policy SSV21 Silver Street	++	++	+	n/a	+	0	0	0/+	0	0	+	+/-
Policy SSV9 Old Mills Industrial Estate	+	n/a	+/0	++/0	++	0	0/+	0	0	0	+	+/-
Policy SSV22 Former Paulton Printworks	+	++	+	-	+	0	0	0/+	0	0	+	+

## 8. Cumulative effects of LPPU policy

- 8.1. Table 12 below presents a summary of all the potential sustainability effects identified for the Local Plan (Core Strategy, Placemaking Plan with Partial Update). From this summary it is possible to assess the likely significant effects of the LPPU as a whole (including the site allocations) in relation to each of the SA objectives. This enables a description of the likely cumulative effects of the plan as required by the SEA Regulations. On the basis of the criteria set out within Table 6, significant effects have been considered to be major positive, major and minor negative effects, plus uncertain effects. Uncertain effects are considered to be significant because they could potentially result in major positive or major negative effects.

Table 12 Summary of cumulative effects of LPPU

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++	++	++	<p>Policy DW1 sets the district wide spatial strategy first adopted through the Core Strategy. The original SA identified a major positive effect as it directs housing growth to existing settlements which contain services and facilities including health and well-being facilities. By directing additional new housing development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services.</p> <p>Policy SB18 supports Royal United Hospital Estate Strategy (2014) which specifically sets out the proposed RUH Redevelopment programme over the next five years supported by a phased masterplan that will improve health facilities.</p> <p>The retained policies to manage pollution, contamination and safety would help to achieve this objective.</p> <p>Proposed transport policy amendments encourage more accessible developments, closer to everyday destinations reachable by active travel through provision of high-quality cycling and walking infrastructure options.</p> <p>The Infrastructure Delivery Programme is also updated to reflect the draft LPPU.</p> <p>Therefore, it is considered likely that the LPPU will have a major positive cumulative effect on this objective.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++	++	+	<p>The Core Strategy Policy DW1 sets out housing targets and broad distribution of new housing development. The locational sequence assessment (Annex L of the Core Strategy SA below) helped establish the sequential approach to development distribution through the Core Strategy. (<a href="#">Link</a>) The new housing sites are identified applying the sequential approach established by the Core Strategy, considering the main urban areas of Bath, Keynsham and Somer Valley. The safeguarded sites in Keynsham are released for development through the Partial Update. These additional allocations help to maintain the supply of housing sites to meet the district's overall housing targets (market and affordable housing) set by the Core Strategy. The SHLAA shows that the Core Strategy targets will be met by existing commitments (already built, permitted and allocated through the Core Strategy/Placemaking Plan) and site allocations in the Partial Update will also help to maintain the provision of 5 year housing land</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>supply. Through the consultation, some further greenfield sites were promoted, however since there is sufficient land available to meet the Core Strategy requirements, additional greenfield land is not considered as alternative options in the SA.</p> <p>The revised Policy H7 with accessibility standards helps to address housing needs of older people.</p> <p>The pressure to manage new student accommodation continues to increase. Policy B5 prioritises the delivery of office space and general housing development. The revised Policy SB19 sets out further guidance and requirements for Claverton Campus and new Policy H2a (PBSA) will help manage new PBSA.</p> <p>Through the revised Policy H2 new build HMOs, the change of use to HMOs from other uses, and intensification of existing HMOs shall provide opportunity to facilitate further HMOs in the areas with lower HMO concentration and provide good quality homes catering for population groups unable to afford other forms of private accommodation.</p> <p>RA1 and RA2 would continue to guide new development in the rural villages.</p> <p>The retained policies (Policies D1-D10, CP9, RA4, H1-H8, CP10 and CP11) help achieve the delivery of good quality housing and affordable housing to meet the fully objectively assessed housing needs.</p> <p>The viability assessments were undertaken taking into account various exiting and new policy requirements. It indicated that the affordable housing requirements can be met across all areas of the District, but the existing use value of sites is a critical factor in determining the outcome. Where existing use values are high, the ability of residential schemes to meet the policy requirement will be more constrained and the level of achievable residential sales values becomes a more critical factor. In these circumstances, the policy contains sufficient flexibility, to enable schemes to come forward with a viable package of affordable housing.</p> <p>The Partial Update does not extend the Plan period, therefore it has only a minor positive effect in the long term.</p> <p><b>Mitigation and enhancement</b></p> <p>Continue to monitor new PBSA promoted outside the allocated sites.</p> <p>Continue to monitor the number of C3 dwellings converted to C4 Houses in multiple occupation.</p> <p>The longer term housing requirements need to be established and addressed through the new (full replacement) Local Plan.</p>
<p><b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>	++	++	++	<p>The site allocations direct most new housing development to the main urban areas in Bath, Keynsham and Somer Valley, which have the majority of higher order services and facilities, including social, cultural and community facilities. This helps to promote stronger more vibrant and cohesive communities.</p> <p>The original NE2 requires development to incorporate green space within the scheme that positively contributes to creating a high-quality environment by providing sustainable public access and other landscape benefits. The revised Policy NE3, new Policy NE3A and Policy NE5 strengthens the protection of biodiversity. The provision of new habitats to achieve BNG might be delivered as multi-functioning publicly accessible open/natural/green space.</p> <p>The revised transport policies further encourage development accessible to community, social and cultural facilities by sustainable transport modes, including supporting disabled people and others with restricted mobility.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>The retained policies (Policy LCR1-LCR9, RA3) help provide or manage a range of appropriate and accessible community, social and cultural facilities.</p> <p>The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p>
<p><b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b></p>	++	++	+	<p>The site allocations included in the Partial Update with the development requirements help achieve the economic vision and objectives set by the Core Strategy.</p> <p>The Milsom Quarter area is currently in decline, shown by falling footfall and increasing vacancy rates, greater than other areas of the City Centre. Many upper floors are also currently underutilised or empty. Redeveloping this area will provide more attractive and diverse range of employment opportunities.</p> <p>The revised Policy ED2A with The Locksbrook Creative Industry Hub and amended Policy ED2B strengthen the protection of industrial land and encourage the delivery of new opportunities. The new allocation of Weston Island will enable the relocation and retention of employment uses from elsewhere within the city, particularly from the Enterprise Zone and continue to provide employment provision.</p> <p>The revised Policy SB19 create more employment opportunities in growth sectors as the policy defines university-related uses to include research and allied business incubation. This will help improve access to local training, work experience and apprenticeships. The UoB is the second biggest employer in the District therefore facilitating meeting long-term requirements for the university on campus (48,000 sqm) would have a major positive effect .</p> <p>Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions ambition to be a driving force for clean and inclusive growth.</p> <p>The amendments to the Policy SSV9 include a limited amount of higher value uses to enable delivery and investment in the site. This would also benefit to bring a greater mix of uses to facilitate a more diverse range of employment opportunities.</p> <p>Revised Policy RE1 allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities.</p> <p>Revised transport policies encourage developments which reduce travel distances from homes to workplaces, with sustainable transport options available, including for first occupiers of new development. Proposed amendments include detail regarding travel plans, which need to be tailored to the specific development and the location context in order to ensure that an optimal package of measures is provided to enable future users of the development to travel sustainably, thus supporting clean and inclusive growth.</p> <p>Other retained and revised employment policies would help build a strong, competitive economy and enable local businesses to prosper.</p> <p><b>Mitigation and enhancement</b></p> <p>A masterplan is in preparation, but no details are available at this stage. The masterplan will inform the future applications and new Local Plan.</p>



SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Subject to an assessment of the capacity of the site, there are also opportunities for more public facing uses such as creative, arts-based activities.</p> <p>The Local Development Order for the Somer Valley Enterprise Zone is in preparing.</p> <p>There are limited opportunity sites available to facilitate new industrial uses therefore this need to be reviewed through the new Local Plan.</p> <p>The Transport and Development SPD provides further guidance to promote sustainable travel.</p>
<p><b>Objective 5:</b>  <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	<p>++/0</p>	<p>++/0</p>	<p>++/0</p>	<p>By locating the majority of new housing and employment development close to the existing main settlements in the district, the Partial Update allocations should help promote accessibility by public transport and cycling and walking. However, the potential development sites allocated in the Core Strategy and draft Placemaking Plan will have a cumulative impact on traffic congestion (although the impact on the highway network is shown not to be severe and is mitigated). The Transport Strategy makes some recommendations taking into account these development sites.</p> <p>The amendments to Policies ST1-ST7 strengthen existing policies in relation to access to public transport, safe walking and cycling routes, reducing dependence on the private car and discouraging short car journeys. Proposed amendments to Policy ST2A include reference to Active Travel Routes and requires <i>'Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible.'</i></p> <p>New Policy SCR9 requires electric vehicle charging infrastructure.</p> <p>To support high quality and affordable public transport and cycling and walking infrastructure, Policy ST1 <i>proposes 'Access to high quality public transport facilities is achieved by improving existing and providing new public transport facilities which would increase the proportion of journeys made by public transport.'</i> ST6 proposes new and expansion of existing Transport Interchange sites.</p> <p>Proposed amendments to Policy ST7 ensure that <i>'Walking and cycling assessment and facilities are provided in line with the Transport and Development SPD, including safe, convenient and inclusive access to and within the site for pedestrians and cyclists.'</i></p> <p>The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p> <p><b>Mitigation and enhancement</b></p> <p>Policy ST2A requires that the provision and enhancement of strategic connections between, and within, urban areas and other key origins/destinations, utilising the Active Travel routes, should be investigated and implemented wherever feasible. Policy 6 requires a Transport Assessment demonstrating transport effects of the proposed development are comprehensively and robustly identified. The Transport and Development SPD provides further guidance to promote sustainable travel including travel plans, parking standards and electric charging infrastructure.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
<p><b>Objective 6 :</b>  <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	+/0/-	+/0/-	+/0/-	<p>New housing development sites were chosen taking into account the consideration of this objective (site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>Policy CP3 sets out the suitable areas for renewable energy development. The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with a 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in the area with 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants demonstrate that adverse impacts on the landscape can be satisfactorily mitigated.</p> <p>The revised Policy NE2 requires great weight to be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities. Proposed amendments to Policy CP7(Green Infrastructure) and NE1 (Development and Green Infrastructure) support effective and functional GI design focussing on nature-based solutions which include protecting, managing, and enhancing landscape character.</p> <p>The provision of new transport related infrastructure would have the potential to increase negative impacts on areas of valued landscape and townscape. The park and ride sites will be removed from the green belt and allocated for use as multi-modal transport interchanges (Policy SB26). The sites are all very sensitive in terms of landscape, due to their locations on the edge of the city. This sensitivity is decreased due to the sites already being developed for park and ride uses. Removal of the sites from the green belt has been informed by a Green Belt harm assessment and consideration of exceptional circumstances.</p> <p>Policy wording ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impact on AONBs and other sensitive landscape features.</p> <p>The Claverton Campus (University of Bath) is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. The Visual Impact Assessment was prepared and informed the key development areas with minimum buffer distances and maximum height restrictions.</p> <p>Policy KE3c and KE3d (East of Keynsham) Building heights generally limited to 2/2.5 storeys, ensuring that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p> <p>The retained urban design policies (D1-D10) also contribute to achieve higher quality townscape.</p> <p><b>Mitigation and enhancement</b></p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>The revised Policy CP3 avoids significant adverse impact on the local environment that cannot be satisfactorily mitigated including protected landscape and visual impacts (inc. cumulative effects) and the special qualities of all nationally important landscapes. Policy NE2 requires proposals with potential to impact on the landscape/townscape character of an area or on views to be accompanied by a Landscape and Visual Impact Assessment undertaken by a qualified practitioner to inform the design and location of any new development.</p> <p>B&amp;NES Council has adopted the West of England Joint Green Infrastructure Strategy 2020-2030 (JGIS). The original Policy ST3 (7) requires that proposals have no unacceptable impact on heritage and environmental assets and amenity including the WHS and its setting, AONBs and Natura 200 sites (SACs/SPAs). New development is also subject to other Development Management policies.</p> <p>Policy (SB26) wording also requires development to be contained within the areas of the sites already developed for Park and Ride use, i.e. no encroachment into the surrounding landscape will occur. Any new development will be subject to other Development Management policies.</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence, individual applications for new buildings should be informed by more detailed specific studies and evidence.</p>
<p><b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	+	+	+	<p>New development sites were chosen taking into account the consideration of this objective (site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The heights of buildings are an important aspect of the visual homogeneity of Bath city, and new developments need to respond creatively and sensitively to their exceptional context. The Building Heights Strategy (2010) provides an overall context for considering building heights and informed the Placemaking Plan site specific requirements.</p> <p>The revised Policy CP1 Retrofitting Existing Buildings would apply to historic buildings. Given the quality of the historic environment in the District and the high number of listed buildings, Conservation Areas and the World Heritage Site designation for Bath, an SPD on energy efficiency, retrofitting and sustainable construction has been prepared to provide guidance on sensitively retrofitting the historic building stock.</p> <p>The retained Policies, particularly HE1, help achieve this objective.</p> <p>Mitigation and enhancement The Bath Building Heights Strategy should be used considering specific development proposals. This same approach will be required for those development sites not covered by a site allocation, but which may impact on these issues of acknowledged importance.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				The revised Energy Efficiency, Retrofitting and Sustainable Construction Supplementary Planning Document would help careful management to improve energy efficiency and retrofitting historic properties.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0/+	0/+	0/+	<p>The revised Policy NE3 provides policy which relates to potential impacts of development on designated sites (such as RAMSAR) and sites within the National Sites Network (including new and existing SACs and SPAs). It also seeks to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. Policy NE3a requires that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE6 protects veteran trees.</p> <p>The proposed Bath River line project and other strategic GI projects referenced will enhance and extend multi-functional Green Infrastructure and make a positive contribution to nature recovery networks including providing new connections between existing and/or new linear wildlife habitats.</p> <p>New development sites were chosen taking into account the consideration of this objective (site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies including avoiding harmful impacts on bats from lighting where development sites are within or close to bat corridors. The river is designated as a 'Site of Nature Conservation Interest' (Local Plan Policy NE3), and the edges of the island form an important associated habitat. Policy SB 23 Weston Island - The policy allocates uses that do not need a frontage to the river and requires enhancing the ecological value of the river edge.</p> <p>Policy SB19 Claverton Campus - The mitigation hierarchy has been used to avoid and minimise impacts. The Policy requires various specific measures such as setting back to reduce light spill and providing space for additional tree planting to bolster the existing perimeter vegetation. Policy SB26 Odd Down P&amp;R – The site is particularly sensitive in terms of biodiversity interest (meets the criteria for designation as a SNCI).</p> <p>The provision of new transport related infrastructure would have potential to increase negative impacts on biodiversity. There are opportunities to encourage biodiversity improvements through development of liveable neighbourhoods and sustainable transport routes.</p> <p>The retained policies such as D8 (Lighting), NE4(Ecosystem Services), PCS1-PCS8(Pollution), SU1(Sustainable Drainage) also contribute to achieving higher quality townscape would help achieve this objective.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0	0	0	The revised Policies PCS5 and LCR6 requires to avoid development that may result in the contamination of land. Also, Policy LCR6 requires a management plan submitted with applications for new artificial pitches setting out the materials used and potential sources of pollution from the installation phase through to end of life.

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>The revised suitability policies such as CP1 (Retrofit) CP3(Renewable Energy), SCR6/7(Zero Carbon), SCR8(Embodied Carbon) and SCR9(EV charging) would help reduce the production of harmful emissions and contribute improving air quality. Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels.</p> <p>The revised transport policies encourage provision of sustainable transport options and to reduce reliance on car-use, thereby improving traffic congestion and air quality issues. Further, proposed amendments to Policy ST1 require proposals to support and promote measures which reduce the levels of traffic pollution in the interests of improving health and quality of life and reducing harmful impacts on the built and natural environment. Proposed amendment to Policy ST3 requires that the environmental impact of the scheme, such as from noise and other forms of pollution, is minimised and of an acceptable level in accordance with relevant topic-specific environmental guidance and standards. Thus, proposed amendments to transport policy support the reduction of pollution.</p> <p>Policy SCR9 requires provision of EV infrastructure to increase the uptake in the use of electric vehicles. This contributes to reducing pollution from vehicles and improve air quality, particularly within AQMAs. Electric vehicles also result in a reduction in traffic noise.</p> <p>New development sites were chosen taking into account the consideration of light pollution, particularly the site along the bat corridor or close to open countryside. (See site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The allocation sites within Bath, Keynsham and Somer Valley in the Local Plan (including the Core Strategy, Placemaking Plan and Partial Update) will have cumulative impacts on traffic congestion. The cumulative impacts were considered through the process of identifying the new development sites.</p> <p>The retained policies such as PCS1-PCS8(Pollution), D8 (Lighting), NE4(Ecosystem Services), SU1(Sustainable Drainage) also contribute to achieve higher quality townscape would help achieve this objective.</p>
<p><b>Objective 10:</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	0	0	0	<p>Sustainable Drainage Systems (SuDS) offer opportunities to reduce vulnerability to and manage flood risk. The retained Policy SU1 facilitates SuDS to be employed for the management of runoff.</p> <p>The revised Policy NE1 requires development design to maximise opportunities for effective and functional Green Infrastructure (GI), focussing on the use of nature-based solutions including the use of natural flood management and SuDS.</p> <p>The new site allocations through the Partial Update were directed to the existing main settlements in the district. They are mainly in Flood Zone 1 and were subject to the flood risk sequential test. Some parts of the Bath Riverside (SB9) are located adjacent to the river, in flood zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy. Therefore, the location of the general growth areas was justified through the Core Strategy high level Sequential Test. Policy SB23 (Westeo Island) - As the site lies within a flood risk zone it is not suitable for residential development and is allocated for employment use.</p> <p>Some retained brownfield allocation sites, particularly in Bath, may be in areas at risk of flooding. However, the sequential approach was taken to identify these development sites and site-specific requirements ensure that vulnerable uses will not be developed within high risk flood zones.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				Other Development Management policies and Guidance such as The West of England Sustainable Drainage Developer Guide would help guide development to reduce the vulnerability to and manage flood risk.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+	+	+	<p>Policy CP1 facilitates the retrofitting of existing buildings allowing them to be more resistant to future climate change such as extreme heat and cold. Policy CP3 facilitates renewable energy developments which reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses. Policies SCR6 and SCR7 require a sustainable method of construction, reducing heat and energy demand by encouraging a fabric first approach then supplying all energy demand through onsite renewable. This will help reduce the production of greenhouse gas emissions and helps to increase resilience to climate change.</p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. Policy NE1 promotes effective and functional Green Infrastructure, focussing on the use of nature based solutions to deliver community benefits.</p> <p>The retained policies such as SCR5(water efficiency), CP5 (flood risk management) and design policies help guide new development to be resilient to climate change.</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>	++/0	++/0	++/0	<p>The Core Strategy Policy DW1 sets out housing targets and broad distribution of new housing development. In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley. The safeguarded land in Keynsham is greenfield land but they are already removed from the Green Belt and safeguarded for development.</p> <p>The new Policy SCR6 and 7 will help new development to be zero carbon by reducing the heat and energy uses. In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation. Policy CP2 requires applicants to demonstrate that waste and recycling during construction and in operation have been addressed as well as the type, lifecycle and source of materials to be used.</p> <p>The site allocation policies require specific measures where identified.</p>

## 9. In combination effects with other plans

- 9.1. There is potential for the cumulative effects in-combination with development planned for areas that are outside of but in close proximity to the District. In combination effects may also occur with county-wide initiatives such as transport infrastructure projects. Table 13 sets out relevant plans which are considered most likely to give rise to in-combination effects with the effects identified for the LPPU.

Table 13

Plan	Progress	Development proposed with potential for in-combination effects with development within B&NES
<b>West of England Combined Authority Spatial Development Strategy(SDS)</b>	The West of England Combined Authority was progressing its Spatial Development Strategy which sets a vision for the West of England over the next 20 years and delivery commitment to reaching carbon neutrality by 2030. However, in May 2022, the WECA Mayor has decided to halt work on the preparation of the Spatial Development Strategy (SDS).	Following the decision of the WECA Mayor to halt all work on the SDS, the Local Plans for Bath & North East Somerset, Bristol and South Gloucestershire will now provide the strategic planning framework for the WECA area. The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan. Therefore no significant in-combination effects with the new Local Plan.
<b>Bristol CC Local Plan</b>	Bristol City Council is currently in the process of updating their local plan for delivery in 2023 which will set out Bristol's development plan for the next 20 years. The plan will replace the Core Strategy (2011), Site Allocations and Development Management Policies Local Plan (2014) and the Bristol Central Area Plan (2015). Progress to date has seen the completion of consultation on the draft proposals (regulation 18) which took place in February 2018 and March 2019. An additional consultation on issues and options for development is due to take place in Spring 2022.	The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.  Therefore no significant in-combination effects with the current Bristol Local Plan.  However, the Councils will continue their longstanding history of joint working and cooperate with each other and with other key bodies on strategic, cross boundary matters as they prepare their Local Plans.
<b>South Gloucestershire Council Local Plan</b>	Current adopted plans for South Gloucestershire Council consist of the Core Strategy (2006-2017), the Policies, Sites and Places Plan (2017) and the Joint Waste Core Strategy. A new local plan is currently developing which will include new strategies and policies to guide development for the next 15 years. Phase 1 of the consultation ran from November 2020 to March 2021 and consultation of SPD's ran from May 2021- June 2021. Phase 2 is planned for late 2021 on potential options for growth, protection, site proposals and place	The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.  Development in the East Keynsham area (Policy KE3c and KE3d) is very close to and may impact on South Gloucestershire communities. B&NES Council and South Gloucestershire Councils are working closely

	discussions with the publication version available for consultation in 2022. The submission and examination are planned for 2023 along with adoption.	together and continue to engage on our respective Local Plans as new evidence emerges relating to proposed development and transport infrastructure improvements in Keynsham to understand how proposals may affect communities within South Gloucestershire.
<b>Wiltshire Council Local Plan (Wiltshire Housing Site Allocations Plan adopted Feb 2020, Chippenham Site Allocations Plan adopted May 2017, Wiltshire Core Strategy adopted Jan 2015) (see the Statement of Common Ground)</b>	The Wiltshire Core Strategy, adopted in 2015, and saves polices from district local plans which form a substantive part of the development plan are under review. The Wiltshire Local Plan Review DPD will provide the strategic context for development up to 2036 and determine the level and direction for future growth. It will include the allocation of a range of sites to meet the identified need for homes and jobs, a review of existing development management policies, and strategic guidance for the preparation of neighbourhood plans	<p>The scope of the changes proposed through the LPPU is confined within those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy &amp; Placemaking Plan.</p> <p>Proposed policy amendments focus on sustainable travel, providing genuine travel choice and reducing car dependence, all supporting a reduction in carbon emissions. B&amp;NES Council and Wiltshire Council transport officers met to discuss the transport technical evidence base to the LPPU including how B&amp;NES is supporting growth in sustainable travel demand, primarily with consideration to demand within and to / from Bath.</p> <p>Therefore no significant in-combination effects with the current Wiltshire Council Local Plans. However discussion of cross boundary issues will continue to inform further development of the local authorities Development Plans.</p>
<b>Mendip District Council Part 1 and Part 2 (see the Statement of Common Ground)</b>	The Mendip District Council Local Plan Part 1 was adopted in December 2014 for the period to 2029. Mendip District Council's Local Plan Part II is currently awaiting the Inspectors Examination Report and Adoption. The Mendip Plan Review 2020-2040 proposes to review strategy and policies in the Local Plan Part 1, incorporate the adopted Local Plan Part II and review strategic policies for Mendip. The direction of the Plan Review and its timetable will be affected by the outcome of the unitary proposals for Somerset.	<p>The scope of the changes proposed through the LPPU is confined within those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy &amp; Placemaking Plan. Some specific issues have been raised such as:</p> <p>1)Policy SSV9 Somer Valley Enterprise Zone: This will be further discussed through the Local Development Order prepared by the B&amp;NES Council.</p> <p>2)Renewable energy and landscape sensitivity: Mendip DC is embarking on a comprehensive assessment of renewable energy generation potential. Strategic cross boundary engagement will take place in preparing the B&amp;NES new Local Plan and Mendip Plan Review.</p> <p>3)Highway matters: A Statement of Common Ground has been prepared between B&amp;NES Council and Somerset County Council relating to highways matters and it has been agreed that in terms of highways considerations, there is no severe cumulative impact that arises from</p>



		<p>the B&amp;NES LPPU on the Mendip administrative area.</p> <p>Therefore no significant in-combination effects with the Mendip Local Plan Part 1 and Part 2.</p>
<p><b>West of England Joint Waste Core Strategy (2011) JWCS</b></p>	<p>The Joint Waste Core Strategy sets out the authorities' aspirations for all levels of waste management until 2026: prevention; reuse; recycling; recovery; and disposal.</p>	<p>The JWCS was produced jointly with B&amp;NES Council, Bristol City Council, South Gloucestershire Council and North Somerset Council. It provides the strategic framework for the waste management and it compliment the draft LPPU. Therefore no significant in-combination effects with the JWCS.</p>
<p><b>Travel West The Joint Local Transport Plan 4 (JLTP4) March 2020</b></p>	<p>The Joint Local Transport Plan 4 (JLTP4) – led by the West of England Combined Authority, working with Bath &amp; North East Somerset, Bristol, North Somerset and South Gloucestershire councils – sets out the vision for transport up to 2036. It sets out how we aim to achieve a well-connected sustainable transport network that works for residents, businesses and visitors across the region; a network that offers greater, realistic travel choices and makes walking, cycling and public transport the natural way to travel.</p>	<p>The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy &amp; Placemaking Plan.</p> <p>5 authorities are working closely together and continue to engage on their respective Local Plans as new evidence emerges relating to proposed development and transport infrastructure improvements.</p>

## 10. Monitoring

What the SEA Regulations say...

Information for Environmental Reports...

9. A description of the measures envisaged concerning monitoring in accordance with regulation 17, which states: 17 (i) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. 17 (ii) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with 17(i).

- 10.1. The SEA Regulations require the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary.
- 10.2. The monitoring of the Local Plan (Core Strategy, Placemaking Plan and Partial Update) will help to:
  - Monitor the significant effects of the plan;
  - Track whether the plan has had any unforeseen effects;
  - Ensure that action can be taken to reduce / offset the significant effects of the plan; and
  - Provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving.
- 10.3. The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Local Plan when they occur. Due to this difficulty we have suggested a number of more general monitoring indicators which are linked to the SA Objectives (contextual indicators, see Appendix G).
- 10.4. Although National Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA Framework. As the Partial Update is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects likely to be significantly adverse.
- 10.5. Monitoring will allow the Council to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the Local Plan, or for further policy guidance to be developed (for example an SPD).

Table 14 Monitoring

SA Objectives	Monitoring
<b>Objective 1:</b> Improve the health and well-being of all communities, and reduce health inequalities	<ul style="list-style-type: none"> <li>• Annual Progress Report on Air Quality management Areas as submitted to DEFRA (by Environmental Health)</li> <li>• Index of multiple deprivation health domain score (Lower Super Output Area)</li> </ul>
<b>Objective 2:</b> Meet identified needs for sufficient, high quality housing including affordable housing	<ul style="list-style-type: none"> <li>• housing permissions granted by tenure and type</li> <li>• housing permissions developed by tenure and type</li> <li>• housing delivery trajectory showing completions and forecast completions</li> <li>• % affordable housing secured on qualifying sites</li> <li>• Permissions granted for new HMOs</li> <li>• Change in resident student numbers</li> <li>• Change in purpose-built student accommodation</li> <li>• Net additional gypsy and traveller pitches provided annually and since 2011</li> </ul>
<b>Objective 3:</b> Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<ul style="list-style-type: none"> <li>• Indices of multiple deprivation (all domains - LSOA)</li> <li>• Total crime per 1,000 population</li> <li>• Indices of multiple deprivation crime domain score (LSOA)</li> <li>• Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country. (Nat 2)</li> <li>• % of LEA pupils obtaining 5 or more GCSEs (grade AC)</li> </ul>
<b>Objective 4:</b> Build a strong, competitive economy and enable local businesses to prosper	<ul style="list-style-type: none"> <li>• Amount of floor space developed type (office/industrial) in sqm, by place annually and total since 2011. Gains, losses and net.</li> <li>• Amount of floor space on previously developed land by type (office/industrial) in sqm, by place annually and total since 2011. Gains, losses and net.</li> <li>• Employment land available by type</li> <li>• Change in work place jobs by sub-area</li> <li>• Number of planning consents for business premises in rural areas</li> <li>• Economic growth forecasts from the Office of Budget Responsibility (OBR) as well as from bodies such as Oxford Economics, Cambridge Econometrics, NIESR</li> <li>• Proportion of new retail floor space provided within the centres listed in the hierarchy annually in total since 2006</li> <li>• Health of the centres as indicated by retail floor space losses, vacancy rates and land use mix changes in each of the centres listed in the hierarchy (city/town centres – annually and district/local centres – periodically)</li> <li>• Market share of comparison goods spending in Bath city centre and the town centres</li> <li>• Number of Unemployment figures</li> </ul>
<b>Objective 5:</b> Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<ul style="list-style-type: none"> <li>• Census information for modes of transport to work, school, other activities</li> <li>• Amount of newly implemented cycle routes</li> <li>• Carbon neutral by 2030 (Indicator: road congestion, bus satisfaction, air quality, Carbon emissions, electric vehicles, road safety and modal share through the Joint Local Transport Plan 4)</li> </ul>
<b>Objective 6</b> Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<ul style="list-style-type: none"> <li>• Change to the recognised landscape character areas within the district.</li> <li>• Monitoring applications for renewable energy development particularly wind turbines and ground mounted solar.</li> <li>• Monitoring key GI projects</li> </ul>
<b>Objective 7 :</b> Conserve and enhance the historic environment, heritage/cultural assets and their settings	<ul style="list-style-type: none"> <li>• Number of listed buildings recorded as 'at risk' on the Council's Buildings at Risk Register</li> <li>• Number of up to date Conservation Area Appraisals and Management Plans in place</li> <li>• Adoption of Historic Environment related SPDs</li> </ul>

SA Objectives	Monitoring
	<ul style="list-style-type: none"> <li>• A range of indicators to monitor implementation of the actions identified in the World Heritage Site Management Plan</li> </ul>
<p><b>Objective 8:</b> Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<ul style="list-style-type: none"> <li>• Change in priority habitats (in hectares)</li> <li>• % of SSSI in “favourable condition”</li> <li>• Number of nature conservation sites that are enhanced annually</li> <li>• Change in areas designated for intrinsic environmental value</li> <li>• Implementation of Biodiversity Net Gain</li> </ul>
<p><b>Objective 9:</b> Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<ul style="list-style-type: none"> <li>• Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1,3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm10), sulphur dioxide)</li> <li>• Bathing water quality</li> <li>• River water quality (chemical, physical and ecological status of water bodies)</li> <li>• Ground water quality</li> </ul>
<p><b>Objective 10:</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to Environment Agency advice.</li> <li>• Numbers of properties affected by fluvial flood events in the last year</li> <li>• Condition of flood defences</li> </ul>
<p><b>Objective 11</b> Reduce negative contributions to and Increase resilience to climate change</p>	<ul style="list-style-type: none"> <li>• Implementation of Green Infrastructure</li> <li>• Number of properties achieving “very good”and “excellent” BREEAM levels</li> <li>• Monitor Embodied Carbon assessments</li> </ul>
<p><b>Objective 12:</b> 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)</p>	<ul style="list-style-type: none"> <li>• Proportion and number of renewable energy schemes granted planning permission annually</li> <li>• Amount of renewable energy generated by installed capacity, for electricity (MWe) and heat (MWth)</li> <li>• Number of heat priority areas where policy district heating schemes have started to be implemented</li> <li>• Proportion and number of Combined Heat and Power schemes granted planning permission annually .</li> <li>• Energy generated from renewable energy sources annually</li> <li>• Percentage of new homes provided on previously developed land annually and since 2006 in B&amp;NES</li> <li>• Amount of floorspace by on previously developed land by type (sqm)</li> <li>• Waste- Monitoring though the Joint Waste Core Strategy</li> </ul>

## 11. Conclusion

- 11.1. The Sustainability Appraisal (SA) objective developed at the Scoping stage of the SA process have been used to undertake a detailed appraisal of the LPPU. Part of this appraisal involved the reviewing the existing Development Management policies and site allocations policies in the context of the Update.
- 11.2. This is a partial update to the existing Plan, and not a new Plan, the scope of the changes is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy & Placemaking Plan. The scope of the LPPU therefore needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the new (full replacement) Local Plan or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.
- 11.3. In summary the key proposed elements or scope of the partial update are set out below.
- Updating policies in order that they better address the climate and ecological emergency
  - Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained
  - Addressing a limited range of other urgent local issues e.g. related to the 'green recovery'
  - Amending policies for clarity and to ensure they are aligned with up to date national policy
- 11.4. The draft Plan updates key Development Management policies and allocate further sites in order to ensure the Council's Planning Framework is aligned with the Council's priorities and that specifically it helps to facilitate solutions.
- 11.5. The likely cumulative effects for the Local Plan (Core Strategy, Placemaking Plan with Partial Update) are described in Section 8 of this report. Potentially significant positive cumulative effects were identified in relation to SA Objective 1 (health and well-being), Objective 2 (housing), Objective 3 (communities) and Objective 4 (economy). For SA Objective 5 (transport) and Objective 12 (resources), it is expected that the significant positive effects identified would be in combination with a neutral effect for an overall mixed cumulative effect. Potentially a minor negative cumulative effect were identified in relation to SA Objective 6 (landscape) in combination with a minor positive for an overall mixed cumulative effect. Various mitigation measures are identified. The LPPU strengthens the protection of industrial land and allocates a number of sites to facilitate further employment resulting in a major positive effect.
- 11.6. An ambitious approach to addressing climate change is embedded in the proposed LPPU Plan. The target of becoming a Carbon Neutral District by 2030 is ahead of the Government target of net Zero Carbon 2050. There are specific criteria which new development will be required to meet to contribute this target. In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley to ensure the continued supply of housing sites. The prioritisation of sustainable modes of transport at new development to discourage the use of private vehicles is expected to help mitigate impacts relating to both climate change and air pollution. The Draft Plan reflects national policy on biodiversity net gain and seeks to protect the existing quality and function of green infrastructure as well as supporting new provision. These requirements are expected to be of particular importance considering the presence of international and national biodiversity sites (including RAMSAR, SACs, SPAs and SSSI) within its boundaries.

- 11.7. Following the hearings sessions which took place in June/July 2022, some Main Modifications are proposed which are considered necessary to make the Plan sound. Appendix I shows the screening of the Main Modifications to the submitted LPPU. Where further appraisals or updates are required, Appendix D (Policy appraisals) of the SA report has been updated. The appraisals show that the Main Modifications do not significantly alter the previously recorded sustainability effects of the submitted plan. Therefore, no significant changes are identified in considering the cumulative effects of the Plan as a whole or in combination with other Plans.

## **12. Next Steps**

- 12.1. A Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.
- 12.2. The SEA Regulations set out the particulars that should be covered by the statement as follows:
- How environmental (sustainability) considerations have been integrated into the LPPU;
  - How the Environmental (SA) Report has been taken into account;
  - How opinions expressed in response to consultation have been taken into account;
  - The reasons for choosing the LPPU as adopted, in the light of the other reasonable alternatives dealt with; and
  - The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the LPPU.

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

**Sustainability Appraisal  
Appendix A: Policy Plan and Programme Review**

**Date: January 2023**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

General Sustainability	
<b>Review of Relevant Plans, Programmes and Strategies:</b>	
<b>Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b>	
<b>Policy</b>	<b>The key messages which have informed the developmental the Partial Update and SA objectives</b>
<b>Key International Policy</b>	
<b>UN Sustainable development goals 2015-2030</b>	<p>The United Nations Sustainable Development Goals (SDGs) were adopted by the UN General Assembly in September 2015 as part of the 2030 Agenda for Sustainable Development</p> <p><a href="http://www.undp.org/content/undp/en/home/sustainable-development-goals.html">http://www.undp.org/content/undp/en/home/sustainable-development-goals.html</a></p>
Key National/Regional Policy	
<b>National Planning Policy Framework (2021)</b> <b>UK Shared Framework for Sustainable Development; One Future – Different Patha 2005</b>	<p>Presumption in favour of sustainable development. Delivering sustainable development by:</p> <ul style="list-style-type: none"> <li>• Building a strong, competitive economy</li> <li>• Ensuring vitality of town centres</li> <li>• Promoting sustainable transport</li> <li>• Supporting high quality communications infrastructure</li> <li>• Delivering a wide choice of high quality homes</li> <li>• Requiring good design</li> <li>• Promoting healthy communities</li> <li>• Meeting the challenge of climate change, flooding, and coastal change.</li> <li>• Conserving and enhancing the natural environment</li> <li>• Conserving and enhancing the historic environment</li> <li>• Facilitating the use of sustainable materials</li> </ul> <p>The latest version of the NPPF was published on July 2021.</p>
<b>National Planning Policy Guidance</b> The NPPG has been updated most recently in July 2021.	<p>Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including: Air quality, Climate change, Conserving and enhancing the historic environment, Flood risk, Green Belt, Health and safe communities Housing and economic development, Land affected by contamination, Natural environment, Noise, Minerals, Rural housing, Open space, Transport, Waste, Water supply, wastewater and water quality</p>
<b>Localism Act (2011)</b>	The aim of the act was to devolve more decision making powers from central government
<b>Environment Bill 2020</b> <b>25 Year Environmental Plan, 2018</b>	The Environment Bill is part of the government response to the clear and scientific case, and growing public demand, for a step-change in environmental protection and recovery.



	Acting as one of the key vehicles for delivering the bold vision set out in the 25 Year Environment Plan, the Environment Bill brings about urgent and meaningful action to deal with the environmental and climate crisis we are facing. It sets a new and ambitious domestic framework for environmental governance as we maximise the opportunities created by leaving the European Union and helps to deliver on the government's commitment to be the first generation to leave our environment in a better state.
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Air Quality and Noise Policy Summary	
Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA	
Policy	Summary of relevance to the plan and SA
<b>Key International Policy- Air Quality</b>	
<ul style="list-style-type: none"> <li>• EU Air Quality Framework and Daughter Directives (2008)</li> <li>• EU Ambient Air Quality Directive (2008/50/EC)</li> <li>• EU Ambient Air Quality and Cleaner Air for Europe Directive (2008/50/EC)</li> <li>• Clean Air Programme for Europe 2013</li> <li>• EU Thematic Strategy on Air Quality (2005)</li> </ul>	<ul style="list-style-type: none"> <li>• The Air Quality Directive 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.</li> <li>• 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:                             <ul style="list-style-type: none"> <li>i) annual mean concentration levels of NO<sub>2</sub> do not exceed 40µg/m<sup>3</sup>; and</li> <li>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</li> </ul> </li> </ul>
<b>Key International Policy- Noise</b>	
<ul style="list-style-type: none"> <li>• European Directive on the Noise 2002/49/EC (2002) Updated 26/07/2019</li> <li>• WHO Environmental Noise Guidelines for the European Region 2018</li> </ul>	<p>To pursue its stated aims, the Environmental Noise Directive focuses on three action areas:</p> <ol style="list-style-type: none"> <li>1)the determination of exposure to environmental noise</li> <li>2)ensuring that information on environmental noise and its effects is made available to the public</li> <li>3)preventing and reducing environmental noise where necessary and preserving environmental noise quality where it is good</li> </ol> <p>The Directive requires Member States to prepare and publish, every 5 years, noise maps and noise management action plans for:</p> <ul style="list-style-type: none"> <li>• agglomerations with more than 100,000 inhabitants</li> <li>• major roads (more than 3 million vehicles a year)</li> <li>• major railways (more than 30.000 trains a year)</li> <li>• major airports (more than 50.000 movements a year, including small aircrafts and helicopters)</li> </ul>

<b>Key National/Regional Policy-Air Quality</b>	
<ul style="list-style-type: none"> <li>• Planning Policy Framework (2019)</li> <li>• The Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2011</li> <li>• Air Quality Standards Regulations 2010</li> <li>• Defra-Local Air Quality Management 2009</li> <li>• Technical Guidance LAQM.TG(09) 2009</li> <li>• The Environment Act 1995 Part IV Office of the Deputy Prime Minister 1995</li> <li>• Clean Air Act (1993)</li> <li>• Clean Air Strategy 2019</li> <li>• Air Quality Pla for Nitrogen Dioxide in the UK, 2017</li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF requires that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</li> <li>• 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</li> <li>• The Air Quality Standards Regulation establishes mandatory standards for air quality and set limits and guide values for sulphur and nitrogen dioxide, suspended particles and lead in the air.</li> <li>• The Act establishes the statutory requirement for Local Authorities to carry out local Review and Assessments of air quality and where necessary declare Air quality Management Areas and produce Air Quality Action Plans.</li> </ul>
<b>Key National/Regional Policy- Noise</b>	
<ul style="list-style-type: none"> <li>• National Planning Policy Framework (2019)</li> <li>• Noise Policy Statement for England (2010)</li> <li>• Environmental Noise regulations 2006</li> </ul>	<ul style="list-style-type: none"> <li>• National Planning Policy Framework, paragraph 109 states that:” The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.</li> <li>• The Statement promotes good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.</li> <li>• Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:                         <ul style="list-style-type: none"> <li>▪ avoid significant adverse impacts on health and quality of life;</li> <li>▪ mitigate and minimise adverse impacts on health and quality of life; and</li> <li>▪ where possible, contribute to the improvement of health and quality of life</li> </ul> </li> </ul>
<b>Key Local Policy- Air Quality</b>	
<ul style="list-style-type: none"> <li>• Keynsham and Saltford Air Quality Management, B&amp;NES (2016)</li> <li>• Air Quality Round 6 progress Report, B&amp;NES (2015)</li> <li>• Bath Air quality Action Plan Progress Report, B&amp;NES (2015)</li> <li>• Air Quality Action Plan, B&amp;NES (April 2011)</li> </ul>	<ul style="list-style-type: none"> <li>• Bath &amp; North East Somerset Council has declared AQMAs in Bath, Keynsham and Saltford. In 2018 AQMAs for Temple Cloud and Farrington Gurney are added.</li> <li>• The objectives of Local Air Quality Strategy is to identify how Bath &amp; North East Somerset can assist in securing air quality improvements across the local authority, both within the AQMA identified and external to it, through planning frameworks and wider activities within the local authority.</li> <li>• The Air Quality Action Plan sets a target of 30% reduction in B&amp;NES Council’s own carbon emissions on 2008 levels by 2014 and 45% for all emissions across the district by 2026.</li> </ul>

## Bath &amp; North East Somerset Council

<ul style="list-style-type: none"> <li>Local Air Quality Strategy (LAQS) B&amp;NES (2002)</li> <li>Bath Clean Air Zone Charging Order 2021</li> </ul> <p><b>Core Strategy Policies (2011-2029)</b></p> <ul style="list-style-type: none"> <li>Objective 2: Growth</li> <li>Policy B1: Bath Spatial Strategy</li> <li>Policy KE2: Town Centre/Somerdale Strategic Policy</li> </ul> <p><b>Placemaking Plan Policies (2011-2029)</b></p> <ul style="list-style-type: none"> <li>Policy D.6 Amenity, criterion b)</li> <li>Policy PCS3: Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>The Air Quality Action Plan (2011) sets a target of 45% reduction for all emissions across the district by 2026.</li> <li>The Air Quality Action Plan for Bath was adopted by the Council in April 2011. It has been developed at a time when a number of inter-related transport initiatives are at varying stages of development, including the Bath Transport Package; CIVITAS initiative; Pulteney Bridge restrictions; increases in City Centre parking charges; and the Greater Bristol Bus Network.</li> <li>Bath and North East Somerset Council has adopted a target of 30% reduction in their own Carbon emissions on 2008 levels by 2014 and 45% for all emissions across the district by 2026. Monitoring of air quality shows that the annual mean national objective for NO<sub>2</sub> is being exceeded at a number of locations along main roads in Bath. This area was consulted on and the major road network area was declared as an Air Quality Management Area for NO<sub>2</sub> in July 2008. Walcot Terrace (just east of the Cleveland junction on London Road); London Road (Snow Hill); and St James' Parade had an annual average concentration of nitrogen dioxide in excess of 60 µg/m<sup>3</sup> in 2009 (the national air quality objectives set a standard of 40 µg/m<sup>3</sup>). Cleveland Place West; Bathwick Street; Broad Street; Somerset Street; The Paragon; Widcombe Parade; Somerset Street (east of Corn Street); Manvers Street; Wells Road (bottom); Kennet House; Morley Terrace; Windsor Bridge; Argyle Terrace and Beckford Road had annual average concentrations in excess of 50 µg/m<sup>3</sup> in 2009. The source apportionment shows road traffic contributes up to 92% of the total NO<sub>x</sub> concentration, with Heavy Duty Vehicles (HDV's) contributing between 24 and 57.1%. It is recommended therefore that the Action Plan should focus on measures that reduce emissions from HDV's as the primary source of NO<sub>x</sub> emissions within Bath.</li> <li>Bath Clean Air Zone is now operational. Bath's Clean Air Zone will help the city meet UK air quality legislation as Bath currently exceeds the legal limit for NO<sub>2</sub>, mainly from vehicle emissions.</li> </ul>
<b>Key Local Policy- Noise</b>	
<p><b>Core Strategy Policies (2011-2029)</b></p> <p><b>Placemaking Plan Policies (2011-2029)</b></p>	<ul style="list-style-type: none"> <li>Objective 2: Growth, Policy B1: Bath Spatial Strategy</li> <li>Policy D.6 Amenity, criterion b), Policy PCS2: Noise and Vibration, Policy PCS3: Air Quality</li> </ul>

<b>Biodiversity, Flora and Fauna Policy Summary</b>	
<b>Review of Relevant Plans, Programmes and Strategies:</b>	
<b>Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b>	
<b>Policy</b>	<b>Details of relevance to the plan and SA</b>
<b>Key International Policy</b>	

<ul style="list-style-type: none"> <li>• The European Commission Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment (2013)</li> <li>• EU Directive (92/43/EEC) on the Conservation of Natural Habitats of Wild Fauna and flora (the Habitats Directive 1992) (1992)</li> <li>• The Convention on Biological Diversity, Rio de Janeiro (1992)</li> <li>• Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (1992)</li> <li>• EU Directive 79/409/EEC on the conservation of Wild Birds European Commission (1979)</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The aim of the Habitats Directive is to create a coherent European ecological network known as Natura 2000. It requires member states to take necessary measures to maintain/ restore habitats and species' populations, maintain Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) at favourable status and develop national biodiversity strategy.</li> <li>• Appropriate Assessments must be carried out for any plan or project not directly connected with or necessary for the management of the sites but likely to have a significant effect thereon, either individually or in combination with other plans or projects, should be subject to appropriate assessment of its implications for the site in view of the site's conservation objective.</li> </ul>
<p><b>Key National / Regional Policy</b></p>	
<ul style="list-style-type: none"> <li>• A Green Future: Our 25 Year Plan to improve the Environment</li> <li>• The Environment Bill</li> <li>• State of Nature Report (2016)</li> <li>• Natural England's Standing Advice on Protected Species (Nov, 2014)</li> <li>• National Planning Policy Framework (2019)</li> <li>• Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services (August 2011)</li> <li>• West of England Joint Green Infrastructure Strategy 2020-2030</li> <li>• The Conservation of Habitats and Species Regulations 2010 (as amended), commonly referred to as the "Habitats Regulations"</li> <li>• Natural Environment and Rural Communities Act DEFRA (2006)</li> <li>• Biodiversity 2020 and progress update July 2013</li> <li>• Wildlife and Countryside Act 1981 as amended</li> <li>• Regional BAPs and biodiversity strategies</li> <li>• The Natural Environment and Rural Communities Act</li> </ul>	<ul style="list-style-type: none"> <li>• <b>This 25 Year Environment Plan</b> sets out government action to help the natural world regain and retain good health. 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. The Plan has the following 25 years goals • Clean air.             <ul style="list-style-type: none"> <li>• Clean and plentiful water.</li> <li>• Thriving plants and wildlife.</li> <li>• A reduced risk of harm from environmental hazards such as flooding and drought. • Using resources from nature more sustainably and efficiently.</li> <li>• Enhanced beauty, heritage and engagement with the natural environment. In addition, we will manage pressures on the environment by:                 <ul style="list-style-type: none"> <li>• Mitigating and adapting to climate change.</li> <li>• Minimising waste.</li> <li>• Managing exposure to chemicals.</li> <li>• Enhancing biosecurity.</li> </ul> </li> </ul> </li> <li>• <b>The Environment Bill 2020</b> sets out how we plan to protect and improve the natural environment in the UK. It aims to improve air and water quality, tackle plastic pollution, restore wildlife, and protect the climate. It also introduces a mandatory requirement of 10% biodiversity net gain.</li> <li>• <b>The Clean Growth Strategy</b> sets out the UK's reaffirmed ambition to promote the ambitious economic and environmental policies to mitigate climate change and deliver clean, green growth.</li> </ul>

<p>(2006), Section 40: Duty to conserve biodiversity</p> <ul style="list-style-type: none"> <li>• West of England Nature Recovery Network (WENP) 2018</li> <li>• Environmental Protection Act (1990)</li> <li>• Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)</li> <li>• Natural Environment White Paper (2011)</li> <li>• UK Post-2010 Biodiversity Framework (2012)</li> <li>• National Pollinator Strategy 2014-2024</li> <li>• South West Nature Map 2007</li> </ul>	<ul style="list-style-type: none"> <li>• Overall goal of the Biodiversity Action Plan is to conserve and enhance biological diversity within the UK and to contribute to the conservation of global biodiversity through all appropriate mechanisms.</li> <li>• The Wildlife and Countryside 1981 Act provides for the notification of Sites of Special Scientific Interest (SSSI) – areas of special scientific interest by reason of their flora, fauna, or geological or physiographical features.</li> <li>• Key elements of the Natural Environment and Rural Communities Act included:             <ul style="list-style-type: none"> <li>▪ The establishment of Natural England with the responsibility for enhancing biodiversity and landscape – in rural, urban and coastal areas – with promoting access and recreation</li> <li>▪ Formal establishment of the Commission of Rural communities, which will act as an independent advocate/adviser for rural people</li> <li>▪ The act delivers the Government’s commitment to curtail the inappropriate use of byways, by putting an end to claims for motor vehicle access on the basis historical use by horse –drawn vehicles</li> </ul> </li> </ul> <p>DEFRA developed the National Pollinator Strategy. This aims to bring about the best possible conditions for bees and other insects to flourish.</p>
<p><b>Key Local Policy</b></p>	
<ul style="list-style-type: none"> <li>• Wildthings bringing biodiversity alive in B&amp;NES</li> <li>• Local Biodiversity Action Plan for B&amp;NES</li> <li>• B&amp;NES Green Infrastructure Strategy (March 2013) – revised Strategy and delivery framework due 2020</li> <li>• WaterSpace Design Guidance ‘Protecting bats in waterside development (2018)</li> </ul> <p><b>Core Strategy (2011-2029)</b></p> <ul style="list-style-type: none"> <li>• Policy CP6 Environmental Quality</li> </ul> <p><b>Placemaking Plan (2011-2029):</b></p> <ul style="list-style-type: none"> <li>• Policy NE3-Sites, species and habitats (part of LPPU), Policy NE4-Ecosystem, Policy NE5- Ecological Networks (part of LPPU), Policy NE6- Woodland Conservation, Policy CP7 Green Infrastructure,Policy (part of LPPU) NE1: Development and Green Infrastructure (part of LPPU)</li> <li>• Biodiversity Net Gain (new policy part of LPPU)</li> </ul>	<p>There are seven key themes of the Action Plan and various targets been set for each theme:</p> <ul style="list-style-type: none"> <li>▪ Species and Habitats</li> <li>▪ Monitoring Change</li> <li>▪ Council Owned Land</li> <li>▪ Tracking Wildlife</li> <li>▪ Communication</li> <li>▪ Farming</li> <li>▪ Education</li> </ul> <ul style="list-style-type: none"> <li>• The Green Infrastructure Strategy provides a framework to deliver a planned and managed green infrastructure within B&amp;NES and beyond, for people, places and nature. It recognises that it GI is a key component in addressing environmental impacts including climate change and biodiversity loss. WaterSpace Design Guidance ‘Protecting bats in waterside development (2018) 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. Key Principle Bats and lighting must be thoroughly considered as part of the planning process. Use of this guidance will be a key requirement within all new waterside development proposals. The principles will also be relevant for other habitat features considered to be supporting habitat for the Bat Special Areas of Conservation.</li> </ul>

**Climate Change Policy Summary**

Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA	
Policy	Details of relevance to the plans and SA
<b>Key International Policy</b>	
<ul style="list-style-type: none"> <li>• Guidance on integrating climate change and biodiversity into Environmental Impact Assessments (2013)</li> <li>• Communication from the commission to the council and the European Parliament on EU policies and measures to reduce greenhouse gas emissions: Towards a European Climate Change Programme (ECCP) (2009)</li> <li>• Renewable Energy Directive 2009/28/EC (2009) and updates</li> <li>• Energy Efficiency Directive (2012/27/EU)</li> <li>• Directive 2004/101/EC (2004) and updates</li> <li>• Floods Directive (2007/60/EC)</li> </ul>	<ul style="list-style-type: none"> <li>• The European Climate Change Programme (ECCP) is a programme of the European Commission which will bring together all relevant stakeholders to co-operate in the Council Conclusions on a Community Strategy on Climate change, preparatory work of common and co-ordinated policies and measures to reduce greenhouse gas emissions.</li> <li>• Renewable energy directive establishes an overall policy for the production and promotion from renewable sources in the EU. Requires EU to fulfil at least 20% of its total energy needs with renewables by 2020. At least 10% of transport fuels comes from renewable sources by 2020</li> <li>• Update to Energy Efficiency Directive including a new 30% energy efficiency target for 2030 and measures to update the directive to make sure the new target is met</li> </ul>
<b>Key National / Regional Policy</b>	
<ul style="list-style-type: none"> <li>• Climate Change Act 2008 and its 2050 target amendment Order, 2019</li> <li>• National Planning Policy Framework (2019) Planning Practice Guidance (2019)</li> <li>• Energy Act 2011</li> <li>• The National Adaptation Programme (2013)</li> <li>• The Government's Statement on the Historic Environment for England 2010 Also of note is the reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.</li> <li>• Planning for Climate Change – guidance for local authorities: Planning and Climate Change Coalition (April 2012)</li> <li>• Part L of the Building Regulations ODPM (2010)</li> <li>• The South West Climate Change Action Plan (2009)</li> <li>• Town and Country Planning Association (TCPA) Climate Change Adaptation by Design (2007)</li> </ul>	<ul style="list-style-type: none"> <li>• The 2008 Climate Change Act establishes a legally binding climate change target to reduce the UK's greenhouse gas emissions by at least 80% (from a 1990 baseline) by 2050. This includes meeting an interim target of 34% by 2020.</li> <li>• Section 10 of the NPPF relates specifically to climate change and the role in helping to secure <i>"radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change"</i></li> <li>• The TCPA's National Adaptation Programme (2013) highlights the importance of adaptation to help the UK become more resilient to climate change. It also reiterates the need for Local Plans to be proactive in adaptation as set out in the NPPF.</li> <li>• Climate Change Adaptation by Design is a guide for sustainable communities, considers the climatic changes ahead and the corresponding impacts on the built environment and proposes a framework for delivering adaptation action at the regional and local levels, together with some guidance on creating local adaptation strategies.</li> <li>• The South West Climate Change Action Plan draws together issues from across the region to ensure that there is a shared vision on tackling climate change, access to a common evidence base and a jointly agreed set of priorities for taking the issues forward. The Action Plan sets out a clear programme of regionally agreed priority actions to address both mitigation and adaptation activity.</li> <li>• HE Energy Efficiency and Historic Building describes a whole building energy-planning process for devising and implementing suitable, well-integrated solutions that: „             <ul style="list-style-type: none"> <li>○ avoid harm to significance „</li> <li>○ are effective, cost efficient, proportionate and sustainable „</li> </ul> </li> </ul>

<ul style="list-style-type: none"> <li>• Energy efficiency: The Government's Plan for Action (following the Energy White Paper, Our Energy Future - Towards a Low Carbon Economy (April 2004)</li> <li>• South West Climate Change Impacts Partnership South West Climate Change Impacts Scoping Study (Jan 2003) 'Warming to the idea'</li> <li>• Energy White Paper DTI (2003)</li> <li>• DETR (2000) Building a Better Quality of Life: A Strategy for More Sustainable Construction</li> <li>• Energy Efficiency and Historic Building: How to improve energy efficiency (Historic England 2018)</li> <li>• UKCP18 guidance Environment Agency</li> <li>• Climate Change Risk Assessment 2012</li> <li>• Low Carbon Transition Plan 2009</li> <li>• Decarbonising Transport: Setting the Challenge 2020</li> <li>• Cutting Carbon, Creating Growth: Making Sustainable Local Transport Happen White Paper 2011</li> <li>• Planning Practice Guidance – Climate Change 2015</li> <li>• Clean Growth Strategy 2017</li> <li>• West of England Climate Emergency Action Plan, 2020</li> <li>• West of England Low Carbon Challenge Fund</li> <li>• West of England Energy Strategy</li> </ul>	<ul style="list-style-type: none"> <li>○ ensure a healthy and comfortable environment for occupants „</li> <li>○ minimise the risk of unintended consequences</li> </ul> <ul style="list-style-type: none"> <li>• UKCP18 places the use of climate projections in the context of risk analysis and aims to help navigate the different components of the UKCP18 land projection with examples.</li> </ul> <p>It covers:</p> <p>1) Using climate model projections, 2) Why are there multiple strands of information? 3)What should you be aware of before using the land projections? 4) What is the relationship between the sets of land projections? 5)How do you choose the appropriate UKCP18 projections?</p> <p>The West of England has set a goal for the region to be net zero carbon by 2030. The action sets out measure to be taken to reach this target and includes work already underway.</p>
<p><b>Key Local Policy</b></p>	

<ul style="list-style-type: none"> <li>• Bath and North East Somerset Environment and Climate Change Strategy 2016-2020</li> <li>• B&amp;NES Climate Emergency Action Plan (Oct 2019)</li> <li>• Climate Emergency Study: Synthesis of Evidence</li> <li>• B&amp;NES Green Infrastructure Strategy (2013)</li> <li>• B&amp;NES Sustainable Construction and Retrofitting SPD (Feb 2013) updated in 2018</li> <li>• B&amp;NES Informal Guidance Note Renewable Energy in the Green Belt (2013)</li> <li>• B&amp;NES Sustainable construction checklist SPD: Heat Networks Guidance Note (2018)</li> <li>• <b>Core Strategy Policies:</b> <ul style="list-style-type: none"> <li>▪ CP1: Retrofitting existing building (Part of LPPU)</li> <li>▪ CP2: Sustainable Construction (part of LPPU)</li> <li>▪ CP3: Renewable Energy (part of LPPU)</li> <li>▪ CP4: District Heating</li> <li>▪ CP5: Flood Risk Management</li> <li>▪ Whole Life Carbon Assessments (new policy part of LPPU)</li> <li>▪ Harnessing Wind Power (new policy part of LPPU)</li> <li>▪ Electric Vehicle (new policy part of LPPU)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The Environment and Climate Change vision is: <i>“The Environmental Sustainability Partnership will lead the B&amp;NES community to an environmentally sustainable, healthy, low carbon future that is resilient to the expected changes in our climate. We want B&amp;NES to be a leader of innovation and achievement in this field.”</i></li> <li>• The B&amp;NES Local Food Strategy (2014-2017) provides a framework for partnership action to increase the production, accessibility and consumption of healthy, local and sustainable food in Bath and North East Somerset to reduce diet-related ill health and inequality, to reduce the environmental impact of the food sector including its contribution to climate change and to improve the local food economy.</li> <li>• The Green Infrastructure Strategy provides a framework to work with partners and the community to make the most of the benefits that the natural environment can and should be providing for people, places and nature within and beyond the district. It is under review and the Council is due to published the updated GI Strategy in Spring 2020.</li> <li>• B&amp;NES Informal Guidance Note: Renewable Energy in the Green Belt, provides guidance on how renewable energy planning proposals should respond specifically to the Green Belt designation</li> <li>• Bath and North East Somerset Council (B&amp;NES) 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 itself. 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. Priority areas for action: <ul style="list-style-type: none"> <li>• Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build;</li> <li>• Transport: a major shift to mass transport, walking and cycling to reduce transport emissions;</li> <li>• A rapid and large-scale increase in local renewable energy generation.</li> </ul> </li> </ul>
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<b>Heritage, Archaeology and Landscape Policy Summary</b>	
<b>Review of Relevant Plans, Programmes and Strategies:</b> <b>Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b>	
<b>Policy</b>	<b>Details of relevance to the plan and SA</b>
<b>Key International Policy- Heritage, Archaeology &amp; Landscape</b>	



<ul style="list-style-type: none"> <li>• Convention on the Protection of Archaeological Heritage (Revised)(Valetta Convention 2000)</li> <li>• European Landscape Convention (2000)</li> <li>• European Spatial Development Perspective 1999</li> <li>• UNESCO World Heritage Convention 1972 <a href="http://www.getty.edu">http://www.getty.edu</a></li> </ul>	<ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention 1972 states that are parties to the Convention agree to not only identify, protect, conserve, and present World Heritage properties, but also to protect its national heritage. They are encouraged to integrate the protection of the cultural and natural heritage into regional planning programmes, set up staff and services at their sites, undertake scientific and technical conservation research and adopt measures which give this heritage a function in the day-to-day life of the community.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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. Spatial policy guidelines include the wise management of the natural and cultural heritage, which will help conserve regional identities and cultural diversity in the face of globalisation</li> </ul>
<b>Key National / Regional Policy- Heritage, Archaeology &amp; Landscape</b>	
<ul style="list-style-type: none"> <li>• Preserving Archaeological Remains (English Heritage, 2016)</li> <li>• Understanding Historic Buildings (English Heritage, 2016)</li> <li>• Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2015 HEAG038 (2015)</li> <li>• The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3 2015 HEAG074 (2015)</li> <li>• Making Changes to Heritage Assets: Historic England Advice Note 2 2016 HEAG023 (2015)</li> <li>• Scheduled Monuments - A Guide for Owners and Occupiers (2013)</li> <li>• National Planning Policy Framework</li> <li>• The Government's Statement on the Historic Environment for England 2010</li> <li>• Heritage Protection for the 21st Century White Paper, Department for culture, media and sport (March 2007)</li> <li>• An Approach to Landscape Character Assessment (natural England, 2014)</li> </ul>	<ul style="list-style-type: none"> <li>• Planning (Listed Buildings and Conservation Areas) Act 1990 This Act introduced legislation which created special controls for the protection of listed buildings and conservation areas. It established that damage to these assets could amount to a criminal offence.</li> <li>• Ancient Monuments and Archaeological Areas Act 1979 This Act legislates to protect the archaeological heritage of Great Britain. The Act defines monuments which warrant protection and establishes that damage to these amounts to a criminal offence.</li> <li>• National Planning Policy Framework (NPPF) This sets out the Government's planning policies for England. Paragraphs 184 to 202 detail historic environment policies and focus on ensuring heritage assets are given protection commensurate with their status and encouraging new development which preserves their special qualities. The NPPF particularly focusses on the significance of heritage assets.</li> <li>• The NPPF is very clear that protection of the historic environment is a key component of sustainable development. The NPPF contains the following policies which are particularly relevant to the local plan: 7 184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value<sup>61</sup>. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations<sup>62</sup>. 185. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.</li> <li>• 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.</li> </ul>

<ul style="list-style-type: none"> <li>• NPPF (2019) PPG July 2019</li> <li>• The Countryside and Rights of Way Act 2000</li> <li>• Planning (Listed building and Conservation Areas Act 1990)</li> <li>• Ancient Monuments and Archaeological Areas Act 1979</li> <li>• Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 advice on historic environment considerations as part of the Sustainability Appraisal/Strategic Environmental Assessment process.</li> <li>• Landscape Character Framework</li> <li>• National Parks and Access to the Countryside Act 1949</li> <li>• Tree Management Strategy and Action Plan 2021</li> </ul>	<ul style="list-style-type: none"> <li>• The proposals in the Heritage Protection for the 21st Century White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future.</li> <li>• Local Green Infrastructure aims to inspire people to make positive changes in their neighbourhoods by considering the potential offered by the natural environment and integrating this into the way places are planned, designed and managed.</li> <li>• The Countryside and Rights of Way Act (CROW) extends the public's ability to enjoy the countryside whilst providing safeguards for landowners and occupiers.</li> <li>• Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 advice on historic environment considerations as part of the Sustainability Appraisal/Strategic Environmental Assessment process.</li> </ul>
<b>Key Local Policy- Heritage, Archaeology &amp; Landscape</b>	
<ul style="list-style-type: none"> <li>• B&amp;NES - City of Bath World Heritage Site Management Plan (2016-2022)</li> <li>• City of Bath World Heritage Site Setting SPD (2013)</li> <li>• Archaeology in Bath and North East Somerset Supplementary Planning Guidance (SPG) (2004)</li> <li>• Archaeology in the City of Bath Supplementary Planning Guidance (SPG) (2003)</li> <li>• Bath City-wide character appraisal (March 2005)</li> <li>• Bath Building Heights Strategy (2010)</li> <li>• Draft Brassmill Lane, Locksbrook and Western Riverside Character Appraisal -Bath Conservation Area (2015)</li> <li>• Draft City Centre Character Appraisal-Bath Conservation Area (2015)</li> <li>• Draft Bathwick Character Appraisal-Bath Conservation Area (2015)</li> <li>• Draft Twerton, Whiteway, Southdown and Moorlands Character Appraisal-Bath Conservation</li> </ul>	<p>The aims of the City of Bath World Heritage Site Management Plan (2016-2022). The aims of the Plan are to:</p> <ol style="list-style-type: none"> <li>I. promote sustainable management of the Site</li> <li>II. ensure that the Outstanding Universal Value of the Site and its setting is understood, protected and sustained</li> <li>III. maintain and promote Bath as a living and working city which benefits from World Heritage Site status;</li> </ol> <p>iv. improve physical access and interpretation encouraging all people to enjoy and understand the Site;</p> <p>V. improve public awareness of, and interest and involvement in, Bath's heritage, achieving a common local, national and international ownership of the Site's management.</p> <p>B&amp;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.</p> <p>Draft Core Strategy CP6 covers</p> <ul style="list-style-type: none"> <li>• High quality design</li> <li>• Historic environment</li> <li>• Landscape</li> <li>• Nature Conservation</li> </ul>

<p>Area (2015)</p> <ul style="list-style-type: none"> <li>• Draft Pulteney Road Character Appraisal-Bath Conservation Area (2015)</li> <li>• Draft North Road and Cleveland Walk Character Appraisal Bath Conservation Area (2015)</li> <li>• Bathscape (2016)</li> <li>• Cotswolds Area of Outstanding Natural Beauty Management Plan 2018-2023</li> <li>• Mendip Hills Area of Outstanding Natural Beauty 2019-2024</li> <li>• Rural Landscapes of Bath &amp; North East Somerset - A Landscape Character Assessment SPG (2003)</li> <li>• B&amp;NES Green Space Strategy (2015)</li> <li>• WoE Green Infrastructure Strategy</li> <li>•</li> </ul>	<p>Conservation Area Appraisals for;</p> <p>Chew Magna(2002), Claverton (Jan 2007), Combe Hay (2014), Freshford and Sharpstone (2007), Hinton Blewett (2014), Midsomer Norton and Welton Conservation Area Appraisal (2004), Radstock (1999), Paulton (2003), Pensford (2008), Woollard (2008), South Stoke (2014), Wellow (2007), Keynsham Assessment (2015), Salford 2018, Queen Charlton 2018, Midsomer Norton and Welton 2018</p> <p>Core Strategy (2011-2029)</p> <p>Policy B4 The World Heritage Site and its Setting, Policy CP6 Environmental Quality, Policy CP7 Green Infrastructure (updated as part of LPPU), Policy CP8 Green Belt</p> <p>Placemaking Plan (2011-2029)</p> <p>Policy HE1: Historic Environment Policy HE2: Somersetshire Coal Canal And The Wansdyke, Policy NE2: Conserving and enhancing the landscape and landscape character, Policy NE2A:Landscape Setting Of Settlements, Policy CP8: Green Belt, Policy CP6: Environmental Quality, Policy CP7: Green Infrastructure, Policy NE1: Development and Green Infrastructure</p>
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Economic Development Policy Summary	
Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA	
Policy	Details of relevance to the plan and SA
Key International Policy-Economic Development	
<ul style="list-style-type: none"> <li>• Strategy for Sustainable Food and Farming (2002)</li> <li>• Integrating the Environment into EC Economic and Development Co-operation (2000)</li> </ul>	<p>Key principles for sustainable farming and food now and in the future:</p> <ul style="list-style-type: none"> <li>• Produce safe, healthy products in response to market demands, and ensure that all consumers have access to nutritious food, and to accurate information about food products.</li> <li>• Support the viability and diversity of rural and urban economies and communities.</li> </ul>
Key National / Regional Policy	
<ul style="list-style-type: none"> <li>• The West of England Local Enterprise Partnership-Strategic Economic Plan 2015-2030</li> <li>• The West of England local economic assessment</li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF sets out that that the planning system should contribute towards '<i>building a strong, competitive economy</i>' 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.</li> </ul>

<p>(2015)</p> <ul style="list-style-type: none"> <li>• The Historic Environment: a prospective for growth in the south west (The SW Heritage Forum) (2013)</li> <li>• National Planning Policy -Framework (2019)</li> <li>• Stern Review Report on the Economics of Climate Change Treasury (2007)</li> <li>• Toward 2015 : Shaping Tomorrow's Tourism South West Tourism and South West of England Regional Development Agency (2005)</li> <li>• Industrial Strategy Building a Britain fit for the future Nov 2017</li> <li>• WoE Industrial Strategy 2019</li> <li>• The South West Framework for Regional Employment and Skills (FRESA) South West of England Regional Development Agency (2003)</li> <li>• Cultural &amp; Creative Strategy Review (2015-2020)</li> <li>• The West of England Local Enterprise Partnership-Strategic Economic Plan (2015-2030)</li> <li>• West of England Economic Development Needs Assessment (2015-2030)</li> <li>• The Historic Environment: a prospective for growth in the south west (The SW Heritage Forum) (2013)</li> </ul>	<ul style="list-style-type: none"> <li>• With regards to the rural areas the NPPF is clear that Local Plans should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should: <ul style="list-style-type: none"> <li>○ support the sustainable growth and expansion of all types of business and enterprise in rural areas</li> <li>○ promote the development and diversification of agricultural and other land-based rural businesses;</li> <li>○ support sustainable rural tourism and leisure developments that benefit businesses in rural areas</li> <li>○ promote the retention and development of local services and community facilities in villages</li> </ul> </li> <li>• Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (paragraph 28).</li> <li>• The Cultural &amp; Creative Strategic Advisory Board (CCSAB) was set up in October 2015. It contributes to the Cultural &amp; Creative Strategy Review 2015-2020, Aim 10: Financial sustainability &amp; infrastructure, which states: Financial sustainability is key for funding bodies who want to be sure that their investment will be of long-term benefit.</li> <li>• 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 &amp; North East Somerset, Bristol, North Somerset, and South Gloucestershire. Four key priority as the heart of the West of England's approach are: <ul style="list-style-type: none"> <li>• fostering cross-sectoral innovation from research through to commercialisation;</li> <li>• ensuring that growth is inclusive, with a focus on opportunities for employment and progression for all;</li> <li>• addressing the productivity challenge, including adopting new technology and management practices and supporting businesses to trade; and</li> <li>• capitalising on the region's innovative strengths to deliver the infrastructure necessary for future growth.</li> </ul> </li> </ul>
<p><b>Key Local Policy</b></p>	
<ul style="list-style-type: none"> <li>• West of England Local Enterprise Partnership Bath City Riverside Enterprise Area – the City of Ideas (2015)</li> <li>• Economic Strategy Review (2014–2030)</li> <li>• Economic Strategy for B&amp;NES 2010-2026</li> <li>• Include info about the SV Enterprise Zone</li> <li>• Amendments to local plan policy ED2A and ED2B</li> </ul>	<ul style="list-style-type: none"> <li>• The Economic Strategy Review for Bath and North East Somerset 2014-2030 seeks to deliver a minimum of 65,000 new jobs by 2030 building on the area's track record in innovation and creativity and a rich heritage and cultural vibrancy. The Review highlights the issues that must be addressed. House prices are 40% higher than the national average. Average wages are 10% lower. Long term unemployment, particularly long term youth unemployment, remains an issue. There is a shortage of industrial space and we lack the overall quality of office space that modern businesses demand. The ambition set by the Review is to increase the overall number of jobs in B&amp;NES by 11,500 and by focussing on "priority sectors" where the area has particular strengths we can increase overall productivity and raise average earnings.</li> <li>• The Future for B&amp;NES comprises a series of place-focused visions for the revitalisation and growth of the district and, in particular,</li> </ul>

<p>as part of LPPU</p>	<p>the main urban centres of Bath, Midsomer Norton and Radstock, and Keynsham. It seeks to realise a number of the ambitions of the Community Strategy and to provide a direct response to the Economic Development and Enterprise section of the Local Area Agreement</p> <ul style="list-style-type: none"> <li>• The B&amp;NES Economic Strategy Review, launched in November 2014, describes the importance of the sector and hence the case for tailored support to sustain it. The Council, despite extreme financial pressure, will wish to enhance the economic and social benefits through continued investment in the sector." .It describes a whole building energy-planning process for devising and implementing suitable, well-integrated solutions that: „ avoid harm to significance „ are effective, cost efficient, proportionate and sustainable „ ensure a healthy and comfortable environment for occupants „ minimise the risk of unintended consequences</li> <li>• Bath's Enterprise Area includes 98Ha of land which follows the line of the river through the city. It has been recognised as an key zone for growth in the city by the <a href="#">West of England Local Enterprise Partnership</a> which has committed significant investment to help the city's ambitions for the development to be realised.</li> <li>• The Bath and Somer Valley Enterprise Zone was established in April 2017 to support local businesses and to attract new businesses to the area. Enterprise Zones are designated areas across England which encourage business growth and new jobs by providing business rate discounts, tax breaks, superfast broadband and other government support.</li> </ul> <p><b>Core Strategy (2011-2029)</b></p> <ul style="list-style-type: none"> <li>• Policy CP12 Centres and Retailing , Policy B2: Central Area Strategic Policy, Policy B3: Strategic Policy for Twerton and Newbridge Riverside, Policy B5: Strategic Policy for Bath's Universities, KE1 Keynsham Spatial Strategy, Policy KE2: Town Centre/Somerdale Strategic Policy, Policy SV1 Somer Valley: Spatial Strategy , Policy SV2: Midsomer Norton Town Centre, Policy SV3: Radstock Town Centre Strategic Policy, Policy RA1: Development in the Villages meeting the listed criteria , RA3 Community Facilities and Shops</li> </ul> <p><b>Placemaking Plan</b></p> <ul style="list-style-type: none"> <li>• Policy ED.1A: Office Development, Policy ED.1B: Change Of Use &amp; Redevelopment of B1 (A) Office To Residential Use, Policy ED.1C: Change Of Use And Redevelopment Of B1 (A) Office Use To Other Town Centre Use, Policy ED.2A: Strategic (*) And Other Primary Industrial Estates, Policy ED.2B: Non-Strategic Industrial Premises, Policy RE1: Employment Uses In The Countryside, Policy RE2: Agricultural Developmet, Policy RE3: Farm Diversification, Policy RE5: Agricultural Land, Policy RE7: Visitor Accommodation, Policy CP12: Centres and retailing, Policy CR1: Sequential Test and Policy CR3: Primary Shopping Areas And Primary Shopping Frontages</li> </ul>
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<p><b>Housing Policy Summary</b></p>
<p><b>Review of Relevant Plans, Programmes and Strategies:</b>  <b>Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b></p>

Policy	Details of relevance to the plans and SA
<b>Key International Policy</b>	
<ul style="list-style-type: none"> <li>Housing Policy in the EU Member States- Directorate General for Research Working Document Social Affairs Series -W 14 – (1996)</li> </ul>	<ul style="list-style-type: none"> <li>Research piece on the need to deliver adequate and affordable housing available to all and the reality that almost every European government fails to achieve this objective. This may reflect resource constraints for public spending, changing socio-economic patterns to which policy only responds slowly, demographic pressures and or the inherent failure of, sometimes and expensive policy solutions.</li> </ul>
<b>Key National / Regional Policy</b>	
<ul style="list-style-type: none"> <li>National Planning Policy Framework (2019)</li> <li>Laying the Foundations: A Housing Strategy for England (2011)</li> <li>English housing survey 2014 to 2015: adaptations and accessibility of homes report (2015)</li> <li>Homelessness Prevention – A Guide to Good Practice: Summary Policy Briefing 15 (2006)</li> <li>Wider Bristol Strategic Housing Market Assessment Volume 1 Final Report (2015)</li> <li>West of England Housing Target Sept 2016</li> <li>Homes and Communities Agency supply of homes (2016)</li> <li>UK Housing Review - Chartered Institute of Housing (2015)</li> <li>Housing White Paper 'Fixing our Broken Housing Market'</li> <li>Wider Bristol Strategic Housing Market Assessment updated March 2018</li> <li>West of England Housing Target updated April 2018</li> <li>West of England Strategic Housing Market Assessment</li> <li>Residential Use of Inland Waterways: Association of Inland Navigation Authorities (2011)</li> <li>Guidance for Development of New Residential Mooring Sites (England &amp; Wales) (2011)</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>The NPPF states that, to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; and should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</li> <li>The Housing White Paper '<i>Fixing our Broken Housing Market</i>' sets out a more up-to-date direction of travel for housing policy. There are numerous policy initiatives in the White Paper, but four groups of proposals set out provide an updated National Framework which even without specific proposals provide themes the Local Plan will need to embrace. These are: <ul style="list-style-type: none"> <li>Step 1 Planning for the right homes in the right places;</li> <li>Step 2 Building homes faster;</li> <li>Step 3 Diversifying the market;</li> <li>Step 4 Helping people now.</li> </ul> </li> </ul>
<b>Key Local Policy</b>	
<ul style="list-style-type: none"> <li>B&amp;NES Sustainable Construction &amp; Retrofitting Supplementary Planning Document (SPD) (2013)</li> </ul>	<ul style="list-style-type: none"> <li>The Sustainable Construction &amp; Retrofitting SPD aims to offer home owners and small scale home builders in Bath &amp; North East Somerset clear direction on how to contribute to the Council's aspirations to increase the energy efficiency of all homes in our district.</li> </ul>

<ul style="list-style-type: none"> <li>• B&amp;NES Planning Obligation SPD (2015) amended 2019</li> <li>• B&amp;NES Homelessness Strategy 2014-2018 (2014)</li> <li>• B&amp;NES Homelessness Strategy Evidence review 2014-2018 (2014)</li> <li>• B&amp;NES Tenancy Strategy 2012-2017 (2012)</li> <li>• B&amp;NES Empty Property Policy (2013)</li> <li>• Houses in Multiple Occupation in Bath Supplementary Planning Document (2013)</li> <li>• Sustainable Construction checklist SPD updated 2018.</li> <li>• Taking Action on empty homes. Bath and North East Somerset</li> <li>• Councils Empty Residential Property Policy 2018</li> <li>• Houses in Multiple Occupation in Bath SPD, November 2017</li> <li>• Bath and North East Somerset SHMA</li> </ul> <p><a href="https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/23259173.1/PDF/-/Bath_Strategic_Housing_Market_Assessment_Establishing_Objectively_Assessed_Need.pdf">https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/23259173.1/PDF/-/Bath_Strategic_Housing_Market_Assessment_Establishing_Objectively_Assessed_Need.pdf</a></p>	<ul style="list-style-type: none"> <li>• The Planning Obligations SPD provides detailed guidance on the implementation of the Council's planning policies on affordable housing. Amendments were approved to enable off site Green Infrastructure contributions to be secured where on site was not practical to mitigate the impact of development.</li> <li>• The HMO SPD sets out Bath &amp; North East Somerset Council's approach to the distribution and dispersal of Houses in Multiple Occupation. It aims to encourage a sustainable community in Bath, by encouraging an appropriately balanced housing mix across Bath, supporting a wide variety of households in all areas.</li> </ul> <p>Core Strategy CP9 and 10 set out affordable housing requirements and housing mix</p> <p>Core Strategy (2011-2029)</p> <ul style="list-style-type: none"> <li>• Policy B1: Bath Spatial Strategy, Policy KE1 Keynsham Spatial Strategy, Policy SV1: Somer Valley Spatial Strategy, RA1 Development in the Villages meeting the listed criteria 125, RA2 Development in Villages outside the Green Belt not meeting Policy RA1 Criteria, RA4: RA4 Rural Exceptions Sites, RA5 Land at Whitchurch – Strategic Site Allocation, Policy: CP9 Affordable Housing (part of LPPU), Policy CP10: Housing Mix, Policy CP1: Gypsies, Travellers and Travelling Show people</li> </ul> <p>Placemaking Plan (2011-2029)</p> <ul style="list-style-type: none"> <li>• Policy GB2: Development In Green Belt Villages (part of LPPU), Policy H1: Housing and facilities for the elderly, people with other supported housing or care needs, Policy H2: Houses in Multiple Occupation (part of LPPU), Policy H3: Residential Uses in Existing Buildings, Policy H4: Self Build, Policy H5: Retention of Existing Housing Stock, Policy H6: Moorings, Policy H7: Housing Accessibility (part of LPPU), Policy H8: Affordable Housing Regeneration Schemes.</li> <li>• New policies part of LPPU– Intensification of Existing HMOs, Purpose Built Student Accommodation (PBSA) .</li> </ul>
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<b>Natural Resources, Water and Soil Policy Summary</b>	
<b>Review of Relevant Plans, Programmes and Strategies:</b> <b>Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b>	
<b>Policy</b>	<b>Details of relevance to the plan and SA</b>
<b>Key International Policy-Water</b>	
<ul style="list-style-type: none"> <li>• The EU Water Framework Directive 2000/60/EU</li> <li>• The Water Framework Directive (2000)</li> </ul>	<p>The key aims of the Directive are:</p> <ul style="list-style-type: none"> <li>▪ to general protection of the aquatic ecology, specific protection of unique and valuable habitats, protection of drinking water resources, and protection of bathing water</li> </ul>

	<ul style="list-style-type: none"> <li>▪ to reverse any antropogenically induced upward pollution trend</li> </ul>
<b>Key International Policy-Soil</b>	
N/A	N/A
<b>Key National / Regional Policy-Water</b>	
<ul style="list-style-type: none"> <li>• National Planning Policy Framework (2019)</li> <li>• Bristol Avon Catchment Plan (2016)</li> <li>• Sustainable Drainage Systems: Written Statement (HCWS161) (2014)</li> <li>• Building Regulations Part H (HM Government, 2010)</li> <li>• West of England Sustainable Drainage Developer Guide (West of England Partnership, 2015)</li> <li>• Environment Agency Local Flood Risk Standing Advice (2014)</li> <li>• Environment Agency River Basin management Plans and Flood Risk management Plans (2015)</li> <li>• B&amp;NES Local Flood Risk Management Strategy Strategic Environmental Assessment Environmental Report (2015)</li> <li>• TCPA British Waterways Policy advice note:</li> <li>• Unlocking the Potential and Securing the Future of Inland Waterways National Planning Practice Guidance, Water supply, wastewater and water quality updated July 2019.</li> <li>• Review Individual Flood Risk Assessments: Standing Advice for Local Planning Authorities, last updated March 2019</li> <li>• Flood and Water Management Act 2010</li> <li>• Flood Risk Regulations 2009</li> <li>• Wessex Water – Water Resource Management Plan</li> <li>• Severn River Basin Management Plan (2015)</li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF states that Local Planning Authorities should set out strategic policies to provide infrastructure for water supply, waste water and flood risk (paragraph 156). Paragraph 100 of the NPPF states that new development should be strategically located away from areas of high flood risk, not act to increase flood risk elsewhere and seek opportunities to reduce flood risk where possible.</li> <li>• The NPPF, paragraph 103 states that new and existing development should be prevented from contributing to water pollution, and that Development should give “<i>priority to the use of sustainable drainage systems</i>”.</li> </ul> <p>TCPA British Waterways Guiding Principles Individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The ‘added value’ of the water space needs to be fully explored. Waterways themselves should be the starting point for consideration of the development and use of the water and waterside land – look from the water outwards, as well as from the land to the water. A waterways towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. New waterside development needs to be considered holistically with the opportunities for water-based development, use and enhancement. Improve the appearance of the site from the towing path and from the water at boat level, and enhance the environmental quality of the waterway corridor. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.</p>
<b>Key National / Regional Policy-Soil</b>	
<ul style="list-style-type: none"> <li>• National Planning Policy Framework (2019)</li> <li>• Defra- Safeguarding our Soils: A Strategy for England (2009)</li> <li>• Contaminated Land (England) Regulations 2006</li> <li>• Environmental Damage (Prevention and Remediation) England</li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF states that planning decisions need to take sufficient account of soil quality in particular in cases where significant areas of the best and most versatile agricultural land may be lost to development.</li> <li>• DEFRA’s vision is to ensure that England’s soils will be protected and managed to optimise the varied functions that</li> </ul>



Regulations 2015	<p>soils perform for society (e.g. supporting agriculture and forestry, protecting cultural heritage, supporting biodiversity, as a platform for construction), in keeping with the principles of sustainable development and on the basis of sound evidence.</p> <ul style="list-style-type: none"> <li>• Safeguarding our Soils: A strategy for England (2009) sets out a vision for the future of soils in England. This is: “By 2030, all of England’s soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”</li> </ul>
<b>Key Local Policy-Water</b>	
<ul style="list-style-type: none"> <li>• B&amp;NES Waterspace Study (2016)</li> <li>• Surface Water Management Plan for Bath &amp; North East Somerset (Bath &amp; North East Somerset Council, 2015)</li> <li>• Bath &amp; North East Somerset Council’s Local Flood Risk Management Strategy (Bath &amp; North East Somerset Council,2015)</li> </ul> <p><b>B&amp;NES Core Strategy (2011-2029)</b></p> <ul style="list-style-type: none"> <li>• Policy CP5: Flood Risk Management, Policy CP6: Environment Quality</li> </ul> <p><b>Placemaking Plan</b></p> <ul style="list-style-type: none"> <li>• Policy SCR5: Water efficiently, Policy PSC7: Water Source Protection Zones, Policy PSC7a: Fowl water sewage infrastructure, Policy PCS8:Bath Hot Springs</li> </ul>	<ul style="list-style-type: none"> <li>• Focusing on the River Avon and Kennet and Avon Canal (Dundas Aqueduct to Bath to Hanham Lock), Bath &amp; North East Somerset Council is working in partnership with the Environment Agency, the Canal &amp; Rivers Trust and Wessex Water to develop an evidence base, undertake public and stakeholder consultation and identify opportunities to deliver enhancements to these waterways and adjoining land.</li> <li>• It is proposed the Water Space Study will conduct field surveys, mapping work, data collection and run stakeholder and public engagement events to focus on the following core themes: <ul style="list-style-type: none"> <li>▪ Assets and Asset Management</li> <li>▪ Mooring Strategy and Navigation</li> <li>▪ Regeneration &amp;Development</li> <li>▪ Water quality &amp; Environmental Enhancement</li> <li>▪ Recreation and Leisure</li> </ul> </li> <li>• Throughout the process Community Engagement will be an important element, including consultation, increased awareness, education, health and well-being, volunteering and recreation.</li> </ul>
<b>Key Local Policy-Soil</b>	
<ul style="list-style-type: none"> <li>• B&amp;NES Development of Potentially Contaminated Land – Guidance Note for Developers, Agents and Consultants (2007)</li> <li>• Contaminated Land Inspection Strategy BANES 2003</li> </ul>	<p>The Guidance identifies contaminated land under the Governments regulatory regime. The document includes the proposed methodology for inspection of the District, identification of contaminated land and how all information gathered will be handled.</p> <p><b>B&amp;NES Core Strategy (2011-2029)</b></p> <ul style="list-style-type: none"> <li>• Policy CP5: Flood Risk Management, Policy CP6: Environment Quality</li> </ul> <p><b>Placemaking Plan</b></p> <ul style="list-style-type: none"> <li>• Policy PCS5: Contamination (part of LPPU), Policy PCS6: Unstable Land</li> </ul>

Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA	
Policy	Details of relevance to the plans and SA
<b>Key International Policy</b>	
<ul style="list-style-type: none"> <li>European Spatial Development Perspective European commission 1999</li> </ul>	<ul style="list-style-type: none"> <li>The European Spatial Development Perspective (ESDP) is a legally non-binding document with the strategic aim of achieving a balanced and sustainable spatial development strategy.</li> </ul>
<b>Key National / Regional Policy</b>	
<ul style="list-style-type: none"> <li>National Planning Policy Framework (2019)</li> <li>White Paper Choosing Health: making healthier choices easier. Department of Health (2004)</li> <li>Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)</li> <li>Fair Society, Healthy Lives ('The Marmot Review') (2010)</li> <li>Health and Social Care Act 2012</li> <li>Sport England: Towards an active nation strategy</li> <li>Spatial Planning for Health: an evidence resource for planning and designing healthier places – Public Health (2017)</li> <li>Towards Social Investment for Growth and Cohesion 2014-2020</li> </ul>	<ul style="list-style-type: none"> <li>The updated National Planning Policy Framework (NPPF) (March 2014) notes that the development of healthy living environments for people of all ages that support social interaction are critical in promoting healthy communities.</li> <li>The updated National Planning Policy Framework (NPPF) has a revised section on health and wellbeing (March 2014). It notes that "The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing". It also sets out a vision for what a healthy community should look like; "A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities". It states that "active" design and the development of healthy living environments for people of all ages that support social interaction are critical in promoting healthy communities.</li> <li>NPPF (2019) Section 8: Promoting Healthy and Safe Communities. Promotes policies and decisions which aim to achieve healthy inclusive and safe places.</li> </ul>
<b>Key Local Policy</b>	
<ul style="list-style-type: none"> <li>Community Safety in Bath and North East Somerset 2016 – 2019</li> <li>B&amp;NES Green Space Strategy 2015-2029</li> <li>B&amp;NES Green Infrastructure Strategy (2013) currently being revised 2020</li> <li>B&amp;NES Playing Pitch Strategy (2015)</li> <li>Playing Pitch Strategy 2016 -2029 May 2016 Draft Version 3</li> <li>Fit for Life Strategy (2014)</li> <li>'Shaping Up' Healthy Weight Strategy 2015-20</li> <li>B&amp;NES Joint Health and Wellbeing Strategy 2015 -2019</li> <li>B&amp;NES Environmental Sustainability Strategy 2012-2015</li> <li>'Fit for Life' - A strategy to get more people, more active, more</li> </ul>	<p>A key priority for B&amp;NES Joint Health and Wellbeing Strategy is to <i>"Increase the resilience of people and communities, including action on loneliness"</i>. 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".</p> <p>B&amp;NES Core Strategy (2011-2029)</p> <ul style="list-style-type: none"> <li>Policy RA3: Community Facilities and shops</li> </ul> <p>Placemaking Plan (2011-2029)</p> <ul style="list-style-type: none"> <li>LCR1: Safeguarding Local Community Facilities</li> <li>LCR1A: Public Houses</li> </ul>

<p>often (Draft, B&amp;NES March 2014)</p> <ul style="list-style-type: none"> <li>• Bath and North East Somerset Cultural Strategy 2011-2026</li> <li>• Bath and North East Somerset Environmental Sustainability and Climate Change Strategy 2016-2020</li> <li>• Bath and North East Somerset Health and Well-being Strategy 2015-2019</li> </ul>	<ul style="list-style-type: none"> <li>• LCR2: New or replacement community facilities</li> </ul>
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<b>Transport Policy Summary</b>	
<b>Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA</b>	
<b>Policy</b>	<b>Details of relevance to the plans and SA</b>
<b>Key International Policy</b>	
<ul style="list-style-type: none"> <li>• EU Manual on Strategic Environmental Assessment of Transport Infrastructure Plans</li> </ul>	<ul style="list-style-type: none"> <li>• This document presents guidance on how to carry out strategic environmental assessment (SEA) for transport plans and programmes in England in accordance with the requirements of European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, also known as the SEA Directive.</li> </ul>
<b>Key National / Regional Policy</b>	
<ul style="list-style-type: none"> <li>• National Planning Policy Framework (2019)</li> <li>• Transport White Paper the Future of Transport A Network for 2030 DfT 2004</li> <li>• DfT Single Departmental Plan 2019</li> <li>• Transport Investment Strategy 2017 <a href="https://www.gov.uk/government/publications/transport-investment-strategy">https://www.gov.uk/government/publications/transport-investment-strategy</a></li> <li>• Transport Decarbonisation Plan <a href="https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan">https://www.gov.uk/government/publications/creating-the-transport-decarbonisation-plan</a></li> <li>• West of England Joint Transport Study <a href="https://www.jointplanningwofe.org.uk/gf2.tj/-/756738/23252773.1/PDF/-/West_of_England_Joint_Transport_Study_Transport_Vision_Summary_Document.pdf">https://www.jointplanningwofe.org.uk/gf2.tj/-/756738/23252773.1/PDF/-/West_of_England_Joint_Transport_Study_Transport_Vision_Summary_Document.pdf</a></li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.</li> <li>• The Transport Investment Strategy sets out the Department for Transport's priorities and approach for future transport investment decisions. The strategy is built round: • less congested , better connected transport network; • build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities; • enhance our global competitiveness by making Britain a more attractive place to trade and invest; • support the creation of new housing.</li> <li>• The Transport Decarbonation Plan will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.</li> </ul>

<ul style="list-style-type: none"> <li>• WECA Bus Strategy</li> <li>• Transport Act 2020</li> <li>• Local Transport Act 2008</li> <li>• Road Safety Act 2006</li> <li>• Road investment Strategy 2020-2025</li> <li>• Planning for the Future: A guide to working with Highways England on planning matters</li> <li>• Network Rail Delivery Plan 2019-2024</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Key Local Policy</b></li> </ul>	
<ul style="list-style-type: none"> <li>• B&amp;NES Joint Local Transport Plan 4 (2020)</li> <li>• Draft West of England Local Cycling and Walking Infrastructure Plan Feb/March 2020 consultation</li> <li>• Draft West of England Bus Strategy - Consultation Feb/March 2020</li> <li>• Local Cycling and Walking Infrastructure Plan</li> <li>• Key Route Network</li> <li>• Amendments to local plan policy ST1, ST2, ST2A, ST3, ST5, ST6, ST7 as part of LPPU</li> </ul>	<ul style="list-style-type: none"> <li>• The vision of the Joint Local Transport Plan (JLTP) 2011-2026 is of an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which we can achieve a more competitive economy and better connected, more active and healthy communities.</li> <li>• The Public Transport Strategy looks at the current and future role of public transport services and the infrastructure needed to support them.</li> <li>• The Cycling Strategy contains the vision of a safe and attractive road environment across the network for cycling, supplemented by quality off-road routes, will contribute to establishing a vibrant cycling culture throughout the area.</li> <li>• The Local Cycling and Walking Infrastructure Plan is a detailed plan that identifies investment needed . The aim is to provide high quality infrastructure to ensure the West of England is a region where cycling and walking are the preferred choice for shorter trips</li> <li>• The bus strategy considers options to improve the bus network and set out how further growth in bus usage can be encouraged</li> </ul>

### Waste Policy Summary

#### Review of Relevant Plans, Programmes and Strategies:

#### Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA

#### Policy

#### Details of relevance to the plans and SA

#### Key International Policy

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| <ul style="list-style-type: none"> <li>• Waste Framework Directive (2006/12/EC)</li> </ul> | <p>The European Landfill Directive requires the UK to reduce the quantity of biodegradable municipal waste that it sends to</p> |
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<ul style="list-style-type: none"> <li>• Waste Framework Directive (75/442/EEC)</li> <li>• Europe Landfill Directive (1999/31/EC)</li> <li>• Waste Electrical and Electronic Equipment Directive (WEEE) (2003/108/EC)</li> <li>• Waste Framework Directive 2008/98/EC</li> <li>• Implementing Regulation (EU) 2019/290</li> </ul>	<p>landfill to:</p> <ul style="list-style-type: none"> <li>▪ 75% of that produced in 1995 by 2010</li> <li>▪ 50% of that produced in 1995 by 2013</li> <li>▪ 35% of that produced in 1995 by 2020</li> </ul> <ul style="list-style-type: none"> <li>• Directives providing frameworks for managing wastes, including the Directive on Waste (“the Waste Framework Directive”), as amended (and includes the European Waste Catalogue), and the Directive on Hazardous Waste, as amended;</li> <li>• Directives on the treatment of wastes, including the Directive in Integrated Pollution Prevention and Control, the Directive on Landfill of Waste and the Directive on Incineration of Waste;</li> <li>• The EU Landfill Directive sets a target to reduce the proportion of biodegradable municipal waste landfilled by 75% by 2035 compared to 1995, in England a commitment is made to meeting this target through the Waste Management Plan for England, 2013.</li> </ul>
<p><b>Key National / Regional Policy</b></p>	
<ul style="list-style-type: none"> <li>• Waste Strategy for England 2013</li> <li>• Waste (England and Wales) Regulations (2011)</li> <li>• West of England Joint Residual Municipal Waste Management Strategy (2008) and wider review 2015/16</li> <li>• South West Regional Assembly From Rubbish to Resource: The Regional Waste Strategy for the South West 2004 – 2020</li> <li>• West of England Joint Waste Core Strategy Development Plan Document (2011)</li> <li>• Resources &amp; Waste Strategy for England, 2018 (Defra)</li> </ul>	<ul style="list-style-type: none"> <li>• The aim of the Waste Strategy for England is to break the link between economic growth and waste growth. Most products should be re-used or their materials recycled. Energy should be recovered from other wastes where possible. For a small amount of residual material, landfill will be necessary.</li> <li>• The Regional Waste Strategy for the South West sets out how we can deliver the ‘South West Vision for Waste: Minimum Waste, Maximum Benefit’. It 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.</li> <li>• Resources and Waste Strategy for England update December 2018</li> <li>•</li> </ul>
<p><b>Key Local Policy</b></p>	
<ul style="list-style-type: none"> <li>• Joint Waste Core Strategy Development Plan Document, adopted (2011)</li> <li>• B&amp;NES Waste Strategy Towards Zero Waste 2020 (2005) and review (2014)</li> </ul>	<ul style="list-style-type: none"> <li>• By 2026 the West of England will be resource efficient with waste generation minimised, in line with the waste hierarchy, and operating a waste management infrastructure, with sufficient capacity to deal with the amount of waste generated in the West of England. The needs of the West of England to enable sustainable economic growth will be met, whilst ensuring the protection of the natural, and historic environment which are its most distinctive and unique assets.</li> </ul>

Bath and North East Somerset Local Plan

Local Plan Partial Update

Appendix B: Baseline Data

Date: January 2023

B&NES District - Baseline data				
SA topic	Data and quantified information	Comparators or targets	Trend and notes	Reference
<b>Objective 1: Improve the health and well-being of all communities</b>	<ul style="list-style-type: none"> <li>Life expectancy at birth in B&amp;NES is 80.7 years for males and 85 years for females (2016-2018)</li> <li>For males, this was higher than the South West (80.2 years) and England (79.6 years) averages</li> <li>For females, this was higher than the South West (83.8 years) and England (83.2) averages</li> <li>Life expectancy is 9.2 years lower for men and 5.2 years lower for women in the most deprived areas of Bath and North East Somerset than in the least deprived areas??</li> <li>In Reception aged children (4 to 5 years old) in B&amp;NES's schools 21.4% are an unhealthy weight, i.e. either overweight or very overweight/obese. 8.3% of Reception aged children in B&amp;NES are very overweight/obese.</li> <li>In Year 6 aged children (10 to 11 years old) in B&amp;NES's schools, 25.6% are an unhealthy weight, i.e. either overweight or very overweight/obese. 13.5% of Year 6 aged children in B&amp;NES are very overweight/obese., These levels are better than the average for England</li> <li>Levels of teenage pregnancy, GCSE attainment, breastfeeding and smoking at time of delivery are better than the England average</li> <li>In 2015, the health of people in Bath and North East Somerset is generally better than the England average</li> <li>Deprivation is lower than average however in 2019, 5 areas were within the most deprived 20% of the country (Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West), and</li> </ul>	<ul style="list-style-type: none"> <li>Life expectancy has increased by about 2.0 and 2.6 years for women and men respectively since 2001</li> <li>Levels of regular participation in sport has fallen for 2 years in a row</li> </ul>	<ul style="list-style-type: none"> <li>On the whole, life expectancy is increasing; for women and for most men</li> <li>The life expectancy of men in our 'most deprived' communities isn't improving</li> </ul>	<ul style="list-style-type: none"> <li>Public Health England (2019) (<a href="#">link</a>)</li> <li>Bath and North East Somerset Council (2019) Inequality (<a href="#">link</a>)</li> <li>Public Health England 2020 Life Expectancy 2016-2018 <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></li> <li>Public Health England (2015) Segmenting Life Expectancy Gaps by Cause of Death Census (2011)</li> <li>Office of National Statistics, Crown Copyright (2012) 2011 Census data</li> <li>Office of National Statistics, Crown Copyright (2012) In house analysis of 2011 Census data</li> <li>Sport England Active People Survey (2016)</li> <li><a href="http://www.sportengland.org/research/whoplays-sport/">http://www.sportengland.org/research/whoplays-sport/</a></li> <li>Climate just <a href="https://www.climatejust.org.uk/">https://www.climatejust.org.uk/</a></li> <li>WENP Access to Green Space <a href="https://www.wenp.org.uk/green-space/">https://www.wenp.org.uk/green-space/</a></li> </ul>

	<ul style="list-style-type: none"> <li>• 12.0% of children were living in poverty in 2017/18</li> <li>• The aging population will impact upon future healthcare provision</li> <li>• In 2011 five wards in the Bath Area had a higher proportion of the population with a limiting long-term illness than the B&amp;NES (16.08%) and England &amp; Wales averages (17.92%):             <ul style="list-style-type: none"> <li>▪ Twerton (20.92%)</li> <li>▪ Weston (18.97%)</li> <li>▪ Abbey (18.80%)</li> <li>▪ Southdown (18.39%)</li> <li>▪ Combe Down (18.32%)</li> </ul> </li> <li>• There are 24 GP practices surgeries across the area and a medical centre at the University of Bath</li> <li>• In 2014/2015, 41.9% of adults (16+) participated in sport at least once per week in B&amp;NES. In 2013/2014, the figure was 44.9%, for 2012/2013 it was 45.9% and for 2011/2012, it was 42.2%</li> <li>• Safe places to play are a key identified issue for young people in the area</li> <li>• Urban populations at risk from heat and flooding. Those most at risk are deprived communities as less able to respond.</li> <li>• Access to green space and natural green space key to health of communities for mental and physical well being. There are significant number of areas where people do not have green space in 300m walking distance</li> </ul>			
<p><b>Objective 2: Meet identified needs for sufficient, high quality housing including</b></p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The majority of the Bath Area wards have a higher proportion of privately rented homes than</li> </ul>	<ul style="list-style-type: none"> <li>• In 2016 the ratio of house prices to average earnings was 11 in B&amp;NES, higher than the ratio for</li> </ul>	<ul style="list-style-type: none"> <li>• There are 21,000 new households formed in 2015/16 however less than 19,000 homes were built in the south west in</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES HEELA (2017)</li> <li>• House Price Ratio (<a href="#">link</a>)</li> <li>• Home Truths January 2020) Annual Monitoring Report (2016)</li> <li>• Homelessness Strategy (2014-2018)</li> </ul>



<p><b>affordable housing</b></p>	<p>the B&amp;NES and England &amp; Wales averages</p> <ul style="list-style-type: none"> <li>• Twerton ward has by far the highest percentage of households living in socially rented homes in the Bath Area</li> <li>• House prices in rural areas are roughly £6,500 higher than in urban areas. At the same time, incomes in these areas are lower</li> <li>• House prices in Keynsham are slightly above average for B&amp;NES</li> <li>• Intermediate options (such as shared ownership) and private renting are more affordable in Midsomer Norton than the rest of Bath &amp; North East Somerset</li> <li>• Nearly half the overall need for affordable housing in B&amp;NES is concentrated in Bath City</li> <li>• Of the households in need in Keynsham, newly forming households unable to afford to buy are the dominant group</li> <li>• Intermediate options (such as shared ownership) and private renting are more affordable in Midsomer Norton than the rest of Bath &amp; North East Somerset</li> <li>• Within the general residential housing stock, 41.7% of properties have an EPC rating of C or above. HMO stock have a considerably lower percentage of C or above ratings, at 18.4%.</li> </ul>	<p>England (10.2)</p> <ul style="list-style-type: none"> <li>• In March 2019 the average house price in Bath and North East Somerset was £337,606</li> </ul>	<p>2015</p> <ul style="list-style-type: none"> <li>• In 2018/19 there were 1040 housing completion (762 market housing 278 affordable housing)</li> <li>• 2011-2019 there were 6165 net completions, which 4665 were market homes and 1500 were affordable houses</li> <li>• In terms of house price There is an increase of over £5651 for October 2018 and an increase of approximately £106944 since October 2011</li> <li>• April 2009 marked the low point on the housing market slump, where average prices for B&amp;NES stood at £199,681, almost £142562 lower than the average for October 2018</li> </ul>	<ul style="list-style-type: none"> <li>• Homelessness Strategy Evidence Review (2014-2018)</li> <li>• Tenancy Strategy (2012-2017)</li> <li>• Office of National Statistics, Crown Copyright (2012) In house analysis of 2011 Census data West of England Local Enterprise Partnership</li> <li>• Land registry UK House Price Index accessed September 2019</li> </ul>
<p><b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of</b></p>	<ul style="list-style-type: none"> <li>• The formal provision of green space is above the draft standard in the green space strategy of 1.5 ha per 1000</li> <li>• There are 59.36 crimes per 1,000 population which is lower than Bristol, North Somerset and South Gloucestershire</li> <li>• In rural areas the level of service deprivation is naturally high due to geographical distance to</li> </ul>	<ul style="list-style-type: none"> <li>• Crime level in B&amp;NES is increasing which is in-line with the Avon and Somerset Police Force Area</li> <li>• In 2015, there were five areas within the most deprived 20% of</li> </ul>	<ul style="list-style-type: none"> <li>• The 2011 census estimated that there were 176,015 people living in B&amp;NES, an increase of 8% since 1981 and 4% since 2001. The population in 2018 is 192,106. This is a 9%</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES Green Space Strategy 2015</li> <li>• 2011 census</li> <li>• Indices of Multiple Deprivation 2019</li> <li>• Avon and Somerset Police Assessments (2017)</li> <li>• Bath Confecting Communities data (2015/16)</li> <li>• Data.police.uk (2015) In house</li> </ul>

<p><b>crime</b></p>	<p>certain services and facilities</p> <ul style="list-style-type: none"> <li>• In 2019, 5 areas are within the most deprived 20% of the country (Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West)</li> <li>• Royal Victoria Park, Sydney Gardens, Henrietta Park, Alexandra Park and Parade Gardens are all near to the Central Zone</li> <li>• The highest proportions of children aged 0-15 years are in the wards of Twerton and Combe Down</li> <li>• Bathwick is the only ward with a higher proportion of black and minority ethnic people than the England &amp; Wales average</li> <li>• In 2011 five wards in the Bath Area had a higher proportion of the population with a limiting long-term illness than the B&amp;NES (16.08%) and England &amp; Wales averages (17.92%):             <ul style="list-style-type: none"> <li>▪ Twerton (20.92%)</li> <li>▪ Weston (18.97%)</li> <li>▪ Abbey (18.80%)</li> <li>▪ Southdown (18.39%)</li> <li>▪ Combe Down (18.32%)</li> </ul> </li> <li>• The highest rates of recorded anti-social behavior and public order offences in the Bath Area in 2014 were also in Abbey (119.52 per 1,000) and Kingsmead (102.73 per 1,000)</li> <li>• There is currently an ‘under supply’ of allotments, amenity green space, parks and recreational spaces and youth play spaces in Keynsham</li> <li>• Keynsham Central West and Keynsham Wellsway are the most deprived wards in Keynsham but these are not deprived compared to the country as a whole. They are counted as average in terms of deprivation</li> <li>• Keynsham Memorial Park which is adjacent to</li> </ul>	<p>the country which is the same as 2010:</p> <ul style="list-style-type: none"> <li>▪ Twerton West</li> <li>▪ Whiteway</li> <li>▪ Twerton</li> <li>▪ Fox Hill North</li> <li>▪ Whiteway West</li> </ul>	<p>increase on the 2011 census population. The structure in 2011 Census reflects the notable proportion of residents in the 15-19 and 20-24 age ranges. Since the 2001 census, the greatest increases have been observed in the 15-24 populations, aligned with an increase in university intake. In addition there have been features of an aging population, with increases in the 40-49, 60-69 and 80+ age ranges matched by a reduction in the 30-39 age ranges. Looking at the most elderly age range (85+), there has been a 23% increase in residents since 2001 (900)</p> <ul style="list-style-type: none"> <li>• Based on the Green Space Strategy 2015 audits per 1000 population all Bath has 0.83ha parks and recreation grounds and 0.11ha sports pitches Somer Valley has 0.55ha parks and recreation grounds and 0.17ha playing pitches</li> </ul>	<p>analysis of Avon and Somerset Constabulary recorded crimes in Bath and North East Somerset for January 2014 – December 2014, <a href="http://data.police.uk/data/">http://data.police.uk/data/</a> (04/03/2015 downloaded)</p> <ul style="list-style-type: none"> <li>• <a href="https://www.nhs.uk/Services/Trusts/GPs/DefaultView.aspx?id=89650">https://www.nhs.uk/Services/Trusts/GPs/DefaultView.aspx?id=89650</a> (viewed 20/01/2020) Royal United Hospitals Bath NHS Foundation Trust (2015) Introducing the RUH, <a href="http://www.ruh.nhs.uk/about/index.asp?menu_id=1">http://www.ruh.nhs.uk/about/index.asp?menu_id=1</a> (viewed 20/01/2020) Bath and North East Somerset Retail Study 2018</li> </ul>
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	<p>the strategic site boundary, received green flag status in 2008</p> <ul style="list-style-type: none"> <li>• This is complemented by Kelston Park and the Manor Road playing field. There is a deficit in sports pitch provision</li> <li>• Silver Street Local Nature Reserv, Midsomer Norton received a Green Flag Community Award in 2019</li> </ul>		<p>Keynsham has 0.78ha parks and recreation grounds and 0.27ha playing pitches .These rates are below the standards required .</p> <ul style="list-style-type: none"> <li>• The area of allotments per 1000 population is greatest in Bath at 0.21 ha</li> <li>• Somer Valley has0.15ha/1000 pop and Keynsham at 0.14 ha. However there is a deficit in allotment space for Bath, Keynsham and Somer Valley in comparison with the standards.</li> <li>• Keynsham, Somer Valley and Bath all have sufficient accessible natural green space provision, when compared to the standard in the Green Space strategy</li> <li>• A lot of industrial land has been lost at Bath Western Riverside as development for housing goes ahead.</li> <li>• Bath has improved its retail ranking since 2011 when it was 22<sup>nd</sup> in rank. In 2014 and 2017 it has remained as the 19th highest placed centre in</li> </ul>	
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<p><b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b></p>	<ul style="list-style-type: none"> <li>• B&amp;NES experiences relatively high levels of economic inactivity at 17.5% which is lower than the national average (21.1%) and the South West total of 18%</li> <li>• As of 2018, 39.1% of employee jobs in B&amp;NES were part-time compared to 36.3% regionally and 32.4% nationally</li> <li>• The proportion of economically active persons who are self-employed was 11.6% from Oct 2018 to September 2019</li> <li>• Of the 143,881sqft of available office space in the Bath central area only 30% is classified as grade A and only 10% of the total 1,095,966sqft of office stock is considered to be of a similar</li> <li>• Keynsham and the Somer Valley area provide two-thirds of the employment outside of Bath</li> <li>• This situation has been exacerbated by major factory closures including Cadbury in Keynsham</li> <li>• Keynsham has been particularly affected by the closure of Cadbury which has seen the town's relatively small employment base reduce by 11%</li> <li>• A farmers market is held in Bath every Saturday at Green Park Station</li> <li>• Bath has a strong local further and higher education sector, as well as excellent local training providers.</li> <li>• Employment in Bath is dominated by the public sector</li> <li>• Retail and tourism are also key employment sectors in Bath resulting in many low skilled and / or low wage jobs</li> <li>• There has been a net loss of office and industrial space in Bath. This is against target for an increase office space</li> <li>• Keynsham has a limited employment base of about 3,500 full time equivalent jobs (2008) which is dominated by distribution (a reflection of</li> </ul>	<ul style="list-style-type: none"> <li>• ??</li> <li>• To deliver sustainable growth Keynsham needs to create an additional 1,500 jobs</li> <li>• In 2004 53.5% of visitors came to Keynsham to shop</li> <li>• In 2004 a small % (0.4) did come to sight</li> <li>• To deliver sustainable growth Midsomer Norton needs to create an additional 1,000 jobs</li> <li>• Office development: The target for Norton Radstock is a 2,000 sq.m increase in office space between 2001-2011</li> </ul>	<p>the country;</p> <ul style="list-style-type: none"> <li>• There is still a need to diversify the employment base in the District as a whole but in Midsomer Norton and Radstock especially</li> </ul> <p>Office development: New floor completed:</p> <ul style="list-style-type: none"> <li>▪ 2018/19 605 m2</li> </ul> <p>Office floor losses</p> <ul style="list-style-type: none"> <li>▪ 2018/19 8650m2</li> </ul> <p>Total gains permitted 24,239 m2 Total losses permitted -30858 m2</p> <p>Industrial development: New floor completed</p> <ul style="list-style-type: none"> <li>▪ 2018/19 1084</li> </ul> <p>Office floor losses</p> <ul style="list-style-type: none"> <li>▪ 2018/19 4177</li> </ul> <p>Total gains permitted 8324 m2 Total losses permitted 95729m2</p> <ul style="list-style-type: none"> <li>• There is no surplus quantitative capacity for convenience or comparison floorspace in Keynsham</li> <li>• In 2010 a Tesco supermarket opened at</li> </ul>	<ul style="list-style-type: none"> <li>• NOMIS, 2018-2019</li> <li>• Home Truths 2016/17: South West (2016)</li> <li>• B&amp;NES Economic Strategy Review 2014-2030</li> <li>• Cultural and Creative Strategy 2015-2020</li> <li>• West of England Local Enterprise Partnership (2015)</li> <li>• 2011 Economic Regeneration Delivery Plan for Bath 2011 census data</li> <li>• LDF</li> <li>• B&amp;NES City and Town Centres Health Check Study revised November 2018</li> <li>• B&amp;NEs Employment Growth –Historic and projection by LSH</li> <li>• B&amp;NES Retail Study 2018 by GVA</li> <li>• B&amp;NES Visitor Accommodation Study Update 2018</li> <li>• B&amp;NES Retail Study Update 2021 by Avison Young</li> </ul>
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	<p>good transport links), public administration and business services. The Cadbury factory accounted for 10% of local employment.</p> <ul style="list-style-type: none"> <li>• Keynsham is ideally located to play a significant role in supporting sustainable economic growth across the District</li> <li>• Keynsham suffers from a lack of available modern business space, the High Street has seen little regeneration over the past decade and it has recently seen the closure of the Cadbury Somerdale site</li> <li>• Keynsham has a population of over 16,000, making it one of the largest urban areas in the district</li> </ul>		<p>Charlton Road on land allocated for such a use in the Local Plan. The netsales area is 1,882m<sup>2</sup> of which 1,600m<sup>2</sup> is for convenience goods. The store is estimated to turnover at £20.5m a year</p>	
<p><b>Objective 5: Ensure everyone has access to high quality and affordable public Transport, cycling and walking infrastructure</b></p>	<ul style="list-style-type: none"> <li>• The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City. Congestion and journey time delays affect rural communities as well as urban areas</li> <li>• The majority of the Bath Package has been completed, including three Park &amp; Ride expansions</li> <li>• There is no direct link to the motorway network in B&amp;NES and Bath suffers particularly from the sub-region's poor internal transport links</li> <li>• The majority of the wards in the Bath Area have a higher proportion of households with no vehicles than the B&amp;NES and England &amp; Wales averages</li> <li>• Bath is served by the following First Bus bus services</li> <li>• City Centre /Bus Station to: 1 Southdown</li> </ul>	<p>MetroWest will deliver improvements on the Bath rail corridor in order to achieve a half-hourly service at Keynsham and Oldfield Park, and linking the Severn Beach line with Bath, via Bristol. This is expected to be delivered by 2021</p> <p>Keynsham High Street - A major project seeks to deliver public realm improvements and enhance the accessibility of Keynsham High Street by alternative modes, in order to revitalise the town centre. Significant investment from West of</p>	<ul style="list-style-type: none"> <li>• On average nearly 50,000 cars enter Bath every day and the Government expects this to increase by 15% over the next 10 years</li> <li>• 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)</li> <li>• Bus use and park and ride use is up in Bath in recent</li> </ul>	<ul style="list-style-type: none"> <li>• Getting Around Bath Transport Strategy</li> <li>• West of England Joint Local Transport Plan 4 2020 to 2036</li> <li>• Bath and North East Somerset Council (2013) JSNA - Socio-Economic Inequality: Presentation to Wellbeing Policy Development &amp; Scrutiny Panel <a href="http://www.bathnes.gov.uk/sites/default/files/socio-economic_inequality_presentation_jan_2013.pdf">http://www.bathnes.gov.uk/sites/default/files/socio-economic_inequality_presentation_jan_2013.pdf</a></li> </ul> <p>Interactive map of bus routes <a href="https://journeyplanner.travelwest.info/routes/region/1">https://journeyplanner.travelwest.info/routes/region/1</a></p>

	<p>2 Mulberry Park                  3,3A Bathford/Elmhurst                  3 Foxhill                  3A Weston via RUH                  4 Weston via RUH                  4 Odd Down                  5 Whiteway                  6,6A Fairfield Park                  6A Larkhall                  7 Larkhall                  8 Kingsway                  9 Upper Weston                  11 Bathampton                  12 Haycombe                  18,19 Cribbs Causeway                  20 University of Bath                  20 Twerton                  37 Bristol via Hanham                  39 Bristol via Keynsham                  X39 Bristol (Direct)                  172 Paulton                  173,174 Wells                  D1 Salisbury                  D2 Frome                  D3 Melksham and Urchfont                  U1 Oldfield Park                  U1 University of Bath                  U5 Bath Spa University                  21 Newbridge Park &amp; Ride                  31 Lansdown Park &amp; Ride                      41 Odd Down Park &amp; Ride</p> <ul style="list-style-type: none"> <li>• Although Keynsham has a railway station, during the day fast services to Bristol and Bath do not stop and the links from the railway station to the High Street are poor</li> </ul>	<p>England Combined Authority has been allocated to the project.</p>	<p>years</p> <ul style="list-style-type: none"> <li>• There has been sustained growth in cycling in the West of England area (which includes B&amp;NES) in 2011/12 as Cycling City measures kick in Cycling in on track compared to target</li> <li>• In 2009/10 the number of bus users unfortunately fell, a reflection of continuing national economic difficulties but 2010/11 saw a welcome recovery and this continued in 2011/12 with patronage slightly above the target figure for that year</li> <li>• There has been a 2 to 3% fall in traffic across most inter-urban key corridors</li> <li>• Congestion will cost the West of England economy £600m 2016.</li> <li>• Since 2000, traffic levels have fallen on the Bath road network inner cordon and remained fairly constant on the outer cordon</li> <li>• In the last two years there has been a 10% fall in traffic on some routes in Bath, which the council believes is a result of recessionary effects</li> </ul>	
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	<ul style="list-style-type: none"> <li>• There is a high level of car ownership in Keynsham for an urban area with good bus links and a mainline rail service</li> <li>• More than 60% of people in Keynsham commute elsewhere to work</li> <li>• The A4 through Keynsham is subject to high levels of congestion.</li> <li>• Many road junctions are of poor quality including the junction of High Street and Bath Hill and the junction of Temple Street and Rock Road</li> <li>• Only 2% of residents travel to work by train</li> <li>• Keynsham is served by the following bus services:             <ul style="list-style-type: none"> <li>▪ 42 Keynsham – Bristol</li> <li>▪ 134 Knowle (Broad Walk) to Kingswood (John Cabot Academy)</li> <li>▪ 178 (678) Bath - Midsomer Norton – Bristol</li> <li>▪ 318 Keynsham - Cribbs Causeway</li> <li>▪ 337 Bath - Keynsham (Park Estate)</li> <li>▪ 338 Bath – Bristol</li> <li>▪ 339 Bath – Bristol</li> <li>▪ 349 Bristol - Keynsham (Park Estate)</li> <li>▪ 442 Bristol (St Phillips) to Newbridge (Oldfield School)</li> <li>▪ 507 Keynsham to Bristol (Southmead Hospital)</li> <li>▪ 533 Keynsham Mangotsfield</li> <li>▪ 636 Keynsham – Whitchurch</li> <li>▪ 640 Bishop Sutton to Keynsham</li> <li>▪ <b>665</b> Keynsham &amp; Saltford Local Service</li> <li>▪ <b>668</b> Midsomer Norton to Bristol</li> <li>▪ <b>678</b> Bristol to Writhlington</li> <li>▪ <b>683</b> Keynsham to Wells</li> <li>▪ <b>684</b> Keynsham - Wick</li> <li>▪ <b>A14</b> Keynsham to Longwell Green (Asda)</li> </ul> </li> </ul>			
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	<ul style="list-style-type: none"> <li>▪ <b>T3</b> Keynsham to Brislington (Tesco)</li> <li>• Midsomer Norton and Radstock are served by the following bus services:             <ul style="list-style-type: none"> <li>▪ 173 Bath – Wells</li> <li>▪ 184 Bath – Frome</li> <li>▪ 178 (678) Bath - Midsomer Norton – Bristol</li> <li>▪ 179 Bath - Midsomer Norton</li> <li>▪ 185 Paulton - Trowbridge</li> <li>▪ 379 Radstock - Bristol</li> <li>▪ 414 Midsomer Norton - Frome</li> <li>▪ 424 Midsomer Norton – Frome</li> <li>▪ 668 Midsomer Norton - Bristol</li> <li>▪ 678 Bristol – Writhlington</li> <li>▪ 754 Bishop Sutton - Radstock</li> <li>▪ 757 Bath (Odd Down) - Midsomer Norton (Tesco)</li> <li>▪ 768 Hinton Blewitt – Bath</li> <li>▪ 776 Radstock - Shepton Mallet</li> <li>▪ 777 Radstock - Midsomer Norton (Tesco)</li> <li>▪ 782 Paulton –Tynning</li> <li>▪ 789 Blagdon to Radstock</li> <li>▪ 791 Bath to Midsomer Norton</li> </ul> </li> <li>• There is a feeling of vehicles dominating in the</li> <li>• Midsomer Norton High Street. The priority is to address specific traffic pressure points, such as the Excelsior Terrace junction and the island junction</li> <li>• High levels of out-commuting from Midsomer Norton             <ul style="list-style-type: none"> <li>▪ and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic</li> <li>▪ Radstock centre experiences traffic</li> </ul> </li> </ul>			
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<p><b>Objective 6: Protect and enhance local environmental distinctiveness</b></p>	<p style="text-align: center;">congestion</p> <ul style="list-style-type: none"> <li>• There are 2 Areas of Outstanding Natural Beauty in the District - Mendip Hills and Cotswolds AONBs</li> <li>• The district has a varied landscape represented by 18 Landscape Character Areas (LCA)</li> <li>• 61% of B&amp;NES is Green Belt</li> <li>• Bath has a distinctive townscape in the way that buildings respond to the distinct topography</li> <li>• Bath was designated as a World Heritage site in 1987</li> <li>• There are 11 Historic Parks and Gardens in Bath</li> <li>• 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</li> <li>• The High Street is of mixed townscape quality</li> <li>• There is high quality development in some areas such as the Church and the Manor House. However, the core of the High Street is of low quality</li> <li>• Keynsham is in the Avon Valley Landscape Character Area</li> <li>• The landscape consists primarily of the meandering River Avon and its wide valley with a generally flat or gently sloping valley floor</li> <li>• Two significant waterways: the River Avon and the Kennet and Avon Canal, along with Chew Valley and Blagdon Lakes are important landscape features and resources for recreational uses</li> <li>• The Chew Valley Lake is an important landscape feature and wildlife habitat within the Mendip Hills AONB</li> </ul>		<ul style="list-style-type: none"> <li>• 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 from increasing traffic and development, for example</li> </ul>	<ul style="list-style-type: none"> <li>• Mendip Hills AONB Management Plan 2019 2024</li> <li>• Cotswolds AONB Management Plan 2013-2018- 2023</li> <li>• Landscapes for life.org.uk (accessed 2016/2017)</li> <li>• World Heritage Setting website (2017)</li> <li>• Bathscape website (2017)</li> <li>• B&amp;NES Planning and Conservation Team (2017)</li> <li>• B&amp;NES Keynsham Conservation Area Appraisal and Management Plan (2016)</li> <li>• Rural Landscapes of Bath and North East Somerset-A Landscape Character Assessment SPD 2003</li> <li>• B&amp;NES Green Infrastructure Strategy</li> </ul>
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	<ul style="list-style-type: none"> <li>• The Midsomer Norton and Welton Conservation Area is currently on the Heritage at Risk Register</li> <li>• The Radstock (including Braysdown and Clandown) Conservation Area is also currently on the Heritage</li> </ul>			
<p><b>Objective 7: Protect and enhance the district's historic, environmental and cultural assets and their settings</b></p>	<ul style="list-style-type: none"> <li>• Bath was designated as a World Heritage site in 1987</li> <li>• There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&amp;NES (of which 5,000 lie within the City of Bath)</li> <li>• There are 3 conservation areas, 8 Scheduled Monuments, grade I / II* listed buildings entries on the national heritage at risk at Risk Register.register</li> <li>• The area which was formerly part of the Somerset coalfield retains a rich industrial heritage</li> <li>• 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</li> <li>• There is one conservation area in Keynsham after the Dapps Hill conservation area and Keynsham Town Conservation Area which was redrawn in 2016</li> <li>• Significant history and nationally important nearby Roman settlement of Traiectus</li> <li>• Considerable archaeological potential within the town and on the former Abbey lands</li> <li>• The town centre of Keynsham has many historic buildings but many of the old shops were replaced with modern units in the 1960s and</li> </ul>		<ul style="list-style-type: none"> <li>• The Historic England heritage at risk register includes 3 buildings of Grade I and II*. Bath and North East Somerset currently has just over 100 listed buildings at risk.</li> <li>• Since 2013, seven conservation areas have been removed from the register</li> <li>• The two Keynsham Conservation Areas were merged in 2016 to form a new larger conservation area called the 'Keynsham Conservation'</li> </ul>	<ul style="list-style-type: none"> <li>• Historic England - Heritage at Risk Register</li> <li>• B&amp;NES website (accessed 12.2010)</li> <li>• World Heritage Setting</li> <li>• B&amp;NES Core Strategy (2011-2029)</li> <li>• B&amp;NES Placemaking Plan (2011-2029)</li> <li>• B&amp;NES Keynsham Conservation Area Appraisal and Management Plan (2016)</li> <li>• Historic England (2017)</li> <li>• B&amp;NES Core Strategy (2011-2029)</li> <li>• B&amp;NES Placemaking Plan (2011-2029)</li> </ul>

	<p>1970s and the High Street lacks vibrancy and coherence</p> <ul style="list-style-type: none"> <li>• High quality buildings are concentrated in the Church Street area</li> <li>• High rise council offices and the surrounding precinct are incongruous with the character and appearance of the town</li> </ul>			
<p><b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<ul style="list-style-type: none"> <li>• There are no SSSIs in the Bath central zone but it is important to recognise that the River Avon has recently been confirmed as functional supporting habitat for the Bath and Bradford on Avon Bats SAC, meaning it benefits from the same level of legislative protection.</li> <li>• Brown's Folly is a SSSI and part of the SAC</li> <li>• Combe Down &amp; Bathampton Down Mines SSSI and Bath and Bradford upon Avon Bats SAC is about 3km from the central zone and about 6km from the Lower Bristol Road</li> <li>• The River Avon has recently been confirmed as functional supporting habitat for the Bath and Bradford on Avon Bats SAC, meaning it benefits from the same level of legislative protection.</li> <li>• This SSSI is in favourable condition.</li> <li>• Kensington Meadows Local Nature Reserve is 1.5 km from the Central Zone</li> <li>• North Road Quarry Geological SSSI is near to the Central Zone</li> <li>• Newton St Loe SSSI is just to the west of the Lower Bristol Road</li> <li>• Carrs Woodland Local Nature Reserve is to the immediate west of the Lower Bristol Road</li> <li>• Twerton Roundhill Local Nature Reserve is about 1km to the south of Lower Bristol Road</li> <li>• The rural areas includes the Chew Valley Lake</li> </ul>	<ul style="list-style-type: none"> <li>• The suggestion is that winters will become wetter over the whole of the UK, by as much as 20% in the 2050's</li> <li>• A shift in the seasonal pattern of rainfall is also expected, with summer and autumn becoming much drier than at present</li> <li>• The Regional Strategy for the South West Environment: sets the target to bring into favourable condition by 2010 95% of all nationally important wildlife sites</li> <li>• 'Change' is considered in terms of the impact of completed development, management programmes and planning agreements</li> <li>• Measurement includes additions and</li> </ul>	<ul style="list-style-type: none"> <li>• 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 from increasing traffic and development</li> </ul> <p>The latest bat monitoring study 2016  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/river_avon_bath_bat_monitoring_final_report_v0.14_cnj_krah_to_publish.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Environment/river_avon_bath_bat_monitoring_final_report_v0.14_cnj_krah_to_publish.pdf</a></p>	<ul style="list-style-type: none"> <li>• B&amp;NES Landscape Character Assessment (2003)</li> <li>• B&amp;NES Biodiversity and Geological Conservation Assessment website (assessed 02.01.17)</li> <li>• B&amp;NES BAP 2017</li> <li>• B&amp;NES Ecology Team (2017)</li> </ul>

	<p>which is a RAMSAR site and a Special Protection Area</p> <ul style="list-style-type: none"> <li>• Blagdon Lake is a SSSI</li> <li>• Approximately 30% of the area is covered the Forest of Avon</li> <li>• There are 11 geological sites of national importance</li> <li>• There are 11 Sites of Special Scientific Interest</li> </ul>	<p>subtractions to biodiversity priority habitats (hectares)</p>		
<p><b>Objective 9: Reduce land, water, air, light, noise pollution</b></p>	<ul style="list-style-type: none"> <li>• Monitoring results of NO<sub>2</sub> in 2015 were on average slightly lower than in 2014</li> <li>• There are five AQMAs identified in the district, all related to exceedance of NO<sub>2</sub>. There are in Bath, Keynsham, Salford, Temple Cloud and Farrington Gurney.</li> <li>• 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</li> <li>• 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 Council is introducing the Clean Air Zone in Bath late 2020.</li> <li>• Hot springs have been, and continue to be, at the centre of economic, social and cultural developments in the City. As such, their protection is of paramount importance locally and nationally</li> </ul>	<ul style="list-style-type: none"> <li>• The air quality objective for Nitrogen dioxide (NO<sub>2</sub>) are: (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</li> </ul>	<ul style="list-style-type: none"> <li>• The area's most at risk of flooding have not changed</li> <li>• Bath &amp; North East Somerset Council has made a commitment to providing the leadership to help our communities to reduce carbon emissions across the area by 45% by 2026, in line with the national targets</li> <li>• Air quality in the Bath AQMA improved during 2011 compared to the previous year</li> <li>• The average level of nitrogen dioxide fell from 50 to 45 µg/ but levels still remain above the 'objective' of 40 µg/m<sup>3</sup> set in the National Air Quality Strategy</li> <li>• Coal measures are present within B&amp;NES, There are approximately 570 mine entries</li> </ul>	<ul style="list-style-type: none"> <li>• Bath and North East Somerset Strategic Flood Risk Assessment (SFRA)</li> <li>• B&amp;NES the Environmental Sustainability &amp; Climate Change Strategy (2016- 2020)</li> <li>• Bath and North East Somerset Strategic Flood Risk Assessment (SFRA)</li> <li>• B&amp;NES the Environmental Sustainability &amp; Climate Change Strategy (2016- 2020)</li> <li>• B&amp;NES GI Strategy 2013 currently being revised</li> <li>• BACP Action Plan 2016</li> </ul>

<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<ul style="list-style-type: none"> <li>• In the Bath &amp; 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</li> <li>• There is thought to be 4,078 properties within B&amp;NES at risk of surface water flooding</li> <li>• Large proportions of the Bath Central Zone and the Lower Bristol Road are in Flood Zone 3a and 3b (the highest risk)</li> <li>• The areas prone to flooding tend to follow the main rivers.</li> <li>• The areas most at risk of flooding are:             <ul style="list-style-type: none"> <li>▪ Bath -at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs)</li> <li>▪ Keynsham -at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial source</li> <li>▪ Midsomer Norton/Radstock -at risk of flooding from rivers, surface water and sewers. Note: Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event</li> <li>▪ Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources</li> <li>▪ Global temperatures will rise between 1.4 – 5.5°C over the 21st Century</li> </ul> </li> <li>• MSN: A level 2 SFRA has been undertaken. This has shown that the town centre is in Flood Zone 1</li> <li>• Small areas are at higher risk of flooding. Midsomer</li> </ul>	<ul style="list-style-type: none"> <li>• The area's most at risk of flooding have not changed</li> <li>• Bath &amp; North East Somerset Council has made a commitment to             <ul style="list-style-type: none"> <li>• providing the leadership to help our communities to reduce carbon emissions across the area by 45% by 2026, in line with the national targets</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• By 2050 average annual temperatures will increase by over 2%, summer rainfall will decrease by 20% and winter rainfall will increase by 17%</li> <li>• There is thought to be 4,078 properties within B&amp;NES at risk of surface water flooding</li> <li>• High summer temperatures are becoming more frequent, and very cold winters are becoming increasingly rare</li> <li>• Winters are becoming wetter (a 5 - 20% increase is expected by the 2050s), whilst summers are becoming drier (10 - 40% decrease by the 2050s)</li> </ul>	<ul style="list-style-type: none"> <li>• Bath and North East Somerset Strategic Flood Risk Assessment (SFRA) B&amp;NES the Environmental Sustainability &amp; Climate Change Strategy (2016- 2020)</li> <li>• Bath and North East Somerset Strategic Flood Risk Assessment (SFRA) B&amp;NES the Environmental Sustainability &amp; Climate Change Strategy (2016- 2020) B&amp;NES Green Infrastructure Strategy 2013 –(2020 revised version to be available)</li> </ul> <p>Bristol Avon Catchment Partnership Action Plan</p>
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	<ul style="list-style-type: none"> <li>• Norton benefits from a flood alleviation scheme during a 1% AEP river flood event</li> <li>• Radstock: A level 2 SFRA has been undertaken</li> <li>• This has shown that some of the central parts of the town centre are in Flood Zone 2 and 3a</li> </ul>			
<p><b>Objective 11</b>  <b>Reduce negative contributions to and increase resilience to climate change</b></p>	<ul style="list-style-type: none"> <li>• 17.3% of B&amp;NES households are living in fuel poverty; cold homes cost the local NHS an estimated £3.8m every year</li> <li>• Fuel poverty figures have risen as a result of rising fossil fuel prices</li> <li>• Climate change may reduce the need for winter heating, but will increase the need for summer cooling</li> <li>• The latest work on the Wessex Water, Water Resources Management Plan has not identified any areas of water supply demand deficit at this stage</li> <li>• The total amount of CO2 emissions in the district was 992 kilo-tonnes in 2010. Sources of greenhouse gas emissions in the district are (2010 data):             <ul style="list-style-type: none"> <li>▪ 34% industrial</li> <li>▪ 41% domestic</li> <li>▪ 24% transport</li> <li>▪ 1% other sources</li> </ul> </li> <li>• There is no record of any major renewable energy schemes undertaken in the District</li> <li>• A renewable energy research study has been undertaken</li> <li>• Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES potential for renewable energy generation by 2026:</li> <li>• 165MW of renewable heat</li> <li>• 110 megawatts (MW) of installed renewable electricity capacity</li> <li>• Since 2014 until 2016 there have been 102 homes in B&amp;NES retrofitted for energy efficient</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES is a high performing recycling authorities within the country, recycling 52.6% of household waste in 2015/16</li> <li>• Current district-wide direct emissions are: 766,876 tCO2e (tonnes of carbon equivalent) per year.</li> <li>• B&amp;NES district consumption emissions, based on an analysis of what local people spend on goods and services bought and used in the district are: 1,271,578 tCO2e (tonnes of carbon equivalent) per year.</li> <li>• 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,</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES Waste Strategy Review 2014</li> <li>• Waste Strategy, statistics and health and safety website (2016)</li> <li>• Record of waste recycled, reused, recovered or composted</li> <li>• TOWARDS ZERO WASTE 2020 - A Waste Strategy for Bath &amp; North East Somerset (2005)</li> <li>• Defra waste statistics</li> <li>• B&amp;NES Climate Emergency Progress Report  <a href="https://democracy.bathnes.gov.uk/documents/s58688/Climate%20Emergency%20Progress%20Report.pdf">https://democracy.bathnes.gov.uk/documents/s58688/Climate%20Emergency%20Progress%20Report.pdf</a>            Climate Emergency Study: Synthesis of Evidence  <a href="https://democracy.bathnes.gov.uk/documents/s58689/Appendix%20-%20Synthesis%20of%20Evidence.pdf">https://democracy.bathnes.gov.uk/documents/s58689/Appendix%20-%20Synthesis%20of%20Evidence.pdf</a>            B&amp;NES Green Infrastructure Strategy 2013 currently being reviewed 2020</li> </ul>

	<p>relation to the historic building</p> <p>B&amp;NES has two significant waterways: the River</p> <ul style="list-style-type: none"> <li>• The latest work on the Wessex Water, Water Resources Management Plan has not identified any areas of supply demand deficit at this stage</li> <li>• In 2007, approx. 40% of households within the Wessex Water supply area (which includes B&amp;NES) were metered</li> <li>• 95% of now or converted dwellings in the District completed during 2010/11 were built on previously developed land</li> <li>• Five sites have been identified as contaminated in the District (Land between former gas works site and Dapps Hill, Keynsham; 2 gardens in Evelyn Road, Bath, a garden in Newbridge Hill, Bath, and a garden at May Lane, Bath). The first is in relation to cyanide contamination and has now been remediated. The final is on the basis of a lead hotspot and the others are in relation to a hotspot of benzo(a)pyrene</li> <li>• Urban heat island effect needs to be addressed as temperatures increase through increase in urban trees</li> <li>• B&amp;NES is committed to producing a Tree and Woodland Plan to address climate and nature emergency addressing flooding, urban heat, biodiversity loss</li> </ul>		<p>forestry and other land use is 1%.</p> <ul style="list-style-type: none"> <li>• Taking into account current national policy and nationally led decarbonisation of the electricity grid, which assumes some local action, the consultants calculate that the business as usual pathway would reduce carbon emissions in the district by 38% by 2030 from 2016.</li> <li>• Total capacity of renewable energy technologies in the district: 20.9 MWe (Target 110MWe by 2026) and 7.4 MWth (Target 165MWth by 2026) in August 2018.</li> </ul>	
<p><b>Objective 12:</b> Encourage careful, efficient use of natural resources including energy and encourage</p>	<ul style="list-style-type: none"> <li>• In 2018-19 over 48,000 tonnes of Bath &amp; North East Somerset residents waste was reused and recycled.</li> <li>• In total B&amp;NES exported just over 14% of the 66,906 tonnes diverted away from landfill. The majority of this exported waste has been</li> </ul>		<ul style="list-style-type: none"> <li>• B&amp;NES is a high performing recycling authorities within the country, recycling 52.6% of household waste in 2015/16</li> </ul>	<ul style="list-style-type: none"> <li>• B&amp;NES Waste Strategy Review 2014</li> <li>• Waste Strategy, statistics and health and safety website (2016)</li> <li>• Record of waste recycled, reused, recovered or composted</li> <li>• TOWARDS ZERO WASTE 2020 - A</li> </ul>

<p><b>sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b></p>	<p>removed from residents' weekly bin waste at different facilities within the region.</p> <ul style="list-style-type: none"> <li>• In B&amp;NES 19,705 tonnes of black bag waste was sent to these facilities in 2018-19, and after all the recyclable and compostable waste had been taken out, the rest was either processed at Energy from Waste facilities in the UK or exported for use in energy recovery in Europe. In 2015-16, over 27,500 tonnes of CO2 equivalent in emissions were avoided as a result of efforts made by residents of Bath &amp; North East Somerset residents in diverting waste from landfill</li> <li>• Bath &amp; North East Somerset had a recycling rate of 58.7% for the 2018/19 financial year, higher than the national average of 45.1%</li> <li>• B&amp;NES disposes of its residual waste at Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset. Waste is also treated at the New Earth Solutions site at Avonmouth</li> <li>• This is a mechanical biological treatment plant (MBT)</li> <li>• Two residual waste facility sites were allocated in the Waste Local Plan; the Former Fuller's Earth Works in Bath and Broadmead Lane in Keynsham. The Fuller's Earth Works site is now operational.</li> <li>• Waste infrastructure: 2 x waste transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots</li> </ul>			<p>Waste Strategy for Bath &amp; North East Somerset (2005)</p> <ul style="list-style-type: none"> <li>• Defra waste statistics</li> <li>• <a href="https://beta.bathnes.gov.uk/sites/default/files/2019-10/recycling_end_use_register_2018-19.pdf">https://beta.bathnes.gov.uk/sites/default/files/2019-10/recycling_end_use_register_2018-19.pdf</a></li> <li>•</li> </ul>
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**Bath & North East Somerset Local Plan  
Partial Update**

**Sustainability Appraisal**

**Appendix C: Local Plan Partial Update alternative options appraisal matrices**

**Date: January 2023**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

**Appendix C Local Plan Partial Update alternative options appraisal matrices**

Ref DM1 and 2	Title <b>Emerging policies on zero carbon construction</b> amendments to Policies SCR1 and CP2 and Heat and Cooling Hierarchy		
SA Objectives	<b>Option 1</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.	<b>Option 2</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.	<b>Option 3</b> <b>Retain current policies SCR1, CP2 and CP1</b>
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Having more energy efficient and warmer buildings means lower energy bills. Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve the general health and well-being. A reduction in CO2 emissions will result in an improvement to air quality.	+ Having more energy efficient and warmer buildings means lower energy bills. Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve the general health and well-being. A reduction in CO2 emissions will result in an improvement to air quality. But this would not apply to smaller windfall developments.	0 The current policy cannot provide the same level of thermal efficiency as is proposed by the emerging policy
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The proposed approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach and on-site renewable energy. An energy efficient home will be more affordable to live in. Financial contributions can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings.  <b>Mitigation and enhancement</b> Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.	+ The proposed approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach. But by restricting the requirement to majors this will not cover all new homes. An energy efficient home will be more affordable to live in. Financial contributions can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings.  <b>Mitigation and enhancement</b> Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan	0 The policy seeks a reduction in carbon emissions but does not promote a fabric first approach which can reduce costs.
<b>Objective 3:</b> <b>Promote stronger more</b>	0/+ Financial contributions can also be used to help alleviate	0/+ Financial contributions can also be used to help alleviate fuel	0

Ref DM1 and 2	Title Emerging policies on zero carbon construction amendments to Policies SCR1 and CP2 and Heat and Cooling Hierarchy		
SA Objectives	Option 1 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.	Option 2 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.	Option 3 Retain current policies SCR1, CP2 and CP1
<b>vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings.	poverty, provide renewable energy schemes or improve the efficiency of existing buildings.	
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>++</p> <p>The proposed zero carbon policy potentially contributes towards building a competitive low carbon economy. The requirement for zero carbon construction would encourage job growth in the sustainable construction and renewable energy industries. The siting of development close to public transport will reduce travel distances to work.</p> <p><b>Mitigation and enhancement</b></p> <p>The policy will be subject to a viability assessment. The evidence base demonstrates the uplift of 5-7%.</p>	<p>++</p> <p>The proposed zero carbon policy potentially contributes towards building a competitive low carbon economy. The requirement for zero carbon construction would encourage job growth in the sustainable construction and renewable energy industries. The siting of development close to public transport will reduce travel distances to work. But on a smaller scale than if this was applied to all new buildings</p> <p><b>Mitigation and enhancement</b></p> <p>The policy will be subject to viability assessment. The evidence base demonstrated the uplift of 5-7%.</p>	0
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>+</p> <p>BREEAM standards require good proximity to public transport and local amenities</p> <p>Cycle storage is required by transport policy ST.7</p>	<p>+</p> <p>BREEAM standards require good proximity to public transport and local amenities</p> <p>Cycle storage is required by transport policy ST.7</p>	0 Cycle storage is required by transport policy ST.7

Ref DM1 and 2	Title Emerging policies on zero carbon construction amendments to Policies SCR1 and CP2 and Heat and Cooling Hierarchy		
SA Objectives	Option 1 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.	Option 2 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.	Option 3 Retain current policies SCR1, CP2 and CP1
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+ / 0 The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management policies especially NE2 and NE2A.	+ / 0 The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management policies especially NE2 and NE2A.	+ / 0 The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management policies especially NE2 and NE2A.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+ / 0 The provision of renewable energy will influence the design of the development and its impact on heritage assets. <b>Mitigation and enhancement</b> Any development will be subject to development management policies especially HE.1	+ / 0 The provision of renewable energy will influence the design of the development and its impact on heritage assets. <b>Mitigation and enhancement</b> Any development will be subject to policy HE.1	+ / 0 The provision of renewable energy will influence the design of the development and its impact on heritage assets <b>Mitigation and enhancement</b> Any development will be subject to development management policies especially HE.1
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	++ The proposed zero carbon policy reduces carbon emissions contribute towards slowing down the global temperature increase which helps tackle protecting threatened habitats and species by threatened by climate change. New development is subject to relevant Development Management policies NE.3, NE.4 and NE.5	++ New development is subject to relevant Development Management policies NE.3, NE.4 and NE.5	++ New development is subject to Development Management policies NE.3, NE.4 and NE.5
<b>Objective 9:</b>	++	++	0

Ref DM1 and 2	Title Emerging policies on zero carbon construction amendments to Policies SCR1 and CP2 and Heat and Cooling Hierarchy		
SA Objectives	Option 1 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.	Option 2 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.	Option 3 Retain current policies SCR1, CP2 and CP1
<b>Reduce land, water, air, light, noise pollution</b>	BREEAM standards require to development to be located close to public transport and local amenities. A sustainable location will reduce the need for car travel and will encourage the use of public transport and cycling. Zero carbon construction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste. A reduction in waste from construction will reduce water pollution.	BREEAM standards require to development to be located close to public transport and local amenities. A sustainable location will reduce the need for car travel and will encourage the use of public transport and cycling. Zero carbon construction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste. A reduction in waste from construction will reduce water pollution. To only apply this policy to major developments will reduce the opportunities for carbon savings.	The current policies require some level of carbon reduction but do not achieve zero carbon.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	++ Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk. <b>Mitigation and enhancement</b> Development will also be subject to development management policies CP5 and SU1 There is a greater benefit if this applies to all development.	++ Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk. <b>Mitigation and enhancement</b> Development will also be subject to development management policies CP5 and SU1.	+ The current policy structure provides some reduction in CO2 but the proposed zero carbon policy provides a greater benefit.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	++ The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach and renewable energy will enable reduction of CO2 emissions.	+ The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the reduction of CO2 emissions. But has a greater benefit if it applies to all new dwellings	+ Policy SCR1 seeks a reduction in carbon emissions but does not promote a fabric first approach. Which may not result in the most efficient development. The sustainable construction checklist addresses

<b>Ref DM1 and 2</b>	<b>Title Emerging policies on zero carbon construction amendments to Policies SCR1 and CP2 and Heat and Cooling Hierarchy</b>		
<b>SA Objectives</b>	<b>Option 1</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.	<b>Option 2</b> Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.	<b>Option 3</b> <b>Retain current policies SCR1, CP2 and CP1</b>
	<b>Mitigation and enhancement</b> The sustainable construction checklist addresses overheating.	Mitigation and enhancement The sustainable construction checklist addresses overheating.	overheating.
<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>	++ The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the provision of a zero carbon development. The use of low carbon materials will reduce the CO2 emissions. A fabric first approach will prioritise the efficiency of the building. Renewable energy generation will be required. District Heating is encouraged under policy CP4. Development will be required to connect to any available heat networks and the use of renewable heat sources such as heat pumps will be prioritised.	+ The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the provision of a zero carbon development. The use of low carbon materials will reduce the CO2 emissions. A fabric first approach will prioritise the efficiency of the building. But has a greater benefit if it applies to all new buildings. Renewable energy generation will be required. A fabric first approach will maximise energy efficiency District Heating is encouraged under policy CP4. Development will be required to connect to any available heat networks and the use of renewable heat sources such as heat pumps will be prioritised.	+ Policy SCR1 seeks a reduction in carbon emissions but does not promote a fabric first approach. Which may not result in the most efficient development
<p><b>General Summary</b></p> <p>The proposed approach (option 1) will help to secure more sustainable methods of construction using the energy hierarchy for all new buildings whereas for options 2 this will only apply to major developments. For objective 1 the proposed policy will result in warmer, more fuel efficient home. For objective 2 an energy efficient homes is more affordable to live in and financial contributions can help to alleviate fuel poverty. For objective 4 the proposed policy will encourage investment in sustainable construction and renewable energy industry. For objective 5 development will be sited close to public transport and local amenities. For objectives 6 and 7 the provision of renewable energy will impact on the landscape and heritage assets. However development will also be subject to development management policies NE.2 and HE.1 which seek to protect the historic and natural environments. For objective 9 a reduction in CO2 emissions will improve air quality. For objective 10 the reduction in carbon emissions will help slow climate change, which would reduce the vulnerability to flood risk. For objectives 11 and 12 a fabric first approach and renewable energy will reduce emissions and help to slow climate change.</p>			

Ref DM3	<b>Title Emerging Policy on Options for Retrofitting Buildings (amendments to Policy CP3)</b>	
<b>SA Objectives</b>	<b>Option 1</b> Introduce a requirement that regulated carbon emissions are reduced by 10% from a baseline of Part L through use of renewable energy as set out in the sustainable construction checklist	<b>Option 2</b> Introduce a requirement that regulated carbon emissions are reduced by 20% from a baseline of Part L through use of renewable energy
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+  Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve the general health and well-being. A reduction in CO2 emissions will result in an improvement to air quality.  Available evidence suggests that Houses in Multiple Occupation (HMO) are more often in poor condition than other types of housing in the same area therefore it helps achieve this objective.	++  Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve the general health and well-being. A reduction in CO2 emissions will result in an improvement to air quality. Requiring a higher standard would have a major positive effect. Available evidence suggests that HMOs are more often in poor condition than other types of housing in the same area therefore it helps achieve this objective.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	+  An energy efficient home will be more comfortable and affordable to live in.	++  To increase the threshold to 20% will result in improvements to existing buildings above the requirements in the sustainable construction checklist.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+  An energy efficient home will be more comfortable and affordable to live in and help improve general social well-being.	+  An energy efficient home will be more comfortable and affordable to live in and help improve general social well-being.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	0	0
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	N/A	N/A

<b>Ref DM3</b>	<b>Title Emerging Policy on Options for Retrofitting Buildings (amendments to Policy CP3)</b>	
<b>SA Objectives</b>	<b>Option 1</b> Introduce a requirement that regulated carbon emissions are reduced by 10% from a baseline of Part L through use of renewable energy as set out in the sustainable construction checklist	<b>Option 2</b> Introduce a requirement that regulated carbon emissions are reduced by 20% from a baseline of Part L through use of renewable energy
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+  The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management policies NE2 and NE2A	+  The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management policies NE2 and NE2A
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/?  The provision of renewable energy will influence the design of the development and its impact on heritage assets <b>Mitigation and enhancement</b> Development is subject to development management policies NE2 and NE2A	+/?  The provision of renewable energy will influence the design of the development and its impact on heritage assets <b>Mitigation and enhancement</b> Development is subject to development management policies NE2 and NE2A
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+  The proposed approach reduces carbon emissions contribute towards slowing down the global temperature increase which helps tackle protecting habitats and species by threatened by climate change. New development is subject to relevant Development Management policies NE.3, NE,4 and NE.5	+  The proposed approach policy reduces carbon emissions contribute towards slowing down the global temperature increase which helps tackle protecting habitats and species by threatened by climate change. New development is subject to relevant Development Management policies NE.3, NE,4 and NE.5
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	+  A carbon reduction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste.	++  A carbon reduction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste. To increase the threshold to 20% will result in improvements to existing buildings above the requirements in the sustainable construction checklist.
<b>Objective 10: Reduce vulnerability to, and</b>	+	++



<b>Ref DM3</b>	<b>Title Emerging Policy on Options for Retrofitting Buildings (amendments to Policy CP3)</b>	
<b>SA Objectives</b>	<b>Option 1</b> Introduce a requirement that regulated carbon emissions are reduced by 10% from a baseline of Part L through use of renewable energy as set out in the sustainable construction checklist	<b>Option 2</b> Introduce a requirement that regulated carbon emissions are reduced by 20% from a baseline of Part L through use of renewable energy
<b>manage flood risk (taking account of climate change)</b>	Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk.	Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk. To increase the threshold to 20% will result in improvements to existing buildings above the requirements in the sustainable construction checklist.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ The proposed policy will enable reduction of CO2	++ The proposed policy will enable reduction of CO2. To increase the threshold to 20% will result in improvements to existing buildings above the requirements in the sustainable construction checklist.
<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>	+ The proposed policy will increase the use of renewable energy and will improve energy efficiency.	++ The proposed policy will increase the use of renewable energy and will improve energy efficiency. To increase the threshold to 20% will result in improvements to existing buildings above the requirements in the sustainable construction checklist.
<b>General Summary</b> The proposed policy changes will see positive effects to objectives 2, 9, 10, 11 and 12. Overall there is a more positive impact from option 2 as this will increase the threshold for carbon reduction. This results in a more positive impact to the stated objectives. Available evidence suggests that HMOs are more often in poor condition than other types of housing in the same area therefore requiring to achieve Energy Performance Certificate “C” rating or above has a positive effect on objective 1 by improve the health and well-being of the HMO occupiers.		

<b>Ref</b>	<b>Title Whole Life Cycle Carbon Assessments</b>
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SA Objectives	Option 1 Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm)	Option 2 Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm)	Option 3 No specific policy and rely on Sustainable Construction Policies
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+/0 Having more energy efficient and warmer buildings means lower energy bills, reduced fuel poverty. Improving the energy efficiency of homes can help to alleviate fuel poverty. Only applying this policy to large scale majors reduces the positive impacts from the proposed policy. Mitigation and enhancement A specific threshold is required to use the assessment in the development management process.	+/0 Having more energy efficient and warmer buildings means lower energy bills, reduced fuel poverty. Improving the energy efficiency of homes can help to alleviate fuel poverty. A specific threshold is required to use the assessment in the development management process. Mitigation and enhancement A specific threshold is required to use the assessment in the development management process.	0
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	+/0 The proposed approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach. An energy efficient home will be more affordable to live in. A specific threshold is required to use the assessment in the development management process. Only applying this policy to large scale majors reduces the positive impacts from the proposed policy	+/0 The proposed approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach. An energy efficient home will be more affordable to live in. A specific threshold is required to use the assessment in the development management process.	0
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	0	0	0
<b>Objective 4:</b>	0/?	0/?	0

<i>Ref</i>	<i>Title Whole Life Cycle Carbon Assessments</i>		
<b>SA Objectives</b>	<b>Option 1</b> Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm)	<b>Option 2</b> Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm)	<b>Option 3</b> No specific policy and rely on Sustainable Construction Policies
<b>Build a strong, competitive economy and enable local businesses to prosper</b>	The proposed Whole Life Cycle Carbon Assessment will require an update to the existing evidence base to assess the proposed uplift to development costs.	The proposed Whole Life Cycle Carbon Assessment will require an update to the existing evidence base to assess the proposed uplift to development costs.	
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	0	0	N/A
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0 The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management polies NE2 and NE2A	0 The provision of renewable energy will influence the design of the development and its impact on the landscape. <b>Mitigation and enhancement</b> Development is subject to development management polies NE2 and NE2A	0
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0 The provision of renewable energy will influence the design of the development and its impact on heritage assets <u>Mitigation</u> Any development will be subject to policy HE.1	0 The provision of renewable energy will influence the design of the development and its impact on heritage assets Mitigation Any development will be subject to policy HE.1	0 The provision of renewable energy will influence the design of the development and its impact on heritage assets Mitigation Any development will be subject to policy HE.1
<b>Objective 8: Conserve, enhance and restore the</b>	+/0 Zero carbon construction reduces carbon emissions	+/0 Zero carbon construction reduces carbon emissions	0

<i>Ref</i>	<i>Title Whole Life Cycle Carbon Assessments</i>		
<b>SA Objectives</b>	<b>Option 1</b> Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm)	<b>Option 2</b> Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm)	<b>Option 3</b> No specific policy and rely on Sustainable Construction Policies
<b>condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	contribute towards slowing down the global temperature increase which helps tackle protecting threatened habitats and species by threatened by climate change. New development is subject to relevant Development Management policies NE.3, NE,4 and NE.5	contribute towards slowing down the global temperature increase which helps tackle protecting threatened habitats and species by threatened by climate change. New development is subject to relevant Development Management policies NE.3, NE,4 and NE.5	
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	+/0 Zero carbon construction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste. A reduction in waste from construction will reduce water pollution. A specific threshold is required to use the assessment in the development management process. Only applying this policy to large scale majors reduces the positive impacts from the proposed policy	+/0 Zero carbon construction will reduce the production of harmful emissions and will improve air quality. The use of renewable energy will result in an improvement of air quality and a reduction in waste. A reduction in waste from construction will reduce water pollution. A specific threshold is required to use the assessment in the development management process.	0
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	+/0 Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk. Mitigation and enhancement A specific threshold is required to use the assessment in the development management process. Development will also be subject to development	+/0 Zero carbon development will enable the reduction of CO2 emissions. This will have a positive impact towards slowing climate change and reducing flood risk. A specific threshold is required to use the assessment in the development management process.	0

<i>Ref</i>	<i>Title Whole Life Cycle Carbon Assessments</i>		
<b>SA Objectives</b>	<b>Option 1</b> Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm)	<b>Option 2</b> Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm)	<b>Option 3</b> No specific policy and rely on Sustainable Construction Policies
	management policies CP5 and SU1. Only applying this policy to large scale majors reduces the positive impacts from the proposed policy	Development will also be subject to development management policies CP5 and SU1.	
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+/0 The proposed policy will help a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the reduction of CO2 emissions. The provision of Whole Life Cycle Carbon Assessment will review the impact on climate change from construction to disposal. Including assessment of embodied energy from materials.  Mitigation and enhancement However a specific threshold is required to use the assessment in the development management Only applying this policy to large scale majors reduces the positive impacts from the proposed policy	+/0 The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the reduction of CO2 emissions. The provision of Whole Life Cycle Carbon Assessment will review the impact on climate change from construction to disposal. Including assessment of embodied energy from materials. However a specific threshold is required to use the assessment in the development management process.	0
<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</b>	+/0 The provision of Whole Life Cycle Carbon Assessment will review the impact on climate change from construction to disposal. This is considered to provide the most sustainable form of construction. There will be a focus on the proposed materials and how they would be produced.	+/0 The provision of Whole Life Cycle Carbon Assessment will review the impact on climate change from construction to disposal. This is considered to provide the most sustainable form of construction. There will be a focus on the proposed materials and how they would be produced.	+0 The proposed policy will secure a sustainable method of construction using the energy hierarchy. The fabric first approach will enable the provision of a zero carbon development. The use of low carbon materials will reduce the CO2

Appendix C B&NES Local Plan Partial Update Sustainability Appraisal

<i>Ref</i>	<i>Title Whole Life Cycle Carbon Assessments</i>		
<b>SA Objectives</b>	<b>Option 1</b> Require a Whole Life Cycle Carbon Assessment for large scale major applications (50 dwellings or 5000sqm)	<b>Option 2</b> Require a Whole Life Cycle Carbon Assessment for major applications (10 dwellings or 1000sqm)	<b>Option 3</b> No specific policy and rely on Sustainable Construction Policies
<b>Recycle)</b>	However without the setting of a specific threshold the proposed assessment cannot be used for development management purposes.  Only applying this policy to large scale majors reduces the positive impacts from the proposed policy	However without the setting of a specific threshold the proposed assessment cannot be used for development management purposes.	emissions. A fabric first approach will prioritise the efficiency of the building.  The proposed policy does not take account of embodied energy such as materials or the impact of the disposal of the building.
<b>General Summary</b>	Both options different thresholds will work towards zero carbon construction and a Whole Life Cycle Carbon Assessment will allow for the provision of the most sustainable form of construction therefore results in a more positive impact to objectives 11 (Climate Change) and 12 (Natural Resources). However the requirement for a Whole Life Cycle Carbon Assessment does not yet include a specific threshold which development will need to meet. Therefore it will be difficult to use for development management purposes.		

<i>Ref DM5</i>	<i>Grid balancing plants (amendments to Policy CP3)</i>	
<b>SA Objectives</b>	<b>Option 1</b> – Add reference to grid balancing plant encouraging the energy hierarchy and avoid fossil fuels.	<b>Option 2</b> – No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ A reduction in CO2 emissions will result in an improvement to air quality and has a positive effect on this objective.	0
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	N/A	N/A
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive</b>	N/A	N/A

Ref DM5	Grid balancing plants (amendments to Policy CP3)	
SA Objectives	Option 1 – Add reference to grid balancing plant encouraging the energy hierarchy and avoid fossil fuels.	Option 2 – No change
communities and reduce anti-social behaviour, crime and the fear of crime		
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+ Positive policy framework for ensuring energy security	0
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	0	0
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	-/? The provision of energy infrastructure has the potential to result in a negative effect on the surrounding landscape  <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management process.	-/? The provision of energy infrastructure has the potential to result in a detrimental effect on the surrounding landscape  <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	-/? The provision of energy infrastructure has the potential to result in a negative effect on this objective.  <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management	-/? The provision of energy infrastructure has the potential to result in a negative effect on this objective.  <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management
Objective 8:	-/?	-/?

Ref DM5	Grid balancing plants (amendments to Policy CP3)	
SA Objectives	Option 1 – Add reference to grid balancing plant encouraging the energy hierarchy and avoid fossil fuels.	Option 2 – No change
<b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	The provision of energy infrastructure has the potential to result in a negative effect on this objective. <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management	The provision of energy infrastructure has the potential to result in a negative effect on this objective. <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	+ The provision of energy infrastructure following the energy hierarchy with renewable generation and freestanding energy storage plant will help reduce the district's carbon emissions will result in an improvement to air quality and has a positive effect on this objective. <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management	-/? The provision of energy infrastructure which increases the district's carbon emissions including those that burn fossil fuels such as gas will have a negative effect on this objective. <b>Mitigation and enhancement</b> Proposals will be assessed on environmental impact and allow for mitigation and enhancement measures through the development management
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	N/A	N/A
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ Policy encourages measures for meeting renewable energy targets	? Current policy approach does not require applicants to consider renewable or low carbon methods of generating electricity
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste</b>	+ Proposed approach encourages generation of electricity through renewable or low carbon technologies ahead of fossil fuels	- Current policy approach does not require applicants to consider renewable or low carbon methods of generating electricity



<b>Ref DM5</b>	<b>Grid balancing plants (amendments to Policy CP3)</b>	
<b>SA Objectives</b>	<b>Option 1</b> – Add reference to grid balancing plant encouraging the energy hierarchy and avoid fossil fuels.	<b>Option 2</b> – No change
<b>hierarchy (Reduce, Reuse and Recycle)</b>		
<p><b>General Summary</b></p> <p>In order to facilitate an increase in the level of renewable energy generation and the transition to realising the Council 2030 goal (to achieve 100% clean energy across all sectors), Option 1 proposes to amend Policy CP3 to require grid balancing plants to contribute to the Core Strategy targets for Renewable Electricity and Heat generation. The policy approach would have positive effects on objective 4(economy), objective 9(pollution) objective 11(climate change) and objective 12 (natural resources). There are negative or uncertainty effects have been identified for environmental objectives.</p> <p>Mitigation and enhancement</p> <p>Site specific mitigation and enhancement measures should be included in the policies and address through the development management process.</p>		

<b>Ref DM5</b>	<b>Emerging policy approach for wind energy development</b>		
<b>SA Objectives</b>	<b>Option 1</b> – Add wind turbine policy and define moderate landscape areas as potentially suitable for proposals	<b>Option 2</b> – Add wind turbine policy and define moderate-high landscape areas as potentially suitable for proposals	<b>Option 3</b> – No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+	+	N/A
	Identifying suitable areas for wind energy development and setting out clear criteria would help facilitate more wind energy development, resulting a reduction in CO2 emissions. This has a positive effect on this objective.	Identifying suitable areas for wind energy development (potentially in a wider area) and setting out clear criteria would help facilitate more wind energy development, resulting a reduction in CO2 emissions. This has a positive effect on this objective.	
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable</b>	N/A	N/A	N/A

Ref DM5	<i>Emerging policy approach for wind energy development</i>		
SA Objectives	Option 1 – Add wind turbine policy and define moderate landscape areas as potentially suitable for proposals	Option 2 – Add wind turbine policy and define moderate-high landscape areas as potentially suitable for proposals	Option 3 – No change
housing			
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0	0	0
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	++	0
	Identifying areas suitable for wind energy would encourage new wind energy development contributing towards building a strong low carbon economy.	Identifying areas suitable for wind energy (potentially in a wider area) would encourage new wind energy development contributing towards building a strong low carbon economy.	
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	N/A	N/A	N/A
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	-/?	-/?	0
	The provision of wind energy has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects  <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	The provision of wind energy has the potential to result in a negative effect on the surrounding landscape, , including cumulative impact from projects  <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	
Objective 7:	-/?	-/?	0

<i>Ref DM5</i>	<i>Emerging policy approach for wind energy development</i>		
<b>SA Objectives</b>	<b>Option 1 – Add wind turbine policy and define moderate landscape areas as potentially suitable for proposals</b>	<b>Option 2 – Add wind turbine policy and define moderate-high landscape areas as potentially suitable for proposals</b>	<b>Option 3 – No change</b>
<b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	The provision of wind energy has the potential to result in a negative effect on this objective, including cumulative impact from projects <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	The provision of wind energy has the potential to result in a negative effect on this objective, including cumulative impact from projects <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	-/? The provision of wind energy has the potential to result in a negative effect on this objective, including cumulative impact from projects <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	-/? The provision of wind energy has the potential to result in a negative effect on this objective, including cumulative impact from projects <b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures.	The provision of wind energy has the potential to result in a negative effect on this objective, including cumulative impact from projects
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	+/? Any wind turbines need to carefully sited so as not to cause harm to amenity through unwanted noise. <b>Mitigation and enhancement</b> A policy which identifies suitable areas will be able to provide mitigation and enhancement.	+/? Any wind turbines need to carefully sited so as not to cause harm to amenity through unwanted noise. <b>Mitigation and enhancement</b> A policy which identifies suitable areas will be able to provide mitigation and enhancement.	0 Any wind turbines need to carefully sited so as not to cause harm to amenity through unwanted noise.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate</b>	N/A	N/A	N/A

Ref DM5	Emerging policy approach for wind energy development		
SA Objectives	Option 1 – Add wind turbine policy and define moderate landscape areas as potentially suitable for proposals	Option 2 – Add wind turbine policy and define moderate-high landscape areas as potentially suitable for proposals	Option 3 – No change
change)			
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+	++	-
	The provision of wind energy will contribute to renewable energy targets and the provision of a zero carbon development.  A criteria based policy as proposed would encourage the provision of wind energy and direct development to suitable locations.	The provision of wind energy will contribute to renewable energy targets and the provision of a zero carbon development.  A criteria based policy as proposed would encourage the provision of wind energy and direct development to suitable locations.	Any proposed development would be subject to district wide policies which may preclude the granting of permission if there is harm to the surrounding landscape.
<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>	+	++	-
	The provision of wind energy will contribute to renewable energy targets and the provision of a zero carbon development.  A criteria based policy as proposed would encourage the provision of wind energy	The provision of wind energy will contribute to renewable energy targets and the provision of a zero carbon development.  A criteria based policy as proposed would encourage the provision of wind energy	Any proposed development would be subject to district wide policies which may preclude the granting of permission if there is harm to the surrounding landscape.
<p><b>General Summary</b> The current policy approach does not specifically make an allowance for wind energy. The provision of wind energy will contribute towards renewable energy targets and zero carbon development. A criteria based policy as proposed would encourage the provision of wind energy by identifying areas of search for suitable sites that also seeks to minimise the impact on the landscape resulting positive effect on objective 1(health), objective 2(housing), objective 4(economy), objective 9(pollution) objective 11(climate change) and objective 12 (natural resources). Option 2 which allows a wider area for consideration would have major positive effects on objective 4(economy), objective 11(climate change) and objective 12(resources). However there are negative or uncertainty effects have been identified for environmental objectives.</p> <p><b>Mitigation and enhancement</b> A policy for wind energy development would allow for identification of suitable sites. Site specific mitigation and enhancement measures should be included in the policies.</p>			

<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+	+	++	-/0
	The proposed approach requiring the provision of EV charging points (active) will help to encourage sustainable travel. The provision of on site chargers helps increase in using an EV vehicle.	The proposed approach requiring the provision of EV charging points will help to encourage sustainable travel. The provision of an on site chargers helps increase in using an EV vehicle.	There are similar benefits but the benefits could apply to all residential development.	Policy ST.7 will only require electric charging points within a development where practicable. The current wording does not provide a robust position for requiring the charging points within developments.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	0	0	0	0
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of</b>	+	+	++	0
	The proposed approach facilitates the provision of electric vehicles, which encourages the provision of low carbon economy with local communities	The proposed approach facilitates the provision of electric vehicles, which encourages the provision of low carbon economy with local communities	There are similar but the benefits could apply to all residential development	

<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7
<b>crime</b>				
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	+	+	++	0
	The proposed approach facilitates the provision of electric vehicles, which helps, contribute to a low carbon economy with local communities.	The proposed approach facilitates the provision of electric vehicles, which helps, contribute to a low carbon economy with local communities	There are similar benefits but the benefits could apply to all residential development	
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++	++	++	-
	The proposed approach will require the provision of EV charging points within developments and will help to provide access to sustainable transport.	The proposed approach will require the provision of EV charging points within developments and will help to provide access to sustainable transport. The policy approach also provides active and passive provision which will future proof a development.  Passive charging means the latest technology in chargers can be used when required and is the more viable option.	There are similar benefits but the benefits could apply to all residential development.	Policy ST.7 will only require electric charging points within a development where practicable. The current wording does not provide a robust position for requiring the charging points within developments.

<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	N/A	N/A	N/A	N/A
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	N/A	N/A	N/A	N/A
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+	+	+	0
	The provision of EV charging points will help to reduce pollution from vehicles and improve air quality. This results in a positive effect on this objective.	The provision of EV charging points will help to reduce pollution from vehicles and improve air quality. This results in a positive effect on this objective.	The provision of EV charging points will help to reduce pollution from vehicles and improve air quality. This results in a positive effect on this objective.	
<b>Objective 9:</b>	++	++	++	-

<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7
<b>Reduce land, water, air, light, noise pollution</b>	<p>The provision of EV charging points will help to reduce pollution from vehicles,</p> <p>The provision of EV charging will encourage the use of electric vehicles. This will lead to a reduction in harmful emissions related to combustion engines and will have a positive impact on air quality, particularly within AQMAs.</p> <p>Electric vehicles result in a reduction in traffic noise.</p>	<p>The provision of EV charging points will help to reduce pollution from vehicles,</p> <p>The provision of EV charging will encourage the use of electric vehicles. This will lead to a reduction in harmful emissions related to combustion engines and will have a positive impact on air quality, particularly within AQMAs.</p> <p>Electric vehicles result in a reduction in traffic noise.</p>	<p>There are similar benefits but the benefits could apply to all residential development.</p>	<p>Policy ST.7 will only require electric charging points within a development where practicable. The current wording does not provide a robust position for requiring the charging points within developments. Therefore the current approach has not minimised the impact to air quality.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>+</p> <p>The provision of EV infrastructure will lead to an increase in the use of electric vehicles. This would result in a reduction of harmful emissions which would help tackle climate change. Reducing the vulnerability to</p>	<p>+</p> <p>The provision of EV infrastructure will lead to an increase in the use of electric vehicles. This would result in a reduction of harmful emissions which would help to tackle climate change. Reducing the vulnerability to flood risk.</p>	<p>++</p> <p>There are similar benefits but the benefits could apply to all residential development.</p>	<p>N/A</p>



<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7
	flood risk.			
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+	+	++	0
	The provision of electric vehicles reduces the emission from cars exhaust.	The provision of electric vehicles reduces the emission from cars exhaust.	There are similar benefits but the benefits could apply to all residential development.	
<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>	+	+	++	0
	The provision of EV charging can help to contribute to a zero carbon development. This will help to contribute towards a sustainable design. The use of EV can then be incorporated into renewable energy options.	The provision of EV charging can help to contribute to a zero carbon development. This will help to contribute towards a sustainable design. The use of EV can then be incorporated into renewable energy options.	There are similar benefits the benefits could apply to all residential development	Policy ST.7 will only require electric charging points within a development where practicable. The current wording does not provide a robust position for requiring the charging points within developments.

<b>Ref DM8</b>	<b>Electric Vehicle (EV) Charging points</b>			
<b>SA Objectives</b>	Option 2b and 3b Introduce new policies requiring the provision of EV charging points and infrastructure with 100% active charging in major residential and non-residential development	Option 2a and Option 3a Introduce new policies requiring the provision of EV charging points and infrastructure with 20% active charging and 80% passive charging in major residential and non-residential development	Options 1a and b (with options 2 or 3) Require the provision of EV infrastructure in minor residential development	Option 4 Rely on reference to charging infrastructure in Policy ST.7

**General Summary**

The current policy approach under ST.7 does not provide a robust requirement to provide electric vehicle charging infrastructure as part of a development. Options 2b and 3b will require EV charging points to be installed as part of a development which will provide access to sustainable travel options and contribute towards reducing air pollution. Options 2a and 3a have similar benefits but the provision of passive charging will reduce the cost of development and allow for the most up to date chargers to be installed when needed. Options, 2 and 3 have significant positive effects on objective 5 (promoting sustainable transport) and objective 9 (air pollution). There are also positive effects on objective 3 (community), objective 4 (economic objective), objective 11 (climate change) and objective 12 (sustainable energy). Options 2 and 3 would only apply the policy to major developments, whilst there would be positive effects similar to option 1, the effects would be limited when only installed in major development. Option 1 to require the provision of EV infrastructure in minor residential development as well as major development have significant positive effects on objective 1, 3, 4, 5, 9, 10,11 and 12.

<b>Ref DM 9, 10, 11, 12 and 13</b>	<b>Biodiversity and Green Infrastructure</b>	
<b>SA Objectives</b>	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ An Ecological Emergency has been declared by the Council in response to ongoing threats to wildlife and ecosystems. The declaration recognises the essential role nature plays in society and the economy. Amendments to biodiversity policies and new biodiversity net gain policy will protect wildlife and habitats, enabling residents to benefit	0 The Environment Bill 2019-2021 in support of the 25 Year Environment Plan is currently progressing through Parliament and seeks to introduce legally binding nature, water, air and waste targets from 2022. It proposes to

<i>Ref DM 9, 10, 11, 12 and 13</i>	<i>Biodiversity and Green Infrastructure</i>	
<b>SA Objectives</b>	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
	<p>from a green, nature rich environment which will improve the health and well-being of all communities and reduce health inequalities.</p> <p>Amendments to Green Infrastructure policy propose to include a designation as relates to the Bath River Line project to plan for green infrastructure and connectivity, help identify and facilitate opportunities for the wider network (of GI corridors, footpath/cycle paths etc) to connect to it. This will provide additional opportunities to support the health and well-being of all communities.</p>	<p>introduce a mandatory requirement for measurable biodiversity net gain in the planning system, to ensure that new developments enhance biodiversity and create new green spaces for local communities. The Environment Bill further proposes introducing provisions requiring the development of Local Nature Strategies across England.</p>
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	N/A	N/A
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>+</p> <p>Proposed policies will support community cohesion in supporting a common purpose to address the ecological emergency.</p> <p>The Council has a central role in the provision, delivery and planning of GI through its role as local planning authority and direct provider of significant areas of open spaces. It will also work in partnership with key public and private bodies, local communities and the voluntary sector to support key GI projects such as the Bath River Line – a walking and cycling connection from the west to the east of Bath and better connect the green spaces along the route and manage it as one. Projects such as this offer the opportunity to enable vibrant and cohesive communities with opportunities to support good design to address inequalities and reduce negative behaviours.</p>	<p>0</p> <p>The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.</p>

<i>Ref DM 9, 10, 11, 12 and 13</i>	<i>Biodiversity and Green Infrastructure</i>	
<b>SA Objectives</b>	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	+ The proposed amendments to biodiversity and GI policy and new biodiversity policy supports the ecological and climate emergency supporting clean and inclusive growth. The policy requirements may encourage green recovery and growth jobs and opportunities.	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+ There is the opportunity to secure biodiversity gains within walking and cycling infrastructure to benefit all, providing multi-functional infrastructure. The proposed Bath River Line project proposes to create a high quality, continuous 10km walking and cycling connection from Newbridge to Batheaston/Bathampton and better connect the green spaces along the route and manage it as one. Proposed designation of the Bath River Line will include opportunities to connect to wider public transport, cycling and walking infrastructure and to access employment and leisure facilities.	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+ It is proposed through amendments to biodiversity policy to support biodiversity gain and management opportunities. The new policy for Biodiversity net gain (BNG) proposes at least 10%+ biodiversity from development. BNG is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development. Biodiversity policy amendments and new policy has the potential to not only protect local biodiversity, but also protect and enhance the local environmental distinctiveness through habitat creation, protection, enhancement, restoration and management. Local nature recovery networks have the opportunity to link to wider nature recovery	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.

<i>Ref DM 9, 10, 11, 12 and 13</i>	<i>Biodiversity and Green Infrastructure</i>	
<b>SA Objectives</b>	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
	networks within the Cotswold and Mendip Hills AONBs which protect the special qualities of the landscape.	
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	N/A	N/A
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	++ Policy NE3 provides policy as relates to potential impacts of development on designated sites of international, national and local importance. Proposed biodiversity new gain policy will ensure that development delivers biodiversity net gain, secured for 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. The proposed Bath River line project will enhance and extend multi-functional Green Infrastructure and make a positive contribution to nature recovery networks. It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human well-being, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.

Ref DM 9, 10, 11, 12 and 13	<b>Biodiversity and Green Infrastructure</b>	
SA Objectives	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
	change. <b>Mitigation and enhancement</b> Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.	
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	+ The proposed Bath River Line project will encourage walking and cycling, whereby minimising traffic congestion and further, reducing air and noise pollution. Sustainable Drainage Systems (SuDS) include opportunities to support biodiversity net gains within a development. These SuDS systems can further support ecosystem services such as filtering dirty water along with providing a habitat for wildlife.	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	+ Sustainable Drainage Systems (SuDS) include opportunities to support biodiversity net gains within a development. These SuDS can further support ecosystem services such as filtering dirty water along with providing a habitat for wildlife. SuDS in turn offer opportunities to reduce vulnerability to and manage flood risk.	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	++ It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human well-being, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change.	0 The Environment Bill 2019-2021 seeks to introduce legally binding nature, water, air and waste targets from 2022 as well as a mandatory requirement for measurable biodiversity net gain in the planning system.

<b>Ref DM 9, 10, 11, 12 and 13</b>	<b>Biodiversity and Green Infrastructure</b>	
<b>SA Objectives</b>	<b>Option 1</b> Amendments to Policy NE3: Site, Species and Habitats, Amendments to Policy NE5: Ecological Networks and Nature Recovery, New Policy for Biodiversity Net Gain Amendments to Policy CP7: Green Infrastructure	<b>Option 2</b> No change
	The proposed amendments to biodiversity policy and new biodiversity policy will support biodiversity gains from development supporting resilience to climate change.	
<b>Objective 12:</b> <b>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>	N/A	N/A
<b>General Summary</b> The proposed policy amendments and new policy seek to strengthen policies as relates to biodiversity and green infrastructure supporting the climate and ecological emergency. The policies will have a positive affect on a number of SA objectives and a major positive impact on SA objectives to conserve, enhance and restore the condition and extent of Biodiversity in the district and reduce negative contributions to and increase resilience to climate change. <b>Mitigation</b> Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.		

<b>Ref DM14, 15 and 16</b>	<b>Artificial pitches (amendments to Policies PCS1, PCS5 and LCR6)</b>	
<b>SA Objectives</b>	<b>Option 1</b> Amend Policies PCS1 Pollution and Nuisance and PCS5 Contamination to provide clarity and require a management plan for artificial pitches to address potential pollution.	<b>Option 2</b> Maintain the current policies and make no amendments
<b>Objective 1:</b>	+	0

Ref DM14, 15 and 16	Artificial pitches (amendments to Policies PCS1, PCS5 and LCR6)	
SA Objectives	Option 1 Amend Policies PCS1 Pollution and Nuisance and PCS5 Contamination to provide clarity and require a management plan for artificial pitches to address potential pollution.	Option 2 Maintain the current policies and make no amendments
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>There are some health concerns related with rubber granules made from old tyres resulting from the migration of polycyclic aromatic hydrocarbons (PAHs), phthalates and metals. However artificial pitches provide several general advantages over natural grass and provide significant benefits supporting active lifestyle and well-being by allowing people to play and exercise longer especially in winter. Based on the 'precautionary principle' in Policy PCS1, this new policy requiring a management plan outlining the material used, potential sources of pollution and adequate remediation measures, has a positive effect on this objective.</p> <p><b>Mitigation and enhancement</b> Further guidance setting out what the management plan should include is helpful.</p>	<p>The current policy approach does not take advantage of the improving technology therefore no effect is identified.</p> <p><b>Mitigation and enhancement</b> Even though artificial pitches are not banned in the UK, there are some health concerns which need to be monitored.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	N/A	N/A
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>+</p> <p>There is an insufficient supply of youth play space, parks and recreational grounds across all area profiles. Difficulties maintaining natural turf and a shortage of available space has amplified the growth in artificial alternatives. Artificial turf stands up to heavy use and helps facilitate longer play especially in winter. Well maintained facilities can contribute to stronger communities.</p> <p><b>Mitigation and enhancement</b></p>	<p>0</p> <p>Artificial turf stands up to heavy use and helps facilitate longer play especially in winter.</p> <p><b>Mitigation and enhancement</b> Even though artificial pitches are not banned in the UK, there are some health concerns which need to be monitored.</p>



Ref DM14, 15 and 16	Artificial pitches (amendments to Policies PCS1, PCS5 and LCR6)	
SA Objectives	Option 1 Amend Policies PCS1 Pollution and Nuisance and PCS5 Contamination to provide clarity and require a management plan for artificial pitches to address potential pollution.	Option 2 Maintain the current policies and make no amendments
	Based on the 'precautionary principle' in Policy PCS1, this new policy requiring a management plan outlining the material used, potential sources of pollution and adequate remediation measures has a positive effect. Use of natural and recyclable materials should be considered and encouraged.	
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	0 3G pitches bring economic benefits. Durable, resistant to heavy uses such as football spikes and cost effective to maintain, they are designed for longevity.	0 3G pitches bring economic benefits. Durable, resistant to heavy uses such as football spikes and cost effective to maintain, they are designed for longevity.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	N/A	N/A
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0 As artificial pitches can be used more intensively, floodlights are often proposed alongside the pitches. <b>Mitigation</b> The landscape impact of floodlights should be assessed to avoid harm.	0 As artificial pitches can be used more intensively, floodlights are often proposed alongside the pitches. <b>Mitigation</b> The landscape impact of floodlights should be assessed to avoid harm.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0 No significant effect.	0 No significant effect.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity</b>	+/? Artificial pitches replace natural grass pitches. Also infill material can be lost from pitches on the skin and clothing of	0/? Artificial pitches replace natural grass pitches. Also infill material can be lost from pitches on the skin and clothing of

Ref DM14, 15 and 16	Artificial pitches (amendments to Policies PCS1, PCS5 and LCR6)	
SA Objectives	Option 1 Amend Policies PCS1 Pollution and Nuisance and PCS5 Contamination to provide clarity and require a management plan for artificial pitches to address potential pollution.	Option 2 Maintain the current policies and make no amendments
(taking account of climate change)	<p>players, as well as being blown or washed out of pitches by wind and rain, causing contamination of watercourses contaminating soil and water quality.</p> <p>Based on the 'precautionary principle' in Policy PCS1, this new policy requiring a management plan outlining the material used, potential sources of pollution and adequate remediation measures has a positive effect.</p> <p>Use of natural and recyclable materials should be considered and encouraged.</p>	<p>players, as well as being blown or washed out of pitches by wind and rain, causing contamination of watercourses, contaminating soil and water quality.</p>
<p><b>Objective 9:</b> Reduce land, water, air, light, noise pollution</p>	<p>+/?</p> <p>Proposed changes to Policies PCS1 and PCS5 to avoid potential sources of pollutions and contamination of land would help achieve this objective. However, the commonly used artificial pitches are constructed using longer pile artificial plastic grass with a rubber crumb infill. These crumb granules are typically styrene butadiene rubber (SBR) originating from shredded waste tyres.</p> <p>Also artificial pitches are often accompanied by floodlights.</p> <p><b>Mitigation and enhancement</b> Need to avoid light nuisance and minimise light pollution.</p>	<p>0/?</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>No significant effect.</p>	<p>0</p> <p>No significant effect.</p>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<p>+</p> <p>Based on the 'precautionary principle' in Policy PCS1, this new policy</p>	<p>0</p>

Ref DM14, 15 and 16	Artificial pitches (amendments to Policies PCS1, PCS5 and LCR6)	
SA Objectives	Option 1 Amend Policies PCS1 Pollution and Nuisance and PCS5 Contamination to provide clarity and require a management plan for artificial pitches to address potential pollution.	Option 2 Maintain the current policies and make no amendments
	<p>requiring a management plan outlining the material used, potential sources of pollution and adequate remediation measures has a positive effect.</p> <p><b>Mitigation and enhancement</b> Use of natural and recyclable materials should be considered and encouraged.</p>	
<p><b>Objective 12:</b> <b>Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b></p>	<p>+</p> <p>There is growing public concern around plastic waste and micro plastic and soil/water contamination. The recycling of materials can offer a range of benefits to both facility owners and the wider environment. For example, there can be reductions in overall project costs, waste materials going to landfill, and the carbon footprint from manufacturing and transporting.</p> <p><b>Mitigation and enhancement</b> The policy to require a management plan outlining the materials used and requiring consideration of potential sources of pollution from the installation phase through to end of life, including disposal is helpful. This includes both chemical and solid wastes including micro-plastics.</p>	<p>0</p>
<p><b>General Summary</b> Proposed changes to Policies PCS1 and PCS5 to avoid potential sources of pollution and contamination of land and requiring a management plan outlining materials used, potential sources of pollution and adequate remediation measures have positive effects on objectives 1 (health and well-being), 3 (stronger communities), 8 (biodiversity), 9 (pollution), 11 (climate change) and 12 (waste).</p> <p><b>Mitigation and enhancement:</b> Use of natural and recyclable materials should be considered and encouraged. Further guidance setting out what the management plan should include is helpful.</p>		

Ref DM 16	Title Affordable housing 'build to rent schemes' Amendments to Policy CP9	
SA Objectives	Option 1 Add 'Affordable units as part of a Build to Rent scheme should be discounted in line with First Homes, to a minimum of 30%'	Option 2 No change
Objective 1:	n/a	n/a
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	n/a	n/a
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	++ Improves the affordability of build-to-rent properties in B&NES, particularly Bath, where rents are currently very high and unaffordable for many members of the population. Could cause viability issues on sites.  <b>Mitigation and enhancement</b> Viability assessment should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.	+ Existing 20% discount will remain, which goes some way to providing affordable rents in Bath and North East Somerset but is not considered to adequately meet affordable rent need in the District, particularly Bath.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+ Encourage more mixed communities by introducing population groups otherwise unable to afford to rent in Bath and North East Somerset Council, particularly Bath.	0 No change proposed.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	n/a	n/a
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a	n/a
Objective 6:	n/a	n/a

Ref DM 16	Title Affordable housing 'build to rent schemes' Amendments to Policy CP9	
SA Objectives	Option 1 Add 'Affordable units as part of a Build to Rent scheme should be discounted in line with First Homes, to a minimum of 30%'	Option 2 No change
Protect and enhance local environmental distinctiveness and the character and appearance of landscape		
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a	n/a
Objective 9: Reduce land, water, air, light, noise pollution	n/a	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a	n/a
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)	n/a	n/a

<b>Ref DM 16</b>	<b>Title Affordable housing 'build to rent schemes' Amendments to Policy CP9</b>	
<b>SA Objectives</b>	<b>Option 1</b> Add 'Affordable units as part of a Build to Rent scheme should be discounted in line with First Homes, to a minimum of 30%'	<b>Option 2</b> <b>No change</b>
<b>General Summary</b>		
<p>The proposed approach (option 1) will have a major positive impact in terms of improving the affordability of rents in the District, particularly in Bath, where existing rent costs are very high. A minor positive impact shall also occur in terms of creating more mixed communities, by introducing population groups to areas within the District where they would otherwise be unable to afford to rent.</p> <p>Mitigation and enhancement</p> <p>Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p>		

<b>Ref DM18, 19</b>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+	0
	Where intensification of existing HMO is proposed, it has potential for overcrowding.  <b>Mitigation and enhancement</b> New H2A wording to require all intensification proposals to provide a good standard of accommodation for occupants, in line with relevant national standards relating to room sizes. Also it needs to achieve an Energy Performance Certificate C rating.	Existing policy wording relates to change of use from C3 to C4 / SG only.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality</b>	++	-/0
	Provision of new build HMOs, the change of use from other uses, and	Retaining policy H2 with no amendments would leave a policy gap

<i>Ref DM18, 19</i>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
<b>housing including affordable housing</b>	<p>intensification of existing HMOs shall provide opportunity to boost the existing supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation.</p> <p><b>Mitigation and enhancement</b> Concern relating to additional new build HMOs creating an over-concentration in an area is mitigated by the requirement for these applications to be tested against the sandwich and threshold tests set out in the HMO SPD.</p>	<p>regarding applications for new build HMOs, changes of use from other uses, and intensification of existing HMOs.</p> <p>As there is currently no policy requirement to test applications for new build HMOs against the sandwich and threshold tests set out in the HMO SPD, there is potential for this option to lead to an over-concentration in some areas.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>0/+</p> <p>Perception that higher concentrations of HMOs in an area might cause more frequent incidences of anti-social behaviour.</p> <p>Perception that the intensification of an existing HMO might cause more frequent incidences of anti-social behaviour. A particular concern where permission is granted for a large HMO following assessment against policy criteria, where no further permission (and therefore no further assessment) is required to increase the number of occupants further.</p> <p><b>Mitigation and enhancement</b> Amended policy wording requires new build HMOs and changes of use from other uses to be tested against the sandwich and threshold tests set out in the HMO SPD, in order to ensure that proposals do not cause harmful concentrations, leading to increases in associated issues such as</p>	<p>-/0</p> <p>Retaining policy H2 with no amendments would leave a policy gap regarding applications for new build HMOs and intensification of existing HMOs.</p> <p>As there is currently no policy requirement to test applications for new build HMOs against the sandwich and threshold tests set out in the HMO SPD, there is potential for this option to lead to an over-concentration in some areas, which could lead to more frequent incidences of anti-social behaviour.</p>

<b>Ref DM18, 19</b>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
	<p>anti-social behaviour.</p> <p>New policy wording allowing the inclusion of conditions on permissions to restrict the number of occupants to that proposed within the permission.</p>	
<p><b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b></p>	<p>+</p> <p>Potential for loss of other uses to HMOs, eg shops, offices, community facilities etc.</p> <p><b>Mitigation and enhancement</b> New policy wording restricting HMO use where the proposal results in the unacceptable loss of a commercial use, in conflict with other Local Plan policies (eg CR3 primary shopping areas and frontages, ED1B Change of Use &amp; Redevelopment of B1(a) Office to Residential Use), and LCR1 Safeguarding local facilities).</p>	<p>0</p>
<p><b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	<p>-/0</p> <p>Occupants of both new and intensified HMOs should have access to adequate cycle storage.</p> <p>Current cycle parking standards do not provide requirements for HMOs. Standards for C3 uses require dwellings to provide a minimum of 2no. cycle parking spaces. As a HMO often houses larger numbers of unrelated adults, the current C3 standards are not considered to be sufficient to ensure adequate provision.</p> <p><b>Mitigation and enhancement</b></p>	<p>0/-</p> <p>Existing policy wording relates to change of use from C3 to C4 / SG only. Policy gap remains.</p>



<i>Ref DM18, 19</i>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
	Future updates to the HMO SPD / provision of a new parking standards SPD to provide cycle storage standards for HMOs.	
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0/+  Potential for new build HMOs to impact local landscape features.  <b>Mitigation and enhancement</b> Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including impact on local landscape.	0  Existing policy wording relates to change of use only.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0/+  Potential for new build HMOs to impact historic environment and heritage assets.  <b>Mitigation and enhancement</b> Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including impact on historic environment and heritage assets.	0  Existing policy wording relates to change of use only.
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0/+  Potential for new build HMOs to impact biodiversity.  <b>Mitigation and enhancement</b> Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including impact on biodiversity.	0  Existing policy wording relates to change of use only.

Ref DM18, 19	Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies	
SA Objectives	Option 1 Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	Option 2 Retain existing policy H2 with no amendments
<p><b>Objective 9:</b> Reduce land, water, air, light, noise pollution</p>	<p>0/+</p> <p>Perception that higher concentrations of HMOs in an area might cause more frequent incidences of noise and disturbance.</p> <p>Perception that the intensification of an existing HMO might cause more frequent incidences of noise and disturbance. A particular concern where permission is granted for a large HMO following assessment against policy criteria, where no further permission (and therefore no further assessment) is required to increase the number of occupants further.</p> <p><b>Mitigation and enhancement</b> Amended policy wording requires new build HMOs to be tested against the sandwich and threshold tests set out in the HMO SPD, in order to ensure that proposals do not cause harmful concentrations, leading to increases in associated issues such as increased noise and disturbance.</p> <p>New policy H2A includes policy wording allowing the inclusion of conditions on permissions for new build HMOs and intensification, restricting the number of occupants to that proposed within the permission. Future update to HMO SPD to suggest ways in which landlords might restrict noise from their HMO properties, such as provision of sound reduction measures.</p>	<p>-</p> <p>Retaining policy H2 with no amendments would leave a policy gap regarding applications for new build HMOs and intensification of existing HMOs.</p> <p>As there is currently no policy requirement to test applications for new build HMOs against the sandwich and threshold tests set out in the HMO SPD, there is potential for this option to lead to an over-concentration in some areas, which could lead to more frequent incidences of noise and disturbance.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>Potential for new build HMOs to be located in areas at risk of flooding.</p>	<p>0</p> <p>Existing policy wording relates to change of use only.</p>

<b>Ref DM18, 19</b>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
	<p><b>Mitigation and enhancement</b></p> <p>Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including flood risk and drainage. A sequential approach will be required when assessing location.</p>	
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+	n/a
	<p>New build HMOs should be built with resilience to changing climate.</p> <p><b>Mitigation and enhancement</b></p> <p>Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including designing new development to be resilient to future climate. Also it is expected that HMOs to achieve an Energy Performance Certificate 'C'.</p>	Existing policy wording relates to change of use only.
<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>	0	n/a
	<p>New build HMOs should consider efficient use of natural resources.</p> <p><b>Mitigation and enhancement</b></p> <p>Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including sustainable construction methods and site-specific waste management.</p>	Existing policy wording relates to change of use only.
<p><b>General Summary</b></p> <p>The proposed approach (option 1) will fill the current policy gap relating to new build HMOs, change of use from other uses such as shops, and the intensification of existing HMOs. The proposed approach will have a major positive impact in terms of boosting the supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation. Potential minor</p>		

<b>Ref DM18, 19</b>	<b>Houses in Multiple Occupation (HMO) amendments to Policy H2 and new policies</b>	
<b>SA Objectives</b>	<b>Option 1</b> Increase scope of policy H2 to refer to new build HMOs and change of use to HMO from other uses, plus introduce supplementary policy H2A to refer to intensification of existing HMOs (C4 to SG)	<b>Option 2</b> Retain existing policy H2 with no amendments
<p>negative impacts relating to issues arising in areas with higher concentrations of HMOs will be mitigated by policy wording requiring new build HMOs to be assessed against threshold tests set out in the HMO SPD. The intensification of HMOs to an extent further than assessable at planning stage will be restricted by policy wording allowing conditions to be attached to relevant permissions, controlling the number of occupiers. A minor negative impact remains in relation cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties. Future updates to the HMO SPD / provision of a new parking standards SPD will provide cycle storage standards for HMOs.</p>		

<b>Ref DM21, 22, 23 and 24</b>	<b>Purpose Built Student Accommodation (PBSA)</b>		
<b>SA Objectives</b>	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	0/+ New policy H2B facilitates the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect to improve the health and well-being of occupiers.	0	0
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	+ Provision of PBSA shall boost the existing supply of housing for students to meet future demand,	-/0 Provision of PBSA shall boost the existing supply of housing for students to meet future demand,	- Existing policy allows for the development of PBSA district-wide, other than three

Ref DM21, 22, 23 and 24	Purpose Built Student Accommodation (PBSA)		
SA Objectives	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
	<p>providing good quality, managed homes, linked directly to an educational facility.</p> <p>Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment.</p> <p>Where students decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and complete with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes.</p> <p><b>Mitigation and enhancement</b> In order to avoid an oversupply of PBSA in Bath outside allocated sites, policy H2B shall require proposals to demonstrate that there is a need for additional student accommodation, evidenced by a formal agreement between the developer and a</p>	<p>providing good quality, managed homes.</p> <p>Provision under existing policy H2 would require PBSA to be tested using the threshold tests set out in the HMO SPD. Inclusion of PBSA in these tests could lead to the dispersal of both PBSA and HMOs to other areas of the city, in some cases further away from educational facilities.</p> <p>Not requiring evidence of need for future PBSA could lead to an oversupply, using land which could be used for other forms of housing.</p> <p>Inclusion of PBSA within the threshold test raises questions about how the PBSA unit numbers would be calculated.</p>	<p>specified areas.</p> <p>Not requiring evidence of need for future PBSA could lead to an oversupply, using land which could be developed for other forms of housing.</p>

Ref DM21, 22, 23 and 24	Purpose Built Student Accommodation (PBSA)		
SA Objectives	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
	relevant education provider.		
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	0  Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of anti-social behaviour.  <b>Mitigation and enhancement</b> Policy H2B requires submission of a Management Plan, in order to manage associated issues such as anti-social behaviour.	0  Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of anti-social behaviour.  Not requiring evidence of need for future PBSA could lead to an oversupply, leading to blocks being empty and unused for the long term.  <b>Mitigation and enhancement</b>  Inclusion of PBSA in the 10% threshold test set out in the HMO SPD would prevent provision in areas where the HMO threshold is close to being met.	-  Not requiring evidence of need for future PBSA could lead to an oversupply, leading to blocks being empty and unused for the long term.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	+/0  Many recently built PBSAs are on sites used for employment uses. The new policy with a more strategic approach would provide clarity and help maintain employment sites.	0	0
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking</b>	0  Occupants of PBSA should have access to adequate cycle storage.	0  Occupants of PBSA should have access to adequate cycle storage.	0

Ref DM21, 22, 23 and 24	Purpose Built Student Accommodation (PBSA)		
SA Objectives	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
<b>infrastructure</b>	<p><b>Mitigation and enhancement</b> Proposals for PBSA shall be required by policy H2B to provide adequate cycle storage in line with current standards for student accommodation. Future preparation of Parking Standards SPD to include updated cycle standards for student accommodation.</p>	<p><b>Mitigation and enhancement</b> Existing policy H2 wording could be updated to require adequate cycle provision for PBSA, in line with current standards for student accommodation.</p>	
<p><b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<p>0</p> <p>Potential for new build PBSA to impact local landscape features.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including impact on landscape.</p>	<p>0</p> <p>Potential for new build PBSA to impact local landscape features.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including impact on landscape.</p>	<p>0</p>
<p><b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>0</p> <p>Potential for new build PBSA to impact historic environment and heritage assets.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including impact on heritage assets.</p>	<p>0</p> <p>Potential for new build PBSA to impact historic environment and heritage assets.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including impact on heritage assets.</p>	<p>0</p>

Ref DM21, 22, 23 and 24	Purpose Built Student Accommodation (PBSA)		
SA Objectives	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0  Potential for new build PBSA to impact biodiversity.  <b>Mitigation and enhancement</b> Proposals for new build PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including impact on biodiversity.	0  Potential for new build PBSA to impact biodiversity.  <b>Mitigation and enhancement</b> Proposals for new build PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including impact on biodiversity.	0
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	0  Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance.  <b>Mitigation and enhancement</b> Policy H2B requires submission of a Management Plan, in order to manage associated issues such as noise disturbance.  The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced.	0  Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance.  <b>Mitigation and enhancement</b> Inclusion of PBSA in the 10% threshold test set out in the HMO SPD would prevent provision in areas where the HMO threshold is close to being met.	0
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0  Potential for PBSA developments to be located in	0  Potential for PBSA developments to be located in	n/a



Ref DM21, 22, 23 and 24	Purpose Built Student Accommodation (PBSA)		
SA Objectives	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
	<p>areas at risk of flooding.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including flood risk and drainage.</p>	<p>areas at risk of flooding.</p> <p><b>Mitigation and enhancement</b> Proposals for new build PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including flood risk and drainage.</p>	
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>0</p> <p>PBSA developments should be built with resilience to changing climate.</p> <p><b>Mitigation and enhancement</b> Proposals for PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including those relating to resilience to changing climate.</p>	<p>0</p> <p>PBSA developments should be built with resilience to changing climate.</p> <p><b>Mitigation and enhancement</b> Proposals for PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including those relating to resilience to changing climate.</p>	n/a
<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>0</p> <p>PBSA developments should consider efficient use of natural resources.</p> <p><b>Mitigation and enhancement</b> Proposals for PBSA required by policy H2B to be consistent with other relevant Local Plan policies, including renewable energy, sustainable</p>	<p>0</p> <p>PBSA developments should consider efficient use of natural resources.</p> <p><b>Mitigation and enhancement</b> Proposals for PBSA required by amended policy H2 to be consistent with other relevant Local Plan policies, including renewable energy, sustainable</p>	n/a

<b>Ref DM21, 22, 23 and 24</b>	<b>Purpose Built Student Accommodation (PBSA)</b>		
<b>SA Objectives</b>	<b>Option 1</b> Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	<b>Option 2</b> Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test	<b>Option 3</b> No policy change
	construction, and waste management.	construction, and waste management.	
<b>General Summary</b>			
<p>Option 1 will have a positive impact in terms of meeting identified need for provision of student housing, through policy wording allowing for the provision of new accommodation off-campus, where need is demonstrated by an educational establishment. This requirement for evidence of need will ensure that an oversupply does not occur. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by policy wording requiring a Management Plan to be submitted through the planning application process. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping etc will be mitigated by policy wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 2 will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of PBSA district wide, in any areas where the concentration of HMOs is over 10%, no PBSA will be considered to be acceptable. This may lead to the dispersal of both PBSA and HMOs to other areas of the city, in some cases further away from educational facilities. Not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment. Potential for minor negative impacts relating to issues such as noise disturbance and anti-social behaviour are mitigated by the inclusion of PBSA in the 10% HMO threshold test, which would prevent provision in areas where the HMO threshold is close to being met. Potential minor negative impacts relating to issues such as heritage assets, biodiversity and landscaping etc will be mitigated by policy wording requiring applications to be assessed against relevant existing local plan policies.</p> <p>Option 3 will have a minor negative impact in terms of meeting identified need, as although it allows for the provision of PBSA district wide, not requiring evidence of need could lead to an oversupply, using land which could be used for other forms of housing or employment.</p>			

<b>Ref DM25</b>	<b>Accessibility Standards (amendments to Policy H7)</b>
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SA Objectives	Option 1 Current Policy H7: Housing Accessibility It is proposed to update Policy H7 to require that new housing meets accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings in line with up to date evidence, subject to viability testing.	Option 2 No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Accessible and adaptable housing enables people to live more independently. It is better to build accessible housing from the outset rather than to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes, with greater choice and control over their lives.	0 Fewer accessible and adaptable homes required by existing policy compared to option 1. Departure from emerging national policy which seeks to address accessibility issues within new homes, with the aim to allow people to remain safe and independent in their homes, with greater choice and control over their lives.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ Market dwellings will be required, where viable and feasible, to meet accessibility requirements, providing the District with a larger stock of high quality, accessible homes. For affordable housing it is proposed that M4(2) accessible and adaptable dwellings standard will be applied to houses, ground floor flats and upper floor flats where a lift is installed, and age restricted homes, providing an increase in the number of accessible affordable homes in the District.	0 Fewer accessible and adaptable homes required by existing policy compared to option 1. Departure from emerging national policy which seeks to address accessibility issues within new homes, including a wider range of affordable dwelling types being required to meet accessibility standards.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ Proposed policy amendment will support opportunities to create homes that are safe, inclusive and accessible and which promote health and well-being which support mixed and balanced communities and support community cohesion and resilience enabling people to remain in their communities.	0
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	n/a	n/a

Ref DM25	Accessibility Standards (amendments to Policy H7)	
SA Objectives	Option 1 Current Policy H7: Housing Accessibility It is proposed to update Policy H7 to require that new housing meets accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings in line with up to date evidence, subject to viability testing.	Option 2 No change
<b>Objective 5:</b> Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a	n/a
<b>Objective 6:</b> Protect and enhance local environmental distinctiveness and the character and appearance of landscape	n/a	n/a
<b>Objective 7:</b> Conserve and enhance the historic environment, heritage/cultural assets and their settings	0	0
<b>Objective 8:</b> Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a	n/a
	Issues may arise relating to the conversion of listed buildings to accessible homes.  <b>Mitigation and enhancement</b> Policy wording to include an approach to site specific factors such as impact on heritage assets, whereby subject to justification the standards are only met on those elements of the site where feasible.	

Ref DM25	Accessibility Standards (amendments to Policy H7)	
SA Objectives	Option 1 Current Policy H7: Housing Accessibility It is proposed to update Policy H7 to require that new housing meets accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings in line with up to date evidence, subject to viability testing.	Option 2 No change
Objective 9: Reduce land, water, air, light, noise pollution	n/a	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 There may be examples of sites where accessible housing is not feasible due to flood risk. <b>Mitigation and enhancement</b> Policy wording to include an approach to site specific factors such as flood risk, whereby subject to justification the standards are only met on those elements of the site where feasible.	0
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a	n/a
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)	+ The proposed amendments to policy will support accessible and adaptable homes supporting sustainable design and construction outcomes.	+ The existing policy supports accessible and adaptable homes supporting sustainable design and construction outcomes.
General Summary		

<b>Ref DM25</b>	<b>Accessibility Standards (amendments to Policy H7)</b>	
<b>SA Objectives</b>	<b>Option 1</b> Current Policy H7: Housing Accessibility It is proposed to update Policy H7 to require that new housing meets accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings in line with up to date evidence, subject to viability testing.	<b>Option 2</b> No change
Option 1 meeting accessibility requirements as relates to M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings will provide a major positive impact in terms of providing a larger number of accessible homes across a range of housing types, sizes and tenures. This will provide a major positive impact in relation to health, community cohesion and housing stock. Issues relating to viability and feasibility of providing the required accessibility standards for new dwellings will be mitigated by policy wording allowing for developers to provide justification where viability or feasibility issues mean that it is not possible to meet the requirements.		

<b>Ref DM26 and 27</b>	<b>Protection of the Industrial Land (amendments to Policies ED2A and ED2B)</b>		
<b>SA Objectives</b>	<b>Option 1</b> Strengthening the protection of existing industrial land by amending Policy ED2A and ED2B	<b>Option 2</b> Option 1 plus allocating a site to facilitate to expand the facilities near the Locksbrook Campus	<b>Option 3</b> No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	0 There is a neutral effect on this objective.	0/+ Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'.	0 There is a neutral effect on this objective.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	N/A	N/A	N/A
<b>Objective 3:</b>	+	+/-	-

Ref DM26 and 27	<i>Protection of the Industrial Land (amendments to Policies ED2A and ED2B)</i>		
SA Objectives	<b>Option 1</b> Strengthening the protection of existing industrial land by amending Policy ED2A and ED2B	<b>Option 2</b> Option 1 plus allocating a site to facilitate to expand the facilities near the Locksbrook Campus	<b>Option 3</b> <b>No change</b>
<b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	The monitoring shows a significant loss of industrial employment floorspace. The policy approach to strengthening the protection of industrial land helps maintain an important mix of employment offers, contributing to promoting stronger communities.	The monitoring shows a significant loss of industrial employment floorspace. If this option leads to further loss of industrial land, it will have a negative effect on this objective. However, identifying a new site for the expansion of the Locksbrook Campus, creating more community shared space, will have a positive effect on this objective contributing to the wider community benefits.  <b>Mitigation and enhancement</b> The site selection and potential uses need to be carefully considered to ensure they contribute to the wider community benefits.	The loss of industrial land is significant, and it is likely to continue therefore the negative effect would only get worse.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	++ The monitoring shows the loss of industrial floorspace has exceeded the levels set by the Core Strategy while demand for industrial floorspace has increased. The approaches included in the Partial Update help to retain existing industrial space for industrial uses contributing to this objective.	+/- The Locksbrook campus is located within the Newbridge Strategic Industrial Estate. If the potential new site for Bath Spa University is only used for academic space it has a negative effect on this objective.  <b>Mitigation and enhancement</b> The site selection and potential uses need to be carefully considered to ensure they contribute to	- The loss in the industrial land is significant and it is likely to continue therefore the negative effect would only get worse.

Ref DM26 and 27	<i>Protection of the Industrial Land (amendments to Policies ED2A and ED2B)</i>		
SA Objectives	<b>Option 1</b> Strengthening the protection of existing industrial land by amending Policy ED2A and ED2B	<b>Option 2</b> Option 1 plus allocating a site to facilitate to expand the facilities near the Locksbrook Campus	<b>Option 3</b> <b>No change</b>
		the wider economic benefits.	
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+  Protecting key existing employment land/sites, especially in Bath, Keynsham and Somer Valley helps maintain good access to major employment areas.	+/-  The Locksbrook campus is located within the Newbridge Strategic Industrial Estate. If the potential new site for Bath Spa University is only used for academic space then it will have a negative effect on this objective.  Bath Spa University proposes walkable campuses. The Locksbrook Campus is walkable from many purpose built student accommodation facilities and houses in multiple occupation where students live.	-/?  It may lead to further loss of employment in the industrial sector and people may need to travel further.
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0  <b>Mitigation</b> Any new development is subject to Development Management Policies	0  <b>Mitigation</b> Any new development is subject to Development Management Policies	0  <b>Mitigation</b> Any new development is subject to Development Management Policies
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0  <b>Mitigation</b> Any new development is subject to Development Management Policies	0  <b>Mitigation</b> Any new development is subject to Development Management Policies	0  <b>Mitigation</b> Any new development is subject to Development Management Policies
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and</b>	0  <b>Mitigation</b>	0  <b>Mitigation</b>	0  <b>Mitigation</b>



Ref DM26 and 27	<i>Protection of the Industrial Land (amendments to Policies ED2A and ED2B)</i>		
SA Objectives	<b>Option 1</b> Strengthening the protection of existing industrial land by amending Policy ED2A and ED2B	<b>Option 2</b> Option 1 plus allocating a site to facilitate to expand the facilities near the Locksbrook Campus	<b>Option 3</b> <b>No change</b>
<b>extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	Any new development is subject to Development Management Policies	Any new development is subject to Development Management Policies	Any new development is subject to Development Management Policies
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	0 There is a neutral effect on this objective. <b>Mitigation</b> Any new development is subject to Development Management Policies	+/- Bath Spa University proposes walkable campuses. The Locksbrook Campus is walkable from many purpose built student accommodation facilities and houses in multiple occupation where students live. Also BSU concentrating on two main campuses helps reduce traveling/movements between key campuses and satellite campuses. This helps reduce the need to travel contributing to reduced air pollution.	0 There is a neutral effect on this objective.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 There is a neutral effect on this objective.	? The Locksbrook Campus is located in Flood Zone 2. <b>Mitigation</b> The site selection should follow the sequential approach.	0 There is a neutral effect on this objective
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	0 There is a neutral effect on this objective. <b>Mitigation</b> Any new development is subject to Development Management Policies	+/- Bath Spa University proposes walkable campuses. The Locksbrook Campus is walkable from many purpose built student accommodation and houses in multiple occupation where	0 There is a neutral effect on this objective.

<b>Ref DM26 and 27</b>	<b>Protection of the Industrial Land (amendments to Policies ED2A and ED2B)</b>		
<b>SA Objectives</b>	<b>Option 1</b> Strengthening the protection of existing industrial land by amending Policy ED2A and ED2B	<b>Option 2</b> Option 1 plus allocating a site to facilitate to expand the facilities near the Locksbrook Campus	<b>Option 3</b> <b>No change</b>
		students live. Also concentrating Bath Spa University on two main campuses helps reduce traveling/movement between key campuses and satellite campuses. This helps reduce travel movements contributing to reduced air pollution.	
<b>Objective 12:</b> <b>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>	0 There is a neutral effect on this objective. <b>Mitigation</b> Any new development is subject to Development Management Policies	0 There is a neutral effect on this objective. <b>Mitigation</b> Any new development is subject to Development Management Policies	0 There is a neutral effect on this objective. <b>Mitigation</b> Any new development is subject to Development Management Policies
<p><b>General Summary</b></p> <p>Option 1 to strengthen the protection of existing industrial land by adding more industrial sites/estates under Policy ED2A and protecting other industrial sites with clear policy expectations would have a significant positive effect on objective 4 (employment) by maintaining the mix of employment offers in the district, particularly in Bath. It also has positive effects on objectives 3 (community) and 5 (sustainable transport). Option 2 to strengthen the protection of existing industrial land as option 1 and identify and allocate a site to facilitate the expansion of the Bath Spa University Locksbrook Campus has mixed (positive and negative) effects on objectives 1(health and well-being), 3 (community), 4 (employment), 5 (sustainable transport), (pollution) and 11 (climate change).</p> <p><b>Mitigation</b></p> <p>The site selection and potential uses need to be carefully considered to ensure they contribute to the wider economic benefits and maintain employment opportunities close to where people live.</p>			

<b>Ref DM 29-35</b>	<b>Transport</b> <b>Amendments to Policies ST1, ST2, ST2A, ST3, ST5, ST6 and ST7</b>
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SA Objectives	Option 1 Updates policies reflect the Council's Climate and Ecological Emergencies and the ambition to achieve carbon neutrality by 2030.	Option 2 No change
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Proposed changes would encourage more accessible developments, closer to everyday destinations reachable by active travel through provision of high-quality cycling and walking infrastructure options. Access routes for those with restricted mobility encouraged.	0 No change proposed.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	n/a	n/a
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ Encourages development accessible to community, social and cultural facilities by sustainable transport modes. Access routes for those with restricted mobility encouraged.	0 No change proposed.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	+ Encourages developments which reduce travel distances from homes to workplaces, with sustainable transport options available.	0 No change proposed.
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ Strengthens existing policies in relation to access to public transport, safe walking and cycling routes, reducing dependence on private car and discouraging short car journeys, and support for people with restricted mobility.	0 No change proposed.
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0/? Where new multi-model P&R sites are proposed within the GB, landscape issues will need to be considered. Please see separate SA relating to these sites (Bath6 Park and Ride). Mitigation Further evidence work is needed to inform the draft Plan.	0 No change proposed.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0/? Where new multi-model P&R sites are proposed, heritage issues will need to be considered. Please see separate SA relating to these sites (Bath6 Park and Ride).	0 No change proposed.

Ref DM 29-35	Transport Amendments to Policies ST1, ST2, ST2A, ST3, ST5, ST6 and ST7	
SA Objectives	Option 1 Updates policies reflect the Council's Climate and Ecological Emergencies and the ambition to achieve carbon neutrality by 2030.	Option 2 No change
	Mitigation Further evidence work is needed to inform the draft Plan.	
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0/? Opportunities to encourage biodiversity improvements through development of liveable neighbourhoods and sustainable transport routes. Further work required to establish the potential level of biodiversity improvements. Mitigation Further evidence work is needed to inform the draft Plan.	0 No change proposed.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	++ Encourages provision of sustainable transport options and lessens reliance on car-use, therefore improving traffic congestion and air quality issues.	0 No change proposed.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 Seeks to lessen reliance on car-use, therefore reducing emissions which lead to climate change issues such as increased flooding. Where new multi-modal P&R sites are proposed, flood risk will need to be considered (particularly at Newbridge P&R). Please see separate SA relating to these sites.	0 No change proposed.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ Encourages sustainable transport options and lessens reliance on car-use, leading to a reduction in emissions contributing to climate change. <b>Mitigation</b> Further evidence work is needed to inform the draft Plan.	0 No change proposed.
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management</b>	+ Encourages sustainable transport options and lessens reliance on car-use, leading to a reduction in emissions contributing to climate change.	0 No change proposed.

<b>Ref DM 29-35</b>	<b>Transport Amendments to Policies ST1, ST2, ST2A, ST3, ST5, ST6 and ST7</b>	
<b>SA Objectives</b>	<b>Option 1</b> Updates policies reflect the Council's Climate and Ecological Emergencies and the ambition to achieve carbon neutrality by 2030.	<b>Option 2</b> No change
<b>accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>		
<b>General Summary</b> The proposed policy amendments seek to strengthen policies relating to sustainable transport, encouraging development in accessible locations and providing access to public transport and active travel methods. The policies will have a positive affect on the majority of the SA objectives. Where new multi-model P&R sites are proposed, numerous issues will need to be considered, and further work carried out. Please see separate SA relating to these sites(Bath6 Park and Ride).		

<b>Ref DM 36</b>	<b>Development in Green Belt Villages Amendments to Policy GB2</b>		
<b>SA Objectives</b>	<b>Option 1</b> Amend Policy GB2 and amend reference to HDBs so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication.	<b>Option 2</b> Amend Policy GB2 and remove HDBs for GB villages from the Policies map. Limited infill will be considered on an individual scheme basis.	<b>Option 3</b> No change
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	n/a	n/a	n/a
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	+	+	0
	Provides clear policy on where residential development is considered acceptable in the green belt, in line with national policy. Infill boundaries provide applicants with assistance indicating where infill development likely to be most appropriate, in order to bring forward appropriate infill developments to help boost the District's supply of housing.	Provides clear policy on where residential development is considered acceptable in the green belt, in line with national policy. Removing HDBs could potentially provide applicants with more flexibility to provide justification for suitable infill sites in more locations, bringing forward potentially appropriate infill developments to help boost the District's	No change.

Ref DM 36	Development in Green Belt Villages Amendments to Policy GB2		
SA Objectives	Option 1	Option 2	Option 3
	Amend Policy GB2 and amend reference to HDBs so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication.	Amend Policy GB2 and remove HDBs for GB villages from the Policies map. Limited infill will be considered on an individual scheme basis.	No change
	<b>Mitigation and enhancement</b> Further work is required to ensure that HDBs fully reflect the role of an infill boundary and that such boundaries are clearly defined for all villages within the Green Belt.	supply of housing.	
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+	0	0
	Provides strong indication of where infill development would be appropriate in GB villages, so as to avoid potential for new housing severed from existing community.	Potentially provides more opportunity for applicants to justify sites for infill which are located further away from existing communities.  <b>Mitigation and enhancement</b> Policy wording to clearly set out definition of infill development and where this would be considered appropriate.	No change
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	n/a	n/a	n/a
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	n/a	n/a	n/a
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+	0	0
	Provides strong indication of where infill development would be appropriate in GB villages, so as to avoid provision of inappropriate development considered harmful to the GB.	Potentially provides more opportunity for applicants to justify sites for infill which are located in areas not within existing HDBs.	No change

Ref DM 36	Development in Green Belt Villages Amendments to Policy GB2		
SA Objectives	Option 1 Amend Policy GB2 and amend reference to HDBs so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication.	Option 2 Amend Policy GB2 and remove HDBs for GB villages from the Policies map. Limited infill will be considered on an individual scheme basis.	Option 3 No change
		<b>Mitigation and enhancement</b> Policy wording or supplementary text to clarify tests to be applied to sites on a site by site basis, to ensure proposals do not constitute inappropriate development in the GB.	
<b>Objective 7:</b> Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a	n/a	n/a
<b>Objective 8:</b> Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a	n/a	
<b>Objective 9:</b> Reduce land, water, air, light, noise pollution	n/a	n/a	
<b>Objective 10:</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a	n/a	
<b>Objective 11</b> Reduce negative contributions to and Increase resilience to climate change	n/a	n/a	
<b>Objective 12:</b> Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce,	n/a	n/a	

<b>Ref DM 36</b>	<b>Development in Green Belt Villages Amendments to Policy GB2</b>		
<b>SA Objectives</b>	<b>Option 1</b> Amend Policy GB2 and amend reference to HDBs so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication.	<b>Option 2</b> Amend Policy GB2 and remove HDBs for GB villages from the Policies map. Limited infill will be considered on an individual scheme basis.	<b>Option 3</b> No change
<b>Reuse and Recycle)</b>			
<p><b>General Summary</b></p> <p>Options 1 and 2 will both bring the Local Plan in line with national policy by adding reference to residential development being permitted where it is limited to infill development, a replacement dwelling, or redevelopment of previously developed land. Option 1 will provide strong indication of where infill development would be considered appropriate in GB villages, so as to avoid potential for new housing severed from an existing community and located in areas considered to be appropriate in GB terms. Option 2 will potentially provide more flexibility to applicants, to justify sites for infill which are located in areas not within existing HDBs.</p> <p>Mitigation</p> <p>For Option 1, Further work is required to ensure that HDBs fully reflect the role of an infill boundary and that such boundaries are clearly defined for all villages within the Green Belt. Concern relating to Option 2 leading to more applications for infill in inappropriate locations will be mitigated by clear policy wording or supporting text clarifying a suitable definition of infill development and where this would be considered appropriate on a site-by-site basis.</p>			

<b>Ref</b>	<b>Title Housing supply</b>		
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014	
<b>Objective 1:</b>	++	++/+/?	



<i>Ref</i>	<i>Title Housing supply</i>	
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	The Options document considers allocating (and re-allocating) 6 sites in Bath, 3 sites in Keynsham and 1 site in Westfield. All sites have good access to a variety of existing health and well-being facilities and access to established footpaths and countryside, especially in Bath. Revising the allocation for the RUH which is a major health care provider would have a major positive effect on this objective.	All proposed allocation sites have good access to a variety of existing health and well-being facilities, therefore it has a positive effect on this objective. Some sites have more benefits than others therefore the overall effect is uncertain as it depends on which sites would be allocated.  <b>Mitigation</b> Careful selection would be needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The housing requirement of around 13,000 homes for the plan period is evidence based and established in the Core Strategy and the Options document explains that the supply shortfall is around 1,200 homes. The Options document considers allocating (and re-allocating) 6 sites in Bath, 3 sites in Keynsham and 1 site in Westfield. These sites are considered in accordance with the SAs undertaken to inform the Core Strategy and Placemaking Plan especially with the Locational Alternative Appraisals below. Identification of specific sites in Bath would help meet identified needs for Bath where the district's major economic activity is focussed and to allow the workforce to live closer to where they work. Keynsham is well located between Bath and Bristol and accessible by public transport. Identification of specific sites in Keynsham would help meet the needs for Keynsham and Bath and allow people to live closer to or with	+/? The Planning Practice Guidance (PPG) states that the standard method for assessing local housing need provides a minimum starting point for plan-making in determining the number of homes needed in an area. As this is only a Partial Update to an existing Plan, and not a new Plan, the housing land supply issue must be considered in the context of the existing Core Strategy, and not the standard methodology. However, the Options document explains that the shortfall under the current standard methodology is 371 dwellings.  Allocating more housing sites would have a positive effect but it does not take into account locally specific circumstances including growth strategies for the area. The PPG encourages Local Authorities to make

<i>Ref</i>	<i>Title Housing supply</i>	
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
	good public transport to where they work (including in Bristol).  Core Strategy SA appendix L (Locational alternative appraisal matrices) <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_1.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_1.pdf</a>	as much use as possible of previously-developed (PDL) or brownfield land and take this into account when considering whether it is appropriate to plan for a higher level of need than the standard methodology suggests. All sites selected are PDL or brownfield land apart from the Safeguarded Land (Policy KE3b) in Keynsham. Therefore, given that under this scenario less housing is provided which may not be sufficient to meet identified 'local' needs there is an uncertain effect against this objective too.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++  All sites selected have good access to a variety of existing community, social and health services and facilities by sustainable transport modes. They also have good access to established footpaths and countryside.	+/?  All sites selected have good access to a variety of existing community, social and health services and facilities by sustainable transport modes. They also have good access to established footpaths and countryside. Some sites have more benefits than others therefore the overall effect is uncertain as it depends on which sites would be allocated to meet the lower shortfall. <b>Mitigation</b> Careful selection would be needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	++  All sites selected have good access to employment by sustainable transport modes. Identification of specific sites in Bath would help meet identified needs for Bath where the district's major economic activity is focussed and planned and to allow the workforce to live closer to where	+/?  All sites selected have good access to employment by sustainable transport modes. Some sites have more benefits than others therefore the overall effect is uncertain as it depends on which sites would be allocated.

<i>Ref</i>	<i>Title Housing supply</i>	
SA Objectives	Option 1 Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	Option 2 Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
	they work. Keynsham is well located between Bath and Bristol accessible by public transport. Identification of specific sites in Keynsham would help meet the needs for Keynsham and Bath allowing people to live closer to and accessible by public transport to where they work, including in Bristol.	<b>Mitigation and enhancement</b> Careful selection would be needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ All sites selected have good access to public transport, cycling and walking infrastructure as they are located in Bath, Keynsham and Westfield.	++ All sites selected have good access to public transport, cycling and walking infrastructure as they are located in Bath, Keynsham and Westfield.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	? Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies. Further assessments are required to finalise the draft Plan which will also set out site specific development requirements and design principles.	? Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> Further assessments are required to finalise the draft Plan which will also set out site specific development requirements and design principles.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	? Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies. Further assessments are required to finalise the draft Plan which will include site specific development requirements and design principles.	? Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> Further assessments are required to finalise the draft Plan which will set out site specific development requirements and design principles.
<b>Objective 8:</b>	?	?

<i>Ref</i>	<i>Title Housing supply</i>	
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
<b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies. Further assessments are required to finalise the draft Plan which will set out site specific development requirements and design principles.	Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> Further assessments are required to finalise the draft Plan which will set out site specific development requirements and design principles.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	+/? All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land and have good access to public transport, cycling and walking infrastructure which helpful improve air quality. Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies. Further assessments are required to finalise the draft Plan which will set out site specific development requirements and design principles	+/? All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land and have good access to public transport, cycling and walking infrastructure which helpful improve air quality. Site appraisals undertaken identified specific constraints based on the evidence available. <b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies. Further assessments are required to finalise the draft Plan which will set out site specific development requirements and design principles
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 All sites selected are within Flood Zone 1, except SB10 Roseberry Place. However, outline permission has already been granted for mixed use development for Roseberry Place of which this allocation forms Phase 2.	0 All sites selected are within Flood Zone 1, except SB10 Roseberry Place. However, outline permission has already been granted for mixed use development for Roseberry Place of which this allocation forms Phase 2.
<b>Objective 11 Reduce negative contributions to and</b>	+	+

<i>Ref</i>	<i>Title Housing supply</i>	
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
<b>Increase resilience to climate change</b>	<p>Site specific opportunities are identified through individual appraisals.</p> <p><b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies and zero carbon policies proposed through this Partial Update. Further assessments are required to finalise the draft Plan with site specific development requirements and design principles.</p>	<p>Site specific opportunities are identified through individual appraisals.</p> <p><b>Mitigation and enhancement</b> The proposed development will be subject to existing DM policies and zero carbon policies proposed through this Partial Update. Further assessments are required to finalise the draft Plan with site specific development requirements and design principles.</p>
<p><b>Objective 12:</b> <b>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>	<p>++/?</p> <p>All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land</p> <p><b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site must be in accordance with the Council's climate and ecological emergency declarations.</p>	<p>++/?</p> <p>All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land</p> <p><b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site must be in accordance with the Council's climate and ecological emergency declarations.</p>
<p><b>General Summary</b></p> <p>Option 1 to allocate about 1,300 dwellings identifies 6 sites in Bath, 3 sites in Keynsham and 1 site in Westfield. All sites have good access to variety of existing community, social and health facilities as well as employment centres by sustainable modes of transport. They also have good access to established footpaths and countryside. All sites (except the Safeguarded land KE2b in Keynsham) are PDL or brownfield land. Therefore, it has major positive effects on objective 1(health), 2(housing), 3(community), 4(employment), 5(sustainable travel) and objective 12 (resources). Individual site appraisals undertaken identified specific constraints based on the evidence available for objective 6(landscape), 7(heritage), 8(ecology) and 9(pollution) and further assessments are required to finalise the draft Plan with site specific development requirements and design principles.</p> <p>Option 2 to allocate housing sites (even though less than option 1) under the Standard Methodology would have a positive effect on a number of objectives but it does not take into account locally specific</p>		

<i>Ref</i>	<i>Title Housing supply</i>	
<b>SA Objectives</b>	<b>Option 1</b> Allocate sites to meet the shortfall of around 1,200 dwellings under the Core Strategy housing requirements	<b>Option 2</b> Allocate sites to meet the shortfall (371 dwellings) under the Standard Methodology 2014
<p>circumstances including growth strategies for the area. The PPG encourages Local Authorities to make as much use as possible of previously-developed (PDL) or brownfield land and take this into account when considering whether it is appropriate to plan for a higher level of need than the standard methodology suggests. All sites selected are PDL or brownfield land apart from the Safeguarded Land (Policy KE3b) in Keynsham. In general uncertain effects are identified on a number of objectives as it depends on which sites would be allocated. Careful selection is needed considering site sustainability. This includes its location, site opportunities and constraints of the site itself in the wider context.</p>		

<i>Ref SB8</i>	<i>Bath Riverside</i>
<b>SA Objectives</b>	
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>++</p> <p>By contributing to the delivery of the safeguarded Sustainable Transport Route and connecting to the 2 Tunnels Route, the development would improve opportunities for active travel.</p> <p>The provision of enhanced open space will benefit the health and well-being of new occupants as well as other nearby residents who choose to use the area.</p> <p>The new school will serve existing and nearby residents, making it easy to reach everyday destinations and helping to meet shortfalls in capacity.</p> <p><b>Mitigation and enhancement</b></p> <p>Further assessments are required to finalise the development requirements and design principles.</p>

<b>Ref SB8</b>	<b>Bath Riverside</b>
<b>SA Objectives</b>	
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The site allocation will enable the delivery of a significant number of high quality homes, including affordable housing, to meet objectively assessed needs. It seeks to optimise development capacity whilst responding to the site's sensitive context.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ The site allocation will deliver a vibrant and cohesive community including a new school and open spaces.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++ The development of this site is essential to contribute towards meeting the objectively assessed needs of B&NES and Bath in particular. Meeting our housing needs directly relates to supporting the economic growth of the city.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ The site is in close proximity to a number of frequent bus services. A safeguarded Sustainable Transport Route runs through the site which will connect to the 3 Tunnels Route, the Bristol/Bath Shared Use Path and into the city centre. The policy requirements seek to deliver
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+/? There is a requirement that development proposals will need to be informed by a comprehensive understanding and full appreciation of the sensitive context in which this area sits.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? There is a requirement that development proposals will need to be informed by a comprehensive understanding and full appreciation of the sensitive context in which this area sits.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+/? That the recently declared ecological emergency must be a core consideration in the formulation of development proposals.
<b>Objective 9:</b>	0

<i>Ref SB8</i>	<i>Bath Riverside</i>
<b>SA Objectives</b>	
<b>Reduce land, water, air, light, noise pollution</b>	These issues will be addressed in the Draft Policy or in the refresh of the Supplementary Planning Document.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 These issues will be addressed in the Draft Policy or in the refresh of the Supplementary Planning Document.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ This is a core theme that the new site allocation will need to address, in accordance with the Council's recently declared climate emergency. The proposed options are whether the site allocation should require a specific target to be met, or whether it defers to the updated climate emergency policies that are contained elsewhere in the Local Plan.
<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>	+ This is a core theme that the new site allocation will need to address, in accordance with the Council's recently declared climate emergency. The proposed options are whether the site allocation should require a specific target to be met, or whether it defers to the updated climate emergency policies that are contained elsewhere in the Local Plan.
<b>General Summary</b> The proposed options for this site are more nuanced approaches that evolve and bring up-to-date the current site allocation which may result in significant positive effects on objective 1 (health), 2(homes), 3(community), 4,(economy), 5(sus travel), 6(landscape), 7(heritage),8(ecology), 11 (climate change)and 12(natural resources) Some elements are not detailed in the options document but will need to be in the Draft Plan and in the updates to the Supplementary Planning Document (SPD).	

<i>Ref SB14</i>	<i>Twerton Park</i>
<b>SA Objectives</b>	



<b>Ref SB14</b>	<b>Twerton Park</b>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>+</p> <p>The policy options ensure that the development delivers community benefits to Twerton. These address local needs such as a neighbourhood employment hub that could provide workspaces, meeting rooms, and communal facilities, potentially combined with club facilities.</p> <p><b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++/+</p> <p>It is anticipated that there is capacity for around 90 dwellings on this site including affordable housing, subject to the appropriate response to issues of acknowledged importance. Option 2ii) to provide minimum thresholds of different housing typologies/size would have a major positive effect on this objective.</p> <p><b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>++</p> <p>The policy seeks to address this objective by ensuring that the development delivers wide benefits – meeting the commercial requirements of the club, the community benefits to Twerton, and economic vibrancy and conservation benefits to Twerton High Street.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>++/+</p> <p>The regeneration of this area offers the potential to not only meet the operational needs of Bath City Football Club, but to also act as the catalyst to secure an economically vibrant, healthy and long term future for Twerton High Street.</p> <p>The development of this site is essential to contribute towards meeting the objectively assessed needs of B&amp;NES and Bath in particular. Meeting our housing needs directly relates to supporting the economic growth of the city. Option 2 i) with a mix of housing types to be determined by the developer to ensure a deliverable scheme would have a major positive effect on this objective.</p>
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++</p> <p>Twerton Park is on a frequent bus route, and has good links to the riverside path.</p>

<b>Ref SB14</b>	<b>Twerton Park</b>
<b>SA Objectives</b>	
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+/? The policy ensures that the development delivers conservation benefits to Twerton High Street, as well as the need to meet other local plan policy requirements, including appropriate design including building heights, scale, massing and materials, and residential amenities. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? The policy ensures that the development delivers conservation benefits to Twerton High Street, and achieves an appropriate response to wider issues such as building heights. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+/? The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0 These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The site is within Flood Zone 1. This is not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.
<b>Objective 12:</b>	+

<i>Ref SB14</i>	<i>Twerton Park</i>
<b>SA Objectives</b>	
<b>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>	The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.  <b>Mitigation and enhancement</b>
<b>General Summary</b>	
The policy wording updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies. Further assessments are required to finalise the development requirements and design principles.	

<i>Ref</i>	<i>Roseberry Place (phase 2)</i>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+ The site is on a frequent bus route and has very good links to cycling and walking infrastructure which helps encourage active lifestyle. Phase one of the development has secured a link from the Two Tunnels Cycle Route to the safeguarded Sustainable Transport Route.  Further assessments are required to finalise the development requirements and design principles.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The policy seeks to enable the redevelopment of this site and will help to deliver much needed homes.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+ The site is accessible to key services and facilities in Bath as well as parks and open countryside.

Ref	Roseberry Place (phase 2)
<b>SA Objectives</b>	
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	<p>-/+</p> <p>The existing site allocation policy sought to enable a mixed use development, including the provision of an office building on the western half of the site. Despite marketing, this has not come to fruition and the Local Plan Partial Update is considering the options to enable this part of the site to come forward. There is an opportunity to explore a range of land use options from full residential to a mixed use scheme.</p> <p>The development of this site is essential to contribute towards meeting the objectively assessed needs of B&amp;NES and Bath in particular. Meeting our housing needs directly relates to supporting the economic growth of the city.</p>
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++</p> <p>The site is on a frequent bus route and has very good links to cycling and walking infrastructure. Phase one of the development has secured a link from the Two Tunnels Cycle Route to the safeguarded Sustainable Transport Route.</p>
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>+/?</p> <p>These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.</p> <p><b>Mitigation and enhancement</b>  Review the evidence provided through the Phase 1 development (15/01932/EOUT) and further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>+/?</p> <p>These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.</p> <p><b>Mitigation and enhancement</b>  Review the evidence provided through the Phase 1 development (15/01932/EOUT) and further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>+/?</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.</p> <p><b>Mitigation and enhancement</b>  Review the evidence provided through the Phase 1 development (15/01932/EOUT) and further assessments are required to finalise the</p>

Ref	Roseberry Place (phase 2)
<b>SA Objectives</b>	
	development requirements and design principles.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	+/? These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	-/? The site is within Flood Zone 2 and partly Flood Zone 3. <b>Mitigation and enhancement</b> Review the evidence submitted through the outline application (15/01932/EOUT). It requires further consideration to inform the draft Plan.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+/? The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations. <b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations
<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>	+ The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations. <b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations
<b>General Summary</b>	This site was granted planning permission in 2015(15/01932/EOUT) for a mixed use scheme comprising Build to Rent housing, retailing on the ground floor and an office development of up to 4,500 sqm. The key change with the policy approach is to explore a range of land use options from full residential to a mixed use scheme in order to enable development. Providing more homes in the area along a frequent bus route and has very good links to cycling and walking infrastructure will have major positive effect on objective 2 (housing) and objective 5 (sustainable transport).

<b>Ref</b>	<b>Roseberry Place (phase 2)</b>
<b>SA Objectives</b>	
The site is located within Flood Zone 2 and partly Flood Zone 3 therefore it requires further consideration to inform the draft Plan.	

<b>Ref SB18</b>	<b>Bath - The Royal United Hospital (RUH)</b>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ The RUH is a major healthcare provider within the district and sub-region. The RUH is revising their Estate Strategy which will set out the future clinical and operational needs as well as increasing staff, patient numbers, forecast population growth and associated healthcare demands. Revising the allocation for the RUH would have a major positive effect on this objective. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The site allocation will provide a specific policy framework to facilitate new staff accommodation and clarity on use of staff accommodation with key worker rental agreements, potentially allowing some flexibility for open market rental accommodation. This will have a major positive effect. <b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity and use of accommodation.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ The RUH plays a key role in promoting stronger and more vibrant and cohesive communities. The Trust as set out in their Strategic Plan (2018) is delivering actions to make a positive difference environmentally, socially and financially to create an organisation that supports the well-being of their patients, staff and their wider community. The Trust has been selected for HIP2 funding and potentially up to £450m of investment could be available subject to approval. Setting an appropriate policy framework contributes well to achieving this objective.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++ The RUH is a major healthcare provider within the district and sub-region. The RUH is revising their Estate Strategy which will set out the future clinical and operational needs as well as increasing staff, patient numbers, forecast population growth and associated healthcare demands. Improving people's health and well-being helps build a stronger economy. Revising the allocation for the RUH would have a major positive effect on this objective.

<b>Ref SB18</b>	<b>Bath - The Royal United Hospital (RUH)</b>
<b>SA Objectives</b>	
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+ Good public transport to/from the RUH, however the level of parking provision needs to be carefully planned to encourage the use of sustainable modes of transport, walking and cycling as well as addressing the off-site parking issues. <b>Mitigation and enhancement</b> A Transport Statement is required, and the scope of the assessment needs to be agreed in advance of a planning application. The Statement will need to include the potential impact of the accommodation on the local highway network, and the car parking levels proposed for the site as part of the wider RUH Parking Strategy.
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+/? The site is falls within the Bath World Heritage Site (WHS) and forms part of the designated landscape setting of the settlement of Bath and its WHS. The whole of the RUH campus falls with a site-wide Tree Preservation Order area designation (ref: 500/105 95/00005/TPO) <b>Mitigation and enhancement</b> There is a requirement that development proposals will need to be informed by a comprehensive understanding and full appreciation of the sensitive context in which this area sits. An Arboricultural Impact Assessment, an Arboricultural Method Statement and Tree Protection Plan are required.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? The site is within the World Heritage Site. The Manor House is a Grade II listed building. <b>Mitigation and enhancement</b> Provide the parameters for development in terms of building heights, scale and massing particularly in relationship with the Grade II listed Manor House. A full and detailed specification of repair works and the authentic reinstatement of missing architectural features to the Manor House should be submitted as part of the listed building application.
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	? <b>Mitigation and enhancement</b> An Arboricultural Impact Assessment, an Arboricultural Method Statement and Tree Protection Plan are required.
<b>Objective 9:</b>	?

<b>Ref SB18</b>	<b>Bath - The Royal United Hospital (RUH)</b>
<b>SA Objectives</b>	
<b>Reduce land, water, air, light, noise pollution</b>	<p>The application submission will need to be supported by appropriate bat surveys to clarify the use of all buildings to be refurbished or demolished. Where roosting activity is identified the roost type, status and significance must be provided with proposals of how any impacts will be avoided and or fully mitigated.</p> <p>Where light shy species are confirmed using the mature trees / woodland or buildings, the design of new and refurbished buildings should seek to minimise light spill from both internal and external lighting to ensure dark foraging and access ways are maintained.</p> <p><b>Mitigation and enhancement</b></p> <p>A bat and lighting report will be required if significant bat activity is determined. The scheme should set out how biodiversity gains will be achieved. This should all considered be in the context of the RUH Green Infrastructure Plan and Biodiversity Action Plan (BAP).</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The site is within Flood Zone 1.</p>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>+</p> <p>The emerging RUH Strategy would also respond to two NHS targets:</p> <ul style="list-style-type: none"> <li>•For the emissions they control directly; reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032;</li> <li>•For the emissions they can influence; reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.</li> </ul> <p>Revising the allocation reflecting its strategy would have a positive effect on this objective</p> <p><b>Mitigation and enhancement</b></p> <p>New development will be subject to zero carbon policies proposed through this Partial Update.</p>
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	<p>+</p> <p>The emerging RUH Strategy would also respond to two NHS targets:</p> <ul style="list-style-type: none"> <li>•For the emissions they control directly; reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032;</li> <li>•For the emissions they can influence; reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.</li> </ul> <p>Revising the allocation reflecting its strategy would have a positive effect on this objective</p> <p><b>Mitigation and enhancement</b></p> <p>New development will be subject to zero carbon policies proposed through this Partial Update.</p>
<p><b>General Summary</b></p> <p>The RUH is a major healthcare provider within the district and sub-region. The RUH is revising their Estate Strategy which will set out the future clinical and operational needs as well as increasing staff, patient</p>	



<b>Ref SB18</b>	<b>Bath - The Royal United Hospital (RUH)</b>
<b>SA Objectives</b>	
	numbers, forecast population growth and associated healthcare demands. Revising the allocation for the RUH facilitating new staff accommodation would have a major positive effect on objectives 1(health and well-being), 2 (housing), 3(community) and 4(economy).
	<b>Mitigation and enhancement</b>
	Further assessments are required to finalise the development requirements and design principles including the site capacity.

<b>Ref</b>	<b>Bath Sion Hill</b>
<b>SA Objectives</b>	
<b>Objective 1:</b>	+
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	The site is close to bus stops along Sion Hill and accessible to a number of footpaths and open countryside.
<b>Objective 2:</b>	++
<b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	The site allocation will help meet the housing shortfall identified including affordable housing. It seeks to optimise development capacity whilst responding to the site's sensitive context. <b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity.
<b>Objective 3:</b>	+
<b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	The site is accessible to key services and facilities in Bath as well as parks and open countryside.
<b>Objective 4:</b>	+
<b>Build a strong, competitive economy and enable local businesses to prosper</b>	Meeting our housing needs directly relates to supporting the economic growth of the city.
<b>Objective 5:</b>	+
<b>Ensure everyone has access to high quality and</b>	The site is close to bus stops along Sion Hill.

<i>Ref</i>	<i>Bath Sion Hill</i>
<b>SA Objectives</b>	
<b>affordable public transport, cycling and walking infrastructure</b>	<b>Mitigation and enhancement</b> A Transport Statement is required, and the scope of the assessment needs to be agreed in advance of a planning application.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+/? This site is in a sensitive hillside location within the World Heritage Site, Conservation Area and also within the green setting of Bath. Redevelopment should be contained within the existing built footprint of the university and needs to be designed with sensitivity to the landscaped setting and contours of the site. The surrounding gardens and mature trees must be protected. <b>Mitigation and enhancement</b> There is a requirement that development proposals will need to be informed by a comprehensive understanding and full appreciation of the sensitive context in which this area sits. An Arboricultural Impact Assessment, an Arboricultural Method Statement and Tree Protection Plan are required
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? The site is within the World Heritage Site and Conservation Area. The site has many layers of history prior to its development by Bath Spa University. The site has known archaeological deposits in the area including Romano-British burials, an Iron Age site and St Winifred's Chapel and Well. The exact location of the chapel and well are not known. The site is the former ornamental landscaped garden of 19th century house (St Winifred's) built in 1803. There may be below ground remains of the property remaining on site. The historic walls and railings survive in places around the perimeter of the site. Sion Place Lodge is located in the north west corner. In the immediate area there are several heritage assets including Grade I listed Somerset Place and Sion Hill Place. The site is also prominent in the world heritage site landscape <b>Mitigation and enhancement</b> Provide the parameters for development in terms of building heights, scale and massing. An Arboricultural Impact Assessment, an Arboricultural Method Statement and Tree Protection Plan are required.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	? <b>Mitigation and enhancement</b> An Arboricultural Impact Assessment, an Arboricultural method Statement and Tree Protection Plan are required
<b>Objective 9:</b>	?

<i>Ref</i>	<i>Bath Sion Hill</i>
<b>SA Objectives</b>	
<b>Reduce land, water, air, light, noise pollution</b>	<p><b>Mitigation and enhancement</b></p> <p>A bat and lighting report will be required if significant bat activity is determined. The scheme should set out how biodiversity gains will be achieved.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The sites is within Flood Zone 1.</p>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>+</p> <p><b>Mitigation and enhancement</b></p> <p>New development will be subject to zero carbon policies proposed through this Partial Update.</p> <p>Provide a specific policy framework that the delivery of the site will be in accordance with the Council's climate and ecological emergency declarations.</p>
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	<p>+</p> <p>The site is previously developed land.</p> <p><b>Mitigation and enhancement</b></p> <p>New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations</p>
<p><b>General Summary</b></p> <p>The site allocation will help meet the housing shortfall identified including affordable housing, therefore it has a major positive effect on object 2 (housing). The allocation also has a number of positive effects by locating housing close to key facilities, services, employment and open countryside.</p> <p><b>Mitigation and enhancement</b></p> <p>Further assessments are required to finalise the development requirements and design principles including the site capacity.</p>	

<i>Ref</i>	<i>Depot site (Station Road, Newbridge)</i>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+ The policy wording safeguards the Sustainable Transport Route which when completed will help to improve the health and well-being of all communities and reduce health inequalities.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	+ The site allocation will help meet the housing shortfall identified including affordable housing.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+ The site is accessible to key services and facilities in Bath as well as parks and open countryside.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	+ The development of this site is essential to contribute towards meeting the objectively assessed needs of B&NES and Bath in particular. Meeting our housing needs directly relates to supporting the economic growth of the city.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+ The site is on a frequent bus route and has very good links to cycling and walking infrastructure. The site is on the safeguarded Sustainable Transport Route.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0/? These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 7: Conserve and enhance the historic environment,</b>	0/? These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.

<i>Ref</i>	<i>Depot site (Station Road, Newbridge)</i>
<b>SA Objectives</b>	
<b>heritage/cultural assets and their settings</b>	<p><b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>+/?</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.</p> <p><b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>0/?</p> <p>These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.</p> <p><b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The site is located within Flood Zone 1.</p>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>+/?</p> <p><b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations</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>+</p> <p><b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations</p>
<b>General Summary</b>	

<i>Ref</i>	<i>Depot site (Station Road, Newbridge)</i>
<b>SA Objectives</b>	
	The policy allocates the site for housing and for the delivery of part of the safeguarded Sustainable Transport Route. The policy wording also updates and refreshes the adopted site allocation policy and reflects the Council's declared climate and ecological emergencies.
	<b>Mitigation and enhancement</b>
	Further assessments are required to finalise the development requirements and design principles.

<i>Ref</i>	<i>Keynsham Fire Station (Policy KE2b)</i>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+ Development would enhance the public realm surrounding the site. The site is well connected and within walking distance of everyday destinations, such as shops, workplaces, schools, health facilities, bus stops and train stations.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	+ It is anticipated that the site could accommodate around 15 dwellings, which would provide a moderate contribution to meeting housing needs. This would be in the form of apartments, which would assist in the diversification of housing supply within Keynsham. <b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+ By providing a mixed use development, the site would could enable easier access to everyday destinations such as employment or retail floorspace. The site requirements would continue to seek enhanced connections between the Civic Centre and Riverside. Development would enhance the public realm surrounding the site and increase natural surveillance of the immediate area.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	+ By providing a mixed use development, the site would could contribute to employment opportunities and addressing imbalances between residential and employment development to help reduce travel distances to work.

<i>Ref</i>	<i>Keynsham Fire Station (Policy KE2b)</i>
<b>SA Objectives</b>	
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p data-bbox="683 274 705 295">+</p> <p data-bbox="683 316 2049 379">A town centre location would reduce the need to travel by car, with easy access to high quality public transport including being within walking distance of the train station.</p> <p data-bbox="683 391 1904 418">Development would enhance the public realm surrounding the site which would constitute better infrastructure for pedestrians.</p> <p data-bbox="683 466 985 493"><b>Mitigation and enhancement</b></p> <p data-bbox="683 504 1422 531">Sufficient and secure cycle parking should be incorporated into the building.</p> <p data-bbox="683 542 2123 606">Current car parking standards would need to be reconsidered in this town centre location to allow for redevelopment on what is a relatively small and constrained footprint.</p>
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p data-bbox="683 657 728 678">+/?</p> <p data-bbox="683 699 1097 726">The site lies within the Conservation Area.</p> <p data-bbox="683 737 1355 764">The site is located between the Civic Centre and Riverside buildings.</p> <p data-bbox="683 775 985 802"><b>Mitigation and enhancement</b></p> <p data-bbox="683 813 2116 914">The development would need to achieve high quality design that enhances the Conservation Area and its setting, and construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include materials identified as central to the character of Keynsham from the Conservation Area Appraisal.</p> <p data-bbox="683 925 2123 989">An appropriate design response would be required to ensure that the primacy of the Civic Centre is maintained, and that any amenity issues with the Riverside flats are designed out.</p>
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p data-bbox="683 1008 728 1029">+/?</p> <p data-bbox="683 1050 1097 1077">The site lies within the Conservation Area.</p> <p data-bbox="683 1088 1355 1115">The site is located between the Civic Centre and Riverside buildings.</p> <p data-bbox="683 1126 985 1153"><b>Mitigation and enhancement</b></p> <p data-bbox="683 1165 2116 1265">The development would need to achieve high quality design that enhances the Conservation Area and its setting, and construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include materials identified as central to the character of Keynsham from the Conservation Area Appraisal.</p> <p data-bbox="683 1276 2123 1303">An appropriate design response would be required to ensure that the primacy of the Civic Centre is maintained, and that any amenity issues with the</p>

<i>Ref</i>	<i>Keynsham Fire Station (Policy KE2b)</i>
<b>SA Objectives</b>	
	Riverside flats are designed out.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+/? Current site is entirely built form or hardstanding. New development should seek to deliver biodiversity net gain  <b>Mitigation and enhancement</b> Further assessment would be required to outline what measures should be taken to achieve biodiversity net gain.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	? A town centre location would reduce the need to travel by car, with easy access to high quality public transport including being within walking distance of the train station. The site is located between the Civic Centre and Riverside buildings.  <b>Mitigation and enhancement</b> Sufficient and secure cycle parking should be incorporated into the building. Current car parking standards would need to be reconsidered in this town centre location to allow for redevelopment on what is a relatively small and constrained footprint. An appropriate design response would be required to ensure that the primacy of the Civic Centre is maintained, and that any amenity issues with the Riverside flats are designed out.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The sites is within FZ1.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+ New development will be subject to zero carbon policies proposed through this Partial Update.
<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>	+ Development would be an effective use of a brownfield site that is currently disused.



<i>Ref</i>	<i>Keynsham Fire Station (Policy KE2b)</i>
<b>SA Objectives</b>	
<b>General Summary</b>	Revising the allocation for the former Fire Station would have minor positive effects on a number of objectives.
<b>Mitigation and enhancement</b>	Further assessments are required to finalise the development requirements and design principles including the site capacity.

<i>Ref</i>	<i>Treetops Nursing Home (New Site)</i>
<b>SA Objectives</b>	
<b>Objective 1:</b>	++
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	Redevelopment would provide an enlarged and enhanced care home (C2). This would provide enhanced healthcare facilities for older people.
<b>Objective 2:</b>	++
<b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	It is anticipated that the site could accommodate up to 40 C2 bed spaces which would provide a moderate contribution to meeting housing needs. This specialist form of accommodation would assist in the diversification of housing supply within Keynsham. <b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity.
<b>Objective 3:</b>	+
<b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	Redevelopment would provide an enlarged and enhanced care home (C2) which would comprise facilities for older people within Keynsham.
<b>Objective 4:</b>	+
<b>Build a strong, competitive economy and enable local businesses to prosper</b>	Redevelopment would allow the operator to grow their business and provide further employment opportunities.
<b>Objective 5:</b>	+

<i>Ref</i>	<i>Treetops Nursing Home (New Site)</i>
<b>SA Objectives</b>	
<b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>The site is located close to the town centre and adjacent to Keynsham medical centre. Recreational routes are in close proximity e.g. the Memorial Park and Chew Valley.</p> <p>Public Realm immediately adjacent to the site will need to be enhanced.</p> <p><b>Mitigation and enhancement</b> Enhancement of public realm</p>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>?</p> <p>The site is in a sensitive location along the boundary of the Green Belt, Conservation Area and the Landscape Setting of Keynsham.</p> <p><b>Mitigation and enhancement</b> LVIA assessment will be required. Development will be required to conserve or enhance the landscape setting of the settlement of Keynsham, local landscape character, landscape features, local distinctiveness and important views.</p>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>?</p> <p>The site is in a sensitive location along the boundary of the Green Belt, Conservation Area and the Landscape Setting of Keynsham.</p> <p><b>Mitigation and enhancement</b> Development will be required to conserve or enhance the setting of the Conservation Area.</p>
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>?</p> <p>Current site comprises built form with areas of soft landscaping or car parking. New development should seek to deliver biodiversity net gain</p> <p><b>Mitigation and enhancement</b> Further assessment would be required to outline what measures should be taken to achieve biodiversity net gain.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>?/0</p> <p>Redevelopment would not have an adverse impact on air pollution.</p> <p>There is a risk of light spill onto nearby habitats which could be used by light-sensitive bat species.</p> <p><b>Mitigation and enhancement</b> Design would need to prevent light spill onto the adjacent hedgerow to the east/south-east of the site. Proposals will need to clearly demonstrate that light spill below 0.5 lux onto this hedgerow is achievable as a result of internal as well as external lighting.</p>

<i>Ref</i>	<i>Treetops Nursing Home (New Site)</i>	
<b>SA Objectives</b>		
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0	The sites is within FZ1.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+	New development will be subject to zero carbon policies proposed through this Partial Update.
<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>	+	New development will be subject to zero carbon policies proposed through this Partial Update. Development would be an effective use of a brownfield site.
<b>General Summary</b> Allocating the site for new care home facility with clear development and design requirements would have major positive effects on objective 1 (health) and 2(housing).		
<b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles including the site capacity.		

<i>Ref</i>	<i>Land at north and east Keynsham (including Policy KE3b)</i>	
<b>SA Objectives</b>	<b>Option 1: Allocate safeguarded land, providing approximately 300 dwellings.</b>	<b>Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.</b>
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+/? It is unlikely that building 300 dwellings would support the provision of additional health services or community facilities, and demand for these services would increase. Current Health services available within Keynsham include a new surgery at Somerdale, but these may not be within reasonable walking distance	++/+ Building at least 1500 dwellings would allow the safeguarded land and additional land to the north of the A4 to be planned for comprehensively. This means that roads, a walking & cycling network, a bus network, new health services, a new primary school, new community shops and facilities, and

Appendix C B&NES Local Plan Partial Update Sustainability Appraisal

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
	<p>to all new properties.</p> <p>It is unclear whether building 300 dwellings would unlock new highways infrastructure including the link road meaning that traffic could increase. An existing shared use pedestrian and cycle path is located adjacent to the site on the A4 and the neighbouring Hygge Park development also includes new cycle infrastructure. The site would be located adjacent to the proposed A4 mass transit route.</p> <p>Some houses would be within walking distance of Keynsham train station where there are good public transport links to Bath and Bristol.</p> <p>There are very good existing exercise facilities within Keynsham, including several small gyms and a new sports &amp; leisure centre. There is good access to Manor Road Woodland and Saltford recreation ground, to which access should be enhanced. Sufficient green infrastructure should be provided within the site to link with the woodland. The proposal would enable the Hygge Park primary school to extend into the safeguarded land to deliver a playing pitch.</p> <p>There are a relatively good range of existing community facilities within Keynsham.</p> <p><b>Mitigation and Enhancement</b></p> <p>Ensure that the pedestrian/cycle crossings across the A4 and pedestrian/cycle connections to key destinations are adequate to ensure health and community services are accessible without relying on private cars. These should be LTN 1/20 compliant. Ensure that good pedestrian and cycle links are created with Hygge Park.</p> <p>Provide allotments to support sustainable food production and community gardening.</p> <p>Provision of playing pitch for the Hygge Park primary school.</p> <p>Enhanced access to Manor Road woodland. Provision of green infrastructure within the development to link with Manor Road woodland.</p>	<p>housing can be built and considered together at a high level, allowing for the most optimal plan in terms of accessibility.</p> <p>Health services are available within Keynsham including a new surgery at Somerdale but this may not be within reasonable walking distance of residents at north Keynsham. The proposed policy approach requires the updating of key infrastructure requirements which should include reference to health facilities. Unlocking this amount of housing would allow all this infrastructure to be built in the medium-to-long term, subject to viability.</p> <p>A strategic site of this size could deliver strategic transport infrastructure including a multi-modal transport corridor. The North Keynsham development will be served by the proposed A4 mass transit route and will be connected to existing off-road cycle paths including national route 4. The site would be designed to include a network of walking and cycling routes to achieve modal shift and be designed to deliver 'liveable neighbourhoods'. There are good public transport links to Bath and Bristol. The surrounding area is within walking distance of Keynsham train station.</p> <p>The proposed strategy for North Keynsham includes recreational facilities and outdoor space providing enhanced access to the River Avon. There is good access to Manor Wood and Saltford recreation ground, to which access should be enhanced. Sufficient green infrastructure should be provided within the site to link with the woodland. The proposal would enable the Hygge Park primary school to extend into the safeguarded land to deliver a playing pitch.</p> <p>There is a good range of community facilities within Keynsham. It is proposed to provide community facilities as part of a proposed local centre at north Keynsham.</p> <p>Mitigation and enhancement</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		Further evidence work is needed to inform the draft Plan.
<p><b>Objective 2:</b>  <b>Meet identified needs for sufficient, high quality housing including affordable housing</b></p>	<p>+</p> <p>This option would boost the supply of housing but there may be potential viability issues depending on the enabling transport infrastructure requirements (to be determined).</p> <p>Development plan policies will require the provision of on-site affordable housing. Greenfield development is likely to be more viable than brownfield.</p> <p>There are recent, high quality housing developments in Keynsham, including at the adjacent Hygge Park site.</p> <p><b>Mitigation and enhancement</b>  Commercial viability will be the key to achieving a sound allocation – evidence must be provided to prove deliverability when considering required transport infrastructure.  Ensure good quality housing designs.</p>	<p>++</p> <p>This option would provide a significant boost in the supply of housing and would enable housing delivery in the short, medium and longer term. This development would provide at least 1500 homes, meaning it would also deliver into the next plan period.</p> <p>Development plan policies will require the provision of on-site affordable housing. Greenfield development is likely to be more viable than brownfield. The Option would entail a large amount of Green Belt release.</p> <p>A mix of housing types and tenures will be designed into the proposed masterplan with the provision of affordable housing. There could be further provision in the form of floating homes or self-build plots.</p> <p>Due to its size this option would be optimal in terms of viability and deliverability but would present a number of additional issues to overcome, such as enhancing access across the railway line.</p> <p>It would provide the opportunity to provide good quality housing and a mix of tenures.</p> <p><b>Mitigation and enhancement</b>  Commercial viability will be the key to achieving a sound allocation – evidence must be provided to prove deliverability when considering required transport infrastructure.  Creation and use of design codes specific to North Keynsham to ensure good quality housing designs within a strategically sized site.</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
<p><b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>	<p style="text-align: center;">+</p> <p>There are a number of existing primary and secondary schools within the town with a new two-form entry primary school provided within the adjacent Hygge Park development. In the longer term, in order to be fully appointed and completed, the school will require a sports pitch/playing field, which would need to be located within the safeguarded land. Development on the site would need to demonstrate that this school would have sufficient capacity to accommodate future anticipated pupil demands. It is anticipated that the secondary age children generated by this development can be accommodated, via the displacement of future children living outside of the Wellsway catchment area. Hygge Park has been designed to facilitate future expansion into the safeguarded land; any proposal should link back into Hygge Park in order to create a cohesive community.</p> <p>There would be opportunities to accommodate space for informal recreation and leisure, play spaces and allotments.</p> <p>There are existing community facilities within Keynsham Town Centre, and a local centre is located within walking distance to the west.</p> <p>The existing policy approach seeks to improve walking and cycling routes and improved public transport.</p> <p>There are existing sports and leisure facilities within Keynsham town.</p> <p>There are good public transport links to Bristol and Bath from Keynsham Railway Station.</p> <p><b>Mitigation and enhancement</b></p> <p>The site must be able to demonstrate that the required education infrastructure can be delivered in a timely fashion in order to accommodate the children generated by the proposed development, plus accommodate the playing pitch requirements.</p> <p>Development should link back into Hygge Park in order to create a cohesive</p>	<p style="text-align: center;">++</p> <p>Building at least 1500 dwellings would allow the whole development to be planned for comprehensively. This would make it easier to design out crime and promote feelings of safety through good urban design. It would also allow the public realm to be designed and integrated in a way which maximises opportunities for social interaction and connection within and between neighbourhoods.</p> <p>Frontage and outlook could be achieved onto the River Avon, providing a high-quality living and recreation environment. Strong opportunities around a new marina for high-density residential development.</p> <p>New community facilities would be incorporated into the proposed strategy along with access to open space. The provision of a local centre will reduce car use and provide services within walking distance.</p> <p>A development of this size is anticipated to require new early years provision, and a three-form entry (630 place) primary school. Enhancements to existing primary schools within Keynsham may also be necessary. It may be necessary to add capacity to Wellsway Secondary School if the secondary school pupils generated cannot be accommodated in existing provision.</p> <p>Cycling and walking routes will be incorporated including access to national route 4. Access to public transport will be improved with the provision of A4 mass transit. There will be good public transport links to Bristol and Bath.</p> <p>Sports and leisure faculties are proposed to be provided within the proposed development, potentially linked to the new school. The proposed development would seek to enhance the existing green infrastructure network, including access to the riverside.</p> <p>Avon Valley Adventure and Wildlife Park would be relocated and enhanced under this option, providing a new facility providing a range of community, social and cultural facilities, accessible to new residents, the wider town and</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
	<p>community.</p> <p>Ensure that the pedestrian/cycle crossings across the A4 and pedestrian/cycle connections to key destinations are adequate to ensure wider community, social and cultural facilities are accessible without relying on private cars.</p>	<p>tourists from across the sub-region.</p> <p><b>Mitigation and enhancement</b></p> <p>The site must be able to demonstrate that the required education infrastructure can be delivered in a timely fashion in order to accommodate the children generated by the proposed development.</p> <p>Development must incorporate the range of appropriate and accessible community, social and cultural facilities as described.</p>
<p><b>Objective 4:</b></p> <p><b>Build a strong, competitive economy and enable local businesses to prosper</b></p>	<p>-/+</p> <p>The Inspector's report on Core Strategy noted: "There are undoubted problems of traffic congestion at Keynsham as a result of peak hour through traffic on the A4 and more local traffic using roads in and around the town centre." This Option would only contribute housing, and would therefore not increase employment within Keynsham, potentially contributing to more out-commuting to Bath and Bristol, leading to more traffic issues.</p> <p>The increase in housing would potentially worsen the current imbalance between residential and employment development.</p> <p>There would be a short-term economic benefit during the construction phase. There are good existing public transport links (Keynsham train station) to Bristol and Bath which are key employment centres. The development is located on the planned A4 mass transit route.</p> <p><b>Mitigation and enhancement</b></p> <p>Ensure new dwellings are well-connected to public transport routes to neighbouring employment centres and existing employment locations within</p>	<p>++</p> <p>The Inspector's report on the Core Strategy acknowledges the existing out-commuting from Keynsham to Bristol and Bath and comments on the need to increase employment land in order to support/improve self-containment at Keynsham.</p> <p>The Inspector's report noted that Keynsham is a good business location, being in the favoured Bath-Bristol corridor and thus has the potential to facilitate economic growth.</p> <p>The development could accommodate significant new employment provision and meet requirements of growth sectors. The proposed location will provide sustainable access to Keynsham Town centre through walking and cycling routes, this will reduce the impact from increased traffic congestion.</p> <p>The proposed strategy includes the relocation of Avon Valley Wildlife and Adventure Park and its incorporation into the proposed design. It will cater for an increased number of visitors and will have a wider range of attractions.</p> <p>There are good public transport links to Bristol and Bath which will improve</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
<b>SA Objectives</b>	<b>Option 1: Allocate safeguarded land, providing approximately 300 dwellings.</b>	<b>Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.</b>
	Keynsham (e.g. ensure enhancement of pedestrian and cycle crossings across A4 to ensure adequate access to employment).	with the provision of a metrobus and walking routes to Keynsham train station. This will ensure access to local employment sites (including Somerdale, the Town Centre and Ashmead/Pixash strategic industrial estate), Bristol Enterprise Zone and Bath Enterprise Zone.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p data-bbox="499 454 1292 488">?</p> <p data-bbox="499 494 1292 598">It is unclear whether a development of this scale would generate the funding for highways infrastructure improvements that may be required to enable housing to be delivered. This could create viability issues.</p> <p data-bbox="499 646 1292 805">Keynsham includes a Train Station with links to Bristol and Bath. There is currently access to local bus routes along the nearby A4. Also, junction improvements are proposed and the facilities at Keynsham train station will be improved. The site would be located adjacent to the proposed A4 mass transit route.</p> <p data-bbox="499 837 1292 933">An existing shared use pedestrian and cycle path is located adjacent to the site on the A4 and the neighbouring Hygge Park development also includes new cycle infrastructure.</p> <p data-bbox="499 965 1292 997"><b>Mitigation and enhancement</b></p> <p data-bbox="499 1005 1292 1069">Delivery of highways infrastructure necessary to accommodate development (to be determined).</p> <p data-bbox="499 1101 1292 1236">Ensure that the pedestrian/cycle crossings across the A4 and pedestrian/cycle connections to key destinations are adequate to ensure trips do not have to be taken using a private car. These should be LTN 1/20 compliant. Ensure that good pedestrian and cycle links are created with Hygge Park.</p>	<p data-bbox="1301 454 2074 488">++</p> <p data-bbox="1301 494 2074 598">This Option would allow the range of strategic transport infrastructure as outlined in JLTP4 to be delivered, including the proposed multi-modal transport corridor.</p> <p data-bbox="1301 646 2074 941">Improvements to transport/travel would include: greater frequency of rail services stopping at Keynsham as part of the Metro West project; enhanced local bus services; a low carbon transport network (focused on new walking and cycle connections); and other soft measures, such as encouraging changes in travel behaviour/walking to school. Working with Sustrans, the Council hopes to secure a new cycle link from the development to the Bath-Bristol cycle path, which would make cycle journeys to Bath and Bristol much more attractive.</p> <p data-bbox="1301 989 2074 1212">This option allows all development to be planned and coordinated at a high level. This will allow development to adopt a simple, permeable and highly connected street network based on a strong street hierarchy. This would support sustainable and healthy transport options by providing a walkable neighbourhood, by also incorporating other essential ingredients of a liveable neighbourhood such as local facilities and employment opportunities.</p> <p data-bbox="1301 1252 2074 1284"><b>Mitigation and enhancement</b></p>



Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		Delivery of highways infrastructure necessary to accommodate development (to be determined).
<p><b>Objective 6:</b>  <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<p>+</p> <p>This Option would require green field development, but no Green Belt release.</p> <p>Small development in concealed location means that there would be no/negligible potential impact on views from Cotswolds AONB.</p> <p>The current approach designates areas of open green space. The policy seeks to maintain and improve existing green infrastructure networks.</p>	<p>+/?</p> <p>This Option would require green field development and a large amount of Green Belt release.</p> <p>The Cotswold AONB lies to the east of Keynsham. Development resulting in the extension of the urban area into the distinctive tributary valleys of the River Avon and the Chew Valley could affect the distinctive character of the existing landscape, meaning that views from Cotswolds AONB may be compromised.</p> <p>The proposed design for north Keynsham includes access to the riverside open space. Green infrastructure will be incorporated into the new development, and in particular the existing riverside will be enhanced. Habitat creation is proposed as part of the proposed layout. Aim is for at least 10% biodiversity net gain.</p> <p>Designing at a high level provides the opportunity to establish and promote Keynsham's identity and local distinctiveness.</p> <p><b>Mitigation and enhancement</b></p> <p>The proposed strategy for north Keynsham will be sensitively sited to avoid harm to the nearby Cotswold AONB. The riverside area will remain as open green space. Development layout and building heights carefully arranged to avoid compromising views from Cotswolds AONB.</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		Avoid hard development close to River Avon to minimise biodiversity disruption.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0/+  There are no designated heritage assets within the site. There are three listed buildings within the surroundings (Grange hotel, c.390 metres to the west; Ellsbridge House, c.55m to the north; and Keynsham Manor, c. 855m to the south east). Most are located at such a distance as to have no historical or functional relationship with the site, and are effectively screened by existing settlement form, topography and vegetation. There appear to be no overriding heritage constraints that would preclude development within the site, nor would any heritage assets be affected directly, or there be impact on their settings such as to cause harm to their significance.	?  The site includes a small number of listed buildings around Avon Mill Lane, two Listed bridges (Pixash Lane and pedestrian bridge to the east) and a number of heritage sites with HER records, notably some Roman finds at Avon Valley Park. There are a small number of buildings with notable character at Broadmead Lane Industrial Estate and Avon Valley Farm Building at least 1500 dwellings would allow the whole development to be planned for comprehensively, leading to a well-designed development that is well related to the surrounding townscape. Public open space could be located in any areas of heritage interest to reduce impact on sensitive sites.  <b>Mitigation and enhancement</b> An archaeological assessment should be completed in order to inform development proposals. Alterations to the road network may require a sensitive design to avoid harm to nearby listed building on Avon Mill Lane, Pixash Lane and Clay Lane Bridge. There is the possibility that archaeological finds may require further investigation.
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity</b>	+/-?  The forthcoming Environment Bill proposes at least 10% mandatory measurable net gain of biodiversity.	++/?  The forthcoming Environment Bill proposes at least 10% mandatory measurable net gain of biodiversity.

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
<p><b>in the district and geodiversity (taking account of climate change)</b></p>	<p>The current approach would designate areas of open green space. The policy seeks to maintain and improve existing green infrastructure networks.</p> <p>The protection and enhancement of biodiversity is covered by district wide policies.</p> <p><b>Mitigation and enhancement</b></p> <p>Ensure the impact on biodiversity will be considered through the site Masterplanning process and that there is suitable mitigation provided through Local Plan policies to address any significant effects on biodiversity in order to help reduce any potential harmful impacts.</p>	<p>This Option would allow comprehensive planning of the whole site, meaning that development layout can be optimised to avoid harm and enhance biodiversity.</p> <p>The strategy for North Keynsham seeks to maintain and enhance the green infrastructure network with an expectation to contribute towards a net gain of the sub-regions natural environment and biodiversity. The strategy requires the incorporation of a well-integrated, multifunctional green infrastructure network. Access to the riverside will be improved. This includes habitat creation and biodiversity management. Retention and management of biodiversity will also be required by district wide policies.</p> <p>There are a number of environmental designations that could potentially be affected by the proposed strategy. Stidham Farm Site of Special Scientific Interest (SSSI) is located to the east of the site and currently managed as an arable field. This SSSI is designated for its geological features. There are three Sites of Nature Conservation Interest on site: Stidham Farm SNCI, Broad Mead Field SNCI in the centre (designated for its marshy grassland and botanical interest), and the River Chew SNCI (designated for its running water and associated marginal habitats, including protected fauna, which use the site in part as a wildlife corridor). The River Avon SNCI runs adjacent to the northern site boundary and is designated for its running water and associated marginal habitats, including protected fauna, botanical and invertebrate interest.</p> <p>The proposed layout should avoid building within SNCIs and SSSIs and these will be retained and enhanced as part of the habitat creation. In particular the riverside will remain undeveloped.</p> <p><b>Mitigation and enhancement</b></p> <p>Ensure the impact on biodiversity will be considered through the site</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		Masterplanning process and that there is suitable mitigation provided through Local Plan policies to address any significant effects on biodiversity and geodiversity in order to help reduce any potential harmful impacts.
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>-/0</p> <p>Site adjacent to A4, so there may be potential noise issues if adequate mitigation measures aren't put in place.</p> <p>Development may cause increased pressure on the existing transport network, impacting on air quality.</p> <p>An AQMA was declared for the Centre of Keynsham in July 2010. Development may cause pressure on the key transport network impacting on air quality in this locality. It is also closely linked to the AQMA in Salford.</p> <p>Policy KSM7 requires SUDS to be incorporated as part of the green infrastructure and flood prevention strategies.</p> <p><b>Mitigation and enhancement</b></p> <p>Use soft planting around housing development along A4 road edge and reconfigure housing layout and orientation to minimise noise disturbance from road.</p> <p>Transport Impact Assessment and adequate preventative and mitigation measures are required.</p> <p>Improve bus routes to surrounding employment centres to avoid overwhelming the rail services and reduce reliance on private car.</p>	<p>+/0/-</p> <p>The site is close to sewerage works and waste recycling facilities which could cause odour and/or noise issues.</p> <p>Part of the site is adjacent to the River Avon, so measures would have to be put in place to prevent risk of water and light pollution.</p> <p>The site includes some areas of artificial ground and historic landfill. This and the existing industrial uses could pose contamination issues for development.</p> <p>The ground conditions are generally not expected to pose constraints for foundations however further investigation would be required.</p> <p>Improved walking and cycling routes will reduce car use. These measures will seek to reduce the increase in traffic congestion.</p> <p>Development within north Keynsham may cause pressure on the existing transport network, impacting on air quality. Access to public transport including the train station and metro bus will minimise the impact from traffic congestion.</p> <p>An AQMA was declared for the Centre of Keynsham in July 2010.</p> <p>Development at North Keynsham may cause pressure on the key transport network impacting on air quality, but has the potential to improve the air quality within the Keynsham Town Centre AQMA (by delivery of the multi-modal transport corridor which should alleviate some of the current traffic in Keynsham Town Centre). It is also closely linked to the AQMA in Salford.</p> <p>Policy KSM7 requires SUDS to be incorporated as part of the green infrastructure and flood prevention strategies.</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		<p><b>Mitigation and enhancement</b>  Transport Impact Assessment and adequate preventative and mitigation measures are required.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>+</p> <p>The entire site is located in Flood Zone 1. There is no history of flooding on any part of the site.</p> <p>SUDS will be required as part of the district wide policies and will manage surface water run-off.</p> <p>There is a small Groundwater Source Protection Zone at Somerdale. There are no Drinking Water Safeguard Zones nearby.</p> <p>District wide policies will steer development to areas outside of the floodplain.</p>	<p>?/+</p> <p>Significant areas of the site lie within Flood Zone 3 (functional floodplain and areas with high probability of flooding). This primarily affects the northern area of the peninsula, around Broadmead Lane Industrial Estate, and up to the Wessex Water site, and a corridor along the River Avon, including the access from Avon Mill Lane / Keynsham Road. There are areas at risk from surface water flooding around the Broadmead Brook. Flood Zone 2 (medium probability - 1:100 to 1:1000yr annual risk) affects further areas around the Wessex Water and Paper Mill sites. The Strategic Flood Risk Assessment demonstrates that further areas of the site will fall within Flood Zone 3 following climate change. Initial work suggests there could be opportunity to re-route Broadmead Brook to provide improved outfall from upstream, reducing flood risk around the railway line, while improvements to levels within the functional floodplain could ease floodwater flows. The alignment of the multi-modal transport corridor could assist in providing current and future flood protection. Significant improvements will be required to attenuate flows from the redeveloped site.</p> <p>Policy KSM7 requires SUDS to be incorporated as part of the green infrastructure and flood prevention strategies. There will be the creation of green corridors between the riverside area and the railway corridor, accommodating surface water attenuation.</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
		<p>SUDS will be required as part of the district wide policies and will manage surface water run-off. There is a small Groundwater Source Protection Zone at Somerdale, contained within the site. There are no Drinking Water Safeguard Zones nearby.</p> <p><b>Mitigation and enhancement</b></p> <p>Flood Risk Assessment identified that provision of new attenuation areas would result in a marginal reduction in the downstream flow of the River Avon and a delay of peak flood flows. It also leaves the out-of-bank flow corridor unobstructed and would lead to further flow enhancement. This approach would reduce the risk to people and property. The flood risk benefits expected from this suggested proposal should be demonstrated by detailed modelling. Flood mitigation should contribute to green infrastructure provision. The sequential approach needs to be applied within the site boundary.</p>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<p>+/?</p> <p>Opportunities for the development to be predominantly arranged on an east-west axis to maximise the potential for solar gain enabling a 'fabric first' approach to the buildings. The southerly orientation of roofs would maximise potential for photovoltaic panels.</p> <p>An existing shared use pedestrian and cycle path is located adjacent to the site on the A4 and the neighbouring Hygge Park development also includes new cycle infrastructure.</p>	<p>++/?</p> <p>A strategy for a network of high-quality low carbon travel will be designed for the development that is sustainable – promoting walking and cycling. The network can be designed at a high level, considering an overview of possible routes, including integrating cycling/walking routes with the existing/wider local area (such as Keynsham railway station, the Bristol to Bath route and future mass transit).</p> <p>The development will have a zero-carbon strategy which will cover buildings, transport and renewable energy.</p>

Ref	Land at north and east Keynsham (including Policy KE3b)	
SA Objectives	Option 1: Allocate safeguarded land, providing approximately 300 dwellings.	Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.
	<p><b>Mitigation and enhancement</b></p> <p>Ensure that the pedestrian/cycle crossings across the A4 and pedestrian/cycle connections to key destinations are adequate to ensure trips do not have to be taken using a private car. These should be LTN 1/20 compliant. Ensure that good pedestrian and cycle links are created with Hygge Park.</p> <p>Increase the supply of local food and increase provision of food growing space in Keynsham e.g. allotments.</p>	<p>The proposed development will be subject to existing DM policies which requires a fabric first approach to construction and provision of renewable energy. The aim is to provide a zero carbon development through the use of sustainable construction and the provision of renewable energy technology. There is an opportunity to provide a heat network. Policy KSM8 identifies heat network priority areas within the proposed SDL. Potential role of green-infrastructure provision may contribute to carbon sequestration.</p> <p><b>Mitigation and enhancement</b></p> <p>Identify and test various options to achieve optimal zero-carbon strategy for north Keynsham, ensuring it is achievable.</p> <p>Consider concept of whole life cycle carbon assessments and robust sustainability models/structures – including approach to development objectives, strategies, KPIs &amp; targets, and the potential use of carbon budgets.</p>
<p><b>Objective 12:</b>  <b>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>	<p>+/?</p> <p>This Option would entirely utilise greenfield land, meaning there would be no option to reuse site materials or any brownfield land.</p> <p>Policy KSM7 requires SUDS to be incorporated as part of the green infrastructure and flood prevention strategies. The proposed development will incorporate SUDS as required by district wide policies. The site is close to sewerage works and waste management facilities.</p>	<p>+/?</p> <p>This Option would mostly use Green Belt land, meaning that options for reusing site materials or brownfield land would be limited, but there are areas of brownfield land within the site (such as buildings associated with Avon Valley Wildlife Park).</p> <p>Policy KSM7 requires SUDS to be incorporated as part of the green infrastructure and flood prevention strategies. The proposed development will incorporate SUDS as required by district wide policies. The site is close to</p>

<b>Ref</b>	<b>Land at north and east Keynsham (including Policy KE3b)</b>	
<b>SA Objectives</b>	<b>Option 1: Allocate safeguarded land, providing approximately 300 dwellings.</b>	<b>Option 2: Allocate all of North Keynsham site for development (including the safeguarded land), providing at least 1500 dwellings.</b>
	Development will be subject to existing DM policies which requires a fabric first approach to construction and provision of renewable energy. The aim is to achieve a zero carbon development. There is an opportunity to provide a heat network.	sewerage works and waste management facilities.  Development will be subject to existing DM policies which requires a fabric first approach to construction and provision of renewable energy. The aim is to achieve a zero carbon development. There is an opportunity to provide a heat network.
<p><b>General Summary</b></p> <p>Option 2 will incorporate the wider area into the proposed strategy. This will allow for the provision of improved infrastructure to be incorporated into proposed developments. The approach will make provision for a new local centre and services at north Keynsham which can be accessed from existing and proposed development sites. The approach will also have improvements to aspects such as health and wellbeing, the economy and air quality. These Options would deliver net zero carbon developments which would achieve and net biodiversity gain. Therefore it has major positive effects on objective 1(health), 2(housing), 3(community), 4(economy), 5 (sustainable travel), 8(ecology) and 11(climate change).</p> <p><b>Mitigation and enhancement</b></p> <p>Further evidence works including viability assessments are needed to inform the draft Plan.</p> <p>It is unclear without further assessment whether building 300 dwellings under Option 1 would deliver new highways infrastructure sufficient to prevent a severe impact on the highway network. Therefore traffic could increase to an unacceptable level resulting some uncertain effects on a number of objectives particularly on objective 5 (sustainable travel).</p>		

<b>Ref Bath1 and Bath2</b>	<b>Bath Recreation Ground (amendments to Policies B1 and SB2)</b>
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SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	0	? <p>The previous SA which informed the allocation identified a major positive effect on this objective as the vision for this area is to create a recreational heart to the city, with the river at its centre, as a forum for leisure, recreation, wildlife, entertainment and culture. Reviewing this policy will have an uncertainty effect.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	? <p>The previous SA informed the allocation identified a major positive effect on this objective as the vision for this area is to create a recreational heart to the city, with the river at its centre, as a forum for leisure, recreation, wildlife, entertainment and culture. Deleting this policy will have an uncertainty effect.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	n/a	n/a	n/a
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	0	? <p>The previous SA which informed the allocation identified a major positive effect on this objective as the policy facilitates the creative reuse of the voids underneath Grand Parade and Terrace Walk and encourage an appropriate new building for cultural uses in front of Terrace Walk subject to a sensitivity analysis. The current policy facilitates the removal of the radial gate and facilitating the</p>	? <p>As option 2, deleting the policy and allocation will have an uncertainty effect on this objective.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>

<i>Ref Bath1 and Bath2</i>	<i>Bath Recreation Ground (amendments to Policies B1 and SB2)</i>		
SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
		<p>creation of a high quality public space that enhances the setting of Pulteney Bridge, improves safety for users of the riverside path, and improves the ecological value and function of the river. Therefore this option will have an uncertainty effect depending on the scope of the review.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	
<p><b>Objective 4:</b> Build a strong, competitive economy and enable local businesses to prosper</p>	<p>0</p> <p><b>Mitigation and enhancement</b></p>	<p>?</p> <p>The previous SA which informed the allocation identified a minor positive effect on this objective as the transformation of this part of the city will contribute to the image and identity of the city as a place to do business. Therefore this option will have an uncertain effect depending on the scope of the review.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	<p>?</p> <p>As option 2, deleting the policy and allocation will have an uncertainty effect on this objective.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>
<p><b>Objective 5:</b> Ensure everyone has access to high quality and</p>	<p>0</p>	<p>?</p> <p>The previous SA which informed the</p>	<p>?</p> <p>As option 2, deleting the policy and allocation</p>

<i>Ref Bath1 and Bath2</i>	<i>Bath Recreation Ground (amendments to Policies B1 and SB2)</i>		
SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
affordable public transport, cycling and walking infrastructure	<b>Mitigation and enhancement</b>	allocation identified a major positive effect on this objective as the site is in very close proximity to Bath Spa train station, and the bus station. Being in the centre of Bath it is highly accessible location, where people are encouraged to walk and cycle. Therefore this option will have an uncertain effect depending on the scope of the review. <b>Mitigation</b> Further evidence work is needed to inform the draft Plan.	will have an uncertain effect on this objective. <b>Mitigation</b> Further evidence work is needed to inform the draft Plan.
<b>Objective 6:</b> Protect and enhance local environmental distinctiveness and the character and appearance of landscape	0	?	?
<b>Objective 7:</b>	0	?	?

<i>Ref Bath1 and Bath2</i>	<i>Bath Recreation Ground (amendments to Policies B1 and SB2)</i>		
SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
<b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<b>Mitigation and enhancement</b>	The previous SA informed the allocation identified a minor positive effect on this objective as the policy facilitates the removal of the radial gate and facilitating the creation of a high quality public space that enhances the setting of Pulteney Bridge, improves safety for users of the riverside path, and improves the ecological value and function of the river. The current Policy requires that the design to respond appropriately and creatively to its sensitive context within the WHS and ensuring appropriate landscaping, tree planning and public realm enhancements. Therefore this option will have an uncertain effect depending on the scope of the review. <b>Mitigation</b> Further evidence work is needed to inform the draft Plan.	As option 2, deleting the policy and allocation will have an uncertainty effect on this objective. Mitigation Further evidence work is needed to inform the draft Plan.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0	?	?
	<b>Mitigation and enhancement</b>	The previous SA informed the allocation identified a minor positive effect on this objective as the current policy seeks to	As option 2, deleting the policy and allocation will have an uncertainty effect on this objective.

Appendix C B&NES Local Plan Partial Update Sustainability Appraisal

Ref Bath1 and Bath2	Bath Recreation Ground (amendments to Policies B1 and SB2)		
SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
		<p>encourage and protect habitats and biodiversity and also facilitates the removal of the radial gate. Therefore this option will have an uncertain effect depending on the scope of the review.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	<p>Mitigation Further evidence work is needed to inform the draft Plan.</p>
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>0</p>	<p>?</p> <p>The land is within the Coal Authority defined Development Low Risk Area. The site is outside the Surface Coal Resource Plan area.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	<p>?</p> <p>The land is within the Coal Authority defined Development Low Risk Area. The site is outside the Surface Coal Resource Plan area.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p>	<p>?</p> <p>The previous SA informed the allocation identified a minor positive effect on this objective as the area falls within FZ 3a/3b and functions as an important storage area during flood events. The current policy requires ensuring no net loss of floodplain</p>	<p>?</p> <p>As option 2, deleting the policy and allocation will have an uncertainty effect on this objective.</p> <p>Mitigation Further evidence work is needed to inform the draft Plan.</p>

<i>Ref Bath1 and Bath2</i>	<i>Bath Recreation Ground (amendments to Policies B1 and SB2)</i>		
SA Objectives	Option 1 No change to the existing policy wording	Option 2 Review the policy wording through the Local Plan Partial Update	Option 3 Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
		<p>storage.</p> <p>Policy facilitates the removal of the radial gate which contributes to this objective. Therefore this option will have an uncertain effect depending on the scope of the review.</p> <p><b>Mitigation</b> Further evidence work is needed to inform the draft Plan.</p>	
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	0	0	0
<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>	0	<p>Other adopted and emerging development plan policies apply</p> <p>?</p> <p>The previous SA which informed the allocation identified a minor positive effect on this objective as the policy encourages efficient use of previously development part of the land.</p> <p>Other development plan policies apply that encourage sustainable construction.</p>	<p>Other adopted and emerging development plan policies apply</p> <p>?</p> <p>As option 2, deleting the policy and allocation will have an uncertainty effect on this objective.</p> <p>Mitigation Further evidence work is needed to inform the draft Plan.</p>
<p><b>General Summary</b> The policy options relate to the recent judgement confirming that the legal covenant relating to use of the land remains capable of being enforced by beneficiaries of it. The various options proposed will have</p>			

<i>Ref Bath1 and Bath2</i>	<i>Bath Recreation Ground (amendments to Policies B1 and SB2)</i>		
<b>SA Objectives</b>	<b>Option 1</b> No change to the existing policy wording	<b>Option 2</b> Review the policy wording through the Local Plan Partial Update	<b>Option 3</b> Delete the policy through the Local Plan Partial Update and revisit it in the Full Local Plan
different effects but these remain uncertain until the policy wording has been reviewed.			

<i>Refm Bath3 and Bath4</i>	<i>Bath Milsom Quarter</i>	
SA Objectives	Option 1: Mixed uses on ground floor, residential on upper floors only	Option 2: Allowing a mix of town centre and residential uses on all floors
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p style="text-align: center;">+</p> <p>The area is well connected and within walking distance of everyday destinations such as shops, workplaces, schools, bus stops and train stations.</p> <p>The development is close to a number of gyms and leisure facilities.</p> <p>There are existing health facilities surrounding the site which can be accessed via sustainable transport means (walking, cycling and public transport).</p> <p><b>Enhancement:</b> Consider the provision of new additional open/natural/green space.</p>	<p style="text-align: center;">+</p> <p>The area is well connected and within walking distance of everyday destinations, such as shops, workplaces, schools, health facilities, bus stops and train stations.</p> <p>The development is close to a number of gyms and leisure facilities.</p> <p>There are existing health facilities surrounding the site which can be accessed via sustainable transport means (walking, cycling and public transport).</p> <p><b>Enhancement:</b> Consider the provision of new additional open/natural/green space.</p>
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p style="text-align: center;">++</p> <p>This Option would increase residential development within a sustainable, City Centre location.</p> <p><b>Mitigation and enhancement:</b> Ensure that the upper floor residential housing is inclusive and accommodates the needs of disabled/older people i.e. lifts and wheelchair-accessible homes.</p>	<p style="text-align: center;">++</p> <p>This Option would increase residential development within a sustainable, City Centre location.</p> <p><b>Mitigation and enhancement:</b> Ensure that the upper floor residential housing is inclusive and accommodates the needs of disabled/older people i.e. lifts and wheelchair-accessible homes.</p>
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p style="text-align: center;">++</p> <p>The Milsom Quarter currently has many vacant units and a decreasing footfall. This Option would allow mixed use redevelopment including residential and retail, helping to both increase and balance activity, in turn improving natural surveillance and designing out crime.</p>	<p style="text-align: center;">+</p> <p>The Milsom Quarter currently has many vacant units and a decreasing footfall. This Option would allow mixed use redevelopment including residential and retail, helping to both increase and balance activity, in turn improving natural surveillance and designing out crime.</p>



Refm Bath3 and Bath4	Bath Milsom Quarter	
SA Objectives	Option 1: Mixed uses on ground floor, residential on upper floors only	Option 2: Allowing a mix of town centre and residential uses on all floors
	<p>The residential development would be located within the City Centre, meaning it would be well connected to the existing community. The greater balance in the mix of uses, activity and increased residential development would all combining to redefine the sense of community and increased local purpose.</p> <p><b>Enhancement:</b> Ensure the creation of/access to public spaces that might support civic, cultural, recreational and community functions.</p> <p><b>Mitigation:</b> Include ground floor retail uses which will also be used in the evenings/nighttime to balance activity and footfall more consistently.</p>	<p>The residential development would be located within the City Centre, meaning it would be well connected to the existing community. The greater balance in the mix of uses, activity and increased residential development would all combining to redefine the sense of community and increased local purpose.</p> <p><b>Enhancement:</b> Ensure the creation of/access to public spaces that might support civic, cultural, recreational and community functions.</p> <p><b>Mitigation:</b> Asses the implications of introducing residential dwellings to ground floors in the City Centre to ensure that ground floor activity, attractiveness and footfall can be maintained in the daytime.</p>
<p><b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b></p>	<p>++</p> <p>Milsom Quarter is currently an area in decline in terms of footfall and vacancy rates. This Option would help to create a more vibrant &amp; diverse part of the city with a greater balance in the mix of uses, activity and increased residential development. Therefore, it would provide an adequate supply of land and diverse range of employment opportunities.</p> <p>Increased residential development will help to create a more vibrant community and assist in making the area more financially viable.</p> <p>This Option would deliver a mixed-use development on brownfield land within a sustainable City Centre location, therefore contributing to the regions' ambition to be a driving force for clean and inclusive growth.</p>	<p>+/?</p> <p>Milsom Quarter is currently an area in decline in terms of footfall and vacancy rates. This Option would help to create a more vibrant &amp; diverse part of the city with a greater balance in the mix of uses, activity and increased residential development. Therefore, it would provide an adequate supply of land and diverse range of employment opportunities.</p> <p>Increased residential development will help to create a more vibrant community and assist in making the area more financially viable. This Option would deliver a mixed-use development on brownfield land within a sustainable City Centre location, therefore contributing to the regions' ambition to be a driving force for clean and inclusive growth.</p> <p>However residential uses on ground floors could potentially undermine the shopping function by fragmenting the shopping active frontages.</p> <p><b>Mitigation</b></p>

<i>Refm Bath3 and Bath4</i>	<i>Bath Milsom Quarter</i>	
<b>SA Objectives</b>	<b>Option 1: Mixed uses on ground floor, residential on upper floors only</b>	<b>Option 2: Allowing a mix of town centre and residential uses on all floors</b>
		Further evidence work is needed in support of the Draft Plan.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++	++
	Development would be within the City Centre, within walking distance of shops, facilities, cycle lanes and public transport.  Access to major employment areas.	Development would be within the City Centre, within walking distance of shops, facilities, cycle lanes and public transport.  Access to major employment areas.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0	0
	The option facilitates redevelopment of upper floors of existing buildings. Milsom Quarter also includes the Cattlemarket site, which is allocated In the Placemaking Plan (Policy SB1). Policy SB1 sets out site specific development requirements and design principles including responding to the important views and to the general character of the area.	The option facilitates redevelopment of existing buildings. Milsom Quarter also includes the Cattlemarket site, which is allocated In the Placemaking Plan (Policy SB1). Policy SB1 sets out site specific development requirements and design principles including responding to the important views and to the general character of the area.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/-	+/-
	Upper floor residential development in the City Centre will require the creation of a separate access/entrance or residential foyer on the ground floor which has the potential to compromise the appearance of Listed Buildings/CA setting.  <b>Mitigation</b> Further evidence work is needed in support of the Draft Plan.	Upper floor residential development in the City Centre will require the creation of a separate access/entrance or residential foyer on the ground floor which has the potential to compromise the appearance of Listed Buildings/CA setting.  <b>Mitigation:</b> Asses the implications of introducing residential dwellings to ground floors in the City Centre to ensure that street-level/ground floor attractiveness is maintained. Even where residential dwellings are limited to upper floors this will require the creation of a separate access/entrance or residential foyer on the ground floor. This would need to be implemented in a manner that maintains or minimises harm to activity levels on the ground floor and may

<i>Refm Bath3 and Bath4</i>	<i>Bath Milsom Quarter</i>	
<b>SA Objectives</b>	<b>Option 1: Mixed uses on ground floor, residential on upper floors only</b>	<b>Option 2: Allowing a mix of town centre and residential uses on all floors</b>
		give rise to listed buildings issues. The policy framework to be established would need to ensure these impacts are appropriately addressed.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0 The option facilitates redevelopment of upper floors of existing buildings. Milsom Quarter also includes the Cattlemarket site, which is allocated In the Placemaking Plan (Policy SB1). Policy SB1 sets out site specific development requirements and design principles including restoring and enhancing the biodiversity value of the river and the river edge.	0 The option facilitates redevelopment of existing buildings. Milsom Quarter also includes the Cattlemarket site, which is allocated In the Placemaking Plan (Policy SB1). Policy SB1 sets out site specific development requirements and design principles including restoring and enhancing the biodiversity value of the river and the river edge.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0	0
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The area is located within Flood Zone 1.	0 The area is located within Flood Zone 1.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	+/? The area is well connected and within walking distance of everyday destinations such as shops, workplaces, schools, bus stops and train stations. This helps promote the use of sustainable transport and reduce carbon emissions. <b>Mitigation and enhancement</b> Further evidence work is needed to set site specific requirements.	+/? The area is well connected and within walking distance of everyday destinations such as shops, workplaces, schools, bus stops and train stations. This helps promote the use of sustainable transport and reduce carbon emissions. <b>Mitigation and enhancement</b> Further evidence work is needed to set site specific requirements.
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable</b>	++ This option encourages the effective use of existing buildings and has a major positive effect on this objective.	++ This option encourages the effective use of existing buildings and has a major positive effect on this objective.

<i>Refm Bath3 and Bath4</i>	<i>Bath Milsom Quarter</i>	
<b>SA Objectives</b>	<b>Option 1: Mixed uses on ground floor, residential on upper floors only</b>	<b>Option 2: Allowing a mix of town centre and residential uses on all floors</b>
<b>construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>		
<p><b>General Summary</b></p> <p>The Milsom Quarter is an area that is in decline, shown by falling footfall and increasing vacancy rates. Both options facilitate a greater balance in the mix of uses, activity and increased residential development in well connected area have major positive effects on objective 2 (housing), objective 5(sustainable transport) and objective 12 (resources). Option 1 with mixed uses on ground floor and residential on upper floors only helps maintain active ground floor uses which results in a major positive effect on objective 4(economy). In comparison, option 2 with residential uses on ground floor may have a negative effect on the same objective.</p> <p>Mitigation</p> <p>Further evidence work is required to support the draft Plan with site specific development requirements and design principles, particularly taking into account a long-term effect.</p>		

<i>Ref</i>	<i>University of Bath</i>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>++/?</p> <p>The University of Bath is preparing the masterplan for the Claverton Down Campus and proposes further improvements to teaching facilities and provides more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. Policy SB19 enables the further provision of facilities for sports and recreation and the masterplan proposes 3<sup>rd</sup> generation pitches which help facilitate longer play especially in winter. Despite significant benefits of 3<sup>rd</sup> generation pitches there are some concerns raised in terms of potential risk to health and soil/water contamination associated with old tyres which are often used as rubber crumbs in the pitches.</p> <p><b>Mitigation and enhancement</b></p> <p>Technology of artificial pitches is improving and now there are hybrid pitches and 100% recyclable with natural filling crumbs. Further discussion is needed to formulate development requirements for the site allocation.</p>

<i>Ref</i>	<i>University of Bath</i>
<b>SA Objectives</b>	
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++</p> <p>The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation has a major positive effect on this objective.</p> <p><b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>+</p> <p>The site can accommodate university related uses including variety of spaces of education, business, conference, IT, sport, health, arts and social, catering and retail which helps promote stronger more vibrant and cohesive communities on campus.</p> <p><b>Mitigation and enhancement</b></p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>++</p> <p>The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation has a major positive effect on this objective as it helps, along with the new policies for PBSA, maintain existing employment sites in the centre of Bath.</p> <p><b>Mitigation and enhancement</b> Further assessment and discussion are needed to agree the site capacity and revise Policy B5.</p>
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++</p> <p>The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic.</p> <p><b>Mitigation and enhancement</b> A Transport Statement is required, and the scope of the assessment needs to be agreed in advance of a planning application.</p>
<b>Objective 6:</b>	+

<i>Ref</i>	<i>University of Bath</i>
<b>SA Objectives</b>	
<b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>The campus is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting.</p> <p><b>Mitigation and enhancement</b></p> <p>The campus is already substantially developed. There is scope for further intensification but this requires careful management and the preparation of its masterplan and Green Infrastructure Strategy will help to consider new development in a comprehensive manner.</p>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>+</p> <p>The main Claverton Down campus is within The City of Bath World Heritage Site. The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p> <p><b>Mitigation and enhancement</b></p> <p>The campus is already substantially developed. There is scope for further intensification but this requires careful management and the preparation of its masterplan and Green Infrastructure Strategy will help to consider new development in a comprehensive manner.</p>
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>+</p> <p>Policy SB19 with the zonal approach already sets out where new development can be facilitated.</p> <p><b>Mitigation and enhancement</b></p> <p>The campus is already substantially developed. There is scope for further intensification but this requires careful management and the preparation of its masterplan and Green Infrastructure Strategy will help to consider new development in a comprehensive manner.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>Whilst the areas concerned are not 'classic AONB' development has the potential to affect the qualities of the wider AONB by virtue of illuminating areas of the campus that are dark at present and causing light spill. This is also an issue in respect of the SAC. The general intensification other parts of the campus also has the potential to increase light spill.</p> <p><b>Mitigation and enhancement</b></p> <p>A bat and lighting report will be required if significant bat activity is determined. The scheme should set out how biodiversity gains will be achieved.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The site is within FZ1.</p>

<i>Ref</i>	<i>University of Bath</i>
<b>SA Objectives</b>	
	<b>Mitigation and enhancement</b>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>+</p> <p>New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations</p>
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	<p>+</p> <p>New development will be subject to zero carbon policies proposed through this Partial Update. Provide a specific policy framework that the delivery of the site in accordance with the Council's climate and ecological emergency declarations</p>
<p><b>General Summary</b></p> <p>The University of Bath is one of the key employers in Bath and is preparing the masterplan for the Claverton Down Campus. This proposes further improvements to teaching facilities and provides more purpose built student accommodation. Revising Policy SB19 with clear capacities and development requirements will have major positive effects on objectives 1(health and well-being) and 4 (community) as there are good ranges of services and facilities available on campus. It will also have major positive effects on 2 (housing)and 5 (economy) as it will help prioritise general housing and jobs in the city.</p> <p><b>Mitigation and enhancement</b></p> <p>Further discussion with the University and assessments are required to finalise the development requirements and design principles including the site capacity.</p>	

Ref Bath6

Park and Ride Site

SA Objectives	Option 1 Remove Park and Ride sites from GB, and allocate for mixed use development comprising transport interchange, solar energy infrastructure and household waste recycling facilities.	Option 2 No change
Objective 1:	+	0
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	Solar energy infrastructure increasing renewable energy generation helps reduce carbon emissions contributing improving air quality has a positive effect on this objective.	
Objective 2:	n/a	n/a
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing		
Objective 3:	+	0
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	Providing household recycling facilities in accessible locations has a positive effect on this objective.	
Objective 4:	+	0
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	Facilitating solar energy infrastructure help build a strong complete energy industry.	
Objective 5:	+	0
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	Provision of household waste recycling facilities at the three P&R sites could potentially provide local areas with facilities accessible by foot or bike. Newbridge and Odd Down P&R sites are situated within walking distance of surrounding residential properties, though Lansdown is disconnected in terms of distance and safe access. Access by foot and bike not as good as multiple, localised options for waste facilities, which are currently being assessed by Waste Management Services. Potential for residents of Bath to use existing P&R buses to access waste facilities, instead of using cars.	No change proposed.
Objective 6:	?	0
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	All three P&R sites are all located within the Green Belt (albeit on brownfield land). Newbridge and Lansdown P&R sites are designated as Cotswold AONB, and the Odd Down P&R site is located directly adjacent to the Cotswold AONB. Further GB assessment work is required in order to establish the impact of removing the sites from the GB, and further landscape assessment work is required to establish potential for harm to the Cotswold	GB land retained for existing P&R use. No impact on GB or AONB.



Ref Bath6	Park and Ride Site	
SA Objectives	Option 1 Remove Park and Ride sites from GB, and allocate for mixed use development comprising transport interchange, solar energy infrastructure and household waste recycling facilities.	Option 2 No change
	<p>AONB.</p> <p><b>Mitigations and enhancements</b> Further assessments are required to finalise the development requirements and design principles.</p>	
<p><b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>?</p> <p>Newbridge P&amp;R site is located within the B&amp;NES World Heritage Site. Lansdown and Odd Down P&amp;R sites are located just outside of the WHS, but within its setting. Further assessment work is required in order to establish the impact that development for waste facilities and solar infrastructure might have on the setting of the World Heritage Site.</p> <p><b>Mitigations and enhancements</b> Further assessments are required to finalise the development requirements and design principles.</p>	<p>0</p> <p>Use retained as per existing. No impact on WHS.</p>
<p><b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>+/?</p> <p>Potential for development to play a beneficial role in supporting nature recovery. Scope to increase and extend a ‘pollinator park’ approach to management of P&amp;R sites to help address Ecological Emergency.</p> <p><b>Mitigation and enhancement</b> Ecological enhancement options for the sites to be considered at draft plan stage.</p>	<p>0</p> <p>No change proposed.</p>
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>?</p> <p>Further assessment work is required in relation to impact of household waste facility use on adjacent residential properties.</p> <p>Further assessment work is required in relation to impact of household waste facility use on traffic congestion at the site accesses.</p>	<p>0</p> <p>No change proposed.</p>

Ref Bath6	Park and Ride Site	
SA Objectives	Option 1 Remove Park and Ride sites from GB, and allocate for mixed use development comprising transport interchange, solar energy infrastructure and household waste recycling facilities.	Option 2 No change
	<p><b>Mitigation and enhancement</b> Noise mitigation options to be considered where appropriate at draft plan stage.</p>	
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>-/? A small section of Newbridge P&amp;R site is located within FZ2 (including the access). Further assessment work is required in relation to the impact that the waste facility uses may have on the areas at risk of flooding.</p> <p><b>Mitigation and enhancement</b> Flood mitigation measures and SUDs may be required at Newbridge P&amp;R site.</p>	<p>0 No change proposed.</p>
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	<p>++ Provision of solar canopies over existing car parking spaces, providing source of local renewable energy.</p>	<p>0 No change proposed.</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>++ Provision of solar canopies over existing car parking spaces, providing source of local renewable energy. Provision of waste facilities and solar infrastructure on brownfield land, already in use as P&amp;R facility.</p>	<p>0 No change proposed.</p>
<p><b>General Summary</b> There is scope for option 1 to achieve a major positive impact in terms of climate change, through the use of brownfield land for solar infrastructure, and a minor positive impact in relation to provision of household waste facilities located in sustainable locations, accessible by public transport, foot and bike. However, as the sites are located in the green belt, close to and within the Cotswold AONB and within the setting of the World Heritage Site, further assessment work is required at draft plan stage in order to establish the impact that the proposals might have on these sensitive issues. Further assessment work is also required in relation to noise impact on local residents, traffic congestion and flood risk (Newbridge Park and Ride). There is potential for development to play a beneficial role in</p>		

<b>Ref Bath6</b>	<b>Park and Ride Site</b>	
<b>SA Objectives</b>	<b>Option 1</b> Remove Park and Ride sites from GB, and allocate for mixed use development comprising transport interchange, solar energy infrastructure and household waste recycling facilities.	<b>Option 2</b> No change
supporting nature recovery.		

<b>Ref Bath7</b>	<b>Bath Community Academy</b>	
<b>SA Objectives</b>	<b>Option 1: Allocate solely for educational and community uses</b>	<b>Option 2: Allocate primarily for educational and community uses, with a minor residential element (to help ensure deliverability)</b>
<b>Objective 1:</b> <b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Potential for provision of safe and appealing community facilities to support social cohesion. Sustainable location set directly adjacent to existing community, allowing active travel options to new facilities.	++ Potential for provision of safe and appealing community facilities to support social cohesion. Sustainable location set directly adjacent to existing community, allowing active travel options to new facilities.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	0	+ Provision of a small amount of housing to meet housing need. Potential to provide mix of housing types / tenures / sizes, including affordable housing.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ Located directly adjacent to existing community. Potential to provide range of accessible community facilities.	+ Located directly adjacent to existing community. Potential to provide range of accessible community facilities. Provision of community / educational floorspace may be lower if residential use is also provided on site.

<i>Ref Bath7</i>	<i>Bath Community Academy</i>	
SA Objectives	Option 1: Allocate solely for educational and community uses	Option 2: Allocate primarily for educational and community uses, with a minor residential element (to help ensure deliverability)
		<b>Mitigation and enhancement</b> Careful consideration of site layout options to maximise community and educational use, with provision of residential only where necessary to fund community / educational uses.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	++	+
	Community / educational uses providing jobs and supporting local economy.	Community / educational uses providing jobs and supporting local economy. Provision of community / educational floorspace may be lower if residential use is also provided on site.  <b>Mitigation and enhancement</b> Careful consideration of site layout options to maximise community and educational use, with provision of residential only where necessary to fund community / educational uses.
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+	+
	Potential for redevelopment layout to include secure bike parking, electric vehicle charging and improved access arrangement. Located adjacent to existing bus stop providing users with public transport option for travel.	Potential for redevelopment layout to include secure bike parking, electric vehicle charging and improved access arrangement. Located adjacent to existing bus stop providing users with public transport option for travel.
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	?	?
	Site located within the Green Belt and highly sensitive in terms of landscape and visual impact on World Heritage Site.  <b>Mitigation and enhancement</b> Potential to reduce landscape and visual impact of site through redevelopment. Further work required to explore design options.	Site located within the Green Belt and highly sensitive in terms of landscape and visual impact on World Heritage Site.  <b>Mitigation and enhancement</b> Potential to reduce landscape and visual impact of site through redevelopment. Further work required to explore design options.

<i>Ref Bath7</i>	<i>Bath Community Academy</i>	
<b>SA Objectives</b>	<b>Option 1: Allocate solely for educational and community uses</b>	<b>Option 2: Allocate primarily for educational and community uses, with a minor residential element (to help ensure deliverability)</b>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	? Site is highly sensitive in terms of visual impact on World Heritage Site.  <b>Mitigation and enhancement</b> Potential to reduce visual impact of site through redevelopment. Further work required to explore design options.	? Site is highly sensitive in terms of visual impact on World Heritage Site.  <b>Mitigation and enhancement</b> Potential to reduce visual impact of site through redevelopment. Further work required to explore design options.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	? <b>Mitigation and enhancement</b> Further work required to investigate potential for redevelopment to deliver biodiversity net gain.	? <b>Mitigation and enhancement</b> Further work required to investigate potential for redevelopment to deliver biodiversity net gain.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	? <b>Mitigation and enhancement</b> Potential for redevelopment to improve site access arrangement to minimise traffic congestion on entering the site. Further work relating to access reconfiguration required.	? <b>Mitigation and enhancement</b> Potential for redevelopment to improve site access arrangement to minimise traffic congestion on entering the site. Further work relating to access reconfiguration required.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The site located within Flood Zone 1.	0 The site located within Flood Zone 1.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	? Potential for redevelopment to provide new buildings and landscaped areas designed to increase resilience to climate change.	? Potential for redevelopment to provide new buildings and landscaped areas designed to increase resilience to climate change.

<b>Ref Bath7</b>	<b>Bath Community Academy</b>	
<b>SA Objectives</b>	<b>Option 1: Allocate solely for educational and community uses</b>	<b>Option 2: Allocate primarily for educational and community uses, with a minor residential element (to help ensure deliverability)</b>
<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>	+	+
	Brownfield redevelopment. Potential for redevelopment to include sustainable design and construction, and adequate waste management.	Brownfield redevelopment. Potential for redevelopment to include sustainable design and construction, and adequate waste management.
<b>General Summary</b>		
Option 1 (allocating solely for educational and community uses) will provide a major positive impact in terms of providing community and educational facilities, supporting the local economy and being located in a sustainable location. Option 2 (allocating primarily for educational and community uses with a minor residential element) also provides positive impacts in relation to these issues, though inclusion of residential units on the site may reduce the floorspace available for community / educational uses. To mitigate this, careful consideration of site layout options is required, to maximise community and educational use, with provision of residential only where necessary to fund other uses. There is potential for redevelopment of the site to provide a positive impact on landscape, heritage, biodiversity, traffic congestion, and resilience to climate change. However, further work is required in these areas.		

<b>Ref Weston Island</b>	
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+
	The policy will enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for redevelopment, including residential. The policy also requires the improvement of walking and cycle routes across Weston Island.
<b>Objective 2: Meet identified needs for sufficient, high quality</b>	+
	The policy will enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for

<b>Ref Weston Island</b>	
<b>SA Objectives</b>	
<b>housing including affordable housing</b>	redevelopment, including residential.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ The policy will enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for redevelopment, including residential. The policy also requires the improvement of walking and cycle routes across Weston Island. These measures will promote stronger more vibrant and cohesive communities, and reduce anti-social behaviour, crime and the fear of crime.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++ The policy will enable the relocation and retention of employment uses from elsewhere within the city. This will help to meet this SA objective
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ The site is close to a frequent bus route and has good links to the riverside path. The policy also requires the improvement of walking and cycle routes across Weston Island.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	+/? These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered. Mitigation and enhancement Further assessments are required to finalise the development requirements and design principles.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered. <b>Mitigation and enhancement</b> Further assessments are required to finalise the development requirements and design principles.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+/? The river is designated as a 'Site of Nature Conservation Interest' (Local Plan Policy NE3), and the edges of the island form an important associated habitat. Development proposals that seeks a frontage with or to increase access to the river's edge may be challenging as there is a need to maintain and improve this habitat. Given the importance of this habitat, a use that doesn't require a relationship with the water, such as the current use or other employment use, would be more appropriate, and would better enable biodiversity enhancements to be achieved.

<i>Ref Weston Island</i>	
SA Objectives	
	<p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations. As such the Policy seeks to enhance the ecological value of the river edge.</p> <p><b>Mitigation and enhancement</b></p> <p>Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>These are not specifically covered by the site allocation as other Local Plan policies will ensure that these objectives are covered.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>-/?</p> <p>The Environment Agency's flood zone mapping shows the site is located within Flood Zone 1. However B&amp;NES Strategic Flood Risk Assessment indicates the entire site is within Flood Zone 3 and the NPPF sets out clear requirements regarding development in flood risk areas entailing the sequential and exceptions tests. As the site lies within a flood risk zone and it is not suitable for residential development.</p> <p>Mitigation and enhancement</p> <p>Further assessments are required to finalise the development requirements and design principles.</p>
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	<p>+</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.</p> <p><b>Mitigation and enhancement</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>+</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declarations.</p> <p><b>Mitigation and enhancement</b></p>
<b>General Summary</b>	
<p>The policy will enable the relocation and retention of employment uses from elsewhere within the city, unlocking existing site allocations for redevelopment, including residential. The policy also requires the</p>	



<b>Ref Weston Island</b>	
<b>SA Objectives</b>	
<p>improvement of walking and cycle routes across Weston Island. Therefore allocating the site for industrial uses and builders merchants (as per sites in Policy ED2A) will have major positive effect on objective 3 (community), objective 4 (jobs) and objective 5 (sustainable transport). The river is designated as a 'Site of Nature Conservation Interest' (Policy NE3) and the edges of the island form an important associated habitat. Therefore, further evidence work is needed to inform the draft Plan.</p> <p>B&amp;NES Strategic Flood Risk Assessment indicates the entire site is within Flood Zone 3 and the NPPF sets out clear requirements regarding development in flood risk areas entailing the sequential and exceptions tests.</p>	

<b>Ref SV2</b>	<b>Midsomer Norton Town Centre (amendments to South Road Car Park Policy SSV2)</b>	
<b>SA Objectives</b>	<b>Option 1: Retain the allocation for retail, mixed use development</b>	<b>Option 2: Removing the allocation</b>
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>+/?</p> <p>The site is located within Midsomer Norton Town Centre which has existing health facilities.</p> <p>The site is located close to town centre bus stops.</p> <p>Redevelopment of the site for retail would enable access to everyday destinations (such as shops) for local people by active travel (walking /cycling), as it is located within the town centre. However, despite some interest in the site from operators it has not come forward for a retail/food store redevelopment.</p>	<p>0/+</p> <p>There may be the scope to consider an element of the site being used for residential development. If the site was redeveloped to include an element of residential development, it would be well connected to existing everyday destinations (such as shops) given the Town Centre location and enable active travel (the site is located close to Town Centre bus stops and many facilities are within walking distance)</p> <p>The site is within Midsomer Norton Town Centre which has existing health facilities.</p> <p>The large area of land dedicated to parking spaces may encourage more private car journeys instead of active/public transport travel modes into the Town Centre.</p>
<b>Objective 2: Meet identified needs for sufficient, high</b>	<p>0</p> <p>This option would not provide any residential development.</p>	<p>+</p> <p>There may be the scope to consider a small element of the site being used</p>

Ref SV2	Midsomer Norton Town Centre (amendments to South Road Car Park Policy SSV2)	
SA Objectives	Option 1: Retain the allocation for retail, mixed use development	Option 2: Removing the allocation
quality housing including affordable housing		for residential development which would provide housing within a sustainable, Town Centre location.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ Redevelopment of the site would provide an accessible community facility, redevelop a car park that does not currently have much in the way of natural surveillance (and therefore has the potential to be a source of fear of crime) and provide facility where opportunities will exist for social interaction.	0/-/+ If a large proportion of the site remains as a car park, natural surveillance will continue to be limited which may enable anti-social behaviour and crime/ fear of crime in this space.  If the site were to be redeveloped to include an element of residential development, it would be well connected to existing everyday destinations (such as shops) given the Town Centre location.  <b>Mitigation:</b> Design out potential crime by ensuring that there are windows overlooking the car park for natural surveillance and/or monitor the site using CCTV. Also ensure that the car park is consistently well-lit.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	++/? Redevelopment of the site for retail would provide new employment opportunities, which although not a higher value-added sector, would help to correct imbalances between residential and employment development. However, despite some interest in the site from operators it has not come forward for retail/food store redevelopment, and retaining significant public car parking has proven difficult to deliver.	0/-/+ There will be less employment opportunities. If the site was redeveloped to include an element of residential development, this could further worsen the existing imbalances between residential and employment development. However centrally located residential housing and retaining larger car park will make it more convenient to travel and shop in the Town Centre, helping to contribute to the local economy.  <b>Mitigation</b> Further feasibility work needs to be undertaken on this approach
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and</b>	+/0 Development would be within the town centre (walking distance of shops, facilities and public transport).	+/0 Both the car park and the potential residential development would be within the town centre (walking distance of shops, facilities and public transport).

<i>Ref SV2</i>		<i>Midsomer Norton Town Centre (amendments to South Road Car Park Policy SSV2)</i>	
<b>SA Objectives</b>	<b>Option 1: Retain the allocation for retail, mixed use development</b>	<b>Option 2: Removing the allocation</b>	
<b>walking infrastructure</b>	<p>The large amount of parking spaces may encourage more private car journeys instead of active/public travel modes into the Town Centre.</p> <p><b>Mitigation:</b> Ensure that public transport in the Town Centre is frequent, reliable and connected so that people don't feel the need to opt for private car journeys.</p>	<p>The large amount of parking spaces may encourage more private car journeys instead of active/public travel modes into the Town Centre.</p> <p><b>Mitigation:</b> Ensure that public transport in the Town Centre is frequent, reliable and connected so that people don't feel the need to opt for private car journeys.</p>	
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>0/?</p> <p>The existing Policy SSV2 sets out requirements to provide landscape, tree planting and public realm enhancement to ensure a positive relationship with South Road and to enhance the Town's Green Infrastructure.</p>	<p>0/?</p> <p>Without any specific allocation, there will be some uncertainty in achieving this objective, however other Development Management policies will apply to any new proposals.</p>	
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>+</p> <p>The site itself is not within the Conservation Area (CA), but it is surrounded by Midsomer Norton's CA. The site is currently a car park so this option (and existing allocation Policy SSV2) would provide the opportunity to enhance the wider setting of the neighbouring CA.</p> <p><b>Mitigation:</b> The draft Plan requires that new development will need to protect and enhance the district's historic environmental and cultural assets.</p>	<p>0</p> <p>The site is not within the Conservation Area (CA), but it is surrounded by Midsomer Norton's CA. The car park may be unsightly and disruptive to the neighbouring CA's setting. Without any specific allocation, there will be some uncertainty in achieving this objective, however other Development Management policies will apply to any new proposals.</p> <p><b>Mitigation:</b> The potential element of residential development at this site may provide an opportunity to conceal large areas of the car park from view from the neighbouring CA.</p>	
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of</b>	<p>+/0</p> <p>New development needs to contribute enhance ecological networks and biodiversity net gain. The existing Policy SSV2 requires enhancing the Town's Green Infrastructure, (e.g. Links to Town Park) and</p>	<p>0</p> <p>The existing site is already used as a car park, so no current ecological networks would be compromised. Large areas of hard surfacing in the car park prevents most of the site from</p>	

Ref SV2	<i>Midsomer Norton Town Centre (amendments to South Road Car Park Policy SSV2)</i>	
SA Objectives	Option 1: Retain the allocation for retail, mixed use development	Option 2: Removing the allocation
climate change)	<p>ecological networks, with specific consideration for bat flight lines</p> <p>There are more opportunities to enhance the condition and extent of Biodiversity and geodiversity in this option compared to the car park.</p>	<p>incorporating biodiversity into the design. Without any specific allocation, there will be some uncertainty in achieving this objective, however other Development Management policies will apply to any new proposals.</p> <p><b>Enhancement:</b> Opportunity to incorporate green corridors around the residential development, connecting it to other parts of the Town Centre.</p>
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>The land is within the Coal Authority defined Development Low Risk Area.</p> <p>The land is within the Surface Coal Resource Plan area. Policy M1 applies.</p> <p>Development would be within the Town Centre, minimising the need to travel and traffic congestion (more people will be able to walk/cycle).</p> <p><b>Mitigation:</b> There may be a challenge to address is the location of a new foodstore with neighbouring (residential) areas due to potential noise and air quality issues. DM policies apply to mitigate against this.</p>	<p>0</p> <p>The land is within the Coal Authority defined Development Low Risk Area. The land is within the Surface Coal Resource Plan area. Policy M1 applies. Residential development would be within the Town Centre, reducing the need to travel and minimising traffic congestion (more people will be able to walk/cycle).</p> <p><b>Mitigation:</b> Likely that previous uses have resulted in contamination which will need to be addressed if residential development were to be pursued.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The site lies within Flood Zone 1.</p> <p><b>Mitigation and enhancement:</b> As the site is located away from the river, incorporating Sustainable Urban Drainage Systems (SUDS) into the site to offset large areas of hard surfacing will be a priority. A flood risk assessment will be required.</p>	<p>0</p> <p>Large areas of hard surfacing for the car park/residential development may increase surface runoff and contribute to flooding.</p> <p>The site lies within Flood Zone 1.</p> <p><b>Mitigation and enhancement:</b> As the site is located away from the river, incorporating Sustainable Urban Drainage Systems (SUDS) into the site to offset large areas of hard surfacing</p>

Ref SV2	<i>Midsomer Norton Town Centre (amendments to South Road Car Park Policy SSV2)</i>	
SA Objectives	Option 1: Retain the allocation for retail, mixed use development	Option 2: Removing the allocation
		would be a priority. A flood risk assessment will be required for any proposals.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	0/+  Large areas of hard surfacing may reduce climate resilience if mitigation measures are not incorporated into the design e.g. use of green/blue infrastructure into design as cooling measures or SUDS.  Mixed use retail development in a sustainable Town Centre location may reduce greenhouse gas emissions as there would be a reduced dependency on and attraction to out-of-town retail facilities.	0/-  Large areas of hard surfacing in the car park prevents most of the site from incorporating climate change mitigation measures such as green/blue infrastructure into the design.  Greenhouse gas emissions could worsen if the large car park, encouraging private car use to the Town Centre, is prioritised over improving public/active travel modes.
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	+  The development would be on brownfield land.  Joint Waste Core Strategy policies apply.	+/?  Under this option there may be scope to explore the possibility of also utilising parts of the car park for other beneficial uses including solar energy generation e.g. through solar cell canopies over the car parking spaces.  The potential residential development would be on brownfield land. Joint Waste Core Strategy policies apply.
<p><b>General Summary</b></p> <p><b>Option 1:</b> Redevelopment of the site (as allocated Policy SSV2) for retail would make it easier to reach everyday destinations (such as shops) for local people by active travel as it is located within the town centre. It would provide employment opportunities; and natural surveillance, improving sense of safety. Therefore, there are positive effects on a number of objectives. However, despite some interest in the site from operators, it has not come forward for a retail/food store redevelopment; retaining significant public car parking has proven difficult to deliver, and some uncertain effects are identified.</p> <p><b>Option 2:</b> This option could provide the opportunity to utilise parts of the car park for other beneficial uses including solar energy generation and provide an element of residential development which would be well connected within this Town Centre location. New proposals will be subject to other Development Management policies but without any specific allocation with development requirements and principles, there will be some uncertainty in achieving some objectives.</p>		



<b>Ref SSV9</b>	<b>Somer Valley Enterprise Zone (amendments Policy SSV9)</b>
<b>SA Objectives</b>	<b>Option 1: Retain the allocation for retail, mixed use development</b>
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+ Development for business uses in this location would make it easier to reach workplaces for local residents. Inclusion of the south eastern corner of the Enterprise Zone (EZ) would help deliver sustainable transport links and improvements to the A362 allowing easier access to key health facilities in Midsomer Norton.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	0 This option would not provide any residential development.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ This approach proposes to include a wider range of commercial uses including eating/drinking establishments, hotel and retail uses subject to not harming the vitality and viability of the town centre. This helps promote stronger more vibrant and cohesive communities in this location.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++ This approach proposes to include a wider range of commercial uses including eating/drinking establishments, hotel and retail uses subject to not harming the town centre. Including higher value uses, with a road frontage, would improve the site's viability and help facilitate its delivery.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ Inclusion of the south eastern corner of the EZ would help deliver sustainable transport links and improvements to the A362 promoting cycling and walking.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0/? The coal mining past is evident within the surrounding landscape, including the widely visible and distinct conical shape of the Old Mills Batch. <b>Mitigation/enhancement</b> Appropriate development requirements and design principles should be carried over. Any proposals are subject to relevant Development Management

Ref SSV9	Somerset Valley Enterprise Zone (amendments Policy SSV9)
SA Objectives	Option 1: Retain the allocation for retail, mixed use development
	policies.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+/? The site is not within the Midsomer Norton Conservation Area. <b>Mitigation/enhancement</b> Appropriate development requirements and design principles should be carried over. Any proposals are subject to relevant Development Management policies.
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+/? No specific ecology designation on site, however it is adjacent to the batch designated as a Site of Nature Conservation Interest (SNCI) and Regionally Important Geological /Geomorphological Site (RIGS) <b>.Mitigation and enhancement</b> Appropriate development requirements and design principles should be carried over. Any proposals are subject to relevant Development Management policies.
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	0 The land is within the Coal Authority defined Development Low Risk Area. The land is within the Surface Coal Resource Plan area. Policy M1 applies. Development would introduce noise into an area that is a currently open green space
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The northern area is Flood Zone 1 including the area proposed to be included.
<b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b>	0 Large areas of hard surfacing may reduce climate resilience if mitigation measures aren't implemented into design e.g. use of green/blue infrastructure into design as cooling measures or Sustainable Urban Drainage System (SUDS).



<b>Ref SSV9</b>	<b>Somer Valley Enterprise Zone (amendments Policy SSV9)</b>
<b>SA Objectives</b>	<b>Option 1: Retain the allocation for retail, mixed use development</b>
	Mixed use retail development in sustainable Town Centre location may reduce greenhouse gas emissions as there is a reduced dependency on out-of-town retail.
<b>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management in accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	-/0 The area proposed to be included is currently used as an agricultural land. Therefore a negative effect is recorded.
<p><b>General Summary</b> This approach proposes to include a wider range of commercial uses including eating/drinking establishments, hotel and retail uses subject to not harming the vitality and viability of the town centre. Including higher value uses, with a road frontage, would improve the site's viability and help facilitate its delivery. Therefore, it has major positive effects on objective 3 (community), 4 (economy) and 5 (sustainable travel).</p> <p><b>Mitigation/enhancement</b> Further assessments are required to finalise the development requirements and design principles.</p>	

Bath & North East Somerset Local Plan  
Partial Update

**Sustainability Appraisal**

Appendix D:

Appraisals include the Main Modifications

**Date: January 2023**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

<b>Ref CP3</b>	<p><b>Title Renewable Energy</b></p> <p><i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i></p>
<b>SA Objectives</b>	
<p><b>Objective 1:</b></p> <p><b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b></p>	<p>+</p> <p>Facilitating renewable energy development and seeking to reduce developments that burn fossil fuels will result a reduction in CO2 emissions. This has an indirect positive effect on this objective.</p> <p>The potential for provision of multi-function green infrastructure within proposals Clause 1) e) would also contribute to a minor positive effect. Clause 2) d) seeks to protect residential amenity as result of noise, shadow flicker and visual intrusion which helps to achieve this objective.</p>
<p><b>Objective 2:</b></p> <p><b>Meet identified needs for sufficient, high quality housing including affordable housing</b></p>	<p>n/a</p>
<p><b>Objective 3:</b></p> <p><b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>	<p>0/+</p> <p>The Policy supports community led energy schemes where evidence of community support can be demonstrated.</p>
<p><b>Objective 4:</b></p> <p><b>Build a strong, competitive economy and enable local businesses to prosper</b></p>	<p>++</p> <p>Providing a positive policy context for renewable energy development will help provide a diverse range of employment opportunities and contribute to the region's ambition to be a driving force for clean and inclusive growth.</p>
<p><b>Objective 5:</b></p> <p><b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	<p>n/a</p>
<p><b>Objective 6:</b></p> <p><b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<p>-/0</p> <p>The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with the 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development.</p> <p>The policy does not avoid ground mounted solar development in the area with 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for solar)</p>

<p><b>Ref CP3</b></p>	<p><b>Title Renewable Energy</b>  <i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i></p>
<p><b>SA Objectives</b></p>	
	<p>however it requires applicants to demonstrate that adverse impacts on the landscape can be satisfactorily mitigated.</p> <p>The policy seeks to guide development to the best locations, along with criteria to bring the consideration of cumulative effects and allows for mitigation and enhancement measures. The revised policy avoids significant adverse impacts on the local environment that cannot be satisfactorily mitigated including protected landscape and visual impacts (inc. cumulative effects) and the special qualities of all nationally important landscapes.</p> <p>The amended supporting text provides further explanation of the landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations based on the landscape Sensitivity Assessment (LSA: LUC 2021). The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District including information from the LSA in the Plan helps clarify and makes the policy more effective. This results in achieving better outcome for this objective. The policy reflects national policy in respect of AONBs.</p> <p><b>Mitigation</b>  Any new development will be subject to other Development Management policy, particularly Policy NE2 which requires a Landscape and Visual Impact Assessment.</p>
<p><b>Objective 7:  Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>-/+</p> <p>The provision of renewable energy projects has the potential to result in a negative effect on heritage assets and their setting, including cumulative impact from projects.</p> <p>The policy seeks to guide development to the best locations, along with criteria to bring the consideration of cumulative effects and allows for mitigation and enhancement measures. The revised Policy requires an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath WHS. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused.</p> <p><b>Mitigation and enhancement</b>  Any new development will be subject to other Development Management policy.</p>
<p><b>Objective 8:  Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>-/?</p> <p>The provision of renewable energy projects has the potential to result in a negative effect on biodiversity, including cumulative impact from projects.</p> <p>The policy seeks to guide development to the best locations, along with criteria to bring the consideration of cumulative effects and allows for mitigation and enhancement measures. Development will be subject to the 10% Biodiversity Net Gain. The revised policy for wind energy requires that Flight paths and habitat corridors of protected mobile species such as</p>

<b>Ref CP3</b>	<p><b>Title Renewable Energy</b></p> <p><i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i></p>
<b>SA Objectives</b>	
	<p>birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected.</p> <p>The policy promotes a shift from burning fossil fuels to reduce emissions of CO<sub>2</sub>, particulates and oxides of nitrogen. This would have positive impacts on ecology.</p> <p><b>Mitigation</b></p> <p>Any new development will be subject to other Development Management policy, particularly Policy NE3 (Sites, Species and Habitats).</p>
<p><b>Objective 9:</b>  <b>Reduce land, water, air, light, noise pollution</b></p>	<p>+/?</p> <p>Projects will need to be carefully sited so as not to cause harm to amenity, e.g. potential shadow flicker and unwanted noise from wind turbines. The policy promotes a shift from burning fossil fuels to reduce emissions of CO<sub>2</sub>, particulates and oxides of nitrogen. This would have a positive effect on this objective.</p> <p>The policy also seeks to ensure that the land is returned to its former use at the end of the project's life.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>n/a</p>
<p><b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b></p>	<p>+</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gases. This has a positive effect on this objective.</p>
<p><b>Objective 12:</b>  <b>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>	<p>+</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. This has a positive effect on this objective.</p> <p>As the most common renewable energy sources are intermittent there is a greater need for power reserves that can "balance" the grid by releasing power onto the grid at times when demand exceeds supply. Balancing plant can be gas turbines or gas engines that can be turned on at short notice to meet temporary demand. Alternatively, energy storage plants can be used to balance the grid.</p> <p>The policy does not encourage the effective use of brownfield land as sites are likely to be greenfield. However the policy aims to protect grades 1 – 3a agricultural land.</p>
<p><b>General Summary</b></p> <p>Providing a positive policy context for renewable energy development will help provide a diverse range of employment opportunities and contribute to the regions' ambition to be a driving force for clean and inclusive growth. Therefore, there is a major positive effect on objective 4(economy). The potential for provision of multi-function green infrastructure within proposals Clause 1) e) would also</p>	

<b>Ref CP3</b>	<b>Title Renewable Energy</b> <i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i>
<b>SA Objectives</b>	
<p>contribute to a minor positive effect. Clause 2) d) seeks to protect residential amenity as result of noise, shadow flicker and visual intrusion which helps to achieve Objective 1.</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses which helps achieve a number of objectives.</p> <p>Some negative or uncertain effects have been identified on objectives 6(landscape), 7(heritage), 8(ecology) and (pollution). The significance of the negative impact will depend on the size and type of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with the 'high' landscape impact (indicated as the low potential area in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in areas with the 'high' landscape impact (indicated as low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants to demonstrate that adverse impacts on the landscape can be satisfactorily mitigated. The amended supporting text through the Main Modifications provides further explanation of the landscape led approach for wind energy and ground-mounted solar PV to guid development to the best locations based on the landscape Sensitivity Assessment (LSA: LUC 2021). The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District Including information from the LSA in the Plan help clarify and make the policy more effective. This results in achieving better outcome for objective 6.</p> <p>The revised Policy requires an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath WHS. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused.</p> <p>The revised Policy for wind energy requires that Flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected.</p> <p>The policy seeks to provide a positive approach for determining applications for renewable energy projects, guiding solar and wind energy development to the right locations in terms of landscape capacity. Site specific mitigation and enhancement measures are included in the policies.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies.</p>	

<b>Policies SCR6 and SCR7</b>	Net Zero Carbon Policy for Residential and Non residential Buildings. The revised policies replace CP2 and SCR1 Residential and non Residential Development
<b>SA Objectives</b>	
<b>Objective 1:</b>	0
Objective 1: Improve the health and well-being of all communities, and reduce health	Having more energy efficient and warmer buildings means lower energy bills. Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve

Policies SCR6 and SCR7	Net Zero Carbon Policy for Residential and Non residential Buildings. The revised policies replace CP2 and SCR1 Residential and non Residential Development
SA Objectives	
inequalities	<p>the general health and well-being. A reduction in harmful emissions will result in an improvement to air quality.</p> <p>For non-residential properties the policy will seek a fabric first approach to carbon reduction with renewable energy and carbon offsetting.</p> <p>Even though there are some indirect positive effects, it is considered to have a neutral effect on this objective.</p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>+</p> <p>The policy approach to residential will reduce the amount of energy required to operate and heat a home. The policy will seek to meet the energy need of the building through the provision of on-site renewable energy.</p> <p>The policy approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach and on-site renewable energy. An energy efficient home will be more affordable to live in.</p> <p>Financial contributions from major developments that cannot meet their energy requirements can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings.</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including zero carbon requirements. It concludes that the affordable housing requirements can be met across all areas of the District but the existing use value of sites is a critical factor in determining the outcome. It identifies that high density flatted schemes are less viable in lower value areas, due to their higher build costs, but these types of schemes generally only come forward where values are higher (i.e. Bath City Centre).</p> <p>Mitigation There maybe some possible negative impacts for viability and affordability of setting additional requirements of house builders. In these circumstances, CIL exceptional circumstances relief could be applied, or the tenure mix or overall level of affordable housing could be changed to improve viability and deliverability.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>0</p> <p>In the case of major developments which cannot meet the policy requirements onsite, offsetting payments will be required through a section 106 agreement.</p> <p>Financial contributions can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings potentially including some community facilities. Even though there are some indirect positive effects, it is considered to have a neutral effect on this objective.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+</p> <p>The proposed low carbon policy potentially contributes towards building a competitive low carbon economy.</p> <p>The requirement for low carbon construction would encourage job growth in the</p>

Policies SCR6 and SCR7	Net Zero Carbon Policy for Residential and Non residential Buildings. The revised policies replace CP2 and SCR1 Residential and non Residential Development
SA Objectives	
	sustainable construction and renewable energy industries.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	-/? The provision of on-site renewable energy generation would have potential to increase negative impacts on areas of valued landscape and townscape.  Mitigation and enhancement Development is subject to development management policies especially NE2 and NE2A. The Energy Efficiency Retrofitting and Sustainable Construction SPD will provide guidance with regards to the design of renewable energy.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	-/? The provision of renewable energy will influence the design of the development and its impact on the setting of heritage assets.  Mitigation and enhancement Any development will be subject to Development Management polices especially HE.1. The Energy Efficiency Retrofitting and Sustainable Construction SPD will provide guidance with regards to the design of renewable energy. The SPD will provide guidance on sustainable construction for historic buildings.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	+ The sustainable construction policy reduces carbon emissions and contributes towards slowing down the global temperature increase which helps tackle protecting threatened habitats and species.  Mitigation and enhancement New development is subject to relevant Development Management policies NE.3, NE.4 and NE.5
Objective 9: Reduce land, water, air, light, noise pollution	+ Sustainable construction will encourage reducing reliance on non-renewable energy sources of heat and power and reduce the production of harmful emissions. This will lead to improving air quality.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	++ The proposed policy will secure a sustainable method of construction. The Policy expects to reduce heat and power demand by encouraging a fabric first approach then supplying all energy demand through onsite renewable. This will help reduce the production of greenhouse gas emissions. A fabric first approach and the need to reduce space heating demand will assist in creating developments that are resilient to extreme



Policies SCR6 and SCR7	Net Zero Carbon Policy for Residential and Non residential Buildings. The revised policies replace CP2 and SCR1 Residential and non Residential Development
SA Objectives	
	<p>temperature.</p> <p>The supporting text encourages all new development to undertake a CIBSE TM59 overheating assessment to evaluate how overheating can be mitigated. Even though this is not a policy requirement, it encourages exemplary development.</p>
<p>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)</p>	<p>++</p> <p>The proposed policy will secure a sustainable method of construction. A fabric first approach will prioritise the efficiency of the building and enable the provision of a zero carbon development.</p> <p>Energy needs are required to be met through renewable energy generation Development will be required to connect to any available heat networks and the use of renewable heat sources such as heat pumps will be prioritised.</p>
<p><b>General Summary</b></p> <p>The policy approach for residential building expects to reduce heat and power demand by encouraging a fabric first approach then supplying all energy demand through on site renewable energy, with a preference for roof mounted solar PV. For non-residential major development, the Policy expects to achieve a 100% regulated operational carbon emissions reduction from Building Regs Part L 2013 (or future equivalent legislation). For major residential and non-residential developments that cannot meet their energy needs on site, off-setting payments will be secured through a section 106 agreement. This will result in a major positive effect on Objective 11(climate) and Objective 12(resources). The supporting text encourages all new development to undertake a CIBSE TM59 overheating assessment to evaluate how overheating can be mitigated. Even though this is not a policy requirement, it encourages exemplary development.</p> <p>A minor negative and uncertainty effect are identified for Objective 6(landscape) and 7(heritage) as the provision of on-site renewable energy generation would have potential to increase negative impacts on areas of valued landscape and townscape and the setting of heritage assets. However, any development will be subject to development management policies in particular HE.1, NE.3, NE.4 and NE.5 which seek to protect the landscape, historic and natural environments and therefore negative impacts could be mitigated. The Energy Efficiency Retrofitting and Sustainable Construction SPD will also provide guidance with regards to the design of renewable energy and sustainable construction on historic buildings.</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including zero carbon requirements. It concludes that the affordable housing requirements can be met across all areas of the District but the existing use value of sites is a critical factor in determining the outcome. It identifies that high density flatted schemes are less viable in lower value areas, due to their higher build costs, but these types of schemes generally only come forward where values are higher (i.e. Bath City Centre).</p> <p><b>Mitigation</b></p> <p>There maybe some possible negative impacts for viability and affordability of setting additional requirements of house builders. In these circumstances, CIL exceptional circumstances relief could be applied, or the tenure mix or overall level of affordable housing could be changed to improve viability and deliverability.</p>	

Policy CP4	CP4 District heating
<b>SA Objectives</b>	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	0/+ The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective to reduce carbon emissions. Therefore it helps achieve this objective.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	n/a
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	0
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	n/a
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 Allowing new development to connect to a zero carbon heat source would help mitigate the impact on biodiversity.
Objective 9: Reduce land, water, air, light, noise pollution	0/+ The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions. Therefore, it helps achieve this objective.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	0/+ The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions. Therefore, it helps achieve this objective.

Policy CP4	CP4 District heating
SA Objectives	
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)	0
General Summary The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions which has positive effects on Objective 1 (health), 9(pollution) and 11(climate change)	

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	+
	The creation, maintenance and enhancement of publicly accessible natural green space can improve mental and physical health and wellbeing of communities, by providing opportunities for exercise and social interaction. Green infrastructure can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	-
	An Ecological Emergency has been declared by B&NES Council in response to ongoing threats to wildlife and ecosystems. The declaration recognises the essential role nature plays in society and the economy. Amendments to biodiversity policies and a new biodiversity net gain policy will protect wildlife and habitats, enabling residents to benefit from a green, nature rich environment. However, the requirement on developers to provide 10% Biodiversity Net Gain (BNG) in residential developments will increase development costs and potentially reduce developable areas on sites; this could have negative impacts including on: <ul style="list-style-type: none"> <li>• Viability of development and the provision of affordable homes.</li> <li>• Reduction in the supply of housing coming to market</li> <li>• Reduction in the mix of housing types and tenures, including sheltered, assisted living etc. coming to market</li> </ul> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including BNG requirements. It concludes that the main impact of a requirement for a net gain on residual land values through this option is relatively modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p><b>Mitigation</b></p>

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
	Some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+ The revised Policy NE3, new Policy NE3 and Policy NE5 strengthen the protection of biodiversity. The provision of new habitats to achieve BNG might be delivered as multi-functioning publicly accessible open/natural/green space. Therefore, there is a minor positive effect on this objective.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+/- The proposed amendments to the biodiversity policy and new biodiversity net gain policy support the ecological and climate emergency, supporting clean and inclusive growth. The policy requirements may encourage green recovery and growth, jobs and opportunities.  The requirement on developers to provide 10% Biodiversity Net Gain in non-residential developments will increase development costs and potentially reduce the developable area of sites; this could have negative impacts.  Mitigation  Some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	+ It is proposed through amendments to the biodiversity policy to support biodiversity net gain and management opportunities. The new policy for Biodiversity net gain (BNG) proposes a minimum of 10% biodiversity net gain from development. BNG is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development. Biodiversity policy amendments and new policy has the potential to not only protect local biodiversity, but also protect and enhance the local environmental distinctiveness through habitat creation, protection, enhancement, restoration and management. Local nature recovery networks have the opportunity to link to wider nature recovery networks within the Cotswold and Mendip Hills AONBs which protect the special qualities of the landscape.
Objective 7: Conserve and enhance the historic	n/a

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
environment, heritage/cultural assets and their settings	
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	++ Policy NE3 provides policy and relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs). Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitate to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. The amendments through the Main Modification help avoid adverse impacts on European, UK protected species, UK Priority and locally important species. It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. Policy NE6 protects veteran trees. Therefore, there is a major positive effect on this objective.
Objective 9: Reduce land, water, air, light, noise pollution	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	+ Sustainable Drainage Systems (SuDS) offer opportunities to reduce vulnerability to and manage flood risk. SuDS include opportunities to support biodiversity net gains within a development. These SuDS can further support ecosystem services such as filtering dirty water along with providing a habitat for wildlife.
Objective 11 Reduce negative contributions to and Increase resilience to climate change	++ It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. The proposed amendments to biodiversity policy and new biodiversity net gain policy will support biodiversity gains from development, supporting resilience to climate change.

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
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)	n/a
<p><b>General Summary</b></p> <p>An Ecological Emergency has been declared by B&amp;NES Council in response to ongoing threats to wildlife and ecosystems. Policy NE3 provides policy as relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs) and other protected species. Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitates to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. The amendments through the Main Modification help avoid adverse impacts on European, UK protected species, UK Priority and locally important species.</p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. The proposed policy amendments and new biodiversity net gain policy seek to strengthen policies as relates to biodiversity requirements, thereby supporting the climate and ecological emergency. The policies will have a major positive effect on Objective 8 (Biodiversity) and 11 (climate change).</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including BNG requirements. It concludes that the main impact of a requirement for a net gain on residual land values through this option is relatively modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p><b>Mitigation</b></p> <p>Minor negative effects are identified for Objective 2 (housing) and Objective 4 (economy) as the requirement on developers to provide 10% Biodiversity Net Gain in residential and non-residential developments could increase build costs and potentially reduce developable areas on sites. However some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>	

Policy GB2 Policy GB3	Title Green Belt policy – infill boundaries
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SA Objectives	Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	n/a
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	+  Defining infill boundaries provides a clear indication of where residential development is acceptable in principle within the Green Belt and aligns with the NPPF. The boundaries allow for small scale development to come forward to help with meeting the housing need. Several villages without an existing HDB are identified with having an opportunity for an infill boundary which will allow more infill development to come forward in more GB villages.  The amendments through the Main Modifications clarify and steer limited infilling in villages within the GB. This has a positive effect on this objective by facilitating appropriate limited infill development in rural areas.  Mitigation and enhancement Boundaries are reviewed to better reflect infill opportunities and to respect village boundaries to mitigate any potential for encroachment.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+  Infill boundaries define where infill development is appropriate and prevents and avoids new development outside of the boundary which would be severed from the village and existing community. The infill boundaries were prepared in discussion with parish councils for all villages washed over the Green Belt.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	0  There is an indirect benefit as newly defined infill boundaries for villages which do not currently have an HDB will allow for infill development to come forward within the boundary which will in turn help local village businesses. However, it is considered to have a neutral effect on this objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	+  The infill boundary clearly defines where infill development is acceptable in principle and will align with national policy. It will prevent inappropriate development in the Green Belt and will preserve the character and appearance of the village and its environment.  Policy GB3 allows extensions to buildings in the Green Belt which do not represent a disproportionate addition over and above the size of the original dwelling. For clarity this policy now includes proposals to alter a building. This should result in a neutral impact on this SA Objective.

Policy GB2 Policy GB3	Title Green Belt policy – infill boundaries
SA Objectives	Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB
	Mitigation and enhancement Infill boundaries will be defined tightly around village edge to prevent encroachment into open countryside.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a
Objective 9: Reduce land, water, air, light, noise pollution	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a
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)	n/a
<p>General Summary</p> <p>Defining infill boundaries and removing reference to HDB's will align policy GB2 more fully with national policy. The policy will reference that residential development is acceptable where it is limited to infilling within the defined infill boundary, replacement dwellings or redevelopment of previously developed land. The boundaries will give a clear indication of where infill development would be considered acceptable in principle within GB villages. This policy approach will avoid proposals for new housing outside of the boundary which could be severed from the village and community and will only allow development in line with national GB policy. The amendments through the Main Modifications amendments clarify and steer limited infilling in villages within the GB. This has a positive effect on this objective by facilitating appropriate limited infill development in rural areas. Therefore, positive effects are identified on Objective 2(housing), Objective 4(economy) and Objective6 (landscape)</p> <p><b>Mitigation</b></p>	



Policy GB2 Policy GB3	Title Green Belt policy – infill boundaries
SA Objectives	Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB
<p>Infill boundaries were defined using the existing HDB's as an indication. Some small amendments are made to better reflect infill opportunities. For villages without existing HDB's, opportunities for infill development were considered and several villages are proposed to have newly defined infill boundaries. These new boundaries are tightly defined around the village boundary to avoid possibility of encroachment (mitigating the impact on landscape). All proposals for infill development within the boundary will be considered on a case-by-case basis and will need to meet criteria for infill development.</p>	

Policy H2	Houses in Multiple Occupation (HMO) amendments to Policy H2
SA Objectives	Increase scope of policy H2 to refer to new build HMOs, change of use to HMO from other uses, and intensification changes of use from C4 (small HMO) to sui generis (large HMO). Additional criteria, including the requirement for all new HMOs to achieve energy performance certificate C.
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	0 Where intensification of existing HMO is proposed, it has potential for overcrowding contributing to poor living environment for occupiers. However, it is considered a neutral effect on this objective. Amended wording requires applications relating to intensification to be assessed against criteria relating to provision of a good standard of accommodation for occupants, and must also achieve an Energy Performance Certificate rating of C. The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	+ Provision of new build HMOs, the change of use from other uses, and intensification of existing HMOs shall provide opportunity to boost the existing supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation.  Where intensification of existing HMO is proposed, it has potential for overcrowding contributing to poor living environment for occupiers. However amended wording requires applications relating to intensification to be assessed against criteria relating to provision of a good standard of accommodation for occupants, and must also achieve an Energy Performance Certificate rating of C. Therefore, there is a minor positive effect on this objective. The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+ Perception that higher concentrations of HMOs in an area, and additional intensification, might cause more frequent incidences of anti-social behaviour. A particular concern where permission is granted for a large HMO following assessment against policy criteria, where no further permission (and therefore no further assessment) is required to increase the number of occupants further.  Amended policy wording requires new build HMOs, changes of use from other uses and

Policy H2	Houses in Multiple Occupation (HMO) amendments to Policy H2
SA Objectives	Increase scope of policy H2 to refer to new build HMOs, change of use to HMO from other uses, and intensification changes of use from C4 (small HMO) to sui generis (large HMO). Additional criteria, including the requirement for all new HMOs to achieve energy performance certificate C.
	<p>applications for intensification to be tested against the sandwich and threshold tests set out in the HMO SPD, in order to ensure that proposals do not cause harmful concentrations, leading to increases in associated issues such as anti-social behaviour.</p> <p>New policy wording is also provided allowing the inclusion of conditions on permissions to restrict the number of occupants to that proposed within the permission.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>0</p> <p>The revised Policy will apply to a change of use from other uses (including office, pub, community facilities etc) therefore there is an indirect benefit to this objective.</p> <p>Mitigation and enhancement Applications for a change of use from other uses are also subject to other Development Management policies such as CR3 (primary shopping areas and frontages), ED1B (Office to Residential Use), and LCR1 (safeguarding local facilities).</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>-</p> <p>Occupants of both new and intensified HMOs should have access to adequate cycle storage. Current cycle parking standards do not provide requirements for HMOs. Standards for class C3 uses require dwellings to provide a minimum of 2no. cycle parking spaces. As an HMO often houses larger numbers of unrelated adults, the current C3 standards are not considered to be sufficient to ensure adequate provision.</p> <p>Mitigation and enhancement Future updates to the HMO SPD and Transport and Development SPD to provide cycle storage standards for HMOs.</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>Potential for new build HMOs to impact local landscape features.</p> <p>Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including impact on local landscape.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>0</p> <p>Potential for new build HMOs to impact historic environment and heritage assets. The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy, especially as they help avoid potential negative impact on fabric or structure (clause c) and unacceptable harm to the heritage significance of a heritage asset (clause d).</p> <p>Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant</p>

Policy H2	Houses in Multiple Occupation (HMO) amendments to Policy H2
SA Objectives	Increase scope of policy H2 to refer to new build HMOs, change of use to HMO from other uses, and intensification changes of use from C4 (small HMO) to sui generis (large HMO). Additional criteria, including the requirement for all new HMOs to achieve energy performance certificate C.
	Local Plan policies relating to new build residential accommodation, including impact on historic environment and heritage assets.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 Potential for new build HMOs to impact biodiversity.  Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including impact on biodiversity.
Objective 9: Reduce land, water, air, light, noise pollution	0 Perception that higher concentrations of HMOs in an area, and additional intensification, might cause more frequent incidences of noise and disturbance. A particular concern where permission is granted for a large HMO following assessment against policy criteria, where no further permission (and therefore no further assessment) is required to increase the number of occupants further.  Amended policy wording requires applications for new HMOs, and for intensification of existing HMOs, to be tested against the sandwich and threshold tests set out in the HMO SPD, in order to ensure that proposals do not cause harmful concentrations, leading to increases in associated issues such as increased noise and disturbance.  New policy wording is also provided allowing the inclusion of conditions on permissions to restrict the number of occupants to that proposed within the permission.  Update to HMO SPD suggests ways in which landlords might restrict noise from their HMO properties, such as provision of sound reduction measures.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 Potential for new build HMOs to be located in areas at risk of flooding.  Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including flood risk and drainage. A sequential approach will be required when assessing location.
Objective 11 Reduce negative contributions to and Increase resilience to climate change	+ New build HMOs should be built with resilience to changing climate.  Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including designing new

Policy H2	Houses in Multiple Occupation (HMO) amendments to Policy H2
SA Objectives	Increase scope of policy H2 to refer to new build HMOs, change of use to HMO from other uses, and intensification changes of use from C4 (small HMO) to sui generis (large HMO). Additional criteria, including the requirement for all new HMOs to achieve energy performance certificate C. development to be resilient to future climate. It is also expected that all new HMOs and intensification of existing HMOs achieve an Energy Performance Certificate 'C'.
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)	0 New build HMOs should consider efficient use of natural resources.  Mitigation and enhancement Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including sustainable construction methods and site-specific waste management.
<p><b>General Summary</b></p> <p>The revised policy would fill the current policy gap relating to new build HMOs, change of use from other uses such as shops, and the intensification of existing HMOs. Where intensification of existing HMO is proposed, it has potential for overcrowding contributing to poor living environment for occupiers. However amended wording requires applications relating to intensification to be assessed against criteria relating to provision of a good standard of accommodation for occupants, and must also achieve an Energy Performance Certificate rating of C. Therefore, there is a minor positive effect on Objective 2(housing), Objective 3(community) and Objective 11(climate).</p> <p>The policy aims to manage potential issues arising in areas with higher concentrations of HMOs by requiring new HMOs and intensification applications to be assessed against threshold tests set out in the HMO SPD. The intensification of HMOs to an extent further than assessable at planning stage will be restricted by policy wording allowing conditions to be attached to relevant permissions, controlling the number of occupiers.</p> <p>The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy, especially as they help avoid potential negative impact on fabric or structure (clause c) and unacceptable harm to the heritage significance of a heritage asset (clause d).</p> <p>A minor negative impact remains in relation cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties. Future updates to the HMO SPD and new Transport and Development SPD will provide cycle storage standards for HMOs.</p>	

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health	+ New policy H2A requires the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect to improve the health and well-being of occupiers.

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
inequalities	
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>+</p> <p>Provision of PBSA shall increase the existing supply of housing for students to meet future demand, providing good quality, managed homes, linked directly to an educational facility.</p> <p>Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, either but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment. The amendments through the Main Modifications provide clarification in regard to need for further student accommodation, particularly to meet the needs of second and third year students. This avoids and oversupply of PBSA in Bath outside allocated sites.</p> <p>Where follow on students (including 2<sup>nd</sup> or 3<sup>rd</sup> year students) decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and complete with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes.</p> <p>B5 sets out the overall strategy to manage student accommodation. In accordance with the strategy set out by Policy B5, Policy H2A facilitates PBSA on-campus as a first priority, and sets out that it will only be allowed on other sites where a need can be demonstrated. Policy H2A sets out the policy requirements for all new, extensions to and conversions to PBSA.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>0</p> <p>Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of anti-social behaviour. However, Policy H2A requires the submission of a Management Plan, in order to manage associated issues such as anti-social behaviour.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+</p> <p>Many recently built PBSAs are on sites previously used for employment uses. The new policy, with a more strategic approach towards location of PBSAs, would provide clarity and help maintain employment sites, unless a need could be demonstrated for PBSA in association with an education provider.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>0</p> <p>PBSA developments will be directed to sites allocated for that purpose, which are accessible by public transport. Proposals for PBSA shall be required by policy H2A to provide adequate cycle storage in line with current standards for student accommodation.</p> <p><b>Mitigation and enhancement</b></p> <p>The new Transport and Development SPD includes updated cycle standards for student accommodation.</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on landscape.</p>

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
<b>SA Objectives</b>	
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on heritage assets.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on biodiversity.
Objective 9: Reduce land, water, air, light, noise pollution	0 Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance. Policy H2A requires the submission of a Management Plan, in order to manage associated issues such as noise disturbance. The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including flood risk and drainage.
Objective 11 Reduce negative contributions to and Increase resilience to climate change	0 Proposals for PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including those relating to resilience to changing climate.
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)	0 Proposals for PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including renewable energy, sustainable construction, and waste management.
<p>General Summary</p> <p>Provision of PBSA shall increase the existing supply of housing for students to meet future demand, providing good quality, managed homes, linked directly to an educational facility. Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment or meeting the needs of second and third year students. This avoids an oversupply of PBSA in Bath outside allocated sites.</p> <p>Where follow on students (including 2<sup>nd</sup> or 3<sup>rd</sup> year students) decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and competitive with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes. Therefore, new policy H2A will have a</p>	

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
<p>positive effect on Objective 2(housing). New policy H2A requires the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect on objective 1(health). Also the new policy, with a more strategic approach towards location of PBSAs, would provide clarity and help maintain employment sites, unless a need could be demonstrated for PBSA in association with an education provider resulting in a positive effect on Objective 3(economy).</p> <p>Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance. Policy H2A requires submission of a Management Plan, in order to manage associated issues such as noise disturbance. The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced. However these negative effects are minimised by requiring a Management Plan to be submitted through the planning application process.</p>	

Policy RE1	Policy RE1 Employment uses in the Countryside
SA Objectives	
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	n/a
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	n/a
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++ The revised Policy allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide diverse range of employment opportunities.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6:	n/a

Policy RE1	Policy RE1 Employment uses in the Countryside
SA Objectives	
Protect and enhance local environmental distinctiveness and the character and appearance of landscape	
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 The amendments through the Main Modification only allow redevelopment of previously developed land where it is not habitat functionally linked to a European site. This helps avoid harm to European sites.
Objective 9: Reduce land, water, air, light, noise pollution	0
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a
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)	n/a
<p>The revised Policy allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities. Therefore, a major positive effect is identified on Objective 4(economy).</p> <p>The amendments through the Main Modification only allow redevelopment of previously developed land where it is not habitat functionally linked to a European site. This helps avoid harm to European sites.(Objective 8).</p>	



<b>DW1</b>	<b>Title District wide spatial strategy</b>
<b>SA Objectives</b>	<b>No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</b>
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>++</p> <p>Policy DW1 sets of the district wide spatial strategy first adopted through the Core Strategy. The original SA identified a major positive effect as it directs housing growth to existing settlements which contain services and facilities including health and well-being facilities. By directing new development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services. The new allocation sites were selected following the sequential approach established through the Core Strategy.</p> <p>Through the Partial Update, the sites safeguarded for development (Core Strategy Policy KE3b) are released for housing (new allocation Policy KE 3c and KE3d). In general these sites have a good access services and facilities including health and well-being facilities in Keynsham, Bath and Bristol.</p> <p>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. (Please see the site allocation SB26 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++</p> <p>The monitoring identified about 1,300 homes shortfall to achieve the Core Strategy target. The LPPU allocates or re-allocates 10 sites (including the sites previously safeguarded for development Policy KE3 c and KE3d) to meet this shortfall. This helps boost significantly the supply of housing. The new housing allocations are subject to the affordable housing policy CP9 which helps achieve this objective. Therefore, a major positive effect on this objective.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>0</p> <p>By locating the majority of new housing and employment development close to the existing main settlements in the district, the spatial strategy should help to support strong, vibrant and cohesive communities. The site specific appraisals (Appendix C) helped to identify the sites most accessible to existing communities to contribute to this objective.</p> <p>The spatial strategy itself will have a limited effect on crime and anti-social behaviour, however, the direction of growth to Keynsham and Bath may help to regenerate areas identified in the baseline as experiencing the highest levels of recorded priority crime. However, overall, a neutral performance is recorded for this spatial strategy against this SA Objective.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>+</p> <p>The spatial strategy refers to improving the quality of jobs as well as delivering growth in jobs numbers, without the need for expansion of settlements. The spatial strategy proposes the delivery of 10,300 new jobs by 2029. The site specific appraisal (Appendix C) helped to identify the sites most accessible to employment areas.</p>
<b>Objective 5:</b>	<b>+/0</b>

<b>DW1</b>	<b>Title District wide spatial strategy</b>
<b>SA Objectives</b>	<b>No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</b>
<b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>The LPPU site allocations direct housing growth to existing settlements which contain services and facilities as well as employment opportunities. By directing new development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services. The new allocation sites were selected following the sequential approach established through the Core Strategy.</p> <p>The 2017 Placemaking Plan analysed the highways capacity in Keynsham and concluded that mitigation would need to be delivered in order to release the safeguarded land. Mitigation opportunities have been reviewed to ensure that they meet the Council's requirements to maximise sustainable transport improvements. This has included identifying measures which will also shift some existing car trips to sustainable modes in order to release capacity for additional housing growth in advance of major strategic interventions such as metrobus and Mass Transit. The content of the mitigation package has been updated to enable the safeguarded land to be allocated for much needed housing. Site specific mitigation requirements are included in Policy KE3c and KE3d.</p> <p>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. The aim of multi-modal transport interchanges is to co-locate sustainable transport opportunities to create choice and opportunities for lower emission and sustainable travel, including into and out of key urban areas. (Please see the site allocation SB26 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</p>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>0</p> <p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core Strategy Policy KE3b). The policy stresses the importance of protecting, conserving and enhancing the district's nationally and locally important cultural and historic assets.</p> <p><b>Mitigation and enhancement</b></p> <p>Policy KE3c and KE3d Placemaking Principles generally limit building heights to ensure that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>0</p> <p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core Strategy Policy KE3b). The site assessments identified the importance of the skyline views from Queen Charlton Conversation Area and Cotswolds AONB.</p> <p><b>Mitigation and enhancement</b></p> <p>Policies KE3c and KE3d Placemaking Principles generally limit building heights to ensure that development does not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p>
<b>Objective 8:</b>	0

<b>DW1</b>	<b>Title District wide spatial strategy</b>
<b>SA Objectives</b>	<b>No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</b>
<b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core Strategy Policy KE3b).</p> <p><b>Mitigation and enhancement</b> Policies KE3c and KE3d require retention and enhancement of internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas, and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>Mature trees and hedgerows and along northern edge of the stie to act as buffer from A4 road. Additional development in Keysham potentially lead worsening the air quality particularly taking into account the Keynsham Air Quality Management area. There are a number of transport related mitigation measures including preparing a Travel Plan and Transport Impact Assessment are identified and included in Policies KE3c and KE3d.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>These sites are located within Flood Zone 1.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	<p>0</p> <p>The amendments have no direct effect on this objective. However development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.</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>+/-</p> <p>The sites are greenfield land, however they were justified and safeguarded for development through the Core Strategy. Any new development will be subject to new zero carbon policies.</p> <p>Therefore, mixed effects have been identified for this objective.</p>
<b>General Summary</b>	
<p>Policy DW1 sets out the overarching spatial strategy for the district and is largely retained. The key amendment to the policy is to increase the development capacity at East Keynsham i.e. releasing the previously safeguarded sites for development through LPPU Policy KE3c and KE3d. The new site allocations prioritise previously developed land and follow the spatial sequential approach directing new development to existing urban settlements, Bath, Keynsham and Somer Valley. This helps encourage walking and cycling by locating new housing close to existing workforces, facilities and services. Therefore, major positive effects on objective 1(health) and 2(housing). There is a minor negative effect on objective 12 as three of the sites are currently greenfield land, however the two sites at Keynsham were justified and safeguarded for development through the Core Strategy.</p>	

<b>DW1</b>	<b>Title District wide spatial strategy</b>
<b>SA Objectives</b>	<b>No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</b>
<p>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. The aim of multi-modal transport interchanges is to co-locate sustainable transport opportunities to create choice and opportunities for lower emission and sustainable travel, including into and out of key urban areas. (Please see the site allocation SB26 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</p>	

<b>Policy SB8</b>	<b>Updated policy: Bath Riverside</b>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>+</p> <p>The site is located in a highly sustainable location with potential for day to day trips to be made locally and on foot or by bicycle, encouraging active lifestyles.</p> <p>A policy requirement for the updated allocation includes provision of a new community hub with communal facilities to promote healthy lifestyles and community cohesion.</p> <p>Other policy requirements relate to improvements to pedestrian and cycle routes, including the provision of a Sustainable Transport Route across part of the site, from east to west, and delivery of an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists. All of these proposals will encourage healthy lifestyles.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++/+</p> <p>Provision of approximately 1750 new homes across the allocation, including policy compliant affordable housing where viable. The policy encourages high density residential development in a very accessible location in Bath.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>+</p> <p>Development of each of the land parcels making up the site allocation will create a number of new communities within the local area.</p> <p>A vibrant development is sought through the requirement to provide a mix of uses, including residential, an early years facility and a new community hub.</p> <p>Policy wording requires development to provide a positive relationship with the adjacent public realm at ground floor level, and the number of main entrances into buildings must be maximised in order to create an active, human scale public realm, to encourage the promotion of vibrant and cohesive communities.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>+</p> <p>Development of the site will provide a mix of uses, some of which will provide local job opportunities, including an early years facility and a new community hub.</p>
<b>Objective 5: Ensure everyone has</b>	<p>++</p> <p>The site is located in a sustainable location, with residential development able to capitalise on the</p>

Policy SB8	Updated policy: Bath Riverside
SA Objectives	
<p><b>access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	<p>location's potential for day to day trips to be made locally and on foot or by bicycle, with public transport being an attractive option for trips to/from the city centre.</p> <p>Policy wording requires development to facilitate improvements to pedestrian and cycle routes, including provision of a new Sustainable Transport Route across part of the site, from east to west, and delivery of an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists. It requires investigating specific infrastructure elements, such as integrating with emerging Metrobus/Mass Transit proposals and ensuring options for crossing Windsor Bridge Road, are feasible solutions for the provision of sustainable transport. The wording also requires provision of clear hierarchy of pedestrian and cycling routes throughout the site, providing good permeability across the site as a whole, and linking individual sites with the surrounding context.</p>
<p><b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<p>0</p> <p>The site is visible from multiple key views around the city, including longer sweeping views from important viewpoints.</p> <p>Policy wording requires development to provide high quality public realm, designed to provide green infrastructure with a focus on nature recovery and nature-based solutions. A strong tree infrastructure is required throughout the site using large growing species to provide both Green Infrastructure (GI) nature-based solutions and structural landscaping to break up extensive massing of buildings.</p> <p>Policy wording also requires that development is informed by a comprehensive understanding of the sensitive landscape context in which the area sits. Any development should not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints as set out in the WHS Setting SPD; and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response and to influence the height, massing and design of buildings. The Bath Building Heights Strategy (BBHS) should be used as part of the evidence base and the starting point for this analysis which must also include a detailed Landscape and Visual Impact Assessment (LVIA).</p> <p><b>Mitigation and enhancement</b> New development will be subject to other Development Management policies.</p>
<p><b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>0</p> <p>The site is historically sensitive. It is located within the World Heritage Site (WHS), Bath Conservation Area and is surrounded by various listed buildings and structures. The site is visible from multiple key views around the city, including longer sweeping views towards the Georgian City and views from historically important viewpoints.</p> <p><b>Enhancement and mitigation</b> Policy wording requires that development is informed by a comprehensive understanding of the sensitive heritage context in which the area sits, including undertaking a detailed historic environment assessment to include assessment of the effects of development proposals on the wider City of Bath WHS, Outstanding Universal Values (OUVs) and Attributes and other heritage assets including the Georgian city, Bath CA, listed buildings, Royal Victoria Park, undesignated heritage assets and archaeology, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation. A heritage-led and contextual approach is strongly encouraged.</p> <p>Policy wording also requires that development does not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints.</p> <p><b>Mitigation and enhancement</b></p>

Policy SB8	Updated policy: Bath Riverside
SA Objectives	
<p><b>Objective 8:</b>  <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>New development will be subject to other Development Management policies.</p> <p>+/0</p> <p>The River Avon runs through the site, and creates a river boundary for a number of the land parcels which make up the allocation. These areas are particularly sensitive in terms of biodiversity and habitats.</p> <p>Policy wording requires development to retain and enhance green infrastructure and habitats along the riverside edge providing a biodiversity led approach towards the treatment of this area. Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated. Built form is required to be set back from the retained or reinstated riverside habitat infrastructure by a buffer of at least 10 metres where feasible. Development blocks should seek to retain and enhance the existing hedgerows throughout the site wherever possible, providing a 10m protective buffer of new grassland habitat for all retained hedgerows, and the provision of additional hedgerows is encouraged.</p> <p><b>Mitigation</b></p> <p>New development will be subject to other Development Management policies including the requirements for biodiversity net gain of a minimum of 10%, and provide one nest or roost site per residential dwelling.</p>
<p><b>Objective 9:</b>  <b>Reduce land, water, air, light, noise pollution</b></p>	<p>0</p> <p>Potential for harmful light spill onto river corridor.</p> <p>Policy wording requires lighting to be designed to safeguard the important ecological function of the river corridor, including the retention of a dark corridor for bats.</p> <p><b>Mitigation</b></p> <p>New development will be subject to other Development Management policies and latest environmental standards.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>Some parts of the site are located adjacent to the river, in Flood Zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy, therefore the location of the general growth areas was justified through the Core Strategy high level Sequential Test.</p> <p>Policy wording requires development proposals to be informed by a site specific Flood Risk Assessment (FRA), with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.</p>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<p>+</p> <p>Policy wording requires development to optimise sustainability innovations, including district heating infrastructure, on-site renewable energy generation, and demonstrate that all reasonable opportunities to reduce the embodied carbon emissions associated with development have been explored. It also requires development to optimise the solar energy potential of development by careful design and orientation.</p> <p><b>Mitigation and enhancement</b></p> <p>New development will be subject to other Development Management policies.</p>
<p><b>Objective 12:</b>  <b>Encourage careful, efficient use of natural resources including energy and encourage sustainable</b></p>	<p>+</p> <p>As per objective 11.</p>

<b>Policy SB8</b>	<b>Updated policy: Bath Riverside</b>
<b>SA Objectives</b>	
<b>construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	
<p><b>General Summary</b></p> <p>The updated site allocation for Bath Riverside will have a major positive effect in terms of Objective 2(housing) boosting the supply of housing (including affordable housing), and Objective 5(sustainable transport) through the provision of improved walking and cycling infrastructure and routes within the local area.</p> <p>A positive impact will arise relating to the promotion of healthy lifestyles through the provision of a health related community facility, and through provision of improved walking and cycling infrastructure in the local area.</p> <p>Other positive impacts will arise through provision of local jobs relating to the provision of an early years facility and a community hub, the protection and enhancement of existing habitats along the river line and within existing hedgerows, provision of 10% biodiversity net gain, and through the optimisation of sustainability innovations at the site.</p> <p>Potential negative impacts relating to heritage impact, landscape, views of the site, light spill and flooding will be mitigated through development requirements set out within the policy wording.</p> <p>Policy wording requires development to retain or reinstate riverside habitat infrastructure to retain and enhance green infrastructure where possible. Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated. Built form is required to be set back from the retained or reinstated riverside habitat infrastructure by a buffer of at least 10 metres where feasible. This helps mitigate potential negative effects on objective 8 (ecology).</p> <p>Some parts of the site are located adjacent to the river, in Flood Zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy, therefore the location of the general growth areas was justified through the Core Strategy high level Sequential Test</p> <p>Policy wording requires development proposals to be informed by a site specific FRA, with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.</p>	

<b>Policy B3 and SB22</b>	<b>B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub</b>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>+</p> <p>Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. The site is located in a highly sustainable location with potential for day to day trips to be made locally and on foot or by bicycle, encouraging active lifestyles. This helps contribute to this objective.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>+</p> <p>The policy facilitates more student accommodation close to teaching facilities. The policy also allows the consolidation of the University estate and release the Sion Hill campus for housing. Therefore, a minor positive effect on this objective.</p>
<b>Objective 3:</b>	<p>+</p> <p>The Creative Industrial Hub in partnership with Bath Spa University offers mixed use development with</p>

Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
<b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	employment space including incubator units and 'grow on' space and teaching. It also provides opportunities to share the university's specialist equipment and facilities and become a focal point where universities and businesses work together. This will have a major positive effect on this objective contributing to the wider community benefits.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>++</p> <p>The policy facilitates mixed use development comprising flexible teaching and employment space. The space will also provide space associated with Bath Spa University which can also be used as studio space with access to specialist equipment and facilities for start-up businesses and workspaces for local people, academics and students, resulting in an increase in the supply and diversity of employment opportunities; contribute to inclusive growth by making units available to students and SMEs; and increasing local training, work experience and apprenticeships.</p> <p>The site is located in a sustainable location with good access to public transport. This mixed use development could increase the potential for reducing travel distances to work.</p> <p>The previous SA stated that 'the Locksbrook campus is located within the Newbridge Strategic Industrial Estate. If the potential new site for Bath Spa University is only used for academic space it has a negative effect on this objective. The site selection and potential uses need to be carefully considered to ensure they contribute to the wider economic benefits.' Responding to this, the policy states that teaching space will be supported subject to a)providing workspace that can be offered to small and medium enterprises and b) the demonstration of economic benefits to the city in particular for industrial uses. This has a major positive effect on this objective.</p>
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++</p> <p>Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. In addition Lockbrook Campus is in a sustainable location well connected to Bath Spa Station, the city centre and Newbridge Campus by public transport.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to Development Management Policies.</p>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>0</p> <p>The new Policy SB22 requires a positive relationship with Station Road and Locksbrook Road and respond positively to short and long distance views having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. It also requires provide an architectural response that helps to reinforce the identity of this area as a Creative Hub, whilst responding to its sensitive context.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to Development Management Policies.</p>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>0</p> <p>The Locksbrook Area has an industrial heritage (the current Locksbrook campus is based on the former Herman Millar building which is a Great II listed building). The mixed use development would help maintain the industrial and creative legacy of the Locksbrook Area. The new Policy SB22 requires to respond positively to short and long distance views having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures. An analysis is required to enable an appropriate response, and to influence the height, massing and design of</p>



Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
	<p>buildings. It also requires provide an architectural response that helps to reinforce the identity of this area as a Creative Hub, whilst responding to its sensitive context.</p> <p><b>Mitigation and enhancement</b> Any new development is subject to Development Management Policies.</p>
<p><b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>0</p> <p>The new Policy NE3a (biodiversity net gain) will apply to this allocation. The SB22 requires to consider opportunities to deliver 10% biodiversity net gain within the site curtilage before any off-site measures are proposed. New clause 10 requires to retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</p> <p><b>Mitigation and enhancement</b> Any new development is subject to Development Management Policies</p>
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>+</p> <p>Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel' and help reduce traffic congestion contributing to reduce air and noise pollution. Also concentrating Bath Spa University on two main campuses helps reduce travel/movements between the key campuses and satellite campuses. This helps reduce the need to travel contributing to reduced air pollution.</p> <p><b>Mitigation</b> Need to ensure that the living conditions at the upper floors will be maintained at an acceptable level in terms of noise from the ground floor teaching/industrial activities. New development will be subject to other Development Management policies and latest environmental standards.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>Part of the Locksbrook Campus is located in Flood Zone 1 and 2. The policy allows some student accommodation. The policy reflects the extant planning permission under which the sequential test was carried out and justified.</p> <p><b>Mitigation</b> Any new development is subject to Development Management Policies, in particular Policy CP5 Flood Risk and SU1 Sustainable Drainage.</p>
<p><b>Objective 11 Reduce negative contributions to and Increase resilience to climate change</b></p>	<p>+</p> <p>The Locksbrook Campus is walkable from may Purpose Built Student Accommodation where students live. Also concentrating Bath Spa University on two main campuses helps reduce traveling/movement between key campuses and satellite campuses. This helps reduce travel movements contributing to reduced carbon emission.</p> <p><b>Mitigation</b> Any new development will be subject to Development Management Policies including in particular zero carbon and biodiversity net gain polices introduced through the Partial Update.</p>
<p><b>Objective 12:</b> <b>Encourage careful, efficient use of natural resources including energy and encourage sustainable</b></p>	<p>0</p> <p>The new allocation encourages the use of brownfield land. The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies.</p> <p><b>Mitigation</b></p>

<b>Policy B3 and SB22</b>	<b>B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub</b>
<b>SA Objectives</b>	
<b>construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</b>	Any new development is subject to Development Management Policies particularly zero carbon and biodiversity net gain polices introduced through the Partial Update.
<p><b>General Summary</b></p> <p>The Creative Industry Hub in partnership with Bath Spa University offers mixed use development with employment space including incubator units and 'grow on' space and teaching. It also provides opportunities to share the university's specialist equipment and facilities and become a focal point where universities and businesses work together. This will have a major positive effect on objective 3(communities) and 4(economy). Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. Also the Locksbrook Campus is well connected to Bath Spa Station, the city centre and Newbridge Campus by public transport. This helps reduce travel/movements between key campuses and satellite campuses limiting air pollution and reducing carbon emission. This results in a major positive effect on objective 5(sustainable transport).</p> <p>The policy SB22 sets out site specific requirements addressing Objective 6 (landscape), 7(heritage) and 8 (biodiversity). The nature of the mixed-use development, in terms of character, scale, external appearance and intensity of use, will need to reflect existing development in the surrounding area. However any new development will be subject to other Development Management policies including in particular new zero carbon and biodiversity net gain policies.</p> <p>New clause 10 requires to retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</p>	

<b>Policy SB18</b>	<b>Royal United Hospital</b>
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&NES. Various projects to improve their facilities have been completed in accordance with their Estate Strategy (2014) and now planning for further improvement tapping into the funding under the government's 'New Hospital Programme'. The modified Policy refers to the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal. The updated policy would facilitate the improvement of these essential healthcare facilities. Therefore, the policy has a major positive effect on this objective.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The policy facilitates the provision of use class C3 flats, with a range of sizes and types for use by key workers associated with the RUH. This will help contribute to boosting the housing supply.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++ The RUH is an essential health, social and well-being facility and improving its facilities will help promote stronger more vibrant and cohesive communities.
<b>Objective 4: Build a strong, competitive economy and enable local</b>	++ As well as being the main provider of healthcare services the Trust is also the largest employer in Bath & North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to

Policy SB18	Royal United Hospital
<b>SA Objectives</b>	
<b>businesses to prosper</b>	1,000). The policy supports the improvement to facilities helping to create more employment opportunities to meet the requirements of this growth sector.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ Site located in a sustainable location well connected by public transport. The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate enhancements to ensure that walking and cycling are the natural choices for local trips. Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate  <b>Mitigation</b> New development will be subject to other Development Management policies--
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	-/0 The Policy requires development to be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area.  <b>Mitigation</b> New development will be subject to other Development Management policies
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0 The Policy requires development to be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area. The Grade II* Manor House and its setting will require an especially sensitive approach to ensure that its significance is taken into account and both enhanced and better revealed. A heritage-led and contextual approach is therefore required. New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.  <b>Mitigation</b> New development will be subject to other Development Management policies
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+ Development of part of the site for residential use provides opportunity to enhance opportunities for biodiversity net gain across the site including the former kitchen garden to the north of the Manor House. It also requires to consider a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.  <b>Mitigation</b> New development will be subject to other Development Management policies
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0 Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill. <b>Mitigation</b> New development will be subject to other Development Management policies and latest environmental standards.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The site is located in flood zone 1. <b>Mitigation</b> New development will be subject to other Development Management policies including the

<b>Policy SB18</b>	<b>Royal United Hospital</b>
<b>SA Objectives</b>	
	requirement for a sustainable drainage system.
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	+ Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.
<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>	+ The site is brownfield land. The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies.
<p><b>General Summary</b></p> <p>The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&amp;NES. Various projects to improve the facilities have been completed in accordance with their Estate Strategy (2014) and now the RUH is planning for further improvements tapping into the funding under the government's 'New Hospital Programme'. The updated policy would facilitate the improvement of essential healthcare facilities. The Trust is also the largest employer in Bath &amp; North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to 1,000). The policy supports the improvement to their facilities helping to create more employment opportunities to meet the requirements of this growth sector. The amended Policy refers to the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal. The site is a sustainable location accessible by public transport and brownfield land. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12 (natural resources)</p> <p>The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate necessary enhancements to ensure that walking and cycling are the natural choices for local trips. Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&amp;NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate</p> <p>New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</p> <p>New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>	

<b>Policy SB24</b>	<b>New Policy: Sion Hill</b>
<b>SA Objectives</b>	
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Development of the site for residential use to include provisions to encourage active lifestyles for residents and surrounding communities.  Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped gardens, for use by both residents and surrounding local community.

Policy SB24	New Policy: Sion Hill
<b>SA Objectives</b>	
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++</p> <p>Provision of approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1 and 2 bed flats) are based on emerging housing needs set out in the WECA draft housing needs assessment.</p> <p><b>Mitigation and enhancement</b> New development will be subject to other Development Management policies including the revised Policy H7 which sets out revised accessibility requirements.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>++</p> <p>The site is located close to community facilities in Bath. The Policy requirements include to make the landscaped gardens available for both residents and the surrounding local community.</p> <p>The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project. This helps contribute to this objective.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>+</p> <p>The University's strategy is to focus development into two campuses: Newton Park and a new campus area around Locksbrook Road. This will free up land at Sion Hill campus for use as residential.</p> <p>The loss of this university facility on this site could have a neutral effect. Providing more homes in Bath which is the district's major employment centre has a positive effect as it helps reduce travel distances to work.</p>
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>+</p> <p>Site located in a sustainable location, within walking distance to the city centre, and close to bus stops with services to the city centre. Development of the site for residential use to include requirements to improve the walking / cycling infrastructure through the site, as well as in the local area.</p> <p>Policy wording requires development to provide a comprehensive network of walking and cycling public access routes through the landscaped gardens, plus appropriate connections to the wider walking and cycling network, including safe crossings where necessary.</p> <p>Policy wording also requires development proposals to ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road.</p> <p>A requirement for the development to provide measures to improve conditions on Winifred's Lane to the east of the site, to make the route safe and suitable for pedestrians and cyclists is also included.</p> <p>The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies as well as Transport and Development SPD which sets out the parking standards.</p>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>0/-</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary planting within the site is substantial, and screens the site well from views across the city.</p> <p>Policy wording requires development to protect and enhance existing landscape infrastructure within the site and to retain and enhance substantial boundary planting to protect both short and long views of the site from across Bath.</p>

Policy SB24	New Policy: Sion Hill
SA Objectives	
	<p>Policy wording also requires development to deliver a high quality, contemporary and sustainable built form and architectural design, informed by the site's sensitive landscape context. Development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies particularly NE2 requiring a Landscape and Visual Impact Assessment.</p>
<p><b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>0</p> <p>The site is located in a highly sensitive hillside location, within the World Heritage Site and Bath Conservation Area. The site has many layers of history prior to its development by Bath Spa University. There are known archaeological deposits in the area including Romano-British burials, an Iron Age site and the former site of St Winifred's Chapel and Well, the exact locations of which are not known. The site is the former ornamental landscaped garden of St Winifred's, a 19th century house built in 1803. There may be below ground remains of the property on site, and historic walls and railings survive in places around its perimeter. Various listed buildings are located in the immediate area surrounding the site, including Grade I listed buildings Somerset Place to the east, and Sion Hill Place to the north.</p> <p>Policy wording requires development to deliver high quality, contemporary and sustainable built form and architectural design, informed by the opportunities presented by the site's sensitive historic and landscape context. In seeking to preserve or enhance this part of the Conservation Area and WHS, it is anticipated that development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.</p> <p>Policy wording also requires applications to undertake a detailed historic environment assessment, and where necessary evaluation, to identify and implement appropriate mitigation.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies.</p>
<p><b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>+</p> <p>Development of the site for residential use provides opportunity to enhance opportunities for biodiversity across the site.</p> <p>Policy wording requires development to protect and enhance existing habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. The development will also be required to deliver biodiversity net gain of at least 10%. Other ecological interventions required include integrated swift boxes and garden boundaries permeable for hedgehogs.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies.</p>
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>0</p> <p>Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies and latest environmental standards.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of</b></p>	<p>0</p> <p>The site is located in Flood Zone 1.</p> <p><b>Mitigation</b></p>

Policy SB24	New Policy: Sion Hill
<b>SA Objectives</b>	
<b>climate change)</b>	New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	+ Development will be required to meet policy compliant reduction in carbon emissions through reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.
<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>	+ The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a positive effect on this objective.  The Policy requires demolition and rebuild of existing building at the site should only be proposed where conversion is not considered feasible.
<b>General Summary</b>	
<p>The site is in brownfield land and expected to provide approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1 and 2 bed flats) are based on emerging housing needs set out in WECA's draft housing needs assessment. Development of the site for residential use includes provisions to encourage active lifestyles for residents and surrounding communities. Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped gardens, for use by both residents and surrounding local community. The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project. Any new development will be subject to new zero carbon development requirements. The Policy requires demolition and rebuild of the existing buildings at the site should only be proposed where conversion is not considered feasible. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities) and 12 (natural resources)</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary planting within the site is substantial, and screens the site well from views across the city. Therefore, potential minor negative effect on objective 6(landscape).</p> <p>Mitigation New development will be subject to other Development Management Policies particularly Policy NE2 with a requirement for a Landscape and Visual Impact Assessment and SPDs including Transport and Development SPD for parking standards.</p>	

Policy SB25	New Policy: St Martins Hospital
<b>SA Objectives</b>	
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	+/-0 The site is currently owned by NHS Property Services. Some areas of the site, namely the clinical buildings to the south-east, continue to play an important role in the NHS's clinical facilities requirement. However, some buildings within the site are expected to soon be declared surplus to the operational healthcare requirements of the NHS by local health commissioners, and are therefore being released for use as housing. The policy requires that the continued use of the south-eastern section of the site for clinical health services is facilitated.

Policy SB25	New Policy: St Martins Hospital
SA Objectives	
	The site is located in a sustainable location with potential for day to day trips to be made locally and on foot or by bicycle, encouraging active lifestyles.
<b>Objective 2:</b> <b>Meet identified needs for sufficient, high quality housing including affordable housing</b>	++ The allocation provides approximately 50 new homes, including policy compliant affordable housing, which will help boost housing supply.
<b>Objective 3:</b> <b>Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+ The policy also requires that the continued use of the south-eastern section of the site for clinical health services is facilitated. Retention / enhancement of safe walking routes through the site in order to ensure permeability, for use by surrounding communities.
<b>Objective 4:</b> <b>Build a strong, competitive economy and enable local businesses to prosper</b>	-/0 Loss of surplus clinical floorspace.  <b>Mitigation and enhancement</b> Policy wording only allows for loss of clinical floorspace where supported by evidence to show that it has been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	+ Site located in a sustainable location. There is potential for future residents to make day to day trips locally and on foot or by bicycle, and there is good public transport links for trips to/from the city centre.  <b>Mitigation and enhancement</b> Policy wording requires development to retain and enhance the existing network of pedestrian footways throughout the site and deliver measures to improve permeability and legibility for pedestrians and cyclists. Policy also requires the examination of pedestrian and cycle routes between the site and key local facilities and to make appropriate <u>necessary</u> enhancements to ensure that the walking and cycling are the natural choice for local trips. The requirements also include "Improve access to Odd Down Sports Ground for pedestrians and cyclists through off-site contributions towards crossing improvements across Wellsway, and a new access to the Sports Ground;"
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0 Attractive landscaped areas throughout the site are considered important visually and potentially important in terms of biodiversity. There are many trees throughout the site which require retention and protection, some of which are located very close to the footprint of the buildings.  <b>Mitigation and enhancement</b> Policy wording requires development to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, planting, and landscaped areas. Any extension or redevelopment of existing buildings will be designed to ensure minimal to no encroachment into landscaped areas.
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0 The site is historically sensitive. It is located within the World Heritage Site and has many layers of history prior to its development by the NHS. Records show that it may have once been used as a military barracks, before becoming a workhouse, and then a hospital. The main building within the complex, a former workhouse building, which has now been converted to apartments, is Grade II listed, as is the Chapel of St Martin, located to the north of the site. A nineteenth century paupers burial ground is also located within the site, and there are known archaeological deposits in the surrounding area. The amendments through the Main Modifications will help conserve the heritage significance of the Chapel of St Martin.



Policy SB25	New Policy: St Martins Hospital
SA Objectives	
	<p><b>Mitigation and enhancement</b> Policy wording requires development to be informed by a detailed, site-wide heritage assessment, which considers each of the individual buildings within the site, their context and relationship to each other, as well as other heritage assets, including the World Heritage Site, adjacent listed buildings, and undesignated heritage assets. The redevelopment of Kempthorne House, Midford House and Ash House will not be supported, unless an objective and comprehensive heritage assessment is provided to justify such a proposal, with a clear evidence base to demonstrate that conversion would not be feasible and / or viable.</p>
<p><b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b></p>	<p>+</p> <p>Landscaped areas throughout the site are considered potentially important in terms of biodiversity.</p> <p><b>Mitigation and enhancement</b> Policy wording requires development to protect and enhance existing habitats within the site. The development will also be required to deliver biodiversity net gain of at least 10%. Other ecological interventions required include integrated swift boxes and garden boundaries permeable for hedgehogs.</p>
<p><b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b></p>	<p>0</p> <p>Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies and latest environmental standards.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>The site is located in Flood Zone 1.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
<p><b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b></p>	<p>+</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through renewable energy interventions on-site. Opportunity to increase sustainability of uses on site.</p>
<p><b>Objective 12:</b> <b>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>	<p>+</p> <p>In terms of sustainable construction, policy wording states that other than the demolition of Frome House, all other buildings within the site should be retained and converted, subject to feasibility and viability.</p>
<p><b>General Summary</b> The new site allocation for St Martins Hospital will have a major positive impact on Objective 2(housing) in terms of boosting the supply of housing (including affordable housing). Other positive impacts will arise through potential enhancement of the existing network of pedestrian footways throughout the site, delivery of measures to improve permeability and legibility for pedestrians and cyclists in the local area and access improvements to Odd Down playing fields. Potential negative impacts on Objective 4(economy) relating to the loss of surplus clinical floorspace will be mitigated by policy wording requiring evidence that clinical floorspace is surplus to the needs of the NHS. Other potential minor negative impacts relating to impact on heritage and biodiversity will be mitigated through development requirements set out within the policy wording. However, the</p>	

<b>Policy SB25</b>	<b>New Policy: St Martins Hospital</b>
<b>SA Objectives</b>	
amendment made to clause 8 will help conserve the heritage significance of the Chapel of St Martin.	
<b>Mitigation</b> New development will be subject to other Development Management policies and SPDs.	

<b>Policy SB19</b>	<b>University of Bath</b>
<b>SA Objectives</b>	The revised development requirements are informed by more detailed and up to date evidence base.
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++  The revised Policy facilitates further improvements to teaching facilities and provides for more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. Policy SB19 enables the further provision of facilities for sports and recreation and the masterplan proposes 3 <sup>rd</sup> generation pitches which help facilitate longer play, especially in winter. Responding to some concerns raised in terms of potential risk to health and soil/water contamination associated with old tyres, revised Policy requires 100 % recyclable pitch materials with natural filling crumbs unless it is demonstrated not to be feasible. Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits.  It also requires a campus-wide approach to sustainable travel including the active implementation of the Travel Plan.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	++  The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation on campus could contribute to bringing existing HMOs back to non-student use (subject to achieving the right types and rental levels). Therefore, it has a major positive effect on this objective.
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	++  The site can accommodate university related uses including a variety of spaces for education, business, conference, IT, sport, health, arts and social, catering and retail which helps promote stronger more vibrant and cohesive communities on campus.  The new Development Framework Plan identifies new or improved public spaces such as open space, Focal Lake and new Focal Spaces. This helps Promote public spaces that support civic, cultural, recreational and community functions.  The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++  The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation has a major positive effect on this objective as it helps, along with the new policies for PBSA, maintain existing employment sites in the centre of Bath, especially as many of the recently built PBSAs have been on previously employment land.

<b>Policy SB19</b>	<b>University of Bath</b>
<b>SA Objectives</b>	The revised development requirements are informed by more detailed and up to date evidence base.
	The revised policy creates more employment opportunities in growth sectors as the policy defines university-related uses to include research and allied business incubation. This will help improve access to local training, work experience and apprenticeships. The UoB is the second biggest employer in the District the the policy facilitates the long term requirements of the university on campus (48,000 sqm). This would have a major positive effect through the short to long terms.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++/+</p> <p>The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between their accommodation and university facilities.</p> <p>The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires a campus-wide approach including the implementation of an up to date Travel Plan. Based on the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. The Policy Framework proposes an improved green corridor and encourages walking and cycling routes.</p> <p><b>Mitigation and enhancement</b> The new Travel and Development Supplementary Planning Document (SPD) will set the parking standards as well as the requirements for electric vehicle charging spaces. Any future applications will be subject to other Development Management policies as well as the SPD.</p>
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>-/0</p> <p>The campus is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. A Visual Impact Assessment was prepared and informed the key development areas. The maximum heights and various buffers were set through the Policy. (eg minimum 15 metres buffer for the multi storey car park at the existing West Car Park area). Therefore, the impact on the landscape can be minimised. The Policy also requires careful design of the eastern-most block (at the current East Car Park) to ensure minimising the impact on views from Bushey Norwood (AONB).</p> <p>The University Park has an important landscape setting and green infrastructure function to the many developed parts of the campus. It should remain as an undeveloped yet enhanced open space as the remainder of the campus intensifies.</p> <p><b>Mitigation and enhancement</b> The original SB19 d) is maintained and carried over to the new SB19. 'In all circumstances where development would be visible to views from within the Cotswolds AONB (at Bushey Norwood, Bathampton Down, and Claverton Down, or from within the Limpley Stoke Valley at places such as Warleigh and Conkwell), it should respond to this context and its visual impact must be moderated with a suitable design response including suitable (immediate and longer term) mitigation measures, including any opportunities to enhance the AONB. Impacts on the AONB will need to be evidenced in an LVIA, the scope of which should be set out in consultation with the LPA, Natural England and the Cotswold Conservation Board.'</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence.</p>
<b>Objective 7:</b>	-/0

<b>Policy SB19</b>	<b>University of Bath</b>
<b>SA Objectives</b>	The revised development requirements are informed by more detailed and up to date evidence base.
<b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>The main Claverton Down campus is within the City of Bath World Heritage Site (WHS). The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p> <p>The redevelopment of the decked car park at the West Car Park could be visible from the city (Bath WHS). The Verified Views Appraisal has informed the need for a tree belt (approx. 15 meters) on the western/north western side of the new decked car park. This will provide additional screening for the buildings in views from the city to the west. Also the facades and rooftop plant of both the car park and building will be required to be carefully designed so that they can be assimilated into views from the west and to ensure that light spill is minimised.</p> <p><b>Mitigation and enhancement</b></p> <p>The original SB19 c) is maintained and carried over to the new Policy SB19. 'In all circumstances development will be assessed to determine the degree to which it affects the significance of the Bath World Heritage Site (by reference to the Bath World Heritage Setting SPD), the Bath Conservation Area, the Claverton Conservation Area, the Claverton Manor Historic Garden and the Bathampton Down Scheduled Ancient Monument (including by affecting their settings) and great weight will be given to their conservation and enhancement.</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence required by the other Development Management policies.</p>
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>+/-</p> <p>The mitigation hierarchy is used to avoid and minimise impacts, and various area specific measures are included in the Policy such as:</p> <ul style="list-style-type: none"> <li>• Set back to reduce light spill and provide space for additional tree planting to bolster the existing perimeter vegetation</li> <li>• Careful design of the buildings to ensure that the impact on the adjacent bat corridors (in terms of light spill) is minimised.</li> </ul> <p>The revised policy requires biodiversity to be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds. It also requires a minimum of a swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.</p> <p>Wider green buffer was proposed around the new 3G pitch.</p> <p><b>Mitigation and enhancement</b></p> <p>The original SB19 f) and j) below is maintained and carried over to the new SB19. f)'In all circumstances the design response should be evidenced as contributing positively to a campus wide strategy for green infrastructure, landscape and ecology (particularly in respect of protected species of Bats) such as the Landscape and Ecological Management Plan. These matters should be intrinsic to development, which should enable the creation, protection, enhancement and management of networks affecting the campus. If it is necessary to cause harm to a network, this should be minimised and suitable compensatory measures must be made within the campus.'</p>

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
	<p>j) In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence required by the other Development Management policies. The new development will be subject to the requirement for 10% biodiversity net gain.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>There is potential for increased light spill by illuminating areas of the campus that are dark at present. The general intensification other parts of the campus also has the potential to increase light spill. The development requirements set out some area specific measures including:</p> <ul style="list-style-type: none"> <li>• Careful design of the buildings to ensure that the impact on the adjacent bat corridors (in terms of light spill)</li> <li>• Roofs over the decked car parks to reduce light spill.</li> <li>• The green corridors around the perimeter of the campus will be retained as a continuous green ribbon around the campus which includes public rights of way and links to the wider network of public footpaths and bridleways.</li> <li>• The 3G pitch is located in the AONB and the opportunity will be explored to use the required earthworks and additional planting to screen / filter views of the pitch and related infrastructure..</li> </ul> <p>The revised policy would facilitate more new university related development (including on the land currently used as a car park), however the Policy requires to maintain or reduce the total number of parking spaces. This contributes to minimising increase in traffic congestion and encouraging the use of public transport, cycling and walking.</p> <p>The revised policy requires enhancing pedestrian and cycling infrastructure to promote active travel modes over private cars.</p> <p>The revised policy requires 3G pitches to be recyclable and use natural crumb.</p> <p><b>Mitigation and enhancement</b>  The original SB19 j) is maintained and carried over to the new SB19 j)'In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).'</p> <p>New development will be subject to other Development Management policies and latest environmental standards.</p>
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The site is within Flood Zone 1.</p> <p><b>Mitigation and enhancement</b>  Any new development will be subject to Development Management Policies, particularly Policy CP5 Flood Risk and Policy SU1 Sustainable Drainage.</p>
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	<p>0</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies and in addition the University has adopted a Climate Action Framework. The University has committed to the targets of being net zero carbon in Scope 1 and 2 emissions by 2030, and</p>

<b>Policy SB19</b>	<b>University of Bath</b>
<b>SA Objectives</b>	The revised development requirements are informed by more detailed and up to date evidence base.
	<p>Scope 3 emissions by 2040.</p> <p>The revised policy requires no increase in car parking provision which help not increase greenhouse gas emissions.</p> <p>The revised policy requirements include to enhance the green corridor and green infrastructure, which helps increase resilience to future climate change with increased extremes of heat.</p> <p><b>Mitigation and enhancement</b> New development will be subject to zero carbon policies proposed through this Partial Update.</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>+</p> <p>The revised Policy encourages the effective use of brownfield land.</p> <p><b>Mitigation and enhancement</b> New development will be subject to other Development Management policies including zero carbon policies proposed through this Partial Update and University's own Climate Action Framework.</p>
<p><b>General Summary</b></p> <p>The revised Policy SB19 proposes further improvements to university related development including spaces for teaching, research and business incubation and provides more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. It also facilitates the further provision for sports and recreation and 3<sup>rd</sup> generation pitches which help facilitate longer play especially in winter. Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits. The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between accommodation and university facilities. The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</p> <p>The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires a campus wide approach including implementing an up to date Travel Plan. As the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. Policy Framework proposes an improved green corridor and encourages walking and cycling routes.</p> <p>Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities), 4(economy) and 5(sustainable transport).</p> <p>The campus is surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area. The Verified Views Appraisal has informed the siting, building heights and required buffers to minimise the impact. The Policy also requires the University Park area to remain undeveloped as it has an important landscape setting and green infrastructure function to the many developed parts of the campus.</p> <p>The main Claverton Down campus is within the City of Bath World Heritage Site. The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p>	

<b>Policy SB19</b>	<b>University of Bath</b>
<b>SA Objectives</b>	The revised development requirements are informed by more detailed and up to date evidence base.
<p>Various area specific measures are included in the Policy such as buildings to be set back to reduce light spill and provision of space for additional tree planting to bolster the existing perimeter vegetation. The revised policy requires biodiversity to be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds. It also requires a minimum of a swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings. Also a wider green buffer was proposed around the new 3G pitch.</p> <p>Therefore, there are some negative effects on Objective 6(landscape), 7(heritage) and 8(biodiversity).</p> <p><b>Mitigation and enhancement</b>  New development will be subject to other Development Management policies particularly HE1 Historic Environment, NE2 /NE2A (Landscape), NE3-NE6 (ecology) and new Biodiversity Net Gain policy. The site-specific policy requirements SB19 c), d), f) and j) are maintained and carried over to the new SB19. This helps ensure individual proposals address negative effects identified through the appraisal at this stage.</p>	

<b>Policy ST6 and Policy SB26</b>	<b>New Policy: Park and Ride Site Allocations</b>
<b>SA Objectives</b>	<b>Park and Ride sites: Odd Down, Newbridge and Lansdown</b>
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++ Allocation of the park and ride sites for use as transport interchanges will provide a range of opportunities relating to health and well-being, including provision of safe walking and cycling routes through the sites, with connections to the surrounding countryside and into the City, plus provision of bikes for hire. The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. The policy has a major positive effect on this objective.
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	n/a
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	+ Use of park and ride sites as transport interchanges seeks to provide people accessing the city to use sustainable forms of transport, with one of the likely results being reduced car use and congestion, which will help to create more vibrant communities in Bath through less congestion and potentially improved air quality.
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	+ Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions' ambition to be a driving force for clean and inclusive growth.  Continued use of the sites as park and ride facilities will be ensured through policy wording.
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and</b>	++ Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel, including into and out of key urban areas. By providing affordable, convenient and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in

Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
<p><b>walking infrastructure</b></p>	<p>the existing public transport network. Interchanges do not need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place. All 3 sites help access to major employment areas in Bath. This is likely to result in reduced greenhouse gas emissions, opportunities for improved health and well-being, reduced car dependency and congestion. The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. The policy has a major positive effect on this objective.</p> <p><b>Mitigation and enhancement</b> Continued use of the sites as park and ride facilities will be ensured through policy wording. Any new development will be subject to other Development Management policies.</p>
<p><b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b></p>	<p>0</p> <p>The park and ride sites will be removed from the green belt and allocated for use as multi-model transport interchanges. The sites are all very sensitive in terms of landscape, due to their locations on three edges of the city. This sensitivity is decreased a little due to the sites already being developed for park and ride uses.</p> <p>Removal of the sites from the green belt has been informed by a green belt harm assessment and consideration of exceptional circumstances.</p> <p>Policy wording ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impacts on Areas of Outstanding Natural Beauty and other sensitive landscape features. The amendments through the Main Modification include the allocation site boundary which helps improve its effectiveness in protecting environmental distinctives/landscape.</p> <p><b>Mitigation</b> Policy wording also requires development to be contained within the areas of the sites already developed for Park and Ride use, i.e. no encroachment into the surrounding landscape will occur. Any new development will be subject to other Development Management policies.</p>
<p><b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b></p>	<p>0</p> <p>Odd Down and Lansdown Park and Ride sites both lie outside of the Bath World Heritage Site boundary but within the indicative extent of its setting (as defined in the City of Bath World Heritage Site SPD). Tree screening around the sites means that they are not visible from the City, and the extent of their development means that they make only a very limited contribution to preserving Bath's setting and special character.</p> <p>Newbridge Park and Ride lies within of the Bath World Heritage Site boundary, which in this area follows the River Avon, but the extent to which the site itself can be considered to contribute to preserving the setting and special character is limited by its developed form for park and ride purposes.</p> <p>Policy wording requires development to be contained within the areas of the sites already developed for Park and Ride use. Any new development will be subject to other Development Management policies.</p>
<p><b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of</b></p>	<p>+/0</p> <p>Odd Down P&amp;R site meets the criteria for designation as an SNCI and will be designated through the LPPU. Odd Down P&amp;R is particularly sensitive in terms of biodiversity interest.</p> <p>Policy wording ensures the protection of biodiversity interest by requiring development proposals to be informed by an ecological survey of each site to ensure key habitats and features of</p>



Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
<p><b>climate change)</b></p>	<p>ecological value are retained and enhanced. This is an absolute requirement for the Odd Down site which is known to support a colony of Small Blue butterflies. The areas of calcareous grassland shown on the site allocations policies map must be retained and enhanced, and where feasible buffered with supporting habitat.</p> <p>Policy wording also requires development to protect and enhance existing green infrastructure and habitats within the sites, including trees, hedgerows, and grassland habitats. And new clause 11 through the Main Modification requires exploring and delivering measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats.</p> <p>Development is also required to be contained within the areas of the sites already developed for Park and Ride use, i.e. the hardstanding areas, as specified on the Site Allocations Policies Map.</p> <p>Development of the sites will need to achieve 10% biodiversity net gain. Any new development will be subject to other Development Management policies.</p>
<p><b>Objective 9: Reduce land, water, air, light, noise pollution</b></p>	<p>0</p> <p>Potential for development to introduce additional light spill to the sites.</p> <p><b>Mitigation and enhancement</b> Policy wording requires flight lines and foraging routes to be protected from light spill. Any development will be subject to other Development Management policies and the latest environmental standards.</p>
<p><b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b></p>	<p>0</p> <p>Odd Down and Lansdown Park and Rides are located in Flood Zone 1.</p> <p>The majority of Newbridge Park and Ride is located in flood zone 1, with some space to the south of the site located in Flood Zone 2.</p> <p><b>Mitigation and enhancement</b> Any development proposed in Flood Zone 2 will need to be supported by a Flood Risk Assessment in line with Core Strategy policy CP5 and SU1 (sustainable drainage).</p>
<p><b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b></p>	<p>+</p> <p>Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel. This is likely to result in reduced greenhouse gas emissions, reduced car dependency and reduced congestion.</p>
<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>	<p>+</p> <p>Opportunity to provide renewable energy infrastructure (solar panels) on the top of new buildings relating to the interchange.</p> <p><b>Mitigation and enhancement</b> Policy wording requires development to incorporate renewable energy provision that is compatible with the primary function of the sites as multi-modal transport interchanges.</p>
<p><b>General Summary</b> Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel, including into and out of key urban areas. By providing affordable, convenient and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in the existing public transport network. Interchanges do not</p>	

<b>Policy ST6 and Policy SB26</b>	<b>New Policy: Park and Ride Site Allocations</b>
<b>SA Objectives</b>	<b>Park and Ride sites: Odd Down, Newbridge and Lansdown</b>
<p>need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place. The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. All 3 sites help access to major employment areas in Bath. This is likely to result in reduced greenhouse gas emissions, opportunities for improved health and well-being, reduced car dependency and congestion. The new site allocations for the three Park and Ride sites and the revised Policy ST6 will have a major positive impact in terms of improvements to health (objective 1), and access to high quality and affordable public transport, cycling and walking infrastructure (objective 5).</p> <p>New clause 11 requires exploring and delivering measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats. The amendments through the Main Modification include the allocation site boundary which help improve its effectiveness in protecting environmental distinctives/landscape.</p> <p>Potential negative impacts relating to landscape, heritage, light spill and flood risk will each be mitigated by requirements set out in policy wording and any new development will be subject to other Development Management policies.</p>	

<b>Policy KE2B</b>	<b>Riverside and Fire Station Site</b>
<b>SA Objectives</b>	<b>Amendments to Policy KE2B</b>
<b>Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>++</p> <p>Development of the site for residential use to include provisions to encourage active lifestyles for residents and surrounding communities. The site is located with good access to community and social facilities which make it easy to reach everyday destinations in Keynsham.</p> <p>The policy requires: to provide a high quality public realm along Temple Street and throughout the public spaces of the development, constructed from an appropriate palette of materials referenced from the local context. The suitability for tree planting along Temple Street should be investigated. The Policy requires to improve the links through the site to the Memorial Park and River Chew.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++ / +</p> <p>The policy requires to provide residential development including affordable housing which helps boost the housing supply.</p> <p><b>Mitigation and enhancement</b> New development will be subject to other Development Management policies including the revised Policy H7 which sets the new accessibility requirements.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>++</p> <p>The site is located close to community facilities in Keynsham. The policy requires to provide residential development (C3 use class) and office Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre with an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level. It also requires to respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it and deliver the 'Market Walk' through the site. This helps contribute to design out crime and promote a feeling of security.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>+ / ++</p> <p>The policy requires to provide office Use Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre. This contributes to the supply of employment land and to the regions' ambition to be a driving force for clean and inclusive growth. Therefore, this has a major positive effect on this objective.</p>

Policy KE2B	Riverside and Fire Station Site
SA Objectives	Amendments to Policy KE2B
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	++ The site is located in the centre of Keynsham accessible to local services and jobs. It is also within walking distance of Keynsham Railway Station and has good access to public transport to key employment areas (Bath and Bristol), and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew.  <b>Mitigation</b> New development will be subject to other Development Management policies as well as the Transport and Development SPD which sets out parking standards.
<b>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	0 The policy requires to deliver the 'Market Walk' through the site. Whilst its alignment may be slightly deflected to enable practical development parcels to come forward, there must be a direct visual connection along its route from the Civic Centre to the Riverside development.
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	0 Achieve high quality design that enhances the Conservation Area and its setting and which complements the transition between the Civic Centre and Library and the Riverside development. This may require some variation in roof heights, and the design of buildings must provide articulation and relief to their elevations. Construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include materials identified as central to the character of Keynsham set out in the Conservation Area Appraisal.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	+ The Policy requires to ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill within and into the River Chew corridor.
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0 The policy requires development to protect all habitats from increased light spill.  <b>Mitigation</b> New development will be subject to other Development Management policies and latest environmental standards.
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	0 The site is located in Flood Zone 1.  <b>Mitigation</b> New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	+ Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. It also requires to enhance the Memorial Park and provide links with Temple Street to include planting in order to improve links, views and green infrastructure. Opportunities for providing terraced public open space overlooking the park will be encouraged, as will reinstatement of the orchard. The provision of SUDS (excluding infiltration techniques) is required.
<b>Objective 12:</b>	+

<b>Policy KE2B</b>	<b>Riverside and Fire Station Site</b>
<b>SA Objectives</b>	<b>Amendments to Policy KE2B</b>
<b>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>	The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a major positive effect on this objective.
<p><b>General Summary</b></p> <p>The site is located close to community facilities and jobs in Keynsham. The policy requires to provide residential development (C3 use class) and around 2,500sqm of B1 office Use Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre with an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level. It also requires to respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it, and deliver the 'Market Walk' through the site. This helps contribute to design out crime and promote a feeling of security. The site also is within walking distance to Keynsham Station and has good access to public transport to key employment areas (Bath and Bristol) and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew. Therefore, there are major positive effects on objective 1(health), 2(housing), 3(communities), 4 (economy), 5(sustainable transport) and 6 (natural resources)</p> <p>New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.</p>	

<b>Policy KE3C and Policy KE3d</b>	<b>KE3c and KE3d East of Keynsham – safeguarded land</b>
<b>SA Objectives</b>	
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	<p>++</p> <p>The provision of a replacement sports pitch in the north-west corner of the KE3c site to facilitate the expanded primary school located within the Hygge Park development. The policy priorities pedestrians and cyclists with a comprehensive network of pedestrian and cycle routes including new link between KE3c and KE3d through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel'. Therefore, there is a major positive effects on this objective.</p>
<b>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</b>	<p>++</p> <p>The sites are allocated for residential development of around 210 units(KE3c) and 70 units (KE3d)b including affordable housing in the plan period. This will help boost the housing supply.</p>
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	<p>++</p> <p>The policies require to provide a new pedestrian and cycle link between new development and the Manor Road Community Woodland. It requires permeable, well-connected, well-lit development designed to optimise potential natural surveillance of public space and the incorporation of green infrastructure, including on-site provision of well-integrated formal and natural green space and play provision, and off-site enhancements to allotments.</p>
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	<p>0</p> <p>The site allocations do not include any employment provision; however Keynsham is well located between major employment areas in Bath and Bristol. The policy requires improving frequency for public transport service along the A4 and an opportunity to interchange with metrobus and Mass Transit Services. This helps improve access to employment opportunities.</p>

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
<b>SA Objectives</b>	
<b>Objective 5:</b> <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b>	<p>++/+/0</p> <p>The policies require an appropriate access to the development from the A4 Bath Road and the creation of a public footpath with KE3d connecting at Manor Road Community Woodland. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. The layout will be pedestrian and cycle dominant. A 'shared space' ethos for streets and spaces should prevail throughout the site.</p> <p><b>Mitigation</b>  The policies require a Travel Plan and Transport Assessment setting out mitigation requirements of an individual site. The amendments through the Main Modifications require Travel Plan and Transport Assessment to assess the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</p> <p>Any new development will be subject to other Development Management policies.</p>
<b>Objective 6:</b> <b>Protect and enhance local environmental distinctiveness and the character and appearance of landscape</b>	<p>0</p> <p>There will be continuation of the housing style, character and density of the adjacent Hygge Park development – incorporating an element of traditional materials including natural lias limestone. Building heights generally limited to 2/2.5 storeys, ensuring that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p> <p>The policies require development to face outwards towards the open countryside, adopting a perimeter block layout, with a clear distinction between the fronts and backs of properties.</p> <p><b>Mitigation</b>  Any new development will be subject to other Development Management policies.</p>
<b>Objective 7:</b> <b>Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	<p>0</p> <p>The policies require building heights generally limited to 2/2.5 storeys, ensuring that development does not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p> <p><b>Mitigation</b>  Any new development will be subject to other Development Management policies.</p>
<b>Objective 8:</b> <b>Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	<p>0/+</p> <p>The policies require retention and enhancement of internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas, and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees. The amendments through the Main Modifications provide some flexibility with regard to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</p> <p><b>Mitigation</b>  Any new development will be subject to other Development Management policies including the requirement for the biodiversity net gain.</p>
<b>Objective 9:</b> <b>Reduce land, water, air, light, noise pollution</b>	<p>0</p> <p>Mature trees and hedgerows and along northern edge of the stie to act as buffer from A4 road.</p> <p><b>Mitigation</b>  New development will be subject to other Development Management policies and latest environmental standards.</p>

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
<b>SA Objectives</b>	
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	<p>0</p> <p>The sites are within Flood Zone 1. Green corridors will be utilised throughout the development to provide shared pedestrian and cycle routes. Public space and footpaths should incorporate species-rich verges and grassland habitat.</p> <p>Development to fully incorporate SuDs as part of the green infrastructure strategy to provide betterment to the existing surface water flood issues.</p> <p><b>Mitigation</b> Any new development will be subject to other Development Management policies.</p>
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	<p>++</p> <p>The policies require the layout to be pedestrian and cycle dominant and encourages improved access to, and frequency of, public transport which helps reduce greenhouse gas emissions. They also require new development to provide sufficient setback allowing for growth of trees and incorporate green infrastructure, including on-site provision of well-integrated formal and natural green space and play provision, and on or off-site provision of allotments.</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.</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>-/+</p> <p>The sites are greenfield land, however they were justified and safeguarded for development through the Core Strategy. Any new development will be subject to new zero carbon policies.</p> <p>Therefore, mixed effects have been identified for this objective.</p>
<p><b>General Summary</b></p> <p>The sites are allocated for residential development of around 210 units (KE3c) and 70 units (KE3d) including affordable housing in the plan period. The provision of a replacement sports pitch in the north-west corner of the KE3c site will facilitate the expanded primary school located within the Hygge Park development. The policies prioritise pedestrians and cyclists with comprehensive networks of pedestrian and cycle routes including a new link between new development through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel'. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. Therefore, there are major positive effects on objective 1 (health), 2(housing), 3(communities), 5(sustainable transport) and 11(climate).</p> <p>The amendments through the Main Modifications require that Travel Plan and Transport Assessment assesses the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</p> <p>There is minor positive effect on objective 8 (biodiversity) as the policy requires a minimum of 10% biodiversity net gain. The amendments through the Main Modifications provide some flexibility with regards to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</p> <p>There is a minor negative effect on objective 12 as the sites are currently greenfield land, however they were justified and safeguarded for development through the Core Strategy</p> <p><b>Mitigation</b> New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD</p>	

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
SA Objectives	
for parking standards.	

Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	+ The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. This helps encourage /makes it easy to reach everyday destinations (workplace) from where people live, by 'active' travel.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+/0 The amendments to the policy include development of ES however new development has to be of a scale, type and format that does not harm, but complements, nearby town centres; and that benefits the attractiveness and operation of the Enterprise Zone.  <b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies including retail impact assessment.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++/0 The Old Mills employment site was allocated in the B&NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses to enable delivery and investment in the site. It would also benefit to bring a greater mix of uses to facilitate a more diverse range of employment opportunities.  Therefore, a major positive effect is identified. however the retail development should be a scale, type and format that does not harm the town centre.  <b>Mitigation and enhancement</b> Local Development Order : Any new development will be subject to other Development Management policies including retail impact assessment. The northern area comprises around 11ha of agricultural land located to the north of the A362 which was designated as an Enterprise Zone in 2018. A Local Development Order (LDO) is being prepared in order to help facilitate investment in the Somer Valley Enterprise Zone (SVEZ). The LDO once approved is effectively a granting of planning permission for development that meets specified parameters, it significantly reduces uncertainty and planning risks for investors and developers.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++ The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development.

Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
	<p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies including retail impact assessment.</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>The amendments have a neutral effect however the original policy requirements include major landscaping to mitigate the impact on the surrounding countryside and nearby residential properties.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>0</p> <p>The amendments have a neutral effect on this objective. However the original development requirements include to undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.</p>
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>0/+</p> <p>The amendments to the policy require substantive retention of internal and boundary hedgerows. Where hedgerow sections will be lost or breached, replacement hedgerows are to be provided within or at the periphery of the site to enhance habitat connectivity for mobile species. Provision of 10m habitat buffers is expected for retained and created hedgerows. A protective and complementary habitat buffer of at least 20m is expected adjacent to the SNCI. A 15m habitat buffer to the River Somer/ Wellow Brook for the southern section of the site is also required. The policy requires bat surveys.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies.</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>0</p> <p>Policy requires to ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill to retained habitats and protective buffers in accordance with latest best practice guidance. It requires bat surveys.</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<p>0</p> <p>The site is located in Flood Zone 1.</p> <p><b>Mitigation</b> New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
Objective 11 Reduce negative contributions to and Increase resilience to climate change	<p>+</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site.</p>
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)	<p>+/-</p> <p>The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a major positive effect on this objective.</p>
<p>General Summary</p> <p>The Old Mills employment site was allocated in the B&amp;NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels</p>	



Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
<p>of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses such as retail, food &amp; drink and a hotel to enable delivery and investment in the site. This would also benefit to bring a greater mixed of uses to facilitate a more diverse range of employment opportunities. Therefore, a major positive effect on objective 4(economy). However the retail development should be of a scale, type and format that does not harm the town centre.</p> <p>The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development. This has a major positive effect on objective 5(sustainable transport).</p> <p><b>Mitigation and enhancement</b> Any new development will be subject to other Development Management policies and Local Development Order.</p>	

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

**Sustainability Appraisal**

**Appendix E: Core Strategy and Placemaking Plan policies screening**

**Date: January 2023**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

**Appendix E  
Core Strategy and Placemaking Plan policies screening**

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

Policies	Revision / Proposed amendments	How dealt with in the LPPU SA
<b>SPATIAL STRATEGY FOR BATH &amp; NORTH EAST SOMERSET</b>		
<b>Vision</b>	<p>No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.</p>	<p>The Vision and Objective is retained. The Partial Update policy changes are contained within the Vision adopted in the Core Strategy.</p>
<b>Objectives</b>		
<b>SPATIAL STRATEGY FOR BATH &amp; NORTH EAST SOMERSET</b>		
<b>CS:DW1</b> District-wide spatial Strategy	<p>Policy DW1 sets out the overarching strategy to promote sustainable development. The Partial Update proposes to amend the policy to incorporate the allocation of land previously safeguarded for development in Keynsham.</p>	<p>The revised policy was assessed, and the matrix is included in Appendix D.</p>
<b>PMP RA1</b> Development in the Villages Meeting the Listed Criteria	<p>No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.</p>	<p>The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.</p>
<b>PMP RA2</b> Development in Villages outside the Green Belt not Meeting Policy RA1 Criteria		
<b>SUSTAINABILITY PRINCIPLES</b>		
<b>CS:SD1</b> Presumption in favour of Sustainable Development	<p>No change</p>	<p>The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.</p>
<b>CORE AND DEVELOPMENT MANAGEMENT POLICIES</b>		

<b>RESPONDING TO CLIMATE CHANGE</b>		
<b>* Following the review of the baseline information and the Council's Climate and Ecological Emergency, it is considered necessary to review these policies.</b>		
<b>CS:CP1</b> Retrofitting Existing Buildings*	Amend the policy to require new houses in multiple occupation to achieve an Energy Performance Certificate 'C' rating.	The amendments are considered and presented in Appendixes C, D and F
<b>CS:CP2</b> Sustainable Construction*	Replaced by new Policy SCR6 and SCR7. Facilitate zero carbon development.	The amendments are considered and presented in Appendixes C, D and F
CS:CP3 Renewable Energy*	Maintain the overall targets for renewable electricity and heat generation and provide further guidance and requirements for renewable energy technology to facilitate more renewable energy schemes.	The amendments are assessed and included in Appendixes C, D and F
PMP:SCR1 On-site renewable energy requirement*	Replaced by new Policy SCR6 and SCR7.	The policy was assessed and presented in Appendixes C, D and F
Policy SCR8 Embodied Carbon	Introduce a requirement to submit an Embodied Carbon Assessment and set a standard to be achieved by large scale new development.	The policy was assessed and presented in Appendixes C, D and F
PMP:SCR3 Ground Mounted Solar Arrays*	Replaced by new CP3.	The policy was assessed and presented in Appendixes C, D and F
Policy SCR9 EV charging	Require electric vehicle charging infrastructure for both residential and non-residential development. Further guidance will be provided by the Transport and Development Supplementary Planning Document.	The policy was assessed and presented in Appendixes C, D and F
PMP:SCR4 Community Renewable Energy Schemes	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SCR5 Water Efficiency		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CS:CP4</b> District Heating*	Amend Keynsham Hight Street to include as an opportunity area rather than a district heating priority area as the majority of land allocated for development in Keynsham Town Centre has been built out.	Minor changes in wording to reflect the latest evidence. The policy is not considered to result in significant sustainability impacts. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CS:CP5</b> Flood Risk Management	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SU1 Sustainable Drainage		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.

	significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	
<b>ENVIRONMENTAL QUALITY</b>		
<b>CS:CP6</b> Environmental Quality	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>High Quality Design</b>		
PMP:D.1 General Urban Design Principles	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.2 Local Character & Distinctiveness		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.3 Urban Fabric		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.4 Streets and Spaces		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.5 Building Design		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.6 Amenity		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.7 Infill & Backland Development		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.8 Lighting		Require lighting to be designed to protect wildlife habits following the best practice as set out in current guidance (inc. B&NES Waterspace Design Guidance and Bats and Lighting in the UK (ILP 2018))
PMP:D.9 Advertisements & Outdoor Street Furniture	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:D.10 Public Realm		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.

<b>Historic Environment</b>		
PMP:H1 Historic Environment	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:H2 Somersetshire Coal Canal and the Wansdyke	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Landscape and Nature Conservation</b>		
<b>* Following the review of the baseline information and the Council's Climate and Ecological Emergency, it is considered necessary to review these policies.</b>		
NE2*	Amend to allow great weight to be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with reference to their special qualities.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:NE2A Landscapes setting of settlements	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:NE2B Extension of residential curtilages in the countryside	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:NE3 Sites, species and habitats*	Strengthen the protection of protected sites, National Network Sites (SPAs and SACs) and internationally protected species and habitats as well as nationally important sites and species and their habitats.	The policy was assessed and presented in Appendixes C, D and F
New Policy NE3a Biodiversity Net Gain	Require a Biodiversity Net Gain of at least 10% from major developments and secure in perpetuity (at least 30 years)	The policy was assessed and presented in Appendixes C, D and F
PMP:NE4 Ecosystem Services	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:NE5 Ecological networks and Nature Recovery*	Facilitate enhancement of Nature Recovery Networks and local ecological networks.	The policy was assessed and presented in Appendixes C, D and F
PMP:NE6 Trees and woodland conservation*	Strengthen the protection of veteran trees.	The policy was assessed and presented in Appendixes C, D and F
<b>Green Infrastructure</b>		

<b>* Following the review of the baseline information and the Council's Climate and Ecological Emergency, it is considered necessary to review these policies.</b>		
PMP:CP7 Green Infrastructure	Facilitate nature recovery and introduction of the Bath River Line, a strategic Green Infrastructure (GI) project.	The policy was assessed and presented in Appendixes C, D and F
PMP:NE1 Development and Green Infrastructure	Promote development design to maximise opportunities for effective and functional Green Infrastructure (GI) focussing on the use of nature based solutions and linking to active travel routes.	The policy was assessed and presented in Appendixes C, D and F
<b>Green Belt</b>		
PMP:CP8 Green Belt	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:GB1 Visual amenities of the Green Belt	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:GB2 Development in Green Belt villages	Define the infill boundaries to guide new developments in villages in the GB for clarity.	The policy was assessed and presented in Appendixes C, D and F
PMP:GB3 Extensions and alterations to buildings in the Green Belt	Amend the policy to include alternation of a building in the Green Belt to reflect the title of the policy for clarity.	The policy was assessed and presented in Appendixes C, D and F
<b>Pollution, contamination and safety</b>		
PMP:PCS1 Pollution and nuisance	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS2 Noise and vibration		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS3 Air quality		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS4 Hazardous substances		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS5 Contamination		Introduce a requirement to produce a management plan for artificial pitch proposals as considered it is an urgent issue.

PMP:PCS6 Unstable land	No change The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS7 Water Source Protection Zones		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS7A Foul sewage infrastructure		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:PCS8 Bath Hot Springs		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>BUILDING STRONG AND VIBRANT COMMUNITIES</b>		
<b>Meeting Housing Needs</b>		
<b>CS:CP9</b> Affordable Housing	No change. The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CS:RA4</b> Rural Exceptions Sites		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:H1 Housing and Facilities for the Elderly, people with other Supported Housing or Care Needs		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CP10</b> Housing Mix		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:H2 Houses in Multiple Occupation	Amend the policy to cover a change of use from non C3 uses to HMO(use class C4 and SG) and intensification (small to large HMO applications) to address urgent local issues.  Introduce a requirement for an Energy Performance Certificate.	The policy was assessed and presented in Appendixes C, D and F
New Policy H2a	New policy to guide new Purpose Build Student Accommodation development to address urgent local issues.	The policy was assessed and presented in Appendixes C, D and F
PMP:H3 Residential Use in Existing Buildings	Amend to include outbuildings in considering the sub-division of existing buildings for clarity	Minor changes to provide clarity. The policy is considered to not result in significant sustainability impacts. No individual assessment is undertaken.
PMP:H4 Self-Build	No change.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:H5 Retention of Existing Housing Stock	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.



PMP:H6 Moorings	strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:H7 Housing accessibility	Set the accessibility standards to be achieved by both new market and affordable housing to address urgent local issues.	The policy was assessed and presented in Appendixes C, D and F
PMP:H8 Affordable Housing Regeneration Schemes	No change.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
CS:CP11 Gypsies, Travellers and Travelling Showpeople	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Meeting local community and recreational needs</b>		
PMP:LCR1 Safeguarding local community facilities	No change.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:RA3 Community Facilities and Shops	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR1A Public houses		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR2 New or replacement community facilities		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR3 Sites safeguarded for primary school use		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR3A Primary school capacity		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR4 Allocation of land for cemeteries		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR5 Safeguarding existing sport and recreational facilities		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR6 New and replacement sports and recreational facilities		Require a management plan to be submitted with an application for a new artificial grass pitch to avoid potential harm and pollution. This is to address urgent local issues.

PMP:LCR6A Local Green Spaces	No change.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR7 Recreational development proposals affecting waterways	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR7A Telecommunications development		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR7BBroadband		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR7C Commercial riding establishments		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR8 Protecting allotments		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:LCR9 Increasing the Provision of Local Food Growing		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Economic Development</b>		
<b>* Following the review of the baseline information and it is considered necessary to review these policies.</b>		
PMP:ED.1A Office Development	No change.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:ED.1B Change of use & redevelopment of B1 (A) office to residential use	Reflect the latest Use Class Order and include a change of use from office to Sui Generis (large HMO and purpose built student accommodation)	The policy was assessed and presented in Appendixes C, D and F.
PMP:ED.1C Change of use and redevelopment of B1 (A) office use to other town centre uses	Remove the reference to change of use from office space to A1, A2 and A3 uses as they are all part of the new E use class.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ED.2A Strategic (*) and other primary industrial estates	Introduce the Locksbrook Creative Industry Hub.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ED2B Non-Strategic Industrial Sites	Strengthen the protection of non-strategic industrial sites	The policy was assessed and presented in Appendixes C, D and F.
<b>Sustaining a buoyant rural economy</b>		
PMP:RE1 Employment uses in the countryside	Include new employment on previously developed land for clarity	The policy was assessed and presented in Appendixes C, D and F.
PMP:RE2 Agricultural development	No change. The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:RE3 Farm diversification		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.

PMP:RE4 Essential dwellings for rural workers	significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:RE5 Agricultural land		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:RE6 Re-use of rural buildings		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:RE7 Visitor accommodation		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Centres and Retailing</b>		
PMP:CP12 Centres and Retailing	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:CR1 Sequential Test	Include the text 'expected to become available within a reasonable period' when considering the availability of alternative sites.	The policy was assessed and presented in Appendixes C, D and F.
PMP:CR2 Impact Assessments	Remove the reference to use class A1-5 and the reference to the impact assessment for office development	The policy was assessed and presented in Appendixes C, D and F.
PMP:CR3 Primary Shopping Areas and Primary Shopping Frontages	Remove the reference to use class A1-5 and the reference to the impact assessment for office development	The policy was assessed and presented in Appendixes C, D and F.
PMP:CR4 Dispersed Local Shops	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>PROMOTING SUSTAINABLE TRANSPORT</b>		
<b>* Following the review of the baseline information and the Council's Climate and Ecological Emergency, it is considered necessary to review these policies.</b>		
PMP:ST1 Promoting sustainable travel and healthy street	Increased recognition of the importance of location and design in the sustainability of development. Ensure that development transport choices e.g. access strategy and mitigation, are required to place sustainable modes first.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST2 Sustainable Transport Routes	Widen the scope to include other land to be safeguarded through Policies Map.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST2A Recreational Routes	Require developments to enhance active travel routes, rather than just maintaining them or avoiding harm. Onus placed on developer to provide, rather than Council to negotiate additional linkages.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST3 Transport infrastructure	Require infrastructure to be planned and designed promoting mode shift to sustainable transport as a priority	The policy was assessed and presented in Appendixes C, D and F.

	over traffic capacity. Schemes which increase traffic capacity must demonstrate that opportunities to achieve mode shift as an alternative solution have been exhausted.	
PMP:ST4 Rail freight facility	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:ST5 Traffic Management Proposals	Include additional requirements and detail reflecting <u>Liveable Neighbourhoods Strategy</u>	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST6 Transport Interchange	Updated to expand its scope to include a new multi-modal interchange model.	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST7 Transport requirements for managing development	Include strengthened requirement for development to offer genuine travel choice through opportunities to travel sustainably. Include requirement for transport improvements and/or mitigation to maximise sustainable travel opportunities. Remove parking standards from the PMP (parking standards to be included in the new Transport and Development SPD)	The policy was assessed and presented in Appendixes C, D and F.
PMP:ST8 Airport and Aerodrome Safeguarding Areas	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>MINERALS</b>		
CS:CP8a Minerals	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:M1 Mineral Safeguarding Areas	The scope of the LPPU needs to be focussed on immediate priorities and must not seek to pre-empt strategic decisions which are the remit of the SDS or significantly change the strategic policy framework of the existing Plan, such as the spatial strategy, key development sites and the plan period.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:M2 Minerals Allocations		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:M3 Aggregate Recycling Facilities		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:M4 Winning and working of minerals		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:M5 Conventional & Unconventional Hydrocarbons		The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>INFRASTRUCTURE</b>		

CS:CP13 Infrastructure Provision	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Volume 2 - Bath</b>		
<b>* Following the review of the baseline information, it is considered necessary to review these policies to replenish housing supply. Most of the site allocations are still effective and provide appropriate guidance therefore only the policies which require updating are included in the LPPU.</b>		
PMP:B1: Bath Spatial Strategy	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
CS:B4 The World Heritage Site and its setting	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:BD1: Bath Design Policy	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:B2 Central Area Strategic Policy	Identify the Milsom Quarter as part of key development opportunity sites.	The policy was assessed and presented in Appendixes C, D and F.
PMP:SB1 Development Requirements and Design Principles Walcot Street /Cattlemarket Site	The Cattlemarket site is part of new designation Milsom Quarter. The policy is revised to reflect latest information.	The policy was assessed and presented in Appendixes C, D and F.
PMP:SB2: Development Requirements and Design Principles Central Riverside & Recreation Ground	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB3: Development Requirements and Design Principles Manvers Street	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB4 – Bath Quays North & Bath College Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB5 – South Quays &Riverside Court	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB6 – South Bank	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB7 – Green Park Station West & Sydenham Park	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB8: Western Riverside	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.

PMP:B3: Strategic Policy for Twerton and Newbridge Riversides	Identify Locksbrook Creative Industry Hub and Weston Island as key development opportunity sites.	The policy was assessed with Policy SB22 (Locksbrook Creative Industry Hub) and Policy SB23 (Weston Island) and presented in Appendixes C, D and F.
PMP:SB9 – The Bath Press Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB10 – Roseberry Place Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
New Policy SB22 Locksbrook Creative Industry Hub	New allocation	The policy was assessed with Policy B3 and presented in Appendixes C, D and F.
New Policy SB23 Western Island	New allocation	The policy was assessed with Policy B3 and presented in Appendixes C, D and F.
PMP:SB9 – The Bath Press Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB10 – Roseberry Place Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB11 – Former MoD Fox Hill Park Development Requirements and Design Principles	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB14 Twerton Park	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.
PMP:SB15 Hartwells Garage	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB16 Burlington Street	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB17 Englishcombe Lane	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SB18 Royal United Hospital	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.
New Allocation SB24 Sion Hill	New allocation	The policy was assessed and presented in Appendixes C, D and F.
New Allocation SB25 St Martin Hospital	New allocation	The policy was assessed and presented in Appendixes C, D and F.
PMP:B5 Strategic policy for universities, private colleges and their impacts	Development capacities at the Claverton Campus are now included in Policy SB19. The amendment to include	The development capacities at the Claverton Campus are assessed with Policy SB19. The amendment is included for clarity and considered no significant sustainability impact.

	teaching space ( <u>apart from at specific allocation</u> ).	
PMP:SB19 University of Bath at Claverton Down	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F
PMP:SB20 – Bath Spa University, Newton Park Campus	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CS:B3a:</b> Land adjoining Odd Down, Bath Strategic Site Allocation	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
New Policy SB26	New policies for Park and Ride sites – all three sites will be removed from the GB.	The policy was assessed and presented in Appendixes C, D and F
<b>Volume 3 - Keynsham</b>		
<b>* Following the review of the baseline information, it is considered necessary to review these policies to replenish housing supply. Most of the site allocations are still effective and provide appropriate guidance therefore only the policies which require updating are included in the LPPU.</b>		
PMP:KE1: Keynsham Spatial Strategy	Amended to include allocation of safeguarded land for development	The released safeguarded land sites were assessed and included in Appendixes C, D and F
PMP:KE2: Town Centre/Somerdale Strategic Policy	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:KE2a: Somerdale	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:KE2b: Riverside and Fire Station Site	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.
CS:KE3b: Safeguarded Land at East Keynsham	Replaced by KE3c and KE3d	The policy was assessed and presented in Appendixes C, D and F.
New Policy KE3c East of Keynsham	New allocation	The policy was assessed and presented in Appendixes C, D and F.
New Policy KE3d East of Keynsham	New allocation	The policy was assessed and presented in Appendixes C, D and F.
New Policy KE5 Treetops	New allocation	The policy was assessed and presented in Appendixes C, D and F.
<b>Volume 4 - Somer Valley</b>		
<b>* Following the review of the baseline information, it is considered necessary to review these policies to replenish housing supply. The majority of the site allocations are still effective and provide appropriate guidance therefore only the policies which require updating are included in the LPPU.</b>		

PMP:SV1: Somer Valley Spatial Strategy	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SV2: Midsomer Norton Town Centre Strategic Policy	Remove the reference to the South Road car park retail allocation.	The policy was assessed with Policy SSV2 and presented in Appendixes C, D and F.
PMP:SSV1: Policy SSV1 Central High Street Core Site	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV2: South Road Car Park	Policy to be deleted. Remove the SSV2 allocation	The policy was assessed with Policy SV2 and presented in Appendixes C, D and F.
PMP:SSV3: Midsomer Norton Town Park	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV4: Former Welton Manufacturing Site	Development requirements and design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.
<b>CS:SV3:</b> Radstock Town Centre Strategic Policy	The overall approach will be reviewed through the new Local Plan.	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV14: Charlton Timber Yard	Site development completed. No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV17: Former Radstock County Infants	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV20: Former St Nicholas School	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV9: Old Mills Industrial Estate	The site boundary and Development requirements & design principles are updated.	The policy was assessed and presented in Appendixes C, D and F.
New Policy SSV21 Silver Street	New allocation	The policy was assessed and presented in Appendixes C, D and F.
PMP:SSV18: Somer Valley Campus	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SSV11: St Peter's Factory site	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>Volume 5 - Rural Areas</b>		
* Following the review of the baseline information, it is considered necessary to review these policies to replenish housing supply. The site allocations in the rural areas are still effective and provide appropriate guidance therefore only the policies which require updating are included in the LPPU. Some sites are already completed.		



PMP:SR24 Land adjacent to Temple Inn Lane, Temple Cloud	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR17 The Former Orchard, Compton Martin	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR5 Pinkers Farm, East Harptree	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR6 Water Street, East Harptree	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR14 Wheelers Manufacturing Block Works, Timsbury	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR15 Land to the East of the St Mary's School, Timsbury	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
PMP:SR2 Leafield, West Harptree	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.
<b>CS:RA5</b> Land at Whitchurch Strategic Site Allocation	No change	The policy is retained. The cumulative impact of the updated Local Plan was considered in Appendix F.

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

**Sustainability Appraisal  
Appendix F: Cumulative SA effects identified for the Local Plan  
(Core Strategy, Placemaking Plan and Partial Update)**

**Date:** January 2023

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
<b>Objective 1: Improve the health and well-being of all communities, and reduce health inequalities</b>	++	++	++	<p>Policy DW1 sets the district wide spatial strategy first adopted through the Core Strategy. The original SA identified a major positive effect as it directs housing growth to existing settlements which contain services and facilities including health and well-being facilities. By directing new development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services.</p> <p>The site specific appraisals (Annexes C &amp; D) helped to identify the sites most accessible to health and well-being facilities.</p> <p>Policy SB18 supports Royal United Hospital Estate Strategy (2014) which specifically sets out the proposed RUH Redevelopment programme over the next five years supported by a phased masterplan that will improve health facilities.</p> <p>The retained policies to manage pollution, contamination and safety would help to achieve this objective.</p> <p>Proposed transport policy amendments encourage more accessible developments, closer to everyday destinations reachable by active travel through provision of high-quality cycling and walking infrastructure options. There is an increased emphasis on linkages between transport, health, equality and inclusivity, creating better places, climate and air quality and thus improving the health and well-being of all communities and reducing health inequalities.</p> <p>The Infrastructure Delivery Programme is also updated to reflect the draft Local Plan Partial Update.</p> <p>Therefore, it is considered a major positive cumulative effect on this objective.</p>	
<b>Objective 2: Meet identified needs for</b>	++	++	+	The Core Strategy Policy DW1 sets out housing targets and broad distribution of new housing development. The locational sequence assessment (Annex L of the	

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
sufficient, high quality housing including affordable housing				<p>Core Strategy SA below) helped establish the sequential approach to development distribution through the Core Strategy.  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_1.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_1.pdf</a></p> <p>The new housing sites are identified applying the sequential approach established by the Core Strategy, considering the main urban areas of Bath, Keynsham and Somer Valley. The safeguarded sites in Keynsham are released for development through the Partial Update. These additional allocations help to maintain the supply of housing sites to meet the district's overall housing targets (market and affordable housing) set by the Core Strategy. The SHLAA shows that the Core Strategy targets will be met by existing commitments (already built, permitted and allocated through the Core Strategy/Placemaking Plan) and site allocations in the Partial Update will also help to ensure the provision of 5 year housing land supply.</p> <p>Through the consultation, some further greenfield sites were promoted, however since there is sufficient land available to meet the Core Strategy requirements, greenfield land are not considered as alternative options in the SA.</p> <p>Land promoted by Kingswood School is within the Bath City boundary and not covered by the Green Belt however it was not allocated due to negative and uncertain effects identified in objective 6(landscape), 7(heritage) and 8(ecology).</p> <p>The revised Policy H7 with accessibility standards helps to address housing needs of older people.</p> <p>The pressure to manage new student accommodation continues to increase. Policy B5 prioritises the delivery of office space and general housing development. The revised Policy SB19 sets out further guidance and requirements for Claverton Campus and new Policy H2a (PBSA) will help manage new PBSA.</p> <p>Through the revised Policy H2, new build HMOs, the change of use from other uses, and intensification of existing HMOs shall provide opportunity to boost the</p>	<p>Continue to monitor new PBSA promoted outside the allocated sites.</p> <p>Continue to monitor the number of C3 dwellings converted to C4 Houses in multiple</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>existing supply of housing, providing good quality homes catering for population groups unable to afford other forms of private accommodation. RA1 and RA2 would continue to guide new development in the rural villages.</p> <p>The retained policies (Policies D1-D10, CP9, RA4, H1-H8, CP10 and CP11) help achieve the delivery of good quality housing and affordable housing to meet the fully objectively assessed housing needs.</p> <p>The viability assessments were undertaken taking into account various exiting and new policy requirements. It indicated that the affordable housing requirements can be met across all areas of the District, but the existing use value of sites is a critical factor in determining the outcome. Where existing use values are high, the ability of residential schemes to meet the policy requirement will be more constrained and the level of achievable residential sales values becomes a more critical factor. In these circumstances, the policy contains sufficient flexibility, to enable schemes to come forward with a viable package of affordable housing.</p> <p>The Partial Update does not extend the Plan period, therefore it has only a minor positive effect in the long term.</p>	<p>occupations.</p> <p>The longer term housing requirements need to be set through the new Local Plan.</p>
<p><b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b></p>	++	++	++	<p>The site allocations direct most new housing development to the main urban areas in Bath, Keynsham and Somer Valley, which have the majority of higher order services and facilities, including social, cultural and community facilities. By locating the majority of new housing and employment development close to the existing main settlements in the district, the draft Plan should help to promote stronger more vibrant and cohesive communities.</p> <p>The revised Policy CP3 supports a community benefit in terms of either profit sharing or proportion of community ownership or delivering local social and community benefits.</p> <p>The original NE2 requires development to incorporate green space within the scheme that positively contributes to creating a high-quality environment by providing sustainable public access and other landscape benefits.</p> <p>The revised Policy NE3, new Policy NE3 and Policy NE5 strengthens the</p>	

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>protection of biodiversity. The provision of new habitats to achieve BNG might be delivered as multi-functioning publicly accessible open/natural/green space.</p> <p>The revised transport policies encourage development accessible to community, social and cultural facilities by sustainable transport modes, including supporting disabled people and others with restricted mobility.</p> <p>The retained policies (Policy LCR1-LCR9, RA3) help provide or manage a range of appropriate and accessible community, social and cultural facilities.</p> <p>The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p>	
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	++	++	+	<p>The site allocations included in the Partial Update with the development requirements help achieve the economic vision and objectives set by the Core Strategy.</p> <p>The Milsom Quarter area is currently in decline, shown by falling footfall and increasing vacancy rates, greater than other areas of the City Centre. Many upper floors are also currently underutilised or empty. Redeveloping this area will provide more attractive and diverse range of employment opportunities.</p> <p>The Locksbrook Creative Hub facilitates mixed use development comprised of flexible teaching and employment space. The space will also provide incubator units and grow on space resulting in increase in the supply and diversity of employment opportunities and contributing to inclusive growth by making units available to students and SMEs and Increasing local training, work experience and apprenticeships.</p> <p>The new allocation of Western Island will enable the relocation and retention of employment uses from elsewhere within the city, particularly from the Enterprise Zone and continue to provide employment provision.</p> <p>The revised Policy SB19 creates more employment opportunities in growth sectors as the policy defines university-related uses to include research and</p>	<p>A masterplan is in preparation, but no details are available at this stage. The masterplan will inform the future applications and new Local Plan.</p> <p>Subject to an assessment of the capacity of the site, there are also opportunities for more public facing uses such as creative, arts-based activities.</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>allied business incubation. This will help improve access to local training, work experience and apprenticeships. The University of Bath is the second biggest employer in the District. Facilitating a long-term requirements for the university on campus (additional academic space of 48,000 sqm) would have a major positive effect through short to long terms.</p> <p>Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions ambition to be a driving force for clean and inclusive growth.</p> <p>The amendments to the Policy SSV9 include a limited amount of higher value uses to enable delivery and investment in the site. This would also benefit to bring a greater mix of uses to facilitate a more diverse range of employment opportunities.</p> <p>Reflecting the latest national policy (NPPF 2021) and the significant losses of industrial land that have occurred since 2011 and the increased demand for industrial accommodation, Policy ED2B has been strengthened to provide greater policy protection of non-strategic or other industrial sites.</p> <p>Revised Policy RE1 allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities.</p> <p>Revised transport policies encourage developments which reduce travel distances from homes to workplaces, with sustainable transport options available, including for first occupiers of new development. Proposed amendments include detail regarding travel plans, which need to be tailored to the specific development and the location context in order to ensure that an optimal package of measures is provided to enable future users of the development to travel sustainably, thus supporting clean and inclusive growth.</p> <p>Other retained and revised employment policies would help build a strong, competitive economy and enable local businesses to prosper.</p>	<p>The Local Development Order for the Somer Valley Enterprise Zone is in preparing.</p> <p>There are limited opportunity sites available to facilitate new industrial uses therefore this need to be reviewed through the new Local Plan.</p> <p>The Transport and Development SPD provides further guidance to promote sustainable travel.</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
<p><b>Objective 5:</b>  <b>Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</b></p>	++/0	++/0	++/0	<p>By locating the majority of new housing and employment development close to the existing main settlements in the district, the Partial Update allocations should help promote accessibility by public transport and cycling and walking. However, the potential development sites allocated in the Core Strategy and draft Placemaking Plan will have a cumulative impact on traffic congestion. The Transport Strategy makes some recommendations taking into account these development sites.</p> <p>The amendments to Policies ST1-ST7 strengthen existing policies in relation to access to public transport, safe walking and cycling routes, reducing dependence on the private car and discouraging short car journeys. Proposed amendments to Policy ST2A include reference routes as Active Travel Routes and requires <i>'Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible.'</i></p> <p>New Policy SCR9 requires electric vehicle charging infrastructure.</p> <p>To support high quality and affordable public transport and cycling and walking infrastructure, Policy ST1 proposes <i>'Access to high quality public transport facilities is achieved by improving existing and providing new public transport facilities which would increase the proportion of journeys made by public transport.'</i> ST6 proposes new and expansion of existing Transport Interchange sites.</p> <p>Proposed amendments to Policy ST7 ensure that <i>'Walking and cycling assessment and facilities are provided in line with the Transport and Development SPD, including safe, convenient and inclusive access to and within the site for pedestrians and cyclists.'</i></p> <p>The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p>	<p>Policy ST2A requires that the provision and enhancement of strategic connections between, and within, urban areas and other key origins/destinations, utilising the Active Travel routes, should be investigated and implemented wherever feasible. Policy 6 requires a Transport Assessment demonstrating transport effects of the proposed development are comprehensively and robustly identified.</p> <p>The Transport and Development SPD provides further guidance to promote sustainable travel including travel plans, parking standards and electric charging infrastructure.</p>
<p><b>Objective 6:</b>  <b>Protect and enhance local environmental distinctiveness</b></p>	+/0/-	+/0/-	+/0/-	<p>New housing development sites were chosen taking into account the consideration of this objective (site specific appraisals Annex C and Annex D). The site allocation policies require protection and enhancement measures</p>	



Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
and the character and appearance of landscape				<p>specific to relevant sites recommended by key studies.</p> <p>Policy CP3 sets out the suitable areas for renewable energy development. The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with a 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in the area with 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants demonstrate that adverse impacts on the landscape can be satisfactorily mitigated.</p> <p>The original policy NE2 requires the incorporation of green space within the scheme that positively contributes to creating a high-quality environment by providing enhanced landscape features which could include some heritage and ecological destinations/asset. The revised Policy NE2 requires great weight to be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities.</p> <p>Proposed amendments to Policy CP7(Green Infrastructure) and NE1 (Development and Green Infrastructure) support effective and functional GI design focussing on nature-based solutions which include protecting, managing, and enhancing landscape character.</p> <p>The provision of new transport related infrastructure would have the potential to increase negative impacts on areas of valued landscape and townscape. The park and ride sites will be removed from the green belt and allocated for use as multi-modal transport interchanges (Policy SB26). The sites are all very sensitive in terms of landscape, due to their locations on three edges of the city. This sensitivity is decreased a little due to the sites already being developed for park</p>	<p>The revised Policy CP3 avoids significant adverse impact on the local environment that cannot be satisfactorily mitigated including protected landscape and visual impacts (inc. cumulative effects) and the special qualities of all nationally important landscapes.</p> <p>Policy NE2 requires proposals with potential to impact on the landscape/townscape character of an area or on views to be accompanied by a Landscape and Visual Impact Assessment undertaken by a qualified practitioner to inform the design and location of any new development.</p> <p>B&amp;NES Council has adopted the West of England Joint Green Infrastructure Strategy 2020-2030 (JGIS).</p> <p>The original Policy ST3 (7) requires that</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>and ride uses. Removal of the sites from the green belt has been informed by a Green Belt harm assessment and consideration of exceptional circumstances.</p> <p>Policy wording ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impact on AONBs and other sensitive landscape features.</p> <p>The Claverton Campus (University of Bath) is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. The Visual Impact Assessment was prepared and informed the key development areas with minimum buffer distances and maximum height restrictions.</p> <p>Policy KE3c and KE3d (East of Keynsham) Building heights generally limited to 2/2.5 storeys, ensuring that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p> <p>The retained urban design policies (D1-D10) also contribute to achieve higher quality townscape.</p>	<p>proposals have no unacceptable impact on heritage and environmental assets and amenity including the WHS and its setting, AONBs and Natura 200 sites (SACs/SPAs). New development is also subject to other Development Management policies.</p> <p>Policy (SB26) wording also requires development to be contained within the areas of the sites already developed for Park and Ride use, i.e. no encroachment into the surrounding landscape will occur. Any new development will be subject to other Development Management policies.</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence, individual applications for new buildings should be informed by more detailed specific studies and evidence.</p>
<b>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</b>	+	+	+	<p>New development sites were chosen taking into account the consideration of this objective (site specific appraisals Annex C and Annex D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The heights of buildings are an important aspect of the visual homogeneity of the Bath city, and new developments need to respond creatively and sensitively to their exceptional context. The Building Heights Strategy (2010) provides an overall context for considering building heights and informed the Placemaking Plan site specific requirements.</p>	<p>The Bath Building Heights Strategy should be used considering specific development proposals. This same approach will be required for those development sites not covered by a site allocation, but which may impact on these issues of acknowledged importance.</p> <p>The revised Energy Efficiency, Retrofitting and</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				The revised Policy CP1 Retrofitting Existing Buildings would apply to historic buildings. Given the quality of the historic environment in the District and the high number of listed buildings, Conservation Areas and the World Heritage Site designation for Bath, an SPD on sustainable construction and retrofitting has been prepared to provide guidance on sensitively retrofitting our historic building stock.	Sustainable Construction Supplementary Planning Document would help careful management to improve energy efficiency and retrofitting historic properties.
<b>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</b>	0/+	0/+	0/+	<p>The revised Policy NE3 provides policy which relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs). It also facilitates to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands.</p> <p>Policy NE3a requires that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery.</p> <p>Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management.</p> <p>Policy NE6 protects veteran trees.</p> <p>The proposed Bath River line project and other strategic GI projects referenced will enhance and extend multi-functional Green Infrastructure and make a positive contribution to nature recovery networks including providing new connections between existing and/or new linear wildlife habitats.</p> <p>New development sites were chosen taking into account the consideration of this objective (site specific appraisals Annex C and Annex D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies including avoiding harmful impacts on bats from lighting where development sites are within or close to bat corridors. The river is designated as a 'Site of Nature Conservation Interest' (Local Plan Policy NE3), and the edges of the island form an important associated habitat.</p> <p>Policy SB 23 Western Island - The policy allocates uses that do not need a</p>	Development will respond to the restrictions on light spill from development set out in the

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>frontage to the river and requires enhancing the ecological value of the river edge.</p> <p>Policy SB19 Claverton Campus - The mitigation hierarchy been used to avoid and minimise impacts. The Policy requires various specific measures such as setting back to reduce light spill and providing space for additional tree planting to bolster the existing perimeter vegetation.</p> <p>Policy SB26 Odd Down P&amp;R – The site is particularly sensitive in terms of biodiversity interest (meets the criteria for designation as an SNCI).</p> <p>The provision of new transport related infrastructure would have potential to increase negative impacts on biodiversity. There are opportunities to encourage biodiversity improvements through development of liveable neighbourhoods and sustainable transport routes.</p> <p>The retained policies such as D8 (Lighting), NE4(Ecosystem Services), PCS1-PCS8(Pollution), SU1(Sustainable Drainage) also contribute to achieving higher quality townscape would help achieve this objective.</p>	<p>Waterspace Design Guidance (June 2018) “Protecting Bats in Waterside Development”.</p> <p>The original requirements SB19 f) and j) are retained to require the design response for green infrastructure, landscape and ecology and lighting.</p> <p>The Policy requires an ecological survey of each site to ensure key habitats and features of ecological value are retained and enhanced.</p> <p>Policy ST6 requires <i>‘the development accords with all relevant planning and environmental policies, such as those relating to the WHS, AONB, European Sites, Green Belt and any other special designations and protections as may be affected by development proposals. It must be robustly demonstrated that potential impacts can be successfully mitigated and the degree of public benefit outweighs the level of harm to any such assets’</i>.</p>
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	0	0	0	<p>The revised Policies PCS5 and LCR6 requires to avoid development that may result in the contamination of land. Also, Policy LCR6 requires a management plan submitted with applications for new artificial pitches setting out the materials used and potential sources of pollution from the installation phase through to end of life.</p> <p>The revised suitability policies such as CP1 (Retrofit) CP3(Renewable Energy), SCR6/7(Zero Carbon), SCR8(Embodied Carbon) and SCR9(EV charging) would help reduce the production of harmful emissions and contribute improving air quality. Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels.</p> <p>The revised transport policies encourage provision of sustainable transport</p>	<p>Policy ST3 (4) requires schemes which propose</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>options and to reduce reliance on car-use, thereby improving traffic congestion and air quality issues. Further, proposed amendments to Policy ST1 require proposals to support and promote measures which reduce the levels of traffic pollution in the interests of improving health and quality of life and reducing harmful impacts on the built and natural environment. Proposed amendment to Policy ST3 requires that the environmental impact of the scheme, such as from noise and other forms of pollution, is minimised and of an acceptable level in accordance with relevant topic-specific environmental guidance and standards. Thus, proposed amendments to transport policy support the reduction of pollution.</p> <p>Policy SCR9 requires provision of EV infrastructure to increase the uptake in the use of electric vehicles. This contributes to reducing pollution from vehicles and improve air quality, particularly within AQMAs. Electric vehicles also result in a reduction in traffic noise.</p> <p>New development sites were chosen taking into account the consideration of light pollution, particularly the site along the bat corridor or close to open countryside. (See site specific appraisals Annex C and Annex D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The allocation sites within Bath, Keynsham and Somer Valley in the Local Plan (including the Core Strategy, Placemaking Plan and Partial Update) will have cumulative impacts on traffic congestion. The cumulative impacts were considered through the process of identifying the new development sites. The Transport Strategy makes some recommendations taking into account these development sites.</p> <p>The retained policies such as PCS1-PCS8(Pollution), D8 (Lighting), NE4(Ecosystem Services), SU1(Sustainable Drainage) also contribute to achieve higher quality townscape would help achieve this objective.</p>	<p>increases in traffic capacity need to demonstrate that all other opportunities to achieve mode shift as an alternative solution have been exhausted, and (5) are required to incorporate commensurate improvements to the sustainable transport network Any development could impact on air quality. However, by directing development into the existing areas, to brownfield sites, the draft Plan will maximise opportunities for new residents to access work, education, facilities and service via walking, cycling and public transport.</p>
<b>Objective 10:</b> Reduce vulnerability to, and manage flood risk (taking account of climate	0	0	0	Sustainable Drainage Systems (SuDS) offer opportunities to reduce vulnerability to and manage flood risk. The retained Policy SU1 facilitates SuDS to be employed for the management of runoff.	

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
change)				<p>The revised Policy NE1 requires development design to maximise opportunities for effective and functional Green Infrastructure (GI), focussing on the use of nature-based solutions including the use of natural flood management and SuDS.</p> <p>The new site allocations through the Partial Update were directed to the existing main settlements in the district. They are mainly in Flood Zone 1 and were subject to the flood risk sequential test. Some parts of the Bath Riverside (SB9) are located adjacent to the river, in flood zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy. Therefore, the location of the general growth areas was justified through the Core Strategy high level Sequential Test.</p> <p>Policy SB23 (Western Island) - The Environment Agency's flood zone mapping shows the site is located within Flood Zone 1. However, B&amp;NES Strategic Flood Risk Assessment indicates the entire site is within Flood Zone 3 and the NPPF sets out clear requirements regarding development in flood risk areas entailing the sequential and exceptions tests. As the site lies within a flood risk zone and it is not suitable for residential development.</p> <p>Some retained brownfield allocation sites, particularly in Bath, may be in areas at risk of flooding. However, the sequential approach was taken to identify these development sites and site-specific requirements ensure that vulnerable uses will not be developed within high risk flood zones.</p> <p>Other Development Management policies and Guidance such as The West of England Sustainable Drainage Developer Guide would help guide development to reduce the vulnerability to and manage flood risk.</p>	<p>Site specific flood risk assessments are required.</p> <p>The Policy (SB9) requires development proposals to be informed by a site specific FRA, with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.</p> <p>The policy requires that development design will take into account flood protection. Any new development is subject to Development Management Policies and a site specific flood risk assessment.</p>
<b>Objective 11 Reduce negative contributions to and increase resilience to climate change</b>	+	+	+	<p>Policy CP1 facilitates the retrofitting of existing buildings allowing them to be more resistant to future climate change such as extreme heat and cold. Policy CP3 facilitates renewable energy developments which reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses. Policies SCR6 and SCR7 require a sustainable method of construction, reducing</p>	<p>The site allocation policies require specific measures where identified.</p>

Local Plan Partial Update					
SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects identified.	Mitigation and enhancement suggested to address residual effects expected.
				<p>heat and energy demand by encouraging a fabric first approach then supplying all energy demand through onsite renewable. This will help reduce the production of greenhouse gas emissions and helps to increase resilience to climate change.</p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. Policy NE1 promotes effective and functional Green Infrastructure, focussing on the use of nature based solutions to deliver community benefits.</p> <p>The retained policies such as SCR5(water efficiency), CP5 (flood risk management) and design policies help guide new development to be resilient to climate change.</p>	
<p><b>Objective 12</b> 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)</p>	++/0	++/0	++/0	<p>The Core Strategy Policy DW1 sets out housing targets and broad distribution of new housing development. In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley. The safeguarded land in Keynsham is greenfield land but they are already removed from the Green Belt and safeguarded for development.</p> <p>The new Policy SCR6 and 7 will help new development to be zero carbon by reducing the heat and energy uses. In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation.</p> <p>Policy CP2 requires applicants to demonstrate that waste and recycling during construction and in operation have been addressed as well as the type, lifecycle and source of materials to be used.</p>	<p>The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p>

**Bath & North East Somerset Local Plan Partial Update  
Sustainability Appraisal Report**

**Appendix G  
Contextual Indicators Monitoring Programme**

**Date:  
December 2022**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**



<b>Table 1: Proposed Monitoring Programme - Contextual Indicators</b>				
<b>SA Objectives</b>	<b>Proposed Contextual indicators</b>	<b>Published targets</b>	<b>Source of data</b>	<b>Frequency of reporting</b>
<b>Objective 1 Improve the health and well-being of all communities</b>	Annual Progress Report on Air Quality management Areas as submitted to DEFRA (by Environmental Health)	N/A	B&NES Air Quality Management Plan	Periodic
	Index of multiple deprivation health domain score (Lower Super Output Area)	N/A	Indices of Multiple Deprivation	Every 3 years.
<b>Objective 2: Meet identified needs for sufficient, high quality and affordable housing</b>	Progress against Local Plan Housing Delivery Target (Inc.tenue and type)	The Local Plan housing requirement for the period up to 2026 is 13,000	B&NES AMR	Annual
	Affordable housing completions	Core Strategy affordable housing %	B&NES AMR	Annual
	Average House Prices	N/A	AMR	Annual
	No of HMOs	N/A	B&NES	Every 4 months
	Number of PBSA	N/A	B&NES	Periodic
	Net additional gypsy and traveller pitches provided annually and since 2011	N/A	B&NES	Periodic
<b>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</b>	Indices of multiple deprivation (all domains - LSOA)	N/A	Indices of multiple deprivation	Every 3 years.
	Total crime per 1,000 population	N/A	AMR	Annual
	Indices of multiple deprivation crime domain score (LSOA)	N/A	Indices of multiple deprivation	Every 3 years.
	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country. (Nat 2)	N/A	Indices of multiple deprivation	Every 3 years.
	% of LEA pupils obtaining 5 or more GCSEs (grade AC)	N/A	AMR	Annual
<b>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</b>	Skills shortages	N/A	To be confirmed following closure of the Learning and Skills Council	Unknown
	Percentage of working age population (16 to	N/A	To be confirmed following closure of the Learning and	Unknown

	64/59) with a trade apprenticeship		Skills Council	
	Percentage of working age population (16 to 64/59) with no formal qualifications	N/A	To be confirmed following closure of the Learning and Skills Council	Unknown
	Unemployment (Nat 1)		Nomis www.nomisweb.co.uk / AMR	Annual
	Amount of employment floorspace developed by type (sqm)			
	Office Gains Losses	Core Strategy	AMR	Annual
	Industrial Gains Losses	Core Strategy	AMR	Annual
	Retail Gains and Losses	Core Strategy	AMR	Annual
<b>Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking</b>	Census information for modes of transport to work, school, other activities		Census / West of England Partnership Joint Local Transport Plan	Every 10 years. Last data set 2011.
	Amount of newly implemented cycle routes	Core Strategy Placemaking Plan	B&NES	Periodic
	Carbon neutral by 2030 (Indicator: road congestion, bus satisfaction, air quality, Carbon emissions, electric vehicles, road safety and modal share through the Joint Local Transport Plan 4)	JLTP 4	WECA	Periodic
<b>Objective 6: Protect and enhance local distinctiveness</b>	Change to the recognised landscape character areas within the district.		National Countryside Quality Counts www.countryside-quality-counts.org.uk	Periodic
	Monitoring applications for renewable energy development particularly wind turbines and ground mounted solar.	N/A	AMR	Annual
	Monitoring key GI projects	N/A	B&NES	Periodic
<b>Objective 7: Protect and enhance the district's historic, environmental and cultural assets</b>	Total number of Listed Buildings	N/A	B&NES	Held on GIS. Annual
	Total number of scheduled monuments	N/A	B&NES	Held on GIS
	Number and area of historic parks and gardens	N/A	B&NES	Held on GIS
	Number and area of conservation areas	N/A	B&NES	Held on GIS

	Number of Listed Buildings, Monuments, Parks and Gardens and Battlefields on the Heritage at Risk Register	N/A	English Heritage website <a href="http://risk.english-heritage.org.uk/2010.aspx">http://risk.english-heritage.org.uk/2010.aspx</a>	Annual
	A range of indicators to monitor implementation of the actions identified in the World Heritage Site Management Plan	N/A	B&NES	Periodic
<b>Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)</b>	Change in area of biodiversity importance.	N/A	AMR	Annual
	% of SSSI in "favourable condition"		Natural England	Annual
	Change in areas designated for intrinsic environmental value	N/A	AMR	Annual
	Implementation of Biodiversity Net Gain	N/A	B&NES	Periodic
<b>Objective 9: Reduce land, water, air, light, noise pollution</b>	Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1,3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm10), sulphur dioxide)	As the AQMA Action Plan	B&NES	Bi-annual
	Bathing water quality	Water Framework Directive:	Environment Agency	Annual
	River water quality (chemical, physical and ecological status of water bodies)	Achieve 'good' chemical, physical and ecological status by 2015.	Environment Agency latest River Basin Management Plan	Annual
	Ground water quality	Achieve 'good' quantitative and chemical status by 2015.	Environment Agency latest River Basin Management Plan	Annual
<b>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</b>	Numbers of properties affected by fluvial flood events in the last year	N/A	Environment Agency Customer Contact Team custswnw@environment-agency.gov.uk or 01278 484813	Annual
	Number of properties benefiting from flood defences	N/A	Environment Agency Customer Contact Team custswnw@environment-agency.gov.uk or 01278 484813	Annual
	Condition of flood defences	N/A	National Flood and Coastal Defence Database (NFCDD) via	

			Environment Agency	
	Planning permissions granted contrary to EA advice on flooding or water quality grounds.	N/A	AMR	
<b>Objective 11 Increase resilience to climate change</b>	Implementation of the Green Infrastructure		B&NES	
	Renewable energy generation (MW of energy and MW of heat)		AMR	Annual
	Total final energy consumption/ Capita (kWh) for BANES	N/A	High Level Energy Indicators, Department of Energy and Climate Change	Annual. Last data set is 2007
	Total domestic/industrial energy, electricity consumption(kWh)	N/A	High Level Energy Indicators, Department of Energy and Climate Change	Annual. Last data set is 2007
	Total domestic/industrial gas consumption (kWh)	N/A	High Level Energy Indicators, Department of Energy and Climate Change	Annual. Last data set is 2007
	CO <sub>2</sub> emissions per capita (tCO <sub>2</sub> )	The district target is to reduce carbon emissions by 30% by 2014.	High Level Energy Indicators, Department of Energy and Climate Change	Annual. Last data set is 2007
<b>Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction</b>	Number of properties achieving “very good”and “excellent” BREEAM levels	The intention is for non-residential buildings to be zero carbon by 2019	B&NES	Annual
	BD2: Amount of floorspace by on previously developed land by type (sqm)	N/A	AMR	Annual

<b>B&amp;NES Local Plan Partial Update SA Scoping Report summary comments and council's responses</b> <b>[Scoping Report consultation:28th April to 3rd June 2020]</b>	
<b>Historic England</b>	
<p>Thank you for sharing a draft Scoping Report for consideration.</p> <p>Our planning system is based on the principle of delivering sustainable development, a component of which is making the best of our heritage assets. Heritage will play an increasingly important role in stimulating regeneration post COVID-19, informing sustainable growth and securing positive change that helps safeguard our historic places and heritage assets. Heritage is not just an environmental consideration but also an important economic and social factor.</p> <p><b>3.4 Heritage, Archaeology and Landscape</b></p> <p>As archaeology is a component of 'heritage', separate reference shouldn't be unnecessary. A more significant issue is a combination of landscape and heritage, as the two are discrete planning matters. An unfortunate consequence of combining the two may be that any assessment may indicate harm to a heritage asset but not the landscape, or visa versa; how will this be recorded and an accurate evaluation derived? This also doesn't appear to tally with Obj 7 in Annex B? Is this more up to date?</p> <p><b>Recent changes, trends and issues</b></p> <p>It would be helpful to appreciate how these <i>changes, trends and issues</i> have been informed. Is there a topic paper? Reference is made to information in 2016 although more up-to-date information is now available e.g. the national Heritage at risk Register is published annually. There is also reference to a report relating to twentieth-century heritage from 2011. This section would benefit from updating. This is further illustrated by a lack of reference to matters such as climate change, the future of the historic high street and the implications of COVID19.</p> <p>The first bullet point in this <i>Recent changes and trends</i> section is as follows. <i>"In accordance with the latest guidance from Historic England, every CA in the district will have a 'CA Appraisal'. In 2016, the Keynsham CA Appraisal was completed. Further appraisals are being drafted.</i></p> <p>Have others been completed since 2016? What do the CA appraisals indicate are the trends, changes and issues? Will all the outstanding appraisals be available to you to inform the SA and the Plan?</p> <p><b>Paragraph 3.4.17</b></p> <p>Unfortunately this section appears to narrowly define the relationship between the historic environment and the delivery of sustainable development and in turn how the development plan can positively respond.<sup>1</sup>The table in this section of the SA</p>	<p>Comments are helpful and noted.</p> <p>For the appraisal objectives, Objective 6 cover landscape issues and Objective 7 covers heritage and archaeology.</p> <p>The reference to the Heritage Topic Paper is added. The Topic Paper and various updated assessments will be available to assess options through the Partial Update process.  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/historic_environment_topic_paper.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/historic_environment_topic_paper.pdf</a></p> <p>Further analysis is added in the report.</p>

<p>appears reactive and limited, failing to reflect national policy, guidance and advice. <a href="https://historicengland.org.uk/advice/planning/planning-system/">https://historicengland.org.uk/advice/planning/planning-system/</a></p> <p>It isn't clear why HMOs are referred to in the table (light blue coloured).</p> <p><b>Paragraph 3.2.19</b>  The proposed SA Framework and its component parts in relation to the historic environment might benefit from a critical review. Guidance is respectfully offered in the following advice note. <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p> <p>As previously mentioned an amalgamation of landscape and heritage matters may confuse/distort the SA assessment and accuracy. Separate objectives might therefore be considered.</p> <p>An alternative objective might be: <i>To conserve and enhance the historic environment, heritage assets and their settings.</i></p> <p>Or if they continue to be combined the following alternative might be considered:</p> <p><i>Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place.</i></p> <p>Objective 7, <i>Appraisal questions/prompts (would the policy/option lead to...)</i>  <i>Development that affects cultural and historic assets and their settings?</i>  <i>Well-designed development that is well related and provides physical connection to the surrounding townscape/landscape?</i></p> <p>When undertaking the SA would either of the above questions be as useful as they might in helping you to assess the relative impact of a proposal. For example, does the first question determine whether the effect is positive or negative, and the degree of any likely harm?</p> <p>The second question is probably immaterial at this stage as the design of a proposal will not be known</p>	<p>Text deleted.</p> <p>SA objective 6 covers landscape matters and objective 7 covers historic and archaeology matters and these objectives were reworded for clarity as below.</p> <p>Objective 6: To protect and enhance local environmental distinctiveness and the character and appearance of landscape</p> <p>Objective 7: To conserve and enhance the historic environment, heritage/cultural assets and their settings</p>
<p>yet and one has to assume anyway that it will be well designed to accord with national design policy. Also is it clear why a "physical connection to the surroundings" is a determinant of sustainability re the historic environment? Perhaps these two questions could be revisited?</p> <p>A simple alternative question might be, <i>Will development safeguard, and where appropriate enhance, the significance of any affected heritage asset, historic townscape/landscape? Or Will the proposal conserve and/or enhance heritage assets, their</i></p>	

<p><i>setting and the wider historic environment?</i></p> <p>I do hope these comments will help to refine your Sustainability Appraisal, to avoid or minimise any adverse effect, maximise potential benefits, identify appropriate mitigation and in doing so deliver sustainable development.</p>	
<p><b>Amanda Grundy Wessex Team Natural England</b></p>	
<p>Thank you for your consultation on the above, which was received by Natural England on 28th April 2020.</p> <p>The SEA Directive sets out the topics that a SA/SEA must cover in its assessment. Natural England is an identified consultation body for biodiversity including flora, fauna, human health, soil (including waste and contaminated land issues), water (water quality and resources), air, climatic factors (including strategic flood risks), material assets (including geological interests and infrastructure), cultural heritage and Landscape. We are the lead authority for biodiversity and landscape and identified as a source of information for soils, material assets and cultural heritage.</p> <p>We consider the Sustainability Appraisal Scoping Report is clearly presented and demonstrates a good understanding of the Plan area and the wider context of the partial review, including with respect to the climate and nature emergency and relevant changes to national policy and legislation. We particularly welcome the consideration given to the natural environment, which is thorough and is reflected across policy topic areas.</p> <p>The Environment Bill represents a significant shift in approach to meeting environmental challenges and opportunities and will bring forward new requirements for local delivery of the 25 Year Environment Plan. Key components include local nature recovery strategies, improved green infrastructure delivery and securing measurable net gains for biodiversity from development. BANES is well placed to deliver those goals, building on work already underway in the district and with partners in the West of England.</p> <p>Nature recovery requires a strategic approach to strengthen ecological networks and protect and enhance natural capital on which the districts economy and communities depend. The SA scoping report begins to recognise this but there is scope to make it a cornerstone of the framework. Similarly, the Joint Green Infrastructure Strategy (and BANES GI Strategy that it will inform) promotes the need to integrate green infrastructure objectives across different policy areas and we would encourage that to be applied through the SA assessment framework.</p> <p>We are pleased to see the importance of landscape and landscape character is recognised in the SA scoping document which notes that almost a third of the District lies within the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty. The SA</p>	<p>Comments are helpful and noted.</p>

Scoping notes the influence of the Local Plan DPD in relation to avoiding harmful impacts on protected landscapes in Objective 6: Protect and enhance local environmental distinctiveness...and in the accompanying question - Avoidance of harmful impacts of development on all landscapes including AONB landscape character and its statutory purpose?

While this is welcome in principle, the SA and local plan should also recognise that development close to the boundaries of protected landscapes (within their settings) can be inconsistent with the purposes of AONB and impact on their special qualities. While we appreciate there is not specific reference to the settings of protected landscapes in the NPPF, the PPG on Landscape notes that the duty on public bodies to have regard to the purpose of NP/AONB is relevant in considering development in their setting. This is a particularly important consideration, noting that in practice, most development is likely to come forward outside than within AONB boundaries.

The key issues to be addressed in the partial review appear reasonable.

The baseline review considers European and nationally designated sites within the district, noting the rare bats associated with Bath & Bradford on Avon Bats SAC and North Somerset & Mendip Bats SAC and the important flight lines and foraging habitat associated with these SACs.

We understand the Council intends to produce technical guidance for development affecting rare bats associated with the European sites, however we could not see a reference to this in the consultation documents.

Recognising that habitats and landscape features outside the designated site boundary are critical to the protection of the bats and to meeting the conservation objectives for the European site, we would welcome an update on the progress of the guidance.

We are pleased the Council recognises the opportunities and obligations presented by the Environment Bill, including securing a 10% biodiversity net gain from new development and establishing a local nature recovery network. We note that updated and renewed habitat and priority habitat baseline data is being produced for the WoE - the detail and scale of this data is not specified, but we expect that it will help to inform a B&NES Local Nature Recovery Strategy and provide a basis for directing and prioritising any BNG contributions secured from new development.

Notwithstanding the above, in most situations, we would expect robust site based ecological surveys will also be required to identify more precisely the habitats and species present, how these could be affected, and to inform mitigation measures. Natural England supports the use of the Defra metric to calculate BNG requirements in accordance with CIEEM biodiversity net gain principles. The Defra metric has been updated recently to include a wider range of interests, including linear features and connectivity.

The WoE GI strategy is being prepared by the WoE authorities, including B&NES, which will help to ensure cross boundary

Habitat Regulation Assessment will be carried out alongside the Sustainability Appraisals.



issues and opportunities are identified. As noted in the SA scoping report, there is also a need to understand the ecological connections in relation to Mendip and Wiltshire neighbouring authorities.

We have reviewed the sustainability objectives and accompanying questions and offer the following recommendations:

Objective 8 Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)

The questions appear focused on development management and minimising harm, which is important, but more could be done to make nature recovery ambitions core to the assessment framework. For example, we note the question 'Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?' This could be improved by also asking whether the development could make a positive contribution to the nature recovery network.

Objective 9 Reduce land, water, air, light, noise pollution

While the objective includes light pollution, a corresponding question/prompt would be helpful to ensure it is accounted for when assessing development proposals. Lighting can have harmful effects on people, wildlife, landscape and perceptions of landscape such as tranquillity and dark skies – it also requires energy. While we recognise there is a need for lighting for safety reasons, the local plan should ensure every effort is made to minimise increases in lighting levels and light spill.

Objective 9 also refers to water pollution and again we suggest a corresponding question is needed to ensure water quality is taken into account in the plan preparation and when assessing new development proposals.

We would also recommend that a question/prompt is needed to ensure potential air quality impacts on wildlife sites are considered.

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)

We suggest the questions relating to SUDS would benefit from an explanation about the range of functions that well designed SUDS can provide and what would be expected from new development. For example water quality, ecology, and place making, as well as managing surface water and flood risk.

In addition, as per comments above, it would useful to check how green infrastructure can be better integrated into the framework – many of the objectives could include a prompt/question related to GI.

Objective 8 – additional question  
'Would the policy/option lead to:  
enhance and extend the Green  
Infrastructure and make a positive  
contribution to the nature recovery  
network?'

Objective 9 – additional question  
'Would the policy/option lead to:  
minimise increase in light pollution?'

Objective 9 – additional question  
'Would the policy /option lead to:  
Development that minimises exposure  
to poor air quality, noise pollution and  
water pollution?'

Objective 10 – additional question'  
Would the policy/option lead to:  
promote best practice for SuDs?'

Objective 8 – additional question  
'Would the policy/option lead to:  
enhance and extend the Green  
Infrastructure and make a positive  
contribution to the nature recovery  
network. ?'

<p>We note the Council intends to undertake a Habitat Regulations Assessment of the Local Plan alongside the SA and would be pleased to comment further on both these assessments in due course.</p>	
<p><b>Environment Agency</b> <b>Mark Willitts</b></p>	
<p>We have reviewed the SA scoping report and offer the following comments:</p> <p><b>Objective 9</b> We advise reference should be made to the requirements of the Avon Act. This is particularly important given the powers it gives the local authority in protecting the sensitive natural thermal springs.</p> <p><b>Objectives 10 and 11</b> The Planning Act 2008 (section 182) advises “<i>Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.</i>” The SA and evidence based must be revised to address this requirement. We advise the objectives must be linked and reference made to UKCP18 guidance.</p> <p>In addressing the above, the Strategic Flood Risk Assessment must be updated, taking into account the latest UKCP18 climate change predictions and best available flood data. It is particularly important reference is made in the above objectives to the delivery of flood risk management infrastructure in respect of climate change adaption and mitigation.</p> <p><b>General comments</b> We note a number of minor typographical errors appear in the consultation documentation and trust these will be corrected. We advise the evidence base must be updated to ensure it is contemporaneous and that the plan is based on a sound evidence base.</p> <p>We would very much welcome further discussion with your authority on the above points at an appropriate time. Please do not hesitate to contact us should you have any further queries.</p>	<p>Objective 9 – additional question ‘Would the policy/option lead to: protect the natural thermal spring under County of Avon Act 1982?’</p>

<b>B&amp;NES Local Plan Partial Update interim SA Report summary comments and council's responses</b> <b>[Options Consultation 7th January to 18th February 2021]</b>	
<b>Historic England</b> Rohan Torkildsen	
<b>Potential new and refined allocations</b> We presume that an understanding of the significance of each site and its setting has informed the proposed Options and that further evidence will be gathered, and made available, to inform the next iteration, as recommended by Interim Sustainability Appraisal Report (November 2020).	Further evidence was prepared and informed the preparation of the Reg 19 draft plan.
<b>Natural England</b> Amanda Grundy	
We broadly concur with the SA findings, which identifies the potential for negative or uncertain effects on landscape and ecology to result from some of the policy proposals, particularly those relating to housing allocations and including renewable energy infrastructure and the need for more detailed assessments.	Further appraisals for development management policies and site allocations were undertaken to inform the draft LPPU.

<b>B&amp;NES Local Plan Partial Update Draft SA Report (LPPU Regulation 19 consultation) summary comments and council's responses</b> <b>Draft LPPU Consultation 27th August to 8th October 2021</b>	
<b>Natural England</b>	Responses
<p>Policy CP3 and the Sustainability Appraisal</p> <p>The LPPU Reg 18 consultation presented 2 options (plus no change) for CP3 about the approach to which areas should be defined as potentially suitable for renewable energy development and shown on the policies map. We note that Option 2 has been taken forward, which includes Landscape Character Areas (LCA) with moderate/low potential for wind energy and corresponding moderate/high landscape sensitivity.</p> <p>The SA presents the assessment of the environmental effects of each of the options in Table 10 'Summary appraisal results of the Options' M6/DM7 New Policy for Harnessing wind energy (amendment to Policy CP3), which found ...Option 2 which allows a wider area for consideration would have major positive effects on objective 4 (economy), objective 11 (climate change) and objective 12 (resources). However, there are negative or</p>	<p>Agreed that potential effects of Option 1 and Option 2 presented in the interim SA Report (Jan 2020) and Local Plan Partial Update Options document (Jan 2020) would be different, but they are both assessed negative and uncertain, and mitigation stated that <i>'a policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures. Site specific mitigation and enhancement measures should be included in the policies.'</i></p> <p>Identifying the areas suitable for wind energy has a positive effect on achieving more renewable energy. Clearly including the moderate-high landscape sensitivity area will increase potential locations and opportunities. However a number of uncertain effects are identified on natural and historic environmental objectives.</p>

uncertain effects that have been identified for environmental objectives.

Appendix C Local Plan Partial Update alternative options appraisal matrices (Ref DM5 Emerging policy approach for wind energy development), presents the assessment of the options against all SA objectives, but does not appear to differentiate between Option 1 and 2 in relation to the environment, noting the findings and mitigation for Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape; Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their setting; and Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change) are identical.

In our view Options 1 and 2 are substantially different in terms of the greater spatial area and uncertain implications for landscape and ecological impacts of Option 2 and we consider that further assessment of the potential environmental effects of this option is warranted to explain and justify its selection.

In order to inform draft Policy CP3, Landscape Sensitivity Assessment for Renewable Energy Development (Aug 2021) was prepared. This is an update from the 2010 study which informed the preparation of the Core Strategy.

The Landscape Sensitivity Assessment (LSA) for Renewable Energy Development provides judgements on the landscape potential of different parts of the B&NES landscape to accommodate solar photovoltaic (PV) and wind energy development in the future. The results of this study provide an indication of landscape sensitivity across the district, so that potential opportunities and constraints for siting such developments be considered. This will also allow the Council to identify broad areas for renewable energy development and establish a local policy framework for such development, in line with the National Planning Policy Framework (paragraph 151).

Draft Policy CP3 was amended to reflect the latest evidence and include detailed development requirements in considering wind energy proposals. (See Table 10 of the draft SA report Aug 2021)

*Policy CP3 states that*

*1) Proposals for all renewable and low carbon energy-generating and distribution networks, will be supported in the context of sustainable development and climate change, where:*

*a) ---*

*b) They will not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated or do not accord with national policy, including:*

*• impacts to biodiversity;*

*• **landscape and visual impacts including cumulative effects;***

*• impacts on the special qualities of all nationally important or protected landscapes; and*

*c) ---*

It refers to national policy and NPPF paragraphs 176 and 177 would apply to any applications proposed in the Area of Natural Outstanding Beauty.

	<p>Landscape Sensitivity Assessment Renewable Energy Development (Aug 2021)  <a href="https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20Renewable%20Energy%20Landscape%20Sensitivity%20Assessment%20-%20combined.pdf">https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20Renewable%20Energy%20Landscape%20Sensitivity%20Assessment%20-%20combined.pdf</a></p> <p>Landscape Sensitivity Analyses for Wind Energy Development (2010)  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/landscape_sensitivity_analysis_for_wind_energy.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/landscape_sensitivity_analysis_for_wind_energy.pdf</a></p>
<p><b>Developer representations</b>  Redrow Homes Limited</p>	
<p>Both the Partial Update and its associated Sustainability Appraisal have failed to adequately assess reasonable alternatives in justifying the approach adopted. The Partial Update remains largely Bath and Keynsham centric and there is no apparent evidence, including in the SA, as to whether reasonable alternatives, including on the edge of Bristol, have been considered.</p> <p>Given this uncertainty, the Council should have assessed all reasonable alternatives, including through the Sustainability Appraisal (SA), prior to the publication of the consultation to ensure that the approach taken was deliverable, effective and justified in the context of paragraph 25 of the National Planning Policy Framework.</p> <p>The previously adopted approach to Whitchurch, which recognises its proximity to Bristol, remains sound and should be also recognised within the Partial Update as a reasonable alternative to meeting the needs of both B&amp;NES and of Bristol City. As such, the sustainability of Whitchurch as a location for development is referenced at paragraph 53 of the Core Strategy and this is carried forward into the Partial Update.</p>	<p>Planning Practice Guidance (Para 9) states that '<i>The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.</i></p> <p>The scope of the Local Plan Partial Update is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy &amp; Placemaking Plan. The reasonable alternatives appropriate for the content of the Partial update were identified and assessed following the location spatial priorities established through the Core Strategy in order to meet the potential housing shortfall.</p> <p>The Annex L of the Core Strategy SA report sets out the locational spatial assessment.  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_l.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_l.pdf</a></p>
<p><b>Developer representation The Duchy of Cornwall</b></p>	

<p>It is not clear what approach has been taken to explore reasonable alternatives, including alternative sites and strategies. If the LPPU does not address the spatial strategy elements that are raised in these representations, then at the very least it should explore how different approaches to site selection have been considered which are consistent with the current spatial strategy. It appears from the limited information within the SA that little account has been taken of the range of sites presented to BaNES as part of the recent Call for Sites exercises described at the beginning of these representations. For the LPPU to be justified, it must be demonstrated how reasonable alternatives have been properly considered throughout the plan-making process. This is set out in the NPPG, which explains: “The sustainability appraisal needs to consider and compare all reasonable alternatives as a plan evolves...” [NPPG ID 11-018-20140306, Copperfield emphasis] 54. The Interim SA does not appear to make any reference to reasonable alternatives, which is unfortunately not consistent with the guidance.</p> <p>One of the issues raised during the Joint Spatial Plan (JSP) Examination was a lack of proper consultation and consideration of reasonable alternatives against which to test the proposals. It would be unhelpful for all if this plan were to suffer the same issue. As such it is suggested that reasonable alternatives are properly and fully considered. From a housing and community perspective, one such alternative is land West of Bath (Appendix A), which is known to the Council and has been submitted as part of the latest Call for Sites exercise. The Duchy of Cornwall would welcome dialogue with the Council about how meeting some of the housing and community needs in this location would align with emerging policy changes and would represent an appropriate part of the Council’s development strategy.</p>	<p>As explained above, the scope of the Local Plan Partial Update is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy &amp; Placemaking Plan. All the sites submitted through the Call for Sites were assessed and presented in the Housing, Economic Land Availability Assessment which helped to identify reasonable alternative sites in line with the Core Strategy spatial priorities.</p>
<p>Developer representation (Taylor Wimpey UK Ltd)</p>	
<p>Land at Chilcompton Road, Midsomer Norton offers an opportunity to deliver a sustainable development that would ensure the consistent delivery of dwellings through the remainder of the Plan period. The site is fully within the control of Taylor Wimpey and development is deliverable. It is anticipated that the site could accommodate a scheme of circa. 120 dwellings and could contribute to the Council’s short-medium land supply. It should be noted that the site and a proposed scheme is supported by all necessary and relevant technical evidence, supporting its delivery. The site has also been promoted through each stage of the LPPU (identified as MSN38b and MSN38A). The Council’s HELAA considered</p>	<p>Comment noted.</p> <p>Enough alternative development sites were identified by assessing sites in accordance with the Core Strategy spatial priorities therefore the greenfield sites in the Somer Valley were not considered as reasonable alternatives.</p>

<p>development of this site to be potentially achievable, however, it is unclear whether the site was subsequently assessed, and it is not noted as part of the Sustainability Appraisal supporting the LPPU.</p>	
<p><b>Kingswood School</b></p>	
<p>The Sustainability Appraisal Site Assessment for Kingswood School Upper Playing Fields should be reviewed to re-consider allocation of the site. (Detail commentary is submitted)</p> <p>Summary conclusion as below.</p> <p>The proposals will deliver development on previously developed land in a sustainable and accessible location in line with the Development Plan spatial strategy. The proposals will make appropriate provision for replacement and new sports facilities as well as providing opportunities for tree planting and biodiversity to integrate with the adjacent SNCI. We disagree that there would be a major negative effect on biodiversity as part of the site is previously developed land and there has not been a thorough assessment of the managed sports pitches. Residential development would also have wider public benefits as it forms a critical part of the school's future investment and funding strategy. It would allow the school to generate funds for reinvestment in major school capital projects to further enhance the array of current buildings, maintain its Grade II listed buildings and heritage structures, improve sustainability and to reduce environmental impact. It is recommended that the land comprised of tennis courts and car parking within the upper playing fields site is re-considered as an allocation to deliver new housing at the edge of Bath, on brownfield land outside of the green belt. It is a deliverable site that aligns with the Local Plan spatial strategy and would make a valuable contribution to housing supply in the current plan period to 2029.</p>	<p>Comments noted.</p> <p>The site was promoted through the LPPU options consultation and HELAA Call for Site. The site is located within and at the edge of the Bath City boundary and positive effects on various SA objectives are identified through the site assessment, however there are negative effects on the landscape, historic and ecology objections and mitigation requires further assessments.</p>
<p>Gladman Land off Old Road, Writhlington for up to 255 dwellings</p>	
<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. Bath and North East Somerset Council should ensure that the results of the SA process clearly justify its</p>	<p>Comment noted.</p> <p>The draft SA report sets out the process gone through and justification for its policy choices.</p>

<p>policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.</p>	
<p>Chew Valley Area Forum Climate &amp; Nature Emergency Working Group</p>	
<p>Nature Protection  We noticed in one of the documents (sustainability appraisal scoring), the score includes "well lit spaces" in its "design out crime". However excess lighting is something to be avoided in rural areas if we want to encourage healthy wildlife habitats and dark skies. This lighting also uses power and high colour temperature which can have a far greater adverse effect on moth populations than low colour temperature ones</p>	<p>Comment noted.  'Well lit' spaces are considered through SA Objective 3(Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime). Would the policy/option lead to Design out crime and promote a feeling of security through better design e.g. well-lit spaces, natural surveillance, limit non-overlooked areas? This need to be considered alongside other objectives such as the SA Objective 9. SA Objective 9 (Reduce land, water, air, light, noise pollution) has a sub question 'would the policy/option lead To minimise increase in light and water pollution?'</p>
<p>South Gloucestershire Council</p>	
<p>Officers also consider that the LPPU has been prepared in accordance with relevant legislative and procedural requirements, including through the preparation of a sustainability appraisal which has informed the development of the Plan.</p>	<p>Comment noted.</p>



**Bath & North East  
Somerset Council**

**Appendix I**

**Bath & North East Somerset  
Local Plan Partial Update  
Sustainability Appraisal Report  
SA Screening of the Main Modifications to the submitted Plan**

**January 2023**

## 1. Introduction

- 1.1 This Annex sets out the SA screening of the Main Modifications proposed to the submitted draft Local Plan Partial Update (LPPU). The draft LPPU was submitted to the Secretary of State to be examined by an independent Planning Inspector in December 2021. The Examination hearings took place in June/July 2022. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation stage on the Main Modifications.
- 1.2 The Inspector is inviting comments on the Main Modifications to the submitted LPPU. The Main Modifications are those the Inspector considers necessary to make the plan sound/and or legally compliant. The Main Modifications are proposed without prejudice to the Inspector's final conclusions on the LPPU which will be informed by all representations submitted in response to this consultation.
- 1.3 Each Modification to the submitted Placemaking Plan has a unique reference number as shown in the left-hand column of the schedule. This report includes tables which present the findings of the Sustainability Appraisal screening of the changes to the Submitted LPPU proposed by Bath and North East Somerset Council in 2021. The screening process has identified changes considered to make a difference to the Sustainability Appraisal (SA) of the LPPU. Where reappraisal is necessary, Annex D (policy appraisals) and Annex F (Cumulative Effect) of the LPPU SA report have been updated to amend the previous policy assessment matrix.

Adopted Plan: Plain text

**Submitted Plan:** added text shown as **Bold** text and deleted text as ~~strike through~~

**Main Modifications:** added text shown as **Bold** and Underline, deleted text as ~~strike through~~ and Underline

## Main Modifications

Mod Ref	Policy	Proposed changes	Screening: Does the Modification significantly affect the findings of the SA Report ?
	Volume 1		
MM1	Para 29a	<p><b>Paragraph 21 of NPPF (2021) states that “Plans should make explicit which policies are strategic polices.” Where a single Local Plan is prepared, the non-strategic policies should be clearly distinguished from the strategic polices. Local Plan Part 1: Core Strategy sets out a strategic planning framework to guide change and development in the District and Part 2: Placemaking Plan covers site allocations and detailed development management policies. <del>and together they address B&amp;NES council’s priorities for the development and use of land in its area. Therefore, it is considered that all policies in the Core Strategy and Placemaking Plan are ‘strategic’ policies. Therefore, in principle the Core Strategy policies are considered to be ‘strategic’ policies as they establish the overall strategy for the District. In addition, Placemaking Plan and Local Plan Partial Update development management policies setting out the overall strategy/approach, as well as strategic site allocations for housing, employment and key infrastructure including those which entail a strategic change to the Green Belt, are also considered to be strategic policies. All strategic policies are listed in Appendix 3 in Volume 6 of the Local Plan: Appendices and Glossary.</del></b></p>	The amendments clarify which policies are considered as strategic policies in line with the NPPF and does not affect the findings of the SA report.
MM2	After para 56	<p><b>56a. Paragraph 66 of the NPPF 2021 states that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. <del>Set out below is a list of designated neighbourhood areas and their proposed housing requirement, comprising the total number of dwellings on site allocations without the benefit of planning permission (both those within the adopted Core Strategy and Placemaking Plan and additional allocations proposed in the partial update) for the remainder of the plan period (2021–2029). A table setting out a housing requirement for the remainder of the plan-period for each of the designated Neighbourhood Areas is included in Policy DW1.</del></b></p>	Responding the NPPF requirements, the amendments sets out the designated neighbourhood areas housing requirements for the remainder of the plan period (2022-2029) and clarify designated neighbourhood area requirements are not a cap. It also references removing the Park & Ride sites from the Green Belt.
	Policy DW1 2)	<p><b>Policy DW1</b> 2). making provision to accommodate:</p>	The removal of the Park & Ride sites were already assessed through the

- a net increase of 10,300 jobs;
- an increase in the supply of housing by around 13,000 homes. **Diagram 3a sets out the proposed delivery at adoption of the Local Plan Partial Update. The table below sets out how this will be achieved.**

	<u>Bath</u>	<u>Keynsham</u>	<u>Somer Valley</u>	<u>Rural</u>	<u>Total</u>
<b><u>Completions (2011-2022)</u></b>	<b><u>3,576</u></b>	<b><u>1,982</u></b>	<b><u>1,937</u></b>	<b><u>1,289</u></b>	<b><u>8,784</u></b>
<b><u>Extant Permissions</u></b>	<b><u>2,070</u></b>	<b><u>260</u></b>	<b><u>490</u></b>	<b><u>80</u></b>	<b><u>2,900</u></b>
<b><u>Existing Allocations from the Core Strategy and Placemaking Plan</u></b>	<b><u>880</u></b>		<b><u>100</u></b>		<b><u>980</u></b>
<b><u>New allocations through the LPPU</u></b>	<b><u>530</u></b>	<b><u>330</u></b>	<b><u>80</u></b>		<b><u>940</u></b>
<b><u>Windfalls</u></b>	<b><u>450</u></b>	<b><u>90</u></b>	<b><u>180</u></b>	<b><u>320</u></b>	<b><u>1,040</u></b>
<b><u>Total (rounded)</u></b>	<b><u>7,500</u></b>	<b><u>2,660</u></b>	<b><u>2,790</u></b>	<b><u>1,690</u></b>	<b><u>14,640</u></b>

**The table below sets out the designated neighbourhood areas housing requirements for the remainder of the plan period (2022-2029). The figures below are not a ‘cap’ on development and additional housing may come forward in designated neighbourhood areas, including through site allocations in Neighbourhood Plans.**

<b><u>Designated Neighbourhood Area</u></b>	<b><u>Allocations in adopted Core Strategy/ Placemaking Plan</u></b>	<b><u>Proposed LPPU allocations</u></b>	<b><u>Housing requirement</u></b>
<b><u>Bathampton</u></b>	<b><u>0</u></b>	<b><u>0</u></b>	<b><u>0</u></b>
<b><u>Batheaston</u></b>	<b><u>0</u></b>	<b><u>0</u></b>	<b><u>0</u></b>

submission Plan appraisals. However this needs to be reflected in the SA report.

<u>Chew Valley</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Claverton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Clutton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Englishcombe</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Freshford and Limpley Stoke</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>High Littleton and Hallatrow</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Keynsham</u>	<u>0</u>	<u>336</u>	<u>336</u>
<u>Midsomer Norton</u>	<u>100</u>	<u>0</u>	<u>100</u>
<u>Paulton</u>	<u>0</u>	<u>80</u>	<u>80</u>
<u>Publow and Pensford</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Radstock</u>	<u>10</u>	<u>0</u>	<u>10</u>
<u>Stanton Drew</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Stowey Sutton</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Timsbury</u>	<u>20</u>	<u>0</u>	<u>20</u>
<u>Westfield</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Whitchurch</u>	<u>0</u>	<u>0</u>	<u>0</u>

4. retaining the general extent of Bristol - Bath Green Belt within B&NES, other than removing land to meet the District's development **and sustainable transport** needs at the following locations identified on the Key Diagram and allocated on the Policies Map:

- Land adjoining Odd Down
- Land adjoining East Keynsham (**now incorporating allocation of land previously safeguarded for development**)
- Land adjoining South West Keynsham
- Land at Whitchurch
- **Land allocated for use as transport interchanges at the Odd Down, Newbridge and Lansdown Park and Ride sites**

MM3 Para 88

The core and development management policies and the place **and site** specific policies are complementary so it is important that the policy framework is read as a whole. **For each of the sites allocated for development in order to meet the plan requirements, a policy is set out**

The amendments are for clarification with regards to references to other documents (SPD/guidance) in policies

		<p>which details specific requirements of development for that site. For the allocated sites the plan must also be read as a whole as the district-wide development management policies also apply, including (but not limited to) policies relating to sustainable construction, biodiversity net gain, affordable housing and sustainable transport. <u>Some policies in the plan also reference Supplementary Planning Document (SPDs) or other guidance that supplements and supports the policy. Whilst not part of the development plan, decision makers should have due regard to these documents as referenced.</u> The policies set out below do not replicate existing national policy.</p>	<p>and do not affect the findings of the SA report.</p>
MM4	<p>Para 99c</p> <p>Para 99e</p> <p>Para 99f</p>	<p><b>Standalone renewable generation</b></p> <p><b>99c. The revised Policy CP3 sets out the criteria for all stand alone renewable energy projects, as well as specific criteria for wind energy and ground mounted solar (previously shown in Policy SCR3). Where <u>either generation type is proposed in the Green Belt, reference will also need to be made to relevant Green Belt policies. The Council has previously prepared a Guidance Note on renewable energy in the Green Belt. <u>Proposals over 50MW, other than for battery storage, are considered Nationally Significant Infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework and Development Plan).</u></u></b></p> <p><b>99e. Particularly for wind energy development Local Plans should identify suitable areas for <u>wind energy</u> such development and make clear what criteria have determined their selection, including what size of development is considered suitable in these areas. The NPPF 2021 states that:</b></p> <p><b>99f. In 2020 onshore wind energy was recognised in a report by the Department for Business, Energy &amp; Industrial Strategy as being one of the cheapest forms of energy generation (including conventional generational sources). The Local Plan Partial Update presents an opportunity to reconsider the Council’s approach to wind energy development in light of the <u>need from</u> NPPF</b></p>	<p>The amended supporting text to explains the policy approach further. Policy amendments are to improve clarity regarding impacts of wind energy schemes to be considered, ensure the policy reflects national policy in respect of AONBs and that the role of community benefit in commercial schemes is correctly articulated. These changes need to be assessed and reflected in the SA report.</p>

	<p>Para 99g</p> <p>Para 99h</p> <p>Para 99k</p>	<p><u>requirement to identify suitable areas for development and the contribution that it can make to help meeting our targets. Policy CP3 takes a landscape sensitivity-based approach to identifying suitable areas for wind energy development (see paragraphs 99r below).</u></p> <p><del><u>99g. An evidence base study has been undertaken to assess the Landscape Potential for wind energy of different scales of wind turbine within the district. The output of this study has been used to identify suitable areas of search for development, recognising that other considerations need to be addressed and are set out in the policy criteria below. The Landscape evidence also provides guidance for wind energy development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals</u></del></p> <p><del><u>99h. 99g.</u></del> <u>99h.</u> In the NPPF, and outlined above, developments for wind energy need to be able to demonstrate that, through consultation, the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. <u>Whether the proposal has the backing of the affected local community is a planning judgement for the decision maker.</u> It is recognised that any development may not be able to achieve 100% <del>of the</del> support from the community, particularly in relation to <del>renewable</del> wind energy development in rural areas, however examples of community support could be <u>(but not limited to)</u>:</p> <ul style="list-style-type: none"> <li>- Community Renewable Energy Schemes (as set out in SCR4)</li> <li>- Support from representative organisations, such as Parish Councils</li> </ul> <p><i>Renumbering of subsequent paragraphs within policy explanatory text. 99i to 99h and 99j to 99i</i></p> <p><del><u>99k. 99j.</u></del> <u>99k.</u> Given the rural nature of the District, and the opportunities for ground mounted solar arrays as part of the renewable energy mix, it is anticipated that <u>such Ground Mounted Solar A arrays, to which should</u> be sited on land of lower agricultural quality and which is not functionally linked to nationally protected sites (SACs, SPAs and SSSIs), will continue to contribute significantly towards the District wide renewable energy target. <del>in CP3, and to</del></p>	
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	Para 99m	<p><del>facilitate Green Infrastructure and biodiversity gains this policy is considered necessary (e.g. provisions for wildlife Placemaking Plan as proposed to be adopted— July 2017 66 and inclusion of permissive paths).</del></p> <p><del><u>99m. An evidence base study has been undertaken to assess the Landscape Potential for solar energy of different scales of solar farm within the district. The Council particularly encourages ground mounted Solar energy development proposals in the high, moderate high and moderate potential areas set out in the Solar Assessment Report and on land which is not functionally linked to nationally protected sites (SACs, SPAs, SSSIs). However proposals can be submitted in other landscape areas, provided that applicants clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated and recognising that other considerations need to be addressed and as set out in the policy criteria below. The Landscape evidence also provides guidance for solar development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals.</u></del></p>	
	New para 99l	<p><i>Renumbering of subsequent paragraphs within policy explanatory text. <u>99l to 99k</u></i></p> <p><b><u>Identifying Suitable Areas for Renewable Energy Development</u></b></p> <p><u>99l. The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District. Through the LPPU the Council has set out a landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations which is based on the Landscape Sensitivity Assessment (LSA) for Renewable Energy Development (LUC, 2021). Through Policy CP3:</u></p> <ul style="list-style-type: none"> <li><u>Wind energy development proposals will be supported where they lie within a landscape area identified as being potentially suitable for this type of development (high, moderate-high, moderate and low-moderate potential areas) and will be normally refused in areas of low landscape potential.</u></li> </ul>	



	New 99m	<ul style="list-style-type: none"> <li>• <u>Solar energy proposals are encouraged within locations with the best landscape potential (high, moderate-high, moderate potential). However applications can be submitted in all areas and will not necessarily be refused in areas of lower landscape potential, provided that applicants can clearly demonstrate that the adverse impacts on the landscape can be satisfactorily mitigated.</u></li> </ul> <p><u>99m. The LSA provides judgements on the landscape potential of different parts (or landscape character types and areas) of the B&amp;NES landscape to accommodate ground-mounted solar and wind energy development of differing scales. The results of this study provide an indication of landscape sensitivity and potential across the District, as well as information on potential opportunities and constraints for siting such developments. This evidence identifies broad areas of search for ground-mounted solar and wind energy development as illustrated by the Policies Map.</u></p>	
	New 99n	<p><u>99n. It is important to note that the LSA assessment does not provide guidance on the wide range of other planning issues that need to be considered as part of the preparation and determination of planning applications for renewable energy developments; these are addressed within the criteria of Policy CP3, as well as the expectation that applicants and decision makers should read the plan as whole.</u></p>	
	New 99o	<p><u>99o. The LSA assesses the suitability of different scales of developments, based on bandings that reflect those that are most likely to be put forward by developers.</u></p>	

New 99p

**Ground-mounted Solar PV Development (measured in hectares (Ha), covering the areas taken up by solar PV panels only)**

• **Band A ≤5ha**

• **Band B >5 to 10ha**

• **Band C >10 to 15ha**

• **Band D >15 to 30ha**

**Wind Energy Development Banding Turbine Height (to blade tip)**

• **Band A 18 – 25m**

• **Band B 26 – 60m**

• **Band C 61 – 99m**

• **Band D 100 – 120m**

• **Band E 121 – 150m**

**99p. The LSA assessment against landscape sensitivity criteria has been translated into overall categories of ‘landscape potential’ in Policy CP3:**

<p><b><u>5 (Low potential)</u></b></p>	<p><b><u>Key characteristics and qualities of the landscape are highly vulnerable to change. New solar PV or wind energy developments are likely to result in a significant change in character. Therefore, there is low landscape potential for new development within Landscape Character Area (LCA) /Landscape Character Type (LCT).</u></b></p>
<p><b><u>4 (Low – Moderate potential)</u></b></p>	<p><b><u>Key characteristics and qualities of the landscape are vulnerable to change from new solar PV or wind energy developments. There may be some very limited potential to accommodate developments without significantly changing landscape character. Great care would be needed in siting and design.</u></b></p>

New 99q

<b><u>3 (Moderate potential)</u></b>	<b><u>Some of the key characteristics and qualities of the landscape are vulnerable to change. Although the landscape may have some potential to accommodate new solar PV or wind energy development, it is likely to cause a degree of change in character. Care would be needed in siting and design.</u></b>
<b><u>2 (Moderate-High potential)</u></b>	<b><u>Fewer of the key characteristics and qualities of the landscape are vulnerable to change. The landscape is likely to be able to accommodate new solar PV or wind energy development with limited change in character. Care is still needed when siting and designing schemes to avoid adversely affecting landscape character.</u></b>
<b><u>1 (High potential)</u></b>	<b><u>Key characteristics and qualities of the landscape are robust in that they can withstand change from the introduction of new solar PV or wind energy developments. The landscape is likely to have high potential to accommodate such development without a significant change in character. Care is still needed when siting and designing these developments to ensure best fit with the landscape.</u></b>

**99q. Each of the LCTs across the District is attributed a category of landscape potential for the different scales of renewable energy development. Landscape potential is presented as maps of the LCTs covering the whole District, which are shown on the Policies Map. The LSA assessment report also presents the results of the assessment as separate profiles for each of the LCTs in B&NES. These detail:**

Para 99r	<ul style="list-style-type: none"> <li>• <u>A summary description of the LCT against each of the assessment criteria, giving a landscape sensitivity assessment rating for both development types.</u></li> <li>• <u>Landscape potential 'scores' for new solar PV and wind energy development within each of the different bandings, using the five-point scale (listed above).</u></li> <li>• <u>An overall discussion on the landscape potential of the LCT to new solar PV and wind energy developments, referencing particular features, attributes or locations which may be more or less sensitive.</u></li> <li>• <u>Discussion on any variations to the overall LCT scores at the LCA level.</u></li> <li>• <u>Recommendations and guidance for accommodating future solar PV and wind energy developments in the landscape.</u></li> </ul> <p><u>Policy CP3 Approach</u>  <u>99r. Part 1 of the policy sets out the criteria that apply to all types of renewable energy installations. In relation to both wind and ground mounted solar PV, further specific criteria have been added for each type of development under Parts 2 and 3 respectively. Please see Policy SCR2 for roof mounted/building integrated scale solar PV.</u></p>	
Para 99s	<ul style="list-style-type: none"> <li>○ <u>Wind energy development proposals will be supported where they lie within a landscape area identified as being potentially suitable for this type of development (high, moderate-high, moderate and low-moderate potential areas as as indicated in the Policies Map) and will be normally refused in areas of low landscape potential.</u></li> <li>○ <u>In addition, this part of the policy sets out other specific factors/criteria that need to be addressed or mitigated. In line with the NPPF, applicants would need to demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal.</u></li> </ul>	

- **Approach to ground mounted solar (Part 3):**
  - **The policy seeks to positively guide solar energy development to the most suitable locations in terms of landscape potential (high, moderate-high, moderate potential as indicated in the Policies Map), however applications can be submitted in all areas and will not necessarily be refused in areas of lower landscape potential, unless applicants cannot clearly demonstrate that the adverse impacts on the landscape can be satisfactorily mitigated.**
  - **Specific factors relating to this kind of development to be addressed/mitigated are also set out in this part of the policy.**

**99n-99s.** Part 4 of the policy relates to balancing or energy storage plant. As the most common renewable energy sources are intermittent there is a greater need for power reserves that can “balance” the grid by releasing power onto the grid at times when demand exceeds supply. Balancing plant can be gas turbines or gas engines that can be turned on at short notice to meet temporary demand. Alternatively, energy storage plants can be used to balance the grid, most commonly battery packs although other technologies are emerging. These either store energy from the grid to release when supply is scarce or can be co-located with renewable energy infrastructure to release renewable power when renewable energy production is otherwise unable to meet demand.

**99e-99t.** It is acknowledged that there is a need for flexibility and stability in the energy supply, and that grid balancing plant will be required to help enable transition to 100% renewable electricity. However, the burning of fossil fuels for energy generation, including by gas balancing plants, would increase the District’s carbon dioxide emissions and is therefore not supported since it is inconsistent with the Council’s Climate Emergency Declaration. **As part of the Council’s commitment to the Climate and Nature emergency, it is also vital that biomass/fuel electricity generators are committed to sustainable sources for fuels at the planning stage and that such sources are utilised once the energy plant is operational. If such plants do not use sustainable sources clearly**

**this undermines the benefits of this source of energy and its contribution to responding to the climate emergency, contrary to the 2008 Act.**

**Policy CP3**

**Renewable Energy Targets**

Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2029.

	Capacity (Megawatt)
Electricity	110MWe (Megawatt Electricity)
Heat	165MWth (Megawatt Thermal)

~~Proposals for low carbon and renewable energy infrastructure, including large scale freestanding installations, will be assessed under the national policies and against the following:~~

- ~~a: potential social and economic benefits including local job creation opportunities~~
- ~~b: contribution to significant community benefits~~
- ~~c: the need for secure and reliable energy generation capacity~~
- ~~d: environmental impact (see Policy CP6)~~

**Proposals for All Standalone Renewable Energy Types**

**1) Proposals for all renewable and low carbon energy-generating and distribution networks, will be supported in the context of sustainable development and climate change, where:**

- a) They balance the wider environmental, social and economic benefits of renewable electricity, heat and/or fuel production and distribution; and**

b) They will not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated ~~or do not~~ and they accord with national policy, including:

- impacts to biodiversity;
- landscape and visual impacts including cumulative effects;
- impacts on the special qualities of all nationally important or protected landscapes, which must be conserved or enhanced;
- when considering applications for development within Areas of Outstanding Natural Beauty permission should be refused for major development other than in exceptional circumstances as set out in national policy, and where it can be demonstrated that the development is in the public interest; and

c) They are informed by an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath World Heritage Site. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused; ~~and~~

d) They are supportive of land diversification and continued agricultural use; ~~and~~

e) They provide at least 10% biodiversity net gain and multi-functional Green Infrastructure e.g. permissive paths and wildlife corridors; ~~and~~

~~f) They Commercial led energy schemes with a capacity over 5MW shall provide an option to communities to own at least 5% of the scheme~~

~~; and~~

**gf) There are appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to its original use or an acceptable alternative use;**

**Opportunities for co-location of energy producers with energy users will be supported.**

**Significant weight Support will be given to community led energy schemes where evidence of community support can be demonstrated, with administrative and financial structures in place to deliver/manage the project and any income from it.**

**In addition, the following criteria will be used to assess proposals for each of the following energy generation types:**

**Wind energy**

**2) Wind energy development proposals will be supported where they:**

**a) Lie within a landscape area identified as being potentially suitable for this type of development (high, moderate-high, moderate and low-moderate potential areas set out in the Wind Energy Assessment Report and shown on the Policies Map). There will be a presumption against wind energy development proposals in low potential landscape areas.**

**Applicants would need to clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated in these areas; and**

**b) Demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal; and**

**c) Avoid or adequately mitigate shadow flicker and adverse impact on air traffic operations, radar and air navigational installations; and**



**c) There is sufficient separation from the proposed wind turbines and/or mitigation measures to protect residential amenity as a result of noise, shadow flicker and visual intrusion;**

**d) The proposals have addressed any potential adverse effects on the safety of aviation operations and navigational systems;**

**e) Potential interference to television and/or radio reception and information and telecommunications systems will be avoided and/or mitigated;**

**f) The proposed site access arrangements and access routes are suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed wind farm. The use of aggregates, concrete batching and provision of grid connection infrastructure ensure adverse impacts are avoided or satisfactorily mitigated; and**

**dg) Ensure flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected**

#### **Ground Mounted Solar Energy**

**3) The Council particularly encourages ground mounted solar energy development proposals on land which is not functionally linked to nationally protected sites (SACs;SPAs,SSSIs) in the high, moderate-high, moderate potential areas set out in the Solar Assessment Report and shown on the Policies Map (subject to the other criteria in this policy).**

**Proposals will be acceptable in other areas (of lower potential) provided that applicants clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated (as set out in 1b). (See SCR2 for roof mounted solar)**

**In addition, ground mounted solar energy development proposals will be supported where they:**

- a. Are not sited on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless significant sustainability benefits are demonstrated to outweigh any loss<sub>zi</sub>
- b. Maintain grazing regimes within SAC bat sustenance zones<sub>zi</sub>
- c. Avoid the loss of hedgerow & woodland connectivity<sub>7</sub>; ~~and~~
- d. Avoid the loss and deterioration of UK priority habitats (as shown on the Policies Map)<sub>zi</sub>; and
- e. Meet current best practice guidelines and standards on protection and enhancement of biodiversity.

**Energy balancing plants**

**4) Energy installations to balance electricity demand and supply in order to assist the transition to 100% renewable electricity must be met by:**

- 1. Energy storage plant co-located with renewable energy generation plant; or
- 2. Freestanding energy storage plant

Balancing plant, or other freestanding energy generation plant, that increases the District's carbon emissions, for example those that burn fossil fuels directly, such as gas or fuels derived from oil, will be refused unless it can be demonstrated by the applicant that the proposal is required for the purposes of temporarily supporting energy needs for a specified and limited temporary period of time.

Applications for energy plant utilising virgin plant feedstocks will need to robustly demonstrate that the feedstock will be sourced sustainably.

MM5	<p>Para 107a</p> <p>Para 107b</p> <p>Para 107e</p> <p>Para 107f</p>	<p><b>Through the Local Plan Partial Update there is an opportunity to revise the sustainable construction policies with an aim to achieve net zero construction. Therefore, policy CP2 of the Core Strategy and SCR1 of the Placemaking Plan <del>will be</del> <u>has been</u> replaced with a new sustainable construction policy.</b></p> <p><b>The government is proposing to update part L of the Building Regulations to achieve more energy efficient homes. The new Part L <u>will be called the Future Homes Standard and is planned to be implemented from 2025.</u> In January 2021 the government released their response to the Future Homes Standards Consultation. The results of the consultation have confirmed that local authorities will still be able to set their own standards. The government has stated their intention to bring in the Future Homes Standards in 2025 but the exact method of how carbon reduction will be enacted is still subject to future consultation. <del>As an interim measure the government are now proposing an uplift of 31% above current Building Regulations requirements. This is due to be published in December 2021 and come into effect June 2022.</del> As an interim measure from June 2022, a 31% CO<sub>2</sub> reduction above Part L 2013 must be achieved to comply with Building Regulations requirements.</b></p> <p><b>In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation. <u>Development proposals where offsetting is relied upon to comply with Policies SCR6 and SCR7 should have regard to the Sustainable Construction Checklist SPD and the Planning Obligations SPD. The Sustainable Construction Checklist SPD includes information which may guide the calculation of the residual on-site renewable energy generation (SCR6) and residual carbon (SCR7). The Planning Obligations SPD includes a formula which may be used to calculate the subsequent financial contribution value. The scale of offsetting required must also meet the statutory tests for planning obligations.</u></b></p> <p><b>107f The compliance tools for Building Regulations are not intended to accurately evaluate overheating, so <del>large-scale</del> proposals are <u>encouraged</u> to use the more sophisticated CIBSE (Chartered Institute of Building Service Engineers) standards TM52 for non-residential</b></p>	<p>The amendments clarify how carbon off-setting (only where necessary should a development scheme be unable to achieve zero carbon on-site) will be calculated and delivered via the Sustainable Construction Checklist and Planning Obligations SPD.</p> <p>The amendments include the removal of the overheating assessment and standards. This needs to be reflected in the SA.</p>
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		<del>Applications for 50 dwellings or more are required to demonstrate that the CIBSE TM59 overheating target has been met in the current climate, and a strategy submitted to show how overheating can be mitigated in the future climate</del>	
MM6	Policy SCR7 Sustainable Construction Policy for new Build Non-Residential Buildings	<p><b>Policy SCR7 Sustainable Construction Policy for new Build Non-Residential Buildings</b></p> <p>New build non-residential major development will maximise carbon reduction through sustainable construction measures. Through the submission of an <u>appropriate energy assessment having regard to the Sustainable Construction Checklist SPD</u> <del>a sustainable construction checklist</del> all planning applications will provide evidence that the standards below are met.</p> <p>Major development is to achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2013 (or future equivalent legislation), following the hierarchy set out below.</p> <ul style="list-style-type: none"> <li>• Minimise energy use through the use of energy efficient fabric and services</li> <li>• Residual energy use should be met through connection to a <u>low- or zero-carbon</u> heat network if available.</li> <li>• Maximise opportunities for renewable energy to mitigate all regulated operational emissions.</li> <li>• Residual carbon emissions that cannot be mitigated on site should be offset through a financial contribution to the Council’s carbon offset fund</li> </ul>	The amendments include the removal of the overheating assessment and standards. This needs to be reflected in the SA.
MM7	Para 107i	<p><del>107i.</del><b>107h.</b> Embodied carbon emissions are the carbon emissions resulting from the materials, production, demolition and disposal. An embodied carbon assessment <u>in the context of the LPPU</u> provides details of a building’s materials used in the substructure, superstructure and finishes. This provides a true picture of a buildings carbon impact on the environment.</p> <p><b>Policy SCR8 Embodied Carbon</b></p>	

	<b>Policy SCR8 Embodied Carbon</b>	<b>Large scale new-build developments (a minimum of 50 dwellings or a minimum of 5000m<sup>2</sup> of commercial floor space) are required to submit an Embodied Carbon <u>Assessment having regard to the Sustainable Construction Checklist SPD that demonstrates a score of less than 900kgCO<sub>2</sub>e/m<sup>2</sup> 900kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.</u></b>	
MM8	CP4 District heating	<b>POLICY CP4 DISTRICT HEATING</b> The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the <del>two</del> <b>three</b> "district heating priority areas", indicated on Diagram 19 (Bath Central, <del>and</del> Bath Riverside <del>and</del> Keynsham High Street), and shown in detail in the associated evidence base, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable, <u>or if an alternative zero carbon heat source is proposed.</u>	The amendments ensure the policy is in line with the overall objective to reduce carbon emissions. This needs to be reflected in the SA report.
MM9	Para 132b  SCR 9 EV charging	<b>Electric Vehicle Infrastructure is best provided at the construction stage. This policy seeks to provide electric vehicle infrastructure within new residential and non-residential development where parking is provided. <u>There are grid connection cost exemptions that apply to providing vehicle charging infrastructure which are set out in Building Regulations and outlined in the Transport and Development SPD. Where costs for grid connections of 7kW minimum active and passive charging can be evidenced to exceed £3,600 (per dwelling), an exemption to a supply of slow charge, 16 amp 3.7 kW, single phase power supply active and passive charging may be applicable. Further exemptions may also apply for grid connections for 3.7 kW active and passive charging costing more than £3,600 (per dwelling). <del>The policy will complement the aims set out in the councils On Street Electric Vehicle Charging Strategy.</del></u></b>  <b>New Policy SCR9 Electric vehicles charging infrastructure</b>  <b>New Build Residential Development:</b> <b>All dwellings with one or more dedicated parking space or garage must provide access to electric vehicle charging infrastructure. Further guidance will be set out in the Transport and Development Supplementary Planning Document. Where off street parking is not provided and</b>	The amendments reflect the Building Regulations and provide further explanation on exemptions. The amendments do not affect the findings of the SA report.

		<p>parking is provided on streets within the proposed development <del>proposal</del>, the design and layout of the <u>proposed development</u> should incorporate infrastructure to enable the <del>on-street</del> charging of electric vehicles <u>on the streets within the proposed development</u> which does not compromise any special characteristics of the area, the public realm or the mobility of other users.</p> <p><b>New Build Non-residential development</b> In all non-residential developments providing 1 or more car parking bays, access to electric vehicle charging infrastructure must be provided. Further guidance will be set out in the Transport and Development Supplementary Planning Document.</p> <p><b>Grid Capacity</b> Where the costs of providing the necessary capacity in the local electric grid infrastructure connections to support electric vehicle infrastructure are abnormally high <u>(as defined in the Building Regulations and referenced in the Transport &amp; Development SPD)</u> the applicant must provide evidence to robustly demonstrate why they are not able to comply with the above policy.</p>	
MM10	<b>POLICY NE3:</b>	<p>Sites, Habitats and Species</p> <p>Insert the following text after clause 5. <b><u>For protected species this means:</u></b> <b><u>Adverse impacts on European, UK protected species, UK Priority and locally important species must be avoided wherever possible</u></b> <b><u>(i) subject to the legal tests afforded to them, where applicable; and</u></b> <b><u>(ii) otherwise, unless the need for and benefits of the proposed development clearly outweigh the loss; and</u></b> <b><u>(iii) where impacts have been minimised; and</u></b> <b><u>(iv) it can be demonstrated that it is possible to mitigate and compensate for any loss</u></b></p>	The amendments reflect the findings of the HRA and ensure species are protected, as well as habitats. This needs to be assessed and reflected in the SA report.
MM11	Para 267b	<p><b><u>The Environment Act 2021 aims to improve air and water quality, tackle waste, improve biodiversity and make other environmental improvements. All new development will be required to deliver a 10% increase in biodiversity and this should become mandatory late 2023.</u></b> <b>Biodiversity Net Gain (BNG) is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than</b></p>	The amendments provide further information and outline national exemptions (householder applications and changes of use of existing buildings). Policy NE3a is amended to



	<p><del>before development. The Environment Bill proposes to introduce a 10% mandatory requirement for biodiversity net gain for certain development types, and will set out specific requirements, including use of different DEFRA metrics for major and minor schemes, and the requirement for long term habitat management plans for BNG habitats retained, created or enhanced.</del></p>	<p>replace biodiversity net gain of <i>'at least'</i> to <i>'a minimum of'</i> 10% net gain which is in line with the NPPF reference. The amendments do not affect the findings of the SA report.</p>
Para 267c	<p>Prior to the mandatory BNG requirements coming into effect the Council's BNG policy <u>NE3a</u> will reflect the proposed mandatory measures, including <u>exemptions (see para 267f)</u>, use of the DEFRA metrics and emerging national guidance. The council will also seek use of the 10 BNG Good Practice Principles Biodiversity Net Gain: Good practice principles for development © CIEEM, CIRIA, IEMA, 2016. <u>Development proposals subject to the requirements of Policy NE3a should also have regard to the Council's BNG Guidance Note (which will inform a future BNG SPD) and the Planning Obligations SPD.</u></p>	
Para 267e	<p><del>The Council has prepared a BNG Guidance Note that will inform and be developed into</del> <u>Work is progressing on the a B&amp;NES Biodiversity Net Gain Supplementary Planning Document (SPD) setting out local requirements for delivering biodiversity net gain and opportunities to deliver biodiversity net gain on householder and exempted brownfield sites.</u></p>	
Para 267f (new)	<p><u>For clarity, exemptions for the 10% mandatory BNG requirement include: Any development defined as Permitted Development by The Town and Country Planning (General Permitted Development) (England) Order 2015 (amended 2022); Any development defined as a Householders Development (extensions/alterations/ outbuildings within the curtilage of a residential dwelling); and Change of Use Applications. Policy NE3a and the accompanying BNG Guidance Note encourage and support opportunities to secure BNG on exempted development schemes.</u></p>	
Para 267g	<p><del>267f</del> <u>267g Research will be undertaken to explore It is proposed to take forward introducing a higher requirement of 15% BNG within through preparation of the new full Local Plan Review.</u></p>	
Policy NE3a	<p>New Policy NE3a Biodiversity Net Gain</p>	

		<p>Development will only be permitted for major developments where a Biodiversity Net Gain of <b><u>at least a minimum of 10%</u></b> is demonstrated and secured in perpetuity (at least 30 years) subject to the following requirements:</p> <p>a The latest DEFRA metric or agreed equivalent is used to quantify the biodiversity value of the site predevelopment, post-development after application of the mitigation hierarchy and for any off-site areas proposed for habitat creation or enhancement both pre- and post development.</p> <p>b That the assessment be undertaken by a suitably qualified and/or experience ecologist and is submitted together with baseline and proposed habitat mapping in a digital format with the application.</p> <p>c A management plan will be required, detailing how the post-development biodiversity values of the site and any supporting off-site provision will be secured, managed and monitored in perpetuity.</p> <p>d Any off-site habitats created or enhanced are well located to maximise opportunities for local nature recovery.</p> <p>For minor developments, development will only be permitted where no net loss and appropriate net gain of biodiversity is secured using the latest DEFRA Small Sites metric or agreed equivalent.</p> <p>Opportunities to secure Biodiversity Net Gain on householder developments and exempted brownfield sites will be supported.</p>	
MM12	Para 301.	<p><b>Limited infilling Development</b> in villages within the Green Belt</p> <p>301. There are a number of settlements in the District that are washed over by the Green Belt. <del>These are:</del> The following that have been identified to be a village and have a defined infill boundary are:</p>	The amendments clarify limited infilling in villages within the GB. This needs to be assessed and reflected in the SA report.

		<p><b>Burnett, Chelwood</b>, Chew Magna, Chew Stoke, Claverton, Combe Hay, <b>Compton Dando</b>, Corston, <b>Dunkerton</b>, Englishcombe, Freshford, Hinton Charterhouse, Kelston, Marksbury, Monkton Combe, Newton St. Loe, <b>North Stoke</b>, <b>Norton Malreward</b>, Pensford, Priston, <b>Queen Charlton</b>, Shoscombe, South Stoke, Stanton Drew (including Upper Stanton Drew and Highfields), <b>Stanton Prior</b>, Tunley, Upper Swainswick, Wellow and <b>Woolley</b>.</p>	
Para 302		<p>302. The NPPF confirms that although the construction of new buildings is regarded as inappropriate development in Green Belt, limited infilling in villages is considered an exception to this policy. The <b>Adopted</b> Core Strategy defines ‘infilling’ <del>in relation to housing</del> as the filling of small gaps within existing development <del>e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage, the plot generally being surrounded on at least three sides by developed sites or roads.</del> <u>In respect of housing development it comprises: a) <b>The building of one or two houses on a small vacant plot in an otherwise extensively built-up frontage, and b) The plot is generally surrounded on at least three sides by developed sites or roads. When considering development proposals, the decision maker would still have to conclude whether a proposal constitutes inappropriate development, and if so, should not be approved except in very special circumstances.</b></u></p>	
Para 302a		<p><b>302a.</b>As the NPPF confirms that <u>limited</u> infilling in villages within the Green Belt is not regarded as inappropriate development, infill boundaries <del>were</del> <u>have been</u> defined in consultation with parish councils for all villages washed over by the Green Belt. Infill boundaries have been defined so as to encompass all parts of the village where there are opportunities for <u>limited</u> infill development and to exclude those areas where development would not be infill. As such the infill boundaries define the areas where <u>limited</u> infill development that meets the definition in the Core Strategy would be acceptable in principle to help to avoid dispute over whether particular sites are covered by infill policies and provide certainty as to where new buildings would be acceptable in Green Belt settlements, subject to other material considerations.</p>	
Para 302b		<p><b>302b.</b> <u>The NPPF (paragraph 149) also lists other exceptions to inappropriate development. In determining planning applications the decision-maker will need to decide whether a proposal is</u></p>	

	<p>Policy GB2 <b>LIMITED INFILLING DEVELOPMENT IN GREEN BELT VILLAGES</b></p>	<p><u>inappropriate development in accordance with the NPPF, in which it case it will be refused other than in very special circumstances.</u></p> <p>Policy GB2 <b>LIMITED INFILLING DEVELOPMENT IN GREEN BELT VILLAGES</b></p> <p><del>Development</del> <b>New buildings</b> in villages in the Green Belt will not be permitted unless it <b>is limited infilling or it falls under the exceptions to inappropriate development listed within the NPPF. is limited to infilling and the proposal is located within the defined Infill Boundary.</b> in the case of residential development the proposal is within the defined Housing Development Boundary.</p> <p><u>Proposed limited infill development should be located within a village and will have to meet the definition of infill as set out below to be considered acceptable. The definition of limited infilling is the filling of small gaps in existing development comprising:</u></p> <p><u>a) The building of one or two houses on a small vacant plot in an otherwise extensively built-up frontage; and</u> <u>b) The plot is generally surrounded on at least three sides by developed sites or roads</u></p> <p><u>Forms of development which fall within the other exceptions to inappropriate development set out in NPPF, paragraph 149 will be dealt with consistent with national policy set out in the NPPF.</u></p>	
MM13	Policy H2 HMO	<p>i. If the site is within Bath, and within an area with a high concentration of existing HMOs <del>(as defined in having regard to</del> the Houses in Multiple Occupation in Bath Supplementary Planning Document, or successor document), <del>further changes of use to HMO use will not be supported as they will be contrary to supporting a balanced community;</del></p> <p><u>vi. The HMO property does not achieve an Energy Performance Certificate "C" rating (unless one or more of the exemptions set out in the HMO SPD applies), unless one or more of the following exemptions applies:</u></p> <p><u>a) The cost of making the cheapest recommended improvement would exceed £10,000 (including VAT).</u></p>	The amendments set the exemptions to achieving EPC rating 'C' in Policy H2 rather than solely in the SPD. This needs to be assessed and reflected in the SA report.

		<p>b) <u>Where all relevant energy efficiency improvements for the property have been made (or there are none that can be made) and the property remains below EPC C.</u></p> <p>c) <u>Where the proposed energy efficiency measures are not appropriate for the property due to potential negative impact on fabric or structure.</u></p> <p>d) <u>Where the minimum energy performance requirements would unacceptably harm the heritage significance of a heritage asset.</u></p>	
MM14	370a	<b>370a. Purpose Built Student Accommodation (PBSA) is accommodation built, or converted, with the specific intention of being occupied by students. Such accommodation is usually provided in the form of cluster flats with shared facilities, individual en-suite units, or studios, and relates to buildings which are not classified by planning use class, or licensing, as HMOs.</b>	The amendments provide clarification in regard to need for further student accommodation. This needs to be assessed and reflected in the SA report.
	370b	<b>370b. The Council’s policy framework seeks to address student accommodation needs arising from educational establishments, whilst not prejudicing other economic, environmental and social objectives from being achieved across the district.</b>	
	370c	<b><u>370c. Policy B5 sets out the overall strategy to manage student accommodation. In accordance with the strategy set out by Policy B5, Policy H2A facilitates PBSA on-campus as a first priority, and sets out that it will only be allowed on other sites where a need can be demonstrated. Policies B5 and H2A set out that as a first priority PBSA should be developed on-campus, and that it will only be allowed on other sites where a need can be demonstrated. Policy H2A sets out the policy requirements for all new, extensions to and conversions to PBSA. <del>on sites not allocated for student accommodation, including the demonstration of need in the form of a formal agreement between a developer and an education provider, confirming the number of bed spaces and accommodation type required.</del></u></b>	
	370d	<b><u>370d. The SHMA that underpinned the Core Strategy housing targets acknowledged the complexity of the population growth in Bath due to its large student population and stated that it is appropriate to provide more detailed local projections with more localised considerations. Therefore, the Council has been engaging with both of the city’s Universities to help understand their expected future growth and associated student accommodation requirements and the impact of student growth on wider housing requirements.</u></b>	

370e

370e. The current future growth projections for the University of Bath and Bath Spa University have been analysed to provide information on the additional PBSA bedspaces required in Bath to meet projected growth. The estimated number of additional bedspaces required to facilitate the universities’ future growth over the Plan period is set out in the Authority Monitoring Report for University Growth and Student Accommodation Requirements. The Council will continue to work closely with the two Universities to understand growth projections on an annual basis throughout the Plan period.

370f

370f. Accommodation required for first year students arising from the future growth of Universities will be met by new on-campus PBSA development allocated through policy SB19. It is established practice that the Universities guarantee PBSA accommodation for first year students, but not for second and third year students. This has resulted in the significant expansion of the student lettings market in the form of HMOs.

370g

370g. Any PBSA bedspaces proposed off-campus must either meet the growth-related need of an educational establishment in the District, evidenced by the provision of a formal agreement with the establishment, or meet the need of second and third year university students who would often otherwise reside in Houses in Multiple Occupation (HMOs) across the city.

370h

370h. The following tables show an average cost comparison summary between renting a bedspace within a private PBSA development within the city, renting a university-led PBSA bedspace, and renting a room in a HMO. The first table shows an average cost comparison for PBSA in general, and the second table shows an average cost comparison only for cluster flats taken from the Council’s Topic Paper: Price Comparison Research for Student Accommodation in Bath. The tables reflect the average rental costs for the different product accommodation types in 2021. As the product types vary in terms of what may or may not be included within the prices, such as utilities costs, they are illustrative only and direct comparisons should not be drawn.

<u>Accommodation type</u>	<u>Average cost per person</u>
	<u>per week (2021)</u>

<u>Private PBSA bedspace</u>	<u>£214</u>
<u>University PBSA bedspace</u>	<u>£159</u>
<u>HMO</u>	<u>£125</u>

<u>Accommodation type</u>	<u>Average cost per person per week (2021)</u>
<u>Private PBSA bedspace (Cluster flats only)</u>	<u>£168</u>
<u>University PBSA bedspace (Cluster flats only)</u>	<u>£137</u>
<u>HMO</u>	<u>£125</u>

Para 370i

**370i. In order to meet the needs of second and third year students who would otherwise often reside in HMOs, PBSA developments must meet the requirements of such students with regards and type of accommodation. These students generally have a preference to live as a household with friends, at a cost level similar to renting a HMO. Such accommodation will likely comprise cluster flats with shared facilities.**

Para 370j

**370j. As necessary a condition should be attached to any planning permission for such off-campus accommodation, to ensure that it is provided solely for second and third year students.**

Para 370k

**370k. Policy H2A criterion e) requires development to be well designed to sufficiently meet the needs of its occupiers. The appropriate standard described within the criterion will relate to:**

- **how functional, adaptable, and accessible spaces within the development are;**
- **whether there is sufficient space for furniture, activity and movement;**
- **whether the development comprises adequately sized rooms and convenient and efficient room layouts;**
- **whether the accommodation provides for appropriate levels of amenity, such as consideration of privacy, outlook and natural light; and**
- **whether the development provides adequate facilities for use by occupiers.**

**370l. Policy H2A criterion g) refers to provision of adequate storage for recycling and refuse, having regard to Waste Planning Guidance. Such guidance can be accessed on the Council's**

	<p>3701</p> <p>Policy H2A PBSA</p>	<p>website at the following link: <a href="https://www.bathnes.gov.uk/services/bins-rubbish-and-recycling/waste-strategy-statistics-and-health-safety/waste-planning-guida">https://www.bathnes.gov.uk/services/bins-rubbish-and-recycling/waste-strategy-statistics-and-health-safety/waste-planning-guida</a></p> <p><u>Policy H2A PBSA</u></p> <p><u>Purpose built student accommodation of an appropriate scale and design will be permitted:</u></p> <p><u>a) 1. On allocated sites where student accommodation use is specifically identified within the Development Principles; or</u></p> <p><u>b) 2. Elsewhere in the District (<del>except for areas restricted by policy B5</del>), only where it can be demonstrated that there is a need for additional student accommodation, and subject to the provisions of policy B5. <del>All proposals for new, extensions to, or conversions to,</del> In these locations proposals for Purpose-Built Student Accommodation <del>on sites not allocated for student accommodation,</del> will be required to demonstrate that:</u></p> <p>i. <u>There is a need for additional student accommodation of the type and in the location proposed, evidenced by a formal agreement between the developer and a relevant education provider located within the District, <del>for the supply of bed spaces created by the development; or</del></u></p> <p>ii. <u>The proposed development meets the needs of second and third year university students.</u></p> <p><u>All proposals for Purpose Built Student Accommodation <del>proposals</del> will also be required to demonstrate that:</u></p> <p>ii. <u>a. The proposal will not result in a significant negative impact on retail, employment, leisure, tourism, housing or the council’s wider strategic objectives;</u></p> <p>iii. <u>b. The site is in a location accessible by sustainable transport methods, including to the educational establishment to which it is associated;</u></p>	
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|--|--|---|--|
|  |  | <ul style="list-style-type: none"> <li><del>iv.</del> <u>c. The use of the site for student accommodation is appropriate in relation to neighbouring uses;</u></li> <li><del>v.</del> <u>d. The development will not have an unacceptable impact on the amenity of surrounding residents. A management plan must be provided prior to occupation of the development, to ensure adequate management arrangements have been incorporated;</u></li> <li><del>vi.</del> <u>e. The internal design, layout and size of accommodation and facilities are of an appropriate standard;</u></li> <li><del>vii.</del> <u>f. The proposal provides an appropriate level of car parking having regard to <del>relevant standards</del> the Transport and Development SPD, and provides adequate provision for servicing, pick up and drop off;</u></li> <li><del>viii.</del> <u>g. The proposal provides adequate storage for recycling/refuse and bicycles, <del>in line with relevant standards</del> having regard to Waste Planning Guidance and the Transport and Development SPD;</u></li> <li><del>ix.</del> <u>h. The development has been designed in such a way that it is capable of being re-configured through internal alterations to meet general housing needs in the future if necessary; and</u></li> <li><del>x.</del> <u>i. The proposal accords with other relevant Local Plan policies relating to, but not limited to, impact on the historic environment, high quality design, landscape, transport and access, flood risk and drainage, nature conservation, pollution and contamination, and responding to climate change.</u></li> </ul> |  |
|--|--|---|--|

MM15	387e	For the purposes of this policy, residential development includes <del>student accommodation, co-living, build to rent, specialist housing and older person housing</del> <b>all forms of residential accommodation where Building Regulations under Approved Document M: Volume 1 (dwellings) apply.</b>	The amendment provides further clarification on forms of residential accommodation. The amendments do not affect the content or implementation of the policies in the Plan and do not therefore affect the findings of the SA report.
MM16	ED1B	POLICY ED1B: CHANGE OF USE & REDEVELOPMENT OF <del>B1 (A)</del> OFFICE TO RESIDENTIAL USE  1. Change of use (i.e. conversion) The conversion of office space ( <del>B1a</del> ) to residential C3 is normally permitted development, subject to the exceptions set out in the <del>GPDO</del> <b>GDPO</b> . (which includes listed buildings). The principle of change of use through conversion of listed buildings in office use to C3 residential use is also accepted, <b>subject to the provisions of Policy HE1. provided there is no adverse impact on the significance of the listed building.</b>	The amendments provide further clarity in line with the NPPF. However, the amendments do not affect the findings of the SA report.
MM17	RE1	POLICY RE1: EMPLOYMENT USES IN THE COUNTRYSIDE  Proposals for employment uses in the countryside outside the scope of Core Strategy Policies RA1 and RA2 will be permitted providing they are consistent with all other relevant policies, and involves:  i) replacement of existing buildings; ii) the limited expansion, intensification or redevelopment of existing premises <b>or redevelopment of previously developed land where it is not habitat functionally linked to a European site;</b> and iii) they would not lead to dispersal of activity that prejudices town and village vitality and viability	The amendments will help protect European sites. This needs to be assessed and reflected in the SA report.
MM18	ST2	POLICY ST2: SUSTAINABLE TRANSPORT ROUTES Development which prejudices the use of <del>safeguarded land including</del> former railway land for sustainable transport purposes as shown on the Policies Map will not be permitted.	The policy wording revert back to the original adopted policy. However, the amendments do not affect the findings of the SA report.
MM19	ST2A	POLICY ST2A: <b>Active Travel Routes</b> <del>RECREATIONAL ROUTES</del>	For clarification with regards to references to other documents

		<p>1. Development which adversely affects the recreational and amenity value of, or access to, public rights of way and other publicly accessible routes for walking, cycling and riding will not be permitted, unless any harm can be successfully mitigated.</p> <p>2. A development proposal affecting a publicly accessible recreational <b>active travel</b> route will be expected to maintain and/or incorporate the route within the scheme, <b>provide appropriate enhancements to the route in line with having regard to guidance set out in the Transport and Development SPD</b>, and depending on the location, the Council will seek to negotiate the provision of <b>support</b> additional linkages between urban areas and the wider countryside, open spaces and the River or Canal. <b>Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible and necessary.</b></p> <p>3. Development that adversely impacts on the established <del>cycle</del> <b>active travel</b> routes shown on the Policies Map will not be permitted, unless any harm can be successfully mitigated.</p>	(SPD/guidance) in policies. The amendments do not affect the findings of the SA report.
MM20	ST3	<p>POLICY ST3: TRANSPORT INFRASTRUCTURE</p> <p>Within the context of Core Strategy Policy CP6(1) the development of transport infrastructure will only be permitted provided that the following requirements have been met:</p> <p><b>5) Schemes which propose increases in traffic capacity will also be required to incorporate commensurate appropriate improvements to the sustainable transport network;</b></p>	The amendments to ensure effectiveness. However, the amendments do not affect the findings of the SA report.
MM21	ST7	<p>POLICY ST7 TRANSPORT REQUIREMENTS FOR MANAGING DEVELOPMENT</p> <p>1) Development will be permitted providing the following provisions are met:</p> <p>b) <del>Safe and convenient access to and within the site for pedestrians, cyclists and those with a mobility impairment is provided or enhanced.</del> <b>Walking and cycling assessment and facilities are provided in line with having regard to the Transport and Development SPD, including safe, convenient and inclusive access to and within the site for pedestrians and cyclists;</b></p> <p>2) In the case of new development proposals, facilities for charging plug-in and other ultra-low emission vehicles will be sought <b>in line with having regard to the Transport and Development SPD.</b></p> <p>3) Transport assessments/<u>statements</u> <b>&amp; Travel Plans</b></p> <p>a. Planning applications for developments that generate significant levels of movement should be accompanied by a transport assessment or transport statement in accordance with National</p>	For clarification with regards to references to other documents (SPD/guidance) in policies. The amendments do not affect the findings of the SA report.

		<p>Planning Policy Framework and Planning Practice Guidance. Schemes will be expected to be tested through transport the Council's modelling, as necessary.</p> <p><b>b. Travel Plans will be expected to be provided <u>in line with having regard to the Transport and Development SPD.</u></b></p>	
	<b>Bath</b>		
MM22	<p>Context</p> <p>Para 152d</p> <p>Policy SB8 (Bath Western Riverside)</p>	<p>SB8 <u>Bath</u> Western Riverside</p> <p><b>152d. The second phase of the Bath Riverside development offers great potential to further deliver sustainable connections through the site and with the wider area to the benefit of the city. The route of the former railway line that runs through the site and westwards through the Newbridge Riverside Policy area to connect to the Bristol Bath Railway Path (BBRP) is safeguarded as a Sustainable Transport Route. The delivery of this route through this site is a key requirement. It is also a requirement to provide a direct, well-aligned and high quality crossing over Windsor Bridge Road and to deliver an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists and to link the site with the BBRP. <u>The Council recognises that further work is required at the Development Management stage on the feasibility of the various options for the crossing of Windsor Bridge Road, which may include the assessment of crossing options both at grade and grade separated.</u></b></p> <p>Policy SB8 Bath Western Riverside</p> <p>Development Requirements and Design Principles</p> <p><u>Collectively, across the entire SB8 area, development proposals will:</u></p> <p><b>1 Deliver <u>high density</u> residential development of around 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.</b></p> <p><b>2. Deliver <del>a Primary School,</del> an early years facility and a new community hub with communal facilities to promote healthy lifestyles and community cohesion.</b></p>	<p>Some development requirements and design principles are amended. This needs to be assessed and reflected in the SA report.</p>

~~4 Ensure that new streets and spaces throughout the area are implemented by the developer/s and are to be in accordance with the relevant typology as set out in the Bath Pattern Book.~~

**5.4** Be required to provide a comprehensive Transport Assessment to assess the transport requirements of development proposals. This will need to include a traffic impact assessment modelling the effects of additional transport demand on the Upper Bristol Road and Lower Bristol Road corridors and additional locations to be agreed with the Local Highways Authority. It will also need to investigate which specific infrastructure elements, such as integrating with emerging Metrobus/Mass Transit proposals and the options for crossing Windsor Bridge Road, are feasible solutions for the provision of sustainable transport. Development is to provide comprehensive on and off site transport infrastructure, as found necessary through the Transport Assessment including, but not limited to:

c. Low car development will be supported and must be accompanied by high quality sustainable transport alternatives to car usage and ownership, including ~~integrating with emerging Metrobus / Mass Transit proposals and~~ providing access to electric car club vehicles.

d. Provide a level of car parking ~~consistent with that has regard to~~ the standards set out in the Council's Transport & Development SPD, with any departure from these standards robustly justified on the basis that proposals are an exemplar for sustainable travel.

g. Deliver the Sustainable Transport Route from east to west across the site. This is required to:  
iii. Deliver a direct, well-aligned and high-quality pedestrian and cycle crossing ~~over~~ of Windsor Bridge Road to ~~that~~ connects to the former railway bridge over the river and to the Bath Riverside Site. Modelling will be required to demonstrate the effects of interaction with existing junctions.

~~v. Integrate with emerging Metrobus / Mass Transit proposals. Design of the route should support Mass Transit proposals as they emerge, which may involve direct usage of the route by the Mass Transit scheme.~~

*Amend Clause vi. to clause v.*

**6-5 Retain and enhance green infrastructure and habitats along the riverside edge where possible, providing a biodiversity led approach towards the treatment of this area. Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated.**

**Built form shall be set back from the existing retained or reinstated riverside habitat infrastructure by a buffer of at least 10 metres where feasible. This buffer could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.**

***Amend Clause 7 to clause 6***

**8 7 Provide and implement a bird and bat enhancement strategy to deliver a minimum of 20 nest or roost site per apartment block, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.**

***Amend Clause 9, 10, 11, 12 to clause 8, 9, 10 and 11***

**13-12 Not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints as set out in the WHS Setting SPD; and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response and to influence the height, massing and design of buildings. The Bath Building Heights Strategy (BBHS) should be used as part of the evidence base and the starting point for this analysis which must also include a detailed Landscape and Visual Impact Assessment (LVIA). The BBHS identifies this site as being within zone 3 – the Valley Floor and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.**

		<b><i>Amend Clause 14 to 13.</i></b>	
MM23	167h	<p><b>167h. This is the area allocated for a Creative Industry Hub where Bath Spa University and businesses will work together to increase local growth and innovation. The Hub aims to:</b></p> <ul style="list-style-type: none"> <li>• Encourage universities to strengthen their roles as strategic partners in local growth</li> <li>• Stimulate development of <u>employment space including incubator or 'grow-on' space for small businesses</u> in locations that encourage businesses to interact with universities and to innovate, as well as some higher education teaching space.</li> </ul>	The amendments provide further clarity on the use of employment and teaching space. New clause 10 will help retain and enhance green infrastructure. This needs to be assessed and reflected in the SA report.
	Policy B3g Strategic Policy for Twerton and Newbridge Riverside	<p><b>Policy B3g Strategic Policy for Twerton and Newbridge Riverside Clause 2(g)</b></p> <p><b>Bath Spa University Locksbrook Campus (Policy SB22) is located within the Newbridge Riverside. There are significant opportunities for new development increasing activity in creative industries and improving the retention of graduates.'</b></p>	
	Policy SB22 Creative Hub	<p><b>Policy SB22 Creative Hub</b></p> <p><b>1. Provide a mixed use development comprised of employment space <del>including incubator units and 'grow-on' space, and teaching space,</del> and higher education teaching space associated with Bath Spa University which can also be used as studio space with access to specialist equipment and facilities for start-up businesses and workspaces for local people, academics and students.</b></p> <p><del><b>2. Ensure that teaching space is designed and managed to be available as flexible workspace that is offered to small and medium enterprises on reasonable terms. The economic benefit to the city especially for industrial uses will need to be demonstrated.</b></del></p> <p><b><i>Update subsequent clause numbering. Amend clause 3, 4, 5, 6, 7, 8 and 9 to 2, 3, 4, 5, 6, 7 and 8.</i></b></p> <p><b><u>New clause 9</u></b></p> <p><b><u>10. Retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding</u></b></p>	

		<b><u>function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</u></b>	
MM24	SB23 Weston Island	<b>4. Respond to the restrictions on lightspill from development that has regard to <del>set out in</del> the Waterspace Design Guidance (June 2018) “Protecting Bats in Waterside Development”</b>	For clarification with regards to references to other documents (SPD/guidance) in policies. The amendments do not affect the findings of the SA report.
MM25	SB14 Twerton Park	Delete the duplicate words, as follows: <b><u>‘Development proposals will: <del>Development proposals will:</del>’</u></b>  <b>9. The site must be designed to prioritise pedestrian and cycle movements over vehicles and minimise conflict between users, whilst accommodating vehicle movements necessary for the successful commercial operation of the football club and the proposed additional development. The <del>masterplan</del> layout for the site as a whole must maximise permeability for pedestrians and cyclists and connect well with the wider transport network.</b>	The amendments make the policy clearer and effective. However, the amendments do not affect the findings of the SA report.



MM26	Paras 214	<p>214. The Trust's <b>ongoing priorities in updating the Estate Strategy</b> are to provide fit for purpose accommodation <b>to meet the clinical and operational needs</b>, demolishing unsuitable and outdated buildings, improving the sustainability of the Estate, <b>and</b> co-locating functions to cluster <b>complementary</b> uses, <del>delivering a parking strategy that will improve on-site parking, improving wayfinding throughout the site, reducing off-site parking impacts and encouraging the use of sustainable modes of travel.</del> <b><u>B&amp;NES will work collaboratively with the Trust on this Estates Strategy with a view to achieving a mutually agreeable outcome and including reference to it in the new Local Plan.</u></b></p>	Some development requirements and design principles are amended. This needs to be assessed and reflected in the SA report.
	Paras 214a	<p><b><u>214a. To complement the Estates Strategy, the Trust will also develop a Sustainable Transport Strategy for the whole site that will reflect its commitment to being a sustainable organisation that is fit for the future. In addition, and complementary to measures to reduce travel demand and travel planning, this will support the transition to the use of more sustainable modes of travel by identifying measures that improve safe and suitable active travel routes, and supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces. B&amp;NES will also commit to working collaboratively with the Trust on this document.</u></b></p>	
	Para 215	<p><b><u>215. Central to delivering the Trust's long term vision and objectives, and complementary to the Sustainable Transport Strategy, is an approach that seeks to improve integrated parking solutions and car park management across the site and maximises the efficient use of land. It will also is an overarching car park strategy for the campus that improves the current parking, site efficiency and circulation arrangements across the site (numbers, rationalisation of car parks and sign posting) and supports the vision as set out in the 2014 Estate Strategy. Potential off-site parking impacts on adjoining residential areas should be analysed and addressed as appropriate. Parking for bicycles and cars should be provided with reference to the Transport and Developments SPD, for both residential and clinical uses.</u></b></p>	
	Paras 215a	<p><b><u>215a. Much has been achieved with the new visitor car park opening in 2016 and wider Trust initiatives including the Travel Plan encouraging changes to staff travel behaviour and modal shift. However, increases in staff, patient numbers, forecast population growth and associated healthcare service demands requires the site wide parking strategy, including the potential for decked car parking, to be reviewed as part of the Estate Strategy update Sustainable Transport Strategy. The Trust is continually assessing how best to improve access to site and implementing</u></b></p>	

	<p>improvements, its ability to deliver significant modal shift is tied in significantly to the council strategy and approach. This is acknowledged by the council and a collaborative approach is to be taken.</p> <p><b>Policy SB18 (RUH)</b></p> <p><b>Policy SB18 for RUH</b></p> <p>1. The Council supports the improvement of this essential healthcare facility, including the principles and proposed building programme and proposals for car parking as set out in its Estate Strategy 2014. <u>The Council will work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District’s healthcare clinical needs and estate renewal.</u></p> <p><u>3a Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&amp;NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriately.</u></p> <p>Development proposals <u>in the vicinity of the Manor House</u> must:</p> <p><u>5a. Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</u></p> <p><del>7. Set out a sustainable transport masterplan for the whole of the RUH site.</del></p> <p><del>8. 7. Examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate necessary enhancements to ensure that the walking and cycling are the natural choices for local trips. Specific opportunities for investigation and delivery as necessary to support safe and suitable access to the proposed development should include, but are not be limited to, the following:</del></p> <p><del>a. Pedestrian improvements at the Weston Lane/Crown Road/High Street junction;</del></p>	
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- ~~b. Pedestrian crossing facilities at the Weston Lane/Combe Park junction;~~
- ~~c. Cycle linkages with recently delivered LCWIP improvements through Weston Village; and~~
- ~~d. Active travel linkages between the site and the Riverside Path to the south.~~

~~9. Provide parking for bicycles and cars in line with the parking standards in the Transport and Developments SPD, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land. Contributions to a Residents Parking Zone (RPZ) may be required as part of parking solutions for the site.~~



designed to respect the landscape and historic sensitivity of the site. Vehicle and active travel access will need to be segregated. Development proposals will be expected to enhance the pedestrian and cycle environment for north-south movements, broadly along the alignment of Winifred's Lane at the eastern side of the site. This is likely to be through providing a route within the site, which is likely to require the relocation of the existing telecommunications unit at the junction of Sion Hill and Winifred's Lane, but options to reduce traffic flows and speeds along Winifred's Lane to make the route safe and suitable for pedestrians and cyclists should also be investigated, within the context of the objectives of the Liveable Neighbourhood Project. Routes through the site must include appropriate connections to the wider walking and cycling network, including safe crossings where necessary.

**10. Development proposals must ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road. A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose ~~and deliver~~ solutions as appropriate. Measures for investigation and delivery where necessary should include, but not be limited to:**

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Amend annotation on concept diagram 26 to remove orange arrow showing location of potential works to Winifred Lane. See amended diagram below:



MM28 SB25 St Martins Hospital

**SB25 St Martins Hospital**

**1. Ensure a comprehensive mix of uses across the site, comprising the delivery of around 50 residential dwellings, and the continued use of the south-eastern section of the site for clinical health services, and use of the Chapel of St Martin for a use which conserves the heritage significance of the building.** Any application for the conversion or redevelopment of buildings within the site to non-clinical uses shall be supported by evidence to show that they have been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.

**8. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers, subject to provision of these features ensuring the conservation of the heritage significance of the heritage assets within the site.** Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.

**11. Examine the pedestrian and cycle routes between the site and key local facilities and make appropriate necessary enhancements to ensure that the walking and cycling are the natural choice for local trips. This should include, but not be limited to:**

The amendments include ensuring conservation of heritage assets. This needs to be assessed and reflected in the SA report.

		<p><b>11.b Upgrade to crossing over Frome Road at the entrance to <del>Fosseway Infant and Primary School</del> <u>St Martin's Garden Primary School</u> to include widening to accommodate shared pedestrian/cycle use;</b></p> <p><b>12. Parking for bicycles and cars will need to be provided <del>in line with current parking standards</del> <u>accordance with policy ST7</u>, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land.</b></p>	
MM29	Policy SB19 The University of Bath at Claverton Down (Including the Sulis Club)	<p><b>Development Framework Plan</b></p> <p><del>The strategy seeks the development of around 870 study bedrooms and 48,000 sq.m. of academic, research and support space at the Claverton Campus to address the potential long-term development needs of the University of Bath.</del></p> <p><u>The following development principles and parameters will ensure that the development capacity of the Claverton Campus is optimised within the context of the environmental constraints in seeking to provide around 870 study bedrooms and 48,000 sq.m. of academic, research and support space, together with associated infrastructure to address the University's potential long-term development needs.</u></p> <p><b>4. South Car Park (Area3)</b></p> <p>The southern edge of the multi storey car park should not adversely affect the residential amenity of properties to the south <del>and special regard should be given to the design of the development in this area and the quality of views from The Parade and from outside the campus.</del></p> <p><b>7.Green Infrastructure and Landscape (the University Park, Green corridor and green open space)</b></p> <p><del>Biodiversity will also be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds.</del></p>	<p>The amendments through the Main Modifications include some factual update which help further clarify the policy requirements and improve effectiveness.</p> <p>The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</p> <p>This needs to be assessed and reflected in the SA report.</p>

## 8. Sports facilities

The loss of playing fields resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location consistent with national policy (NPPF para 99b).

The provision of the 3G pitch ~~will~~ would meet that requirement by significantly increase increasing the capacity and quality of the pitch provision across the campus. Responding to environment and health related concerns a precautionary approach must be taken and a completely recyclable ~~3G~~ pitch and natural crumb will be required unless it is demonstrated not to be feasible.

f) In all circumstances the design response should be evidenced as contributing positively to a campus wide strategy for green infrastructure, landscape and ecology (particularly in respect of protected species of Bats) ~~such as the Landscape and Ecological Management Plan~~. These matters should be intrinsic to development, which should enable the creation, protection, enhancement and management of networks affecting the campus. If it is necessary to cause harm to a network, this should be minimised and suitable compensatory measures must be made within the campus.

The implementation of the campus GI Strategy and Landscape and Ecological Management Plan (which will be updated periodically) is required to enhance the Green Infrastructure within the campus.

New development proposals should identify how Green Infrastructure, landscape and ecological assets within and around the development site have been addressed, any harm minimised / mitigated, and where appropriate enhanced, or localised green infrastructure linkages provided.

Biodiversity will also be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds.



~~g) As part of a campus wide strategy and to implement its Travel Plan a~~All development proposals should enable ~~and encourage~~ sustainable transport choices to be made travelling to, and from and within the campus. ~~This should be delivered as part of a campus wide approach to sustainable travel including the active implementation of an up to date Travel Plan.~~ This includes retaining but not increasing an ~~or reducing the current~~ operational level of car parking ~~(about 2,200 spaces)~~ of not more than 2,200 spaces so as not to harm the patronage of sustainable transport modes, their viability, or cause additional car trips to and from the campus.

~~h~~Decked parking as part of any reorganisation of parking supply and/or optimising development capacity should meet the design related criteria of this and other policies, ~~including the B&NES Transport & Development SPD. Proposals to provided decked car parking will need to be accompanied by robust justification of the level of parking proposed, including e-bike parking, Blue Badge, cycle and ULEV, including demonstration of suitable measures aimed at reducing the demand for campus parking.~~

~~g) Travel demand to and from the campus will be actively managed through the University's academic offer and operations, the provision of PBSA on-campus and by enabling and encouraging the use of sustainable modes of travel. A campus-wide approach is required including the implementation of an up- to-date Travel Plan, that should include suitable measures which reduce the demand for car parking on the campus. The operational level of car parking (about 2,200 spaces) should be maintained or reduced to avoid additional car trips and to protect the patronage and viability of sustainable travel modes. Proposals for decked parking as part of the reorganisation of the parking supply and optimising development capacity on the campus should include provision for blue badge, ULEV and bicycles (including ebikes)~~

~~i~~h.~~Apart from the Area 2 (current Eastern field playing field) which is identified for redevelopment following the rationalisation of the playing pitches and the provision of a 3G pitch, the loss of publicly accessible playing pitch capacity -----~~

~~j. becomes i. and q. becomes j.~~

Should put a revised map as the current map is not showing the public rights of ways correctly



MM30  
Policy SB26  
Transport  
Interchanges

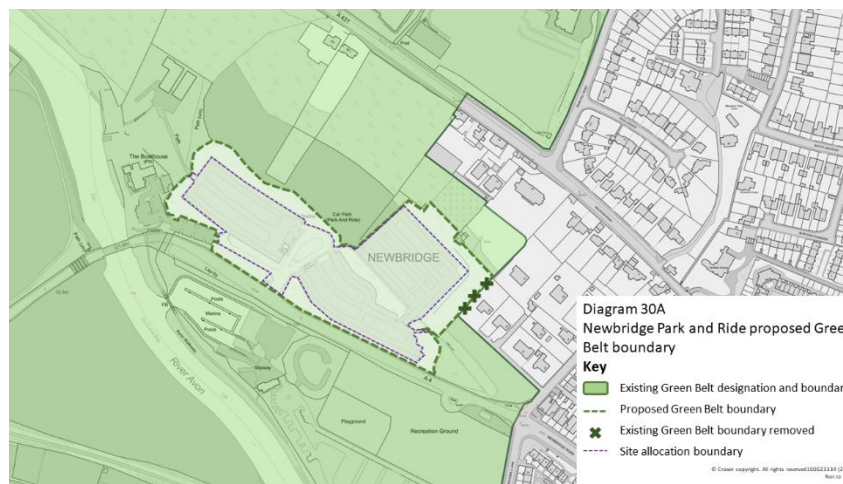
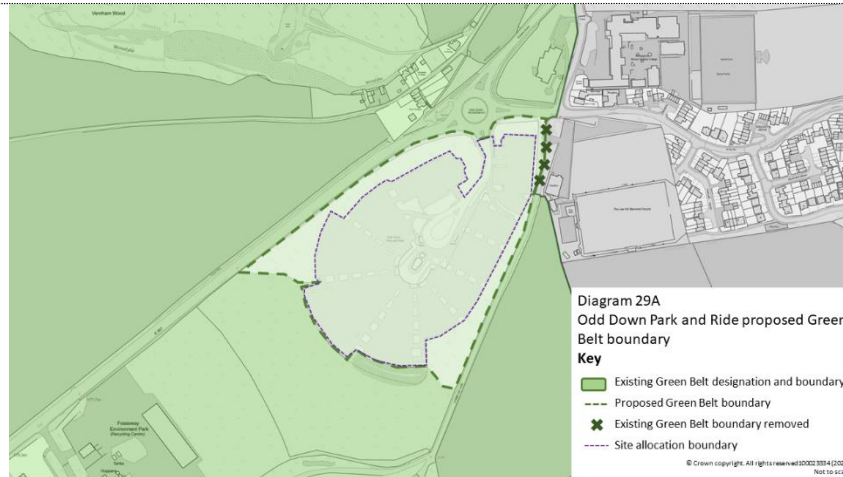
**1. Deliver multi-modal transport interchanges, the appropriate uses for which are set out in the supporting text for policy ST6 of the Local Plan Partial Update include, but are not limited to, safe and secure cycle parking; electric bike hire and charging; micro mobility such as e-scooters; walking infrastructure and wayfinding; electric vehicle charging; last mile freight consolidation; and coach parking and interchange with a range of public transport services including the integration of local bus services.**

**4. Be contained within the areas of the sites removed from the Green Belt, and that are allocated for Transport Interchange use as specified on the Policies Map. already developed for Park and Ride use and removed from the Green Belt, as specified on the Policies Map.**

Insert after criterion 10:

Some development requirements and design principles are amended. This needs to be assessed and reflected in the SA report.

**11. Explore and deliver measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats.**



<b>Keynsham</b>			
MM31	KE2B Riverside and Fire Station Site	<p><b>Policy KE2B</b></p> <p><b>Clause 1. Provide residential development (C3 use class) and <del>around 2,500sqm of B1 office Class</del> <u>Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre.</u></b></p>	This needs to be assessed and reflected in the SA report.
MM32	Para 96	<p>National planning policy makes it clear that when altering Green Belt boundaries consideration should be given as to whether land needs to be safeguarded to meet longer term development needs. At south west Keynsham it is not considered there is any scope to identify safeguarded land. Policy KE3B <b>identifies</b> safeguarded land at East of Keynsham for development beyond the end of the plan period <b>or following a review of the Local Plan. This review has taken place and through this partial update of the Local Plan the previously safeguarded land is allocated for development under Policies KE3C and KE3D.</b></p>	This needs to be assessed and reflected in the SA report.
MM33	Para 96a	<p><b>Context</b></p> <p><b>Para 96a. The 2017 Placemaking Plan analysed the highways capacity in Keynsham and concluded that mitigation would need to be delivered prior to allocating further housing growth. Hence this land was safeguarded but not allocated</b></p>	Some development requirements and design principles are amended. This needs to be assessed and reflected in the SA report.

	<p>Para 96b.</p> <p>KE3C Keynsham East</p>	<p>for future housing. It has however been removed from the Green Belt.</p> <p>Para 96b. Mitigation opportunities have been reviewed following the Climate and Ecological Emergency Declarations to ensure that they meet the Council's requirements to maximise sustainable transport improvements. This has included identifying measures <u>in the 'Sustainable Transport Strategy for Safeguarded Land at Keynsham' (August 2021)</u> which will also shift some existing car trips to sustainable modes in order to release capacity for additional housing growth in advance of major strategic interventions such as metrobus and Mass Transit. Thus, the Council's position remains that mitigation is required to deliver growth, but the content of the mitigation package has been updated to meet the requirements of the Climate Emergency, enabling the safeguarded land to be allocated for much needed housing.</p> <p><u>Policy KE3C Keynsham East</u></p> <p>8. Be accompanied by a Travel Plan and Transport Assessment, which assesses in detail the mitigation requirements of an individual site, <u>in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. Prior to first occupation in</u> Mitigation proposals for the site must investigate, and provide as necessary <del>deliver, but not be limited to,</del> the following:</p> <ul style="list-style-type: none"> <li>a. Improved frequency of public transport services along the A4;</li> <li>b. Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;</li> <li>c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and Keynsham Town Centre. This <del>could</del> <u>must</u> include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre; and</li> <li>d. New active travel connection between the A4 and the Bristol Bath Railway Path via Clay Bridge, World's End Lane.</li> </ul> <p>9. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested</p>	
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		<p>before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland <u>unless it can be clearly demonstrated by the applicant that a reduced buffer would adequately protect the woodland.</u></p>	
MM34	<p>Para 96c</p> <p>Para 96d.</p> <p>Policy KE3D Keynsham East</p>	<p><b>Context</b>  <b>Para 96c.</b>The 2017 Placemaking Plan analysed the highways capacity in Keynsham and concluded that mitigation would need to be delivered prior to allocating further housing growth. Hence this land was safeguarded but not allocated for future housing. It has however been removed from the Green Belt.</p> <p><b>Para 96d.</b> Mitigation opportunities have been reviewed following the Climate and Ecological Emergency Declarations to ensure that they meet the Council’s requirements to maximise sustainable transport improvements. This has included identifying measures <u>in the ‘Sustainable Transport Strategy for Safeguarded Land at Keynsham’ (August 2021)</u> which will also shift some existing car trips to sustainable modes in order to release capacity for additional housing growth in advance of major strategic interventions such as metrobus and Mass Transit. Thus, the Council’s position remains that mitigation is required to deliver growth, but the content of the mitigation package has been updated to meet the requirements of the Climate Emergency, enabling the safeguarded land to be allocated for much needed housing.</p> <p><b>Policy KE3D Keynsham East</b></p> <p><b>6.</b> Be accompanied by a Travel Plan and Transport Assessment, which assesses in detail the mitigation requirements of an individual site <u>in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. <del>Prior to first occupation in</del> Mitigation proposals for the site must <u>investigate, and provide as necessary deliver, but not be limited to,</u> the following:</u></p> <p><b>a.</b> Improved frequency of public transport services along the A4;  <b>b.</b> Enhanced local town centre bus services connecting the development site with the town more widely and providing an opportunity to interchange with metrobus and Mass Transit Services;</p>	<p>Some development requirements and design principles are amended. This needs to be assessed and reflected in the SA report.</p>

		<p>c. LCWIP route improvements to LTN1/20 standards within Keynsham, specifically between the development location, Wellsway School, and Keynsham Town Centre. This <del>could</del> <b>must</b> include segregated pedestrian and cycle provision on the south side of the A4 between Grange Road and Broadmead Roundabout, and onward comparable provision along Bath Road to the Town Centre;</p> <p>d. New active travel connection between the A4 and the Bristol Bath Railway Path via Clay Bridge, World's End Lane;</p> <p>e. The creation of a public footpath between KE3C and KE3D, connecting at Manor Road Community Woodland; and</p> <p>f. <del>Upgrade of the footpath connection to Windrush Road to allow cycling – this will entail altering the section of footpath in the existing residential areas to become a Bridleway via a TRO. A contribution to improve the existing footpath connection to Windrush Road, including to enable cycle access.</del></p> <p>7. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed. The substantive retention of internal and boundary hedgerows, with 10-15m habitat buffers is expected. Protective buffers of at least 25m are expected around the LNR woodland <u>unless it can be clearly demonstrated by the applicant that a reduced buffer would adequately protect the woodland.</u></p>	
	<b>Somer Valley</b>		
MM35	SSV9 Old Mills	<p><b><u>SSV9 OLD MILLS INDUSTRIAL ESTATE (Incorporating Somer Valley Enterprise Zone</u></b></p> <p>7. Development of <del>some retail</del>, food &amp; drink units (use classes <del>E(a), (b)</del>), ancillary retail (use class <u>E(a)</u>) and a hotel (use class C1) will be supported if of a scale, type and format that does not harm, but complements, nearby town centres and that benefits the attractiveness and operation of the Enterprise Zone.</p>	The amendments through the Main Modification are for clarity. Some minor adjustments are made to the appraisal matrix.
	Volume 6		
MM36	Contents	21 Table 5 Saved Local Plan policies <del>made obsolete</del> <b>deleted</b> by the Placemaking Plan	Editorial amendments which do not affect the findings of the SA report.

MM37	Table 5	Table 5: Saved Local Plan policies from the B&NES Local Plan (2007) no longer required and <del>will be obsolete with</del> <b>deleted by</b> the adoption of the Placemaking Plan	Editorial amendments which do not affect the findings of the SA report.																		
MM38	New Table 8	New table 8 Remove ST2 as it is reverted back to the original policy.	Editorial amendments which do not affect the findings of the SA report.																		
MM39	New Table 9	<b>New Table 9 Core Strategy/Placemaking Plan policies that will be <del>obsolete</del> deleted in the Local Plan Partial Update</b>	Editorial amendments which do not affect the findings of the SA report.																		
MM40	New Table 11	<b>Table 11: Saved Bath &amp; North East Somerset Council Local Plan policies that are now <del>obsolete</del> deleted (i.e. no longer form part of the Development Plan)</b>	Editorial amendments which do not affect the findings of the SA report.																		
MM41	Appendix 3 New table listing Strategic policies	<p><b><u>Appendix 3: Local Plan Strategic Policies</u></b></p> <table border="1"> <tr> <td><b><u>Volume 1 - District-wide Strategy and Policies</u></b></td> </tr> <tr> <td><b><u>DW1 District-wide spatial Strategy</u></b></td> </tr> <tr> <td><b><u>RA1 Development in the villages meeting the listed criteria</u></b></td> </tr> <tr> <td><b><u>RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria</u></b></td> </tr> <tr> <td><b><u>SD1 Presumption in favour of Sustainable Development</u></b></td> </tr> <tr> <td><b><u>CP1 Retrofitting Existing Buildings</u></b></td> </tr> <tr> <td><b><u>SCR6 Sustainable Construction for New Build Residential Development</u></b></td> </tr> <tr> <td><b><u>SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</u></b></td> </tr> <tr> <td><b><u>CP3 Renewable Energy</u></b></td> </tr> <tr> <td><b><u>CP4 District Heating</u></b></td> </tr> <tr> <td><b><u>CP5 Flood Risk Management</u></b></td> </tr> <tr> <td><b><u>CP6 Environmental Quality</u></b></td> </tr> <tr> <td><b><u>HE1 Historic Environment</u></b></td> </tr> <tr> <td><b><u>NE2 Conserving and Enhancing the Landscape and Landscape Character</u></b></td> </tr> <tr> <td><b><u>NE3 Sites, Habitats and Species</u></b></td> </tr> <tr> <td><b><u>CP7 Green Infrastructure</u></b></td> </tr> <tr> <td><b><u>CP8 Green Belt</u></b></td> </tr> <tr> <td><b><u>CP9 Affordable Housing</u></b></td> </tr> </table>	<b><u>Volume 1 - District-wide Strategy and Policies</u></b>	<b><u>DW1 District-wide spatial Strategy</u></b>	<b><u>RA1 Development in the villages meeting the listed criteria</u></b>	<b><u>RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria</u></b>	<b><u>SD1 Presumption in favour of Sustainable Development</u></b>	<b><u>CP1 Retrofitting Existing Buildings</u></b>	<b><u>SCR6 Sustainable Construction for New Build Residential Development</u></b>	<b><u>SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</u></b>	<b><u>CP3 Renewable Energy</u></b>	<b><u>CP4 District Heating</u></b>	<b><u>CP5 Flood Risk Management</u></b>	<b><u>CP6 Environmental Quality</u></b>	<b><u>HE1 Historic Environment</u></b>	<b><u>NE2 Conserving and Enhancing the Landscape and Landscape Character</u></b>	<b><u>NE3 Sites, Habitats and Species</u></b>	<b><u>CP7 Green Infrastructure</u></b>	<b><u>CP8 Green Belt</u></b>	<b><u>CP9 Affordable Housing</u></b>	The amendment clarifies which policies are considered as strategic policies in line with the NPPF. This does not directly affect the content or implementation of the policies in the Plan and do not therefore affect the findings of the SA report.
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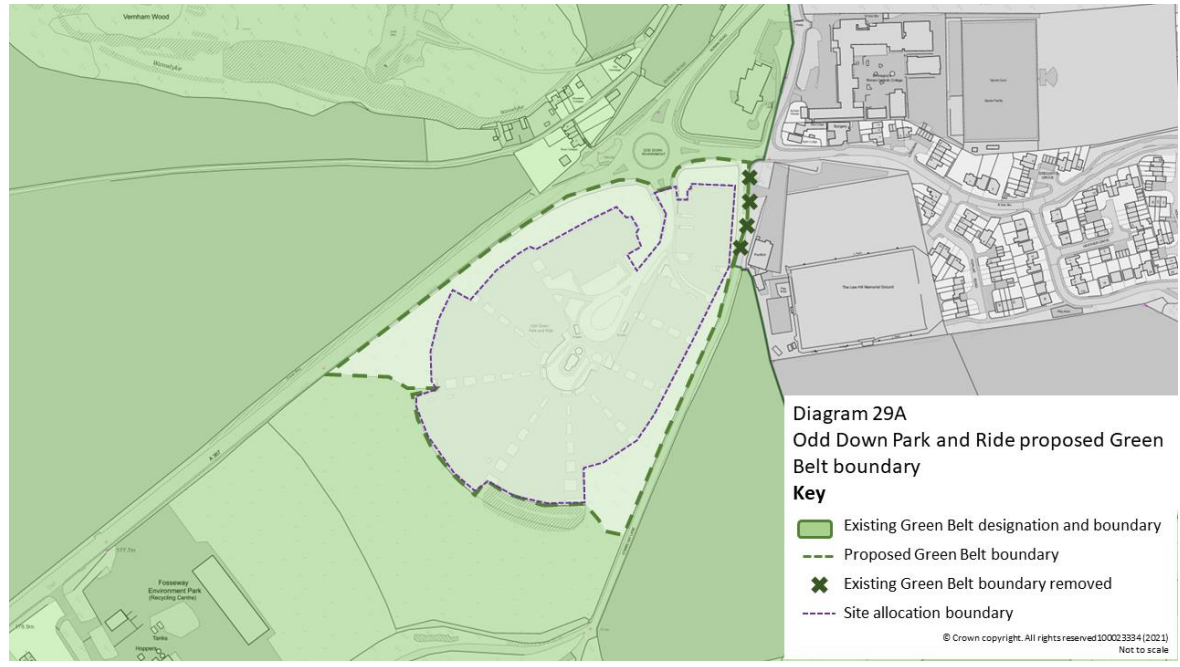
	<u>RA4 Rural Exceptions Sites</u>		
	<u>CP10 Housing Mix</u>		
	<u>CP11 Gypsies, Travellers and Travelling Showpeople</u>		
	<u>RA3 Community Facilities and Shops</u>		
	<u>ED2A Strategic (*) and other primary industrial estates</u>		
	<u>CP12 Centres and Retailing</u>		
	<u>ST1 Promoting sustainable travel and Healthy Streets</u>		
	<u>CP8a Minerals</u>		
	<u>CP13 Infrastructure Provision</u>		
	<u>Volume 2 - Bath</u>		
	<u>B1 Bath Spatial Strategy</u>		
	<u>B4 The World Heritage Site and its setting</u>		
	<u>B2 Central Area Strategic Policy</u>		
	<u>SB4 – Bath Quays North &amp; Bath College</u>		
	<u>SB7 – Green Park Station West &amp; Sydenham Park</u>		
	<u>SB8 Western Riverside</u>		
	<u>B3 Strategic Policy for Twerton and Newbridge Riversides</u>		
	<u>SB11 – Former MoD Fox Hill Park</u>		
	<u>B5 Off-Campus Student Accommodation and Teaching Space</u>		
	<u>SB19 University of Bath at Claverton Down</u>		
	<u>SB26 – Park and Ride Sites</u>		
	<u>B3a Land adjoining Odd Down, Bath Strategic Site Allocation</u>		
	<u>Volume 3 - Keynsham</u>		
	<u>KE1 Keynsham Spatial Strategy</u>		
	<u>KE2 Town Centre/Somerdale Strategic Policy</u>		
	<u>KE2a Somerdale</u>		
	<u>KE3a: Land adjoining East Keynsham Strategic Site Allocation</u>		
	<u>KE3c – East of Keynsham – Former Safeguarded Land</u>		
	<u>KE3d – East of Keynsham Former Safeguarded Land</u>		
	<u>KE4 Land adjoining South West Keynsham Strategic Site Allocation</u>		

<b>Volume 4 - Somer Valley</b>
<b><u>SV1 Somer Valley Spatial Strategy</u></b>
<b><u>SV2 Midsomer Norton Town Centre Strategic Policy</u></b>
<b><u>SV3 Radstock Town Centre Strategic Policy</u></b>
<b><u>SSV9 Old Mills Industrial Estate</u></b>
<b>Volume 5 - Rural Areas</b>
<b><u>RA5 Land at Whitchurch Strategic Site Allocation</u></b>

MM42 Annex 1

SB26 Odd Down Park and Ride

See the assessment for each policy.



SB26 Newbridge Park and Ride



SB26 Lansdown Park and Ride

