Sustainability Appraisal (SA) for the Bath and North East Somerset Local Plan

Interim SA Report (accompanying Regulation 18 consultation)

Bath and North East Somerset Council

February 2024

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Quality information

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Revision History

Revision	Revision date	Details	Name	Position
V1	28 Nov 2023	Draft work in progress for client input	NCB	Technical Director
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1. Introduction

1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Bath and North East Somerset Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.[1]

SA explained

1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).[2]

1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".[3] The report must then be considered, alongside consultation responses, when finalising the plan.

1.4 More specifically, the SA Report must answer the following three questions[4]:

1. What has plan-making/ SA involved up to this point?
   - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this current stage?
   - I.e., in relation to the Options Document.
3. What happens next?
   - What are the next steps for plan-making and SA?

This SA Report

1.5 This Interim SA Report is published alongside the Local Plan 2022-2042 Options Document, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and, as such, each of the three questions for the SA (see para 1.4) is answered in turn below, with a discrete 'part' of the report dedicated to each.

1.6 Before answering Question 1, two initial questions are answered to provide further context: i) What is the Local Plan trying to achieve? and ii) What is the scope of the SA?

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012) and subsequent revisions (2023). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic).
[3] Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004
[4] See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the Local Plan seeking to achieve?

2.1 This chapter of the report sets out the priorities for the Local Plan. Once adopted, the Bath and North East Somerset Local Plan will set out the framework to guide and shape development in the district up to 2042. It will replace the existing Core Strategy (2014), Placemaking Plan (2017), and Local Plan Partial Update (2023) that form the current local planning policy framework for the district.

Local Plan spatial priorities

2.2 The Council has identified spatial priorities for the Local Plan which shape and articulate what it is that the Local Plan will achieve. These priorities are informed by the key issues and challenges identified within the Plan and link with the Council's Corporate Strategy. The spatial priorities are:

"Our Local Plan will plan for development in response to local needs to create attractive, healthy, and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- *Create a fairer, more prosperous, and sustainable economy.*
- *Maximise the delivery of housing that is affordable.*

In doing so, our plans for development must:

- *Enable B&NES to become carbon neutral by 2030 and mitigating/ adapting to climate change.*
- *Protect and enhance nature through facilitating nature recovery.*
- *Improve health and well-being outcomes for all, including through planning healthier places and providing for cultural enrichment.*
- *Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities.*
- *Respect, conserve, and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath.*
- *Align the timely provision of transport, health, social, cultural, and green infrastructure with development."*

3. What is the scope of the SA?

3.1 The aim here is to introduce the reader to the scope of the SA, i.e., the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) the SA.

3.2 Further information on the scope of the SA - i.e., a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix B**.

Consultation on the scope

3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "*When deciding on the scope and level of detail of the information that must be included in the Environmental Report* [i.e., the SA scope], *the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.[5] As such, these authorities were consulted on the SA scope in March 2023. Since that time, the SA scope has evolved as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2023. It should be noted that updated scoping information is presented in **Appendix B** of this SA Report.

SA framework

3.4 **Table 3.1** below presents the SA framework.

Table 3.1 SA Framework

SA theme	SA objective	Appraisal questions
Health and wellbeing	Improve the health and well-being of all communities and create healthy places	• Make it easy to reach everyday destinations including essential services (e.g. schools, workplaces, homes, shops, community facilities) by "active" travel e.g. through high quality cycling, wheeling, and walking infrastructure? • Create opportunities to engage in structured sport, play, leisure, and informal recreation? • Create a healthy and sustainable food environment, including the provision of allotments and community gardening? • Maintain or increase access to existing open/green/blue space, improve existing natural spaces, and in areas of deficiency, provide new green spaces? • Promote inclusive design which supports social interaction for all ages, including

[5] In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

SA theme	SA objective	Appraisal questions
		the needs of those with sensory and mobility impairments? • Consider possible suicide prevention measures (Preventing Suicide in England example)? • Provide adequate supporting health services and improved access to healthcare including through sustainable transport provision?
Housing	Meet identified needs for sufficient, high-quality housing including affordable housing	• Provide viable and deliverable good quality housing and affordable housing to meet the full objectively assessed housing needs? • Help to significantly boost the supply of housing? • Mixed size, type, and tenure development? • Address housing needs of older people i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes? • Delivery of housing that meets local needs, including wheelchair accessible housing, and elderly persons housing?
Communities	Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime	• Connection with existing communities? Prevention of community severance e.g. new road or development dividing a community in two? • Streets and the public realm are safe, attractive, and accessible for all ages and levels of disabilities, promoting use and enhancing safety? • Range of sports and leisure facilities and pitches designed and maintained for use by the whole community? • Provision of a range of appropriate and accessible community, social and cultural facilities? • Amenities and facilities are accessible for all e.g. people with mobility problems or a disability, parents with young children, older people? • Design out crime and promote a feeling of security through better design e.g. well-lit spaces, natural surveillance, limit non-overlooked areas? • Promotion of public spaces that might support civic, cultural, recreational and community functions?

SA theme	SA objective	Appraisal questions
		• Design of the public realm which maximises opportunities for social interaction and connections within and between neighbourhoods? • Lead to co-created spaces with local people, particularly groups who are seldom heard?
	Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services.	• Lead to direct or indirect benefits for groups with protected characteristics? • Reduce barriers to access to housing services and facilities? • Ensure that decisions are inclusive? • Improve the quality of the living environment, particularly within areas of higher deprivation? • Ensure that areas and communities which require greater attention and need of services are accommodated? • Support and promote social inclusion and social cohesion? • Encourage local participation and active engagement?
Economy	Build a strong, prosperous and fairer economy and enable local businesses to prosper	• Enhance educational and training opportunities / skills? • Support inclusive development that enables access to economic opportunities for all? And opportunities to meet the district's employment needs? • Retain business and space and commercial land? • Provide an adequate increase in supply of land and diverse range of employment opportunities? • Support the expansion and diversification of business? • Correct imbalances between residential and employment development to reduce in / out commuting? • Support the prosperity and diversification of the district's rural economy? • Support the visitor economy, arts and culture and further develop civic pride and pride in the community? • Contribute to the regions' ambition to be a driving force for clean and inclusive growth? • Increase energy efficiency in businesses and provide for innovative energy production?

SA theme	SA objective	Appraisal questions
		• Enable town centres to enhance vitality and viability, by promoting mixed-use spaces; and providing public realm and utility improvements? • Improve digital connectivity?
Transportation	Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	• Reduce the need to travel by car and prioritise 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? • Ensure new cycle and pedestrian paths are linked with existing / wider networks to ensure connectivity? • Deliver traffic management and calming measures to help people feel safe & confident to walk & cycle, whilst helping to reduce and minimise road injuries? • Incorporate electric vehicle charging points into new developments or ensure they can be retrofitted? • Provide access to major employment areas by active travel or public transport? • Prioritise modes of transport in the below order: ○ Walking ○ Cycling ○ Public transport ○ Private cars • Provide access to healthcare services by active travel or public transport?
Landscape	Protect and enhance local environmental distinctiveness and the character and appearance of landscapes	• Protect areas of landscape and townscape character and distinctiveness? • Avoid harmful impacts on all landscapes? • Ensure that great weight is attached to conserving and enhancing the landscape and scenic beauty of designated National Landscapes (formerly AONBs) with reference to their special qualities? • Include the Setting of City of Bath WHS in relation to protection of the OUVs and their attributes especially those relating to landscape? • Deliver development which values and protects diversity and local

SA theme	SA objective	Appraisal questions
		distinctiveness including cultural distinctiveness such as rural ways of life and local history and traditions? • Deliver well-designed development and places that are well related and provide physical connection to the surrounding townscape/landscape? • Deliver well-designed places and new development which creates high-quality townscapes and landscapes, including within streets, and includes GI, SUDs, and open spaces? • Ensure that soils within new developments are protected and managed as a vital living natural capital resource which will underpin the delivery of high-quality landscapes?
Historic environment	To conserve and enhance the historic environment, heritage/ cultural assets and their settings	• (For listed buildings) Have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it proposes? • (For Conservation Areas) Pay special attention to the preservation or enhancement of the character of the surrounding conservation area? • Conserve and/or enhance heritage assets, or better reveal their significance, their setting, and the wider historic environment (including World Heritage Site designations, Scheduled Monuments, and Historic Parks and Gardens)? • Ensure heritage assets have viable uses consistent with their conservation? • Give great weight to a heritage asset's conservation (and the more important the asset, the greater weight)? • Avoid any harm to or loss of the significance of a designated heritage asset, unless clear and convincing justification is provided? • Consider the effect of development on the significance of non-designated heritage assets including locally listed heritage assets and assets identified on the Historic Environment Record?
Biodiversity	Conserve and	• Has the mitigation hierarchy been used to avoid and minimise impacts?

SA theme	SA objective	Appraisal questions
	enhance the condition and extent of Biodiversity in the district	• Does development deliver biodiversity net gains at at least 10%? • Avoid potential impacts on designated sites (international, national, local)? • Avoid potential impacts for or loss of ancient woodland and aged or veteran trees? • Avoid any net loss, damage to, or fragmentation and positive enhancement of designated and undesignated wildlife sites protected species and priority species? • Conserve, restore and/ or re-create priority habitats? • Incorporate biodiversity into the design e.g. street trees, green corridors, linking open space etc? • Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced? • Enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery network? • Incorporate spaces for protected species that are reliant on buildings for nesting sites, including swifts, swallows, and martins? • Maximise the use of native species with wildlife value in planting? • Ensure new lighting will not impact on biodiversity?
Natural resources	Reduce land, water, air, light, and noise pollution	• Minimise increase in traffic congestion? • Deliver development that minimises exposure to poor air quality and noise pollution? • Contribute to measures identified in the Air Quality Management Plans? • Remediate contaminated sites? • Avoid locating development of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity? • Locate development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available? • Minimise increase in light pollution?

SA theme	SA objective	Appraisal questions
		• Protect the natural thermal spring under County of Avon Act 1982? • Conserve, protect, and enhance water resources? • Encourage the effective use of brownfield land if it is not of high environmental value? • Protect grades 1- 3a agricultural land from development?
Climate change	Reduce vulnerability to, and manage flood risk (taking account of climate change)	• Deliver development which supports and corresponds with appropriate flood risk management guidance including applying natural solutions and a sequential approach and policies for any form of flooding including surface water flooding? • Avoids development in areas vulnerable to the impacts of climate change (e.g. flood plains)? • Promote best practice for SuDs?
	Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change	• Reduce greenhouse gas emissions and eliminate fossil fuel use in new development? • Deliver development designed to be resilient to a 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 infrastructure? • Facilitate the supply of local food and increase provision of food growing spaces, i.e., allotments, community farms, and farmers markets? • Improve existing building energy efficiency? • Encourage and enable community resilience and preparedness to extreme events (e.g. community heat refuges)?
	Encourage careful, efficient use of natural resources including energy and encourage sustainable construction	• Limit embodied carbon emissions? • Increase renewable energy generation? • Deliver water efficient design and reduce water consumption, including rainwater harvesting? • Deliver development that demonstrates sustainable design and construction including efficient use of materials? • Deliver development that maximises energy efficiency?

SA theme	SA objective	Appraisal questions
		• Facilitate low carbon community infrastructure such as district heating?

Waste	Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	• Facilitate and enable the shift to a low-carbon and circular economy principles:
		  ○ Designing out waste and pollution
		  ○ Keeping products and materials in use
		  ○ Regenerating natural systems
		• Promote sustainable markets for recycling of materials?
		• Provide adequate provision of waste management facilities and where possible include measures to help to reduce the amount of waste generated by development?
		• Provide facilities to recover and repair existing materials and products?
		• Deliver housing developments designed with adequate space provision for recycling & waste containers?

SA scope and Local Plan objectives

3.5 The compatibility of the SA objectives and Local Plan objectives are explored below using a simple 'red, amber, green' (RAG) method explained below:

- Red 'R': Incompatible objectives
- Amber 'A': Some potential for conflict
- Green 'G': Compatible objectives

3.6 A summary narrative is provided following this assessment.

Table 3.1: Compatibility of SA and Local Plan objectives

SA objectives	Local Plan objectives: Enable B&NES to become carbon neutral by 2030 and mitigating/ adapting to climate change	Protect and enhance nature through facilitating nature recovery	Improve health and wellbeing outcomes for all, including through planning healthier places and providing for cultural enrichment	Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities.	Respect, conserve, and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath.	Align the timely provision of transport, health, social, cultural, and green infrastructure with development.
Improve the health and well-being of all communities and create healthy places	G	G	G	G	G	G
Meet identified needs for sufficient, high-quality housing including affordable housing	A	A	G	A	A	G
Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime	G	G	G	G	G	G
Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services.	A	G	G	G	A	G
Build a strong, prosperous and fairer economy and enable local businesses to prosper	A	G	G	A	A	G
Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	G	G	G	G	A	G

SA objectives	Local Plan objectives Enable B&NES to become carbon neutral by 2030 and mitigating/ adapting to climate change	Protect and enhance nature through facilitating nature recovery	Improve health and wellbeing outcomes for all, including through planning healthier places and providing for cultural enrichment	Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities.	Respect, conserve, and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath.	Align the timely provision of transport, health, social, cultural, and green infrastructure with development.
Protect and enhance local environmental distinctiveness and the character and appearance of landscapes	G	G	G	G	G	A
To conserve and enhance the historic environment, heritage/ cultural assets and their settings	A	G	G	G	G	A
Conserve and enhance the condition and extent of Biodiversity in the district	G	G	G	G	G	A
Reduce land, water, air, light, and noise pollution	G	G	G	G	G	G
Reduce vulnerability to, and manage flood risk (taking account of climate change)	G	G	G	G	G	G
Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change	G	G	G	G	G	G
Encourage careful, efficient use of natural resources including energy and encourage sustainable construction	G	G	G	G	G	G
Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	G	G	G	G	G	G

SA objectives	Local Plan objectives: Enable B&NES to become carbon neutral by 2030 and mitigating/ adapting to climate change	Protect and enhance nature through facilitating nature recovery	Improve health and wellbeing outcomes for all, including through planning healthier places and providing for cultural enrichment	Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities.	Respect, conserve, and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath.	Align the timely provision of transport, health, social, cultural, and green infrastructure with development.
Improve the health and well-being of all communities and create healthy places	G	G	G	G	G	G

3.7 Most objectives are compatible, with only a few areas where the potential for conflict is identified. This largely relates to delivering new homes, infrastructure, and jobs growth, which will need to be sensitively located to avoid conflicts arising with other objectives (e.g., avoiding impacts on the most sensitive landscape areas and designated and non-designated heritage assets).

Part 1: What has plan-making/ SA involved to this point?

4. Introduction (to Part 1)

4.1 In line with regulatory requirements, there is a need to explain how work has been undertaken to develop and then appraise reasonable alternatives, and how the Council will consider the appraisal findings when developing the Local Plan.

4.2 This part of the report presents information regarding the consideration of reasonable alternatives, with alternatives explored in relation to both the spatial strategy and policy framework. This information is important given regulatory requirements.[6]

4.3 Alternatives are being developed to address the regulatory requirements, but it is recognised that the Local Plan Options Document is at an early stage of development (considering options) and the Local Plan options will be refined (and alternatives updated) in later plan and SA stages.

Structure of this part of the report

4.4 This part of the report is structured as follows:

- **Chapter 5** – presents the reasons for selecting the alternatives dealt with at this stage.
- **Chapter 6** – presents a summary of the appraisal of the alternatives, and
- **Chapter 7** – explains the Council's approach moving forward.

[6] There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

5. Establishing reasonable alternatives for growth

5.1 This chapter explains how the policy context and evidence base was drawn on to establish reasonable alternatives for appraisal and then consultation at this Regulation 18 'issues and options' stage of plan-making. Ultimately, the aim of this chapter is to present "*an outline of the reasons for selecting the alternatives dealt with*", in accordance with regulatory requirements.

5.2 This chapter is structured under the following questions:

- How much growth needs to be delivered?
- Where could growth be located?
- What other policy considerations are there? and
- What reasonable alternatives can be identified at this stage?

How much growth needs to be delivered?

5.3 This section explores housing and employment growth needs for the district in the period up to 2042.

Housing needs

5.4 The Local Plan needs to align with the NPPF, which, since 2018, requires the use of a standardised method for calculating housing needs as a starting point.

5.5 Using the standard method for calculating housing need and the latest affordability data, the current indicative housing need for the district equates to **725 dwellings per annum**, or a total of **14,500 homes** over the plan period 2022 – 2042.

5.6 A 20% buffer is required where there has been significant under delivery of housing over the previous three years, measured using the Housing Delivery Test. However, data for Bath and North East Somerset indicates that delivery rates have been met and exceeded and the 20% buffer is not required on this basis.

5.7 LPAs can exceptionally use a locally based assessment of need that still needs to be based on demographic projections and take account of market signals. Such a local assessment for B&NES results in a similar, albeit slightly lower, figure. Therefore, the B&NES LP will likely be based on and respond to standard method figure of need.

5.8 The Local Housing Needs Assessment (LHNA) identifies an overall affordable housing need of around 2,600 dwellings for Bath City and 2,400 dwellings for the rest of B&NES to be delivered over the 20-year plan period 2022-2042, equivalent to 77% of the LHN for Bath City and 31% in the rest of B&NES. This shows that affordable housing needs are acutely higher in Bath City. The forecasted housing needs are broken down further to account for Purpose Built Student Accommodation (PBSA) and C2 accommodation

5.9 Additional specialist housing needs that must be planned for include those of gypsies, travellers, and travelling showpeople. Opinion Research Services (ORS) have undertaken an initial update to the 2021 Gypsy and Traveller Accommodation Assessment (GTAA) to provide an estimate of needs over the plan period (up to 2042). This assessment sets out a requirement for an additional 2 pitches and recommends intensification of existing private pitches to meet this need.

Existing commitments

5.10 The plan period runs from 2022 to 2042 overlapping with the adopted plan period which runs up to 2029. Therefore, there are existing permissions and allocations which are counted as existing commitments. At this stage of plan-making, around 6,250 new homes are counted as existing commitments, expected to be delivered in the early part of the plan period, that will contribute towards meeting the total need for 14,500 homes.

Housing needs outside the district

5.11 Under the Duty to Cooperate local authorities are required to respond to and assist in meeting the unmet needs arising in neighbouring areas where it is reasonable to do so having regards to the principles of sustainable development.

5.12 It is recognised at this stage that Bristol is unable to meet its forecasted housing needs in full within its city boundary. In its most recent Publication Draft Local Plan, Bristol City Council identified a shortfall (or unmet need) of around 10,500 homes and has formally written to its neighbouring authorities (B&NES, North Somerset Council, and South Gloucestershire Council) to request that they accommodate a proportion of these unmet needs. B&NES Council response to this request will be considered through the preparation of the Local Plan.

5.13 The other authorities surrounding B&NES have confirmed that they are seeking to meet their objectively assessed need for housing within their own administrative areas.

Employment growth needs

5.14 Whilst options are presented through the Options Document for protecting existing employment land, intensifying existing employment areas and potential allocations for new space, further work will be required in preparing the Local Plan (and SA) to assess whether and how the evidence based space requirements are met.

5.15 At this stage, the emerging Economic Strategy indicates that B&NES has a resident workforce that is highly skilled and unemployment levels are low. The district is home to some nationally leading and significant businesses and economic sectors, but the evidence indicates that the economy is under performing and median wage levels are low.

5.16 A key issue for the Local Plan will be ensuring a sufficient supply of employment land over the plan period, in locations that can stimulate continued investment and growth. Key evidence underpinning the Local Plan indicates a lack of supply of suitable employment sites and premises currently contributes

to a relatively weak economic performance over recent years, including a substantial under-supply of industrial floorspace. Firms have reporting being unable to locate or expand in the area, and some companies have relocated outside of the district to find suitable accommodation. Most notably, these challenges are acute within the city of Bath sub-area.

5.17 Challenges are also identified for the rural economy, which include poor public transport and digital connectivity, social isolation and unequal access to essential goods and services. Notably, there is a need for more local employment and sustainable travel options for rural communities.

5.18 At this stage, the Council have outlined the approach to future economic growth which draws upon the principles of Doughnut Economics to deliver balanced action targeted at three areas: infrastructure, innovation, and opportunity. It is expected that focus will be paid to developing a green economy and leading in green inclusive growth, addressing an ongoing need to deliver more office, industrial and warehousing, and hybrid business spaces. In response to the pandemic and increased levels of hybrid working, there is also a recognised need to support high-quality spaces that attract workers back into the office.

Where could growth be located?

5.19 This section explores growth potential across the district and explores the site options emerging at this stage.

Context for future growth

5.20 There are key sensitive areas across the district that need to be considered in the context of future growth. These are considered in turn below.

Bath World Heritage Site

5.21 The City of Bath is exceptional in having two UNESCO inscriptions. In 1987 it was inscribed for its hot springs, Roman archaeology, Georgian buildings, and natural landscape setting. In 2021 a second inscription was received as one of the Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. The entire city is covered by the status and the former municipal city boundary forms the site boundary. The Council have also identified a buffer around the boundary, where development will likely impact upon its setting.

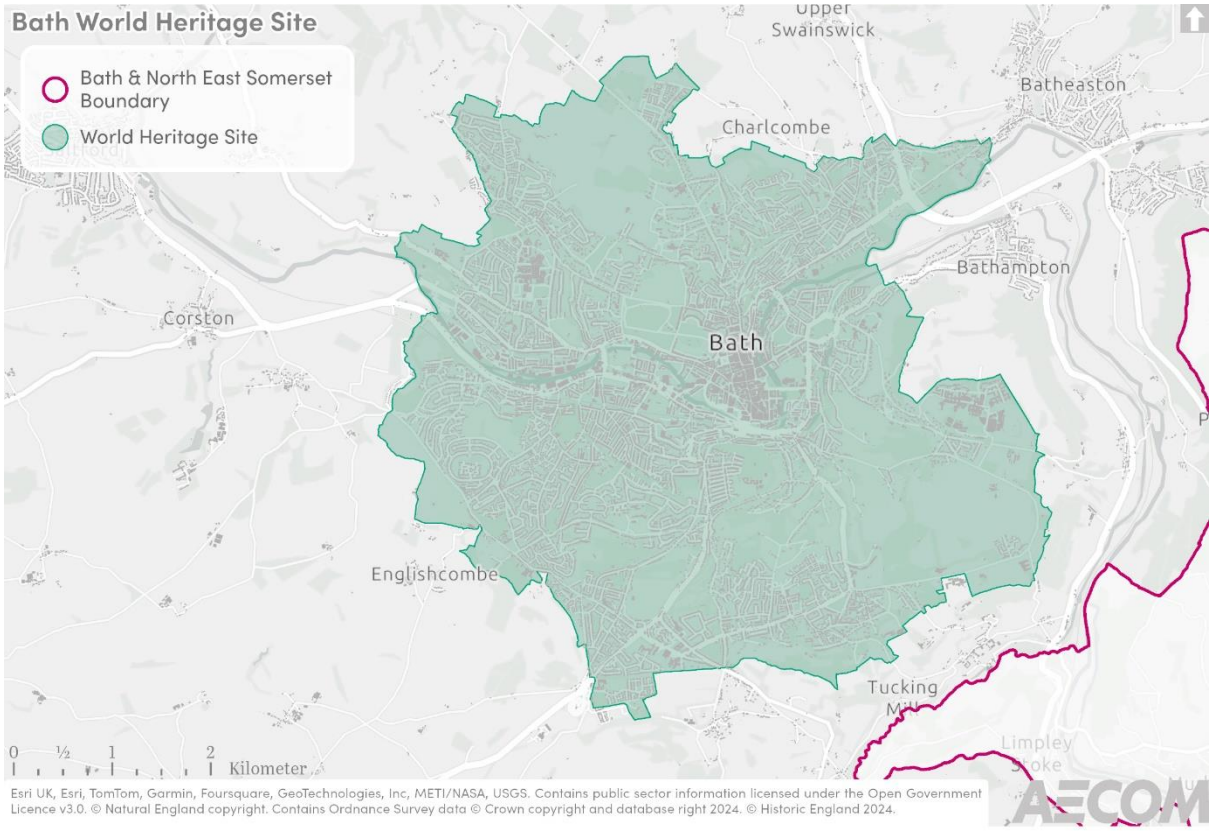
5.22 The NPPF identifies that World Heritage Sites are of highest significance and an irreplaceable resource. It states that "*great weight should be given to the asset's conservation*." Furthermore, any substantial harm to or loss of World Heritage Sites should be "*wholly exceptional*" (NPPF Paras 205 & 206).

5.23 Additionally, UNESCO has its own guidance for assessing impacts[7] which operates independently of any individual country's planning system. What this means is that UNESCO will also consider the impact of a development (planned or built) on the World Heritage Site, and should any future development undermine the Outstanding Universal Value[8] of the site, the status

[7] Guidance and Toolkit for Impact Assessment in a World Heritage Context
[8] Outstanding universal value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

may be revoked. This can happen regardless of whether the development was considered acceptable in terms of the NPPF and local plan policies.

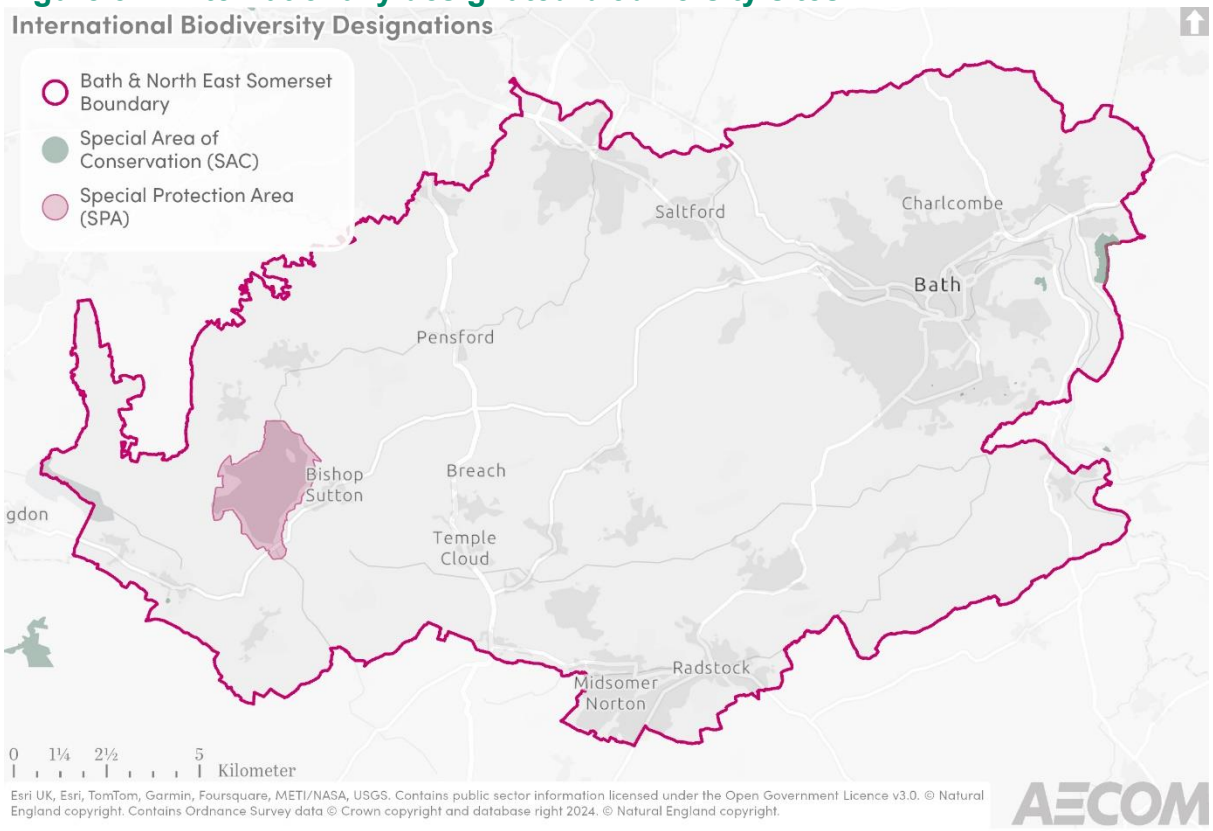
Figure 5.1: Bath World Heritage Site and its indicative extent



Internationally designated sites for biodiversity

5.24 There are internationally designated biodiversity sites within and surrounding the district. Notably, within the district is the Chew Valley Lake Special Protection Area (SPA) and the Bath & Bradford-on-Avon Bats Special Area of Conservation (SAC) (multiple small sites). A small portion of the North Somerset and Mendip Bats SAC is within the south of the district, but predominantly lies nearby in Somerset. A Habitats Regulations Assessment (HRA) is being developed to support the Local Plan and will inform the significance of effects in relation to the integrity of internationally designated sites for biodiversity (and feed into the SA).

Figure 5.2: Internationally designated biodiversity sites

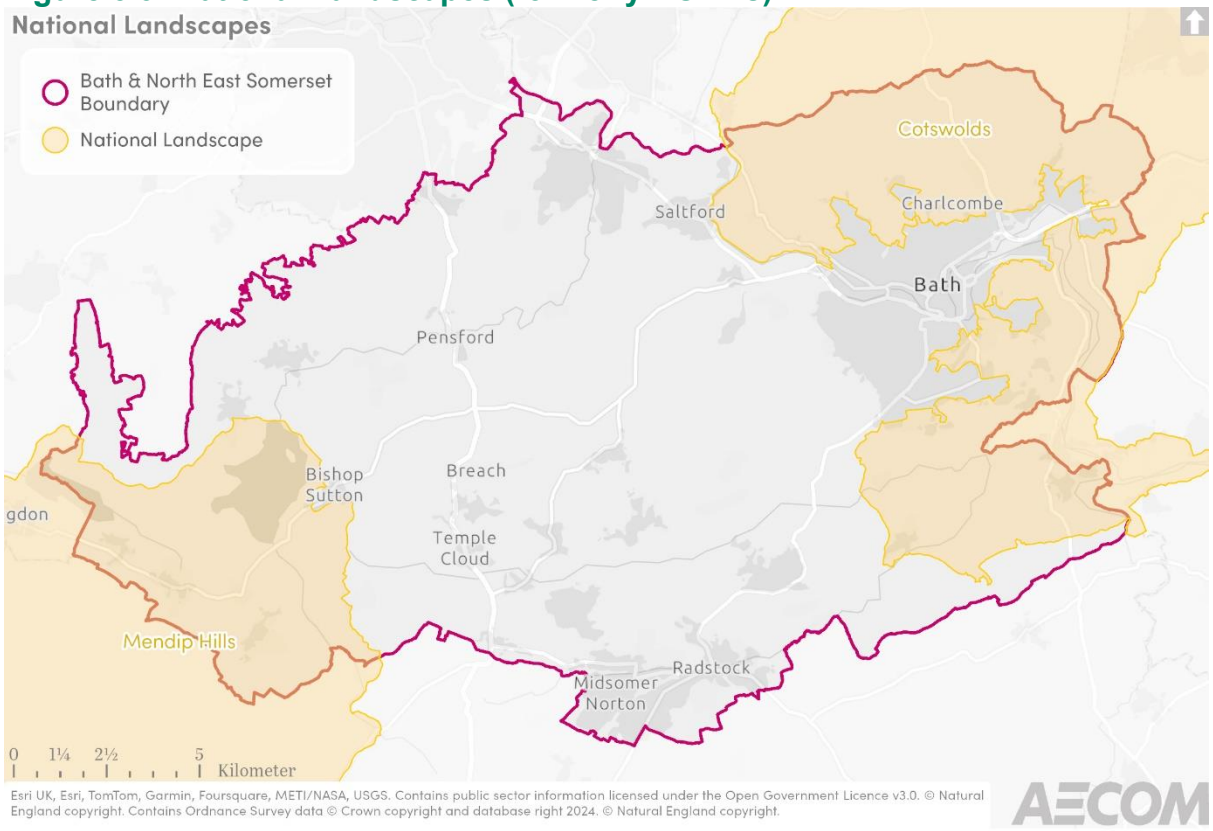


National Landscapes (formerly AONBs)

5.25 National Landscapes, formerly known as Areas of Outstanding Natural Beauty (AONBs), are nationally important sites designated for conservation due to their significant landscape value. The recent name change to National Landscapes has sought to elevate the sites to place them alongside their larger and more well-known counterpart National Parks. The district forms part of two National Landscapes: Cotswolds in the north and east, and Mendip Hills in the south-west. The government also recently announced the declaration of the new Mendip 'super' National Nature Reserve (NNR) spanning Cheddar Gorge and the Mendip Hills, bringing together 31 existing nature reserves and more than 400ha of new land which will be managed primarily for conservation.

5.26 The NPPF identifies that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and that "*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues*" (NPPF Para 182). When considering major development within these areas, permission should be refused other than in exceptional circumstances (NPPF Para 183).

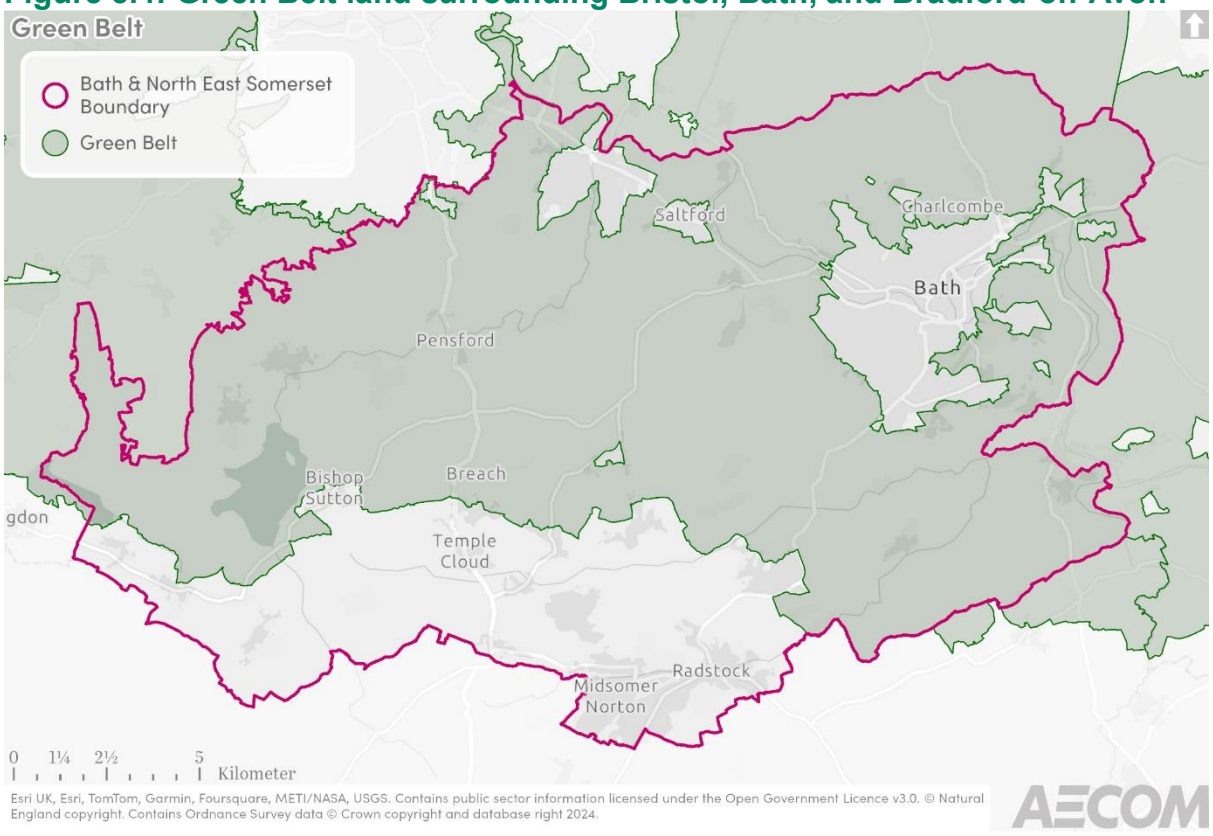
Figure 5.3: National Landscapes (formerly AONBs)



Green Belt land

5.27 Designated Green Belt land surrounds Bristol, Bath, and Bradford-on-Avon, covering nearly 70% of the district and washing over most of the settlements (see Figure 5.4). The NPPF (Para 142) identifies that "*The Government attaches great importance to Green Belts*" and that (Para 145) "*the essential characteristics of Green Belts are their openness and their permanence*". It goes on to state that "*Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.*" The Green Belt in B&NES has remained largely unchanged, although land was removed principally on the edge of Bath, Keynsham, and Whitchurch for development through the B&NES Local Plan (2007), Core Strategy (2014), and Local Plan Partial Update (2023).

Figure 5.4: Green Belt land surrounding Bristol, Bath, and Bradford-on-Avon



HELAA

5.28 The Housing and Economic Land Availability Assessment (HELAA) has taken a range of identified sites in the district (some 600 sites either submitted by landowners, developers, or other stakeholders, or identified by the Council where land in sustainable locations has not been submitted) and assessed their suitability, availability, and achievability. The potential development capacity and trajectory of site assessed as suitable, available, and achievable is also identified. Those sites identified as suitable, available, and achievable over the plan period have been considered further by the Council as they refine options for the Local Plan Options Document and have been considered separately as alternatives for the purposes of SA.

SA GIS analysis of sites

5.29 All suitable, available, and achievable HELAA sites have been subject to a high-level 'quantitative' GIS analysis. This does not seek to assess the potential significance of effects for each of the sites, but rather is intended to indicate potential high-level constraints and opportunities that should be scrutinised further in assessment of growth alternatives ('qualitative' analysis).

5.30 The method for this assessment and the assessment outcomes are presented in **Appendix C**. This work has also produced individual proforma outputs for each site assessed, which are provided in a separate technical annex to this report and linked via Appendix C.

Key settlements

5.31 There are key settlements across the district that provide a reasonable level of services and facilities and are considered relatively well connected by sustainable transport modes. These areas are considered separately (in turn below) to the remaining rural areas, which are considered later in this section.

5.32 The key settlements are explored through the SA for their strategic growth potential (i.e., potential for larger scale contributions to housing supply). This recognises that the key settlements are likely to be the focus for most of the growth over the plan period.

5.33 There is an assumption that small and medium sites emerging within settlement boundaries or utilising brownfield land, would be prioritised as part of any future growth strategy dependent upon the outcomes and recommendations of the HELAA (given these are deemed appropriately connected and accessible areas). Furthermore, sites that have known insurmountable issues are discounted as reasonable alternatives and these are identified within the settlement narratives as appropriate.

5.34 The following sections set out the alternatives identified for each of the district's key settlements, followed by summary SA findings.

5.35 For each of the alternatives, the assessment has examined likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects. Where appropriate neutral effects, or uncertainty have also been identified. Numbers are used to highlight the alternatives that are preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where alternatives perform equally and cannot be differentiated between.

Bath City and environs

5.36 In terms of its potential to contribute strategically to future growth in the district, Bath is notably constrained by its World Heritage Site status and the surrounding Cotswold National Landscape. Landscape and heritage sensitivity studies are being developed, which will ultimately inform the significance of effects for growth options around Bath (and the potential for growth to align with the NPPF and international objectives), and the SA provides support by exploring wider impacts relating to other sustainability objectives.

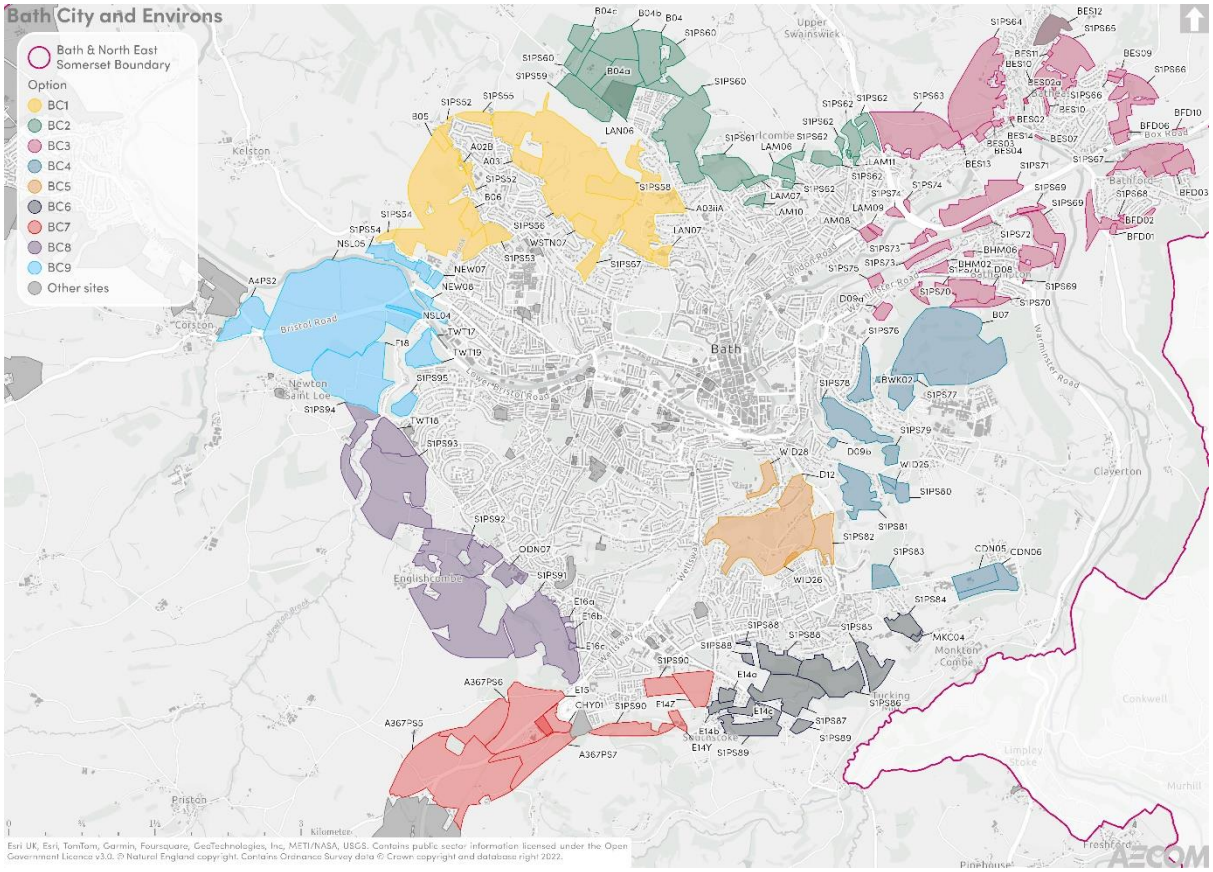
5.37 Most notably, potential growth options (and growth sites) surround the city, such that alternatives exist at every point of the compass. On this basis, the SA has sought to group sites according to a coherent landscape character areas.

5.39 The settlement growth alternatives emerging for Bath City and environs are as follows:

- **Option BC1** – Growth within Landscape Character Area ELV1 (Sites S1PS54, S1PS53, S1PS52, B06, A02B, B05, S1PS55, A03i, S1PS56, S1PS58, A03iiA, WSTN07, S1PS57, LAN07)
- **Option BC2** - Growth within Landscape Character Area ELV2 (Sites B04c, S1PS60, B04a, B04b, B04, S1PS60, LAN06, S1PS59, S1PS61, LAM07, LAM10, LAM06, S1PS62, LAM11)
- **Option BC3** - Growth within Landscape Character Area ELV5 (Sites S1PS63, S1PS64, S1PS65, BES13, BES04, BES03, BES14, BES02, BES02a, BES07, BES10, BES11, BES12, BES09, S1PS66, BFD06, BFD10, S1PS67, BFD03, BFD02, BFD01, S1PS68, LAM08, LAM09, S1PS73, S1PS74, S1PS71, S1PS72, S1PS75, D09a, BHM02, S1PS70, D08, BHM06, S1PS69)
- **Option BC4** - Growth within Landscape Character Area HWDS4 (Sites B07, S1PS77, BWK02, S1PS76, S1PS78, S1PS79, D09b, WID25, S1PS80, S1PS81, S1PS83, CDN05, CDN06)
- **Option BC5** - Growth within Landscape Character Area ELV7 (Sites WID28, D12, S1PS82, WID26)
- **Option BC6** - Growth within Landscape Character Area ELV8 (Sites S1PS84, MKC04, S1PS85, S1PS86, S1PS88, S1PS87, S1PS89, E14c, E14a, E14b)
- **Option BC7** - Growth within Landscape Character Area HWDS5 (Sites S1PS90, E14Z, E14Y, S1PS90, CHY01, A367PS7, E15, A367PS6, A367PS5)
- **Option BC8** - Growth within Landscape Character Area EPV1 (Sites E16a, b, and c, S1PS91, S1PS92, ODN07, S1PS93, TWT18, S1PS94)
- **Option BC9** - Growth within Landscape Character Area SORV1 (Sites A4PS2, NSL05, NSL04, F18, S1PS95, TWT19, TWT17, NEW08, NEW07, S1PS54)

5.40 These alternatives are depicted in **Figure 5.5** and have been assessed in detail in **Appendix D**.

Figure 5.5: Bath City and environs options for SA



5.41 The summary findings for the Bath City and environs options assessment are provided in Table 5.1.

Table 5.1: Summary findings for Bath City and environs options assessment

SA theme		Option BC1	Option BC2	Option BC3	Option BC4	Option BC5	Option BC6	Option BC7	Option BC8	Option BC9
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes - negative	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=1	=1	=1	3	=1	=1	=2	=2	=1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	=2	=1	=2	=2	=2	=1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – negative	Yes – positive	Yes – positive	No	No	Yes – positive
	Rank	=1	=1	=1	4	=1	=1	3	2	=1
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank									
Transportation	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	=1	=1	=1	=1	=1	=1	2	2	=1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	=3	=3	=3	=3	=3	=3	1	=2	=2
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank							1		
Biodiversity	Significant effects?	No	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	No	No	Yes – negative
	Rank	1	2	=4	=4	=4	=4	=3	=3	=4

SA theme		Option BC1	Option BC2	Option BC3	Option BC4	Option BC5	Option BC6	Option BC7	Option BC8	Option BC9
Natural resources	**Significant effects?**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**
	Rank	**=2**	**=3**	**=2**	**=2**	**=2**	**1**	**=2**	**4**	**=3**
Climate change	**Significant effects?**	**Uncertain**	**No**	**Yes – negative**	**No**	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**	**Yes – negative**
	Rank	**=2**	**=2**	**3**	**=1**	**=1**	**=1**	**=1**	**=2**	**4**
Waste	**Significant effects?**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**	**=**	**=**	**=**	**=**	**=**	**=**

Keynsham & Saltford

5.42 Keynsham is a well-connected settlement lying in the Bath to Bristol corridor, connecting well with both cities and served by both bus and train. Saltford lies between Keynsham and Bath, connected by the A4 and bus services. Whilst public transport links are good, this area suffers congestion, especially at peak times, and investment in sustainable transport services, including active travel opportunities will be required to accommodate strategic growth. Furthermore, both settlements are inset in the Green Belt and the landscape surrounding them plays an important role in maintaining separation between both Bristol and Keynsham and Keynsham and Saltford.

5.43 The strategic alternatives for growth are formed by logical groupings of connected sites identified in the north, south, west, and south-west of Keynsham, and in the south and west of Saltford.

5.44 The alternatives emerging for Keynsham & Saltford are as follows:

Keynsham:

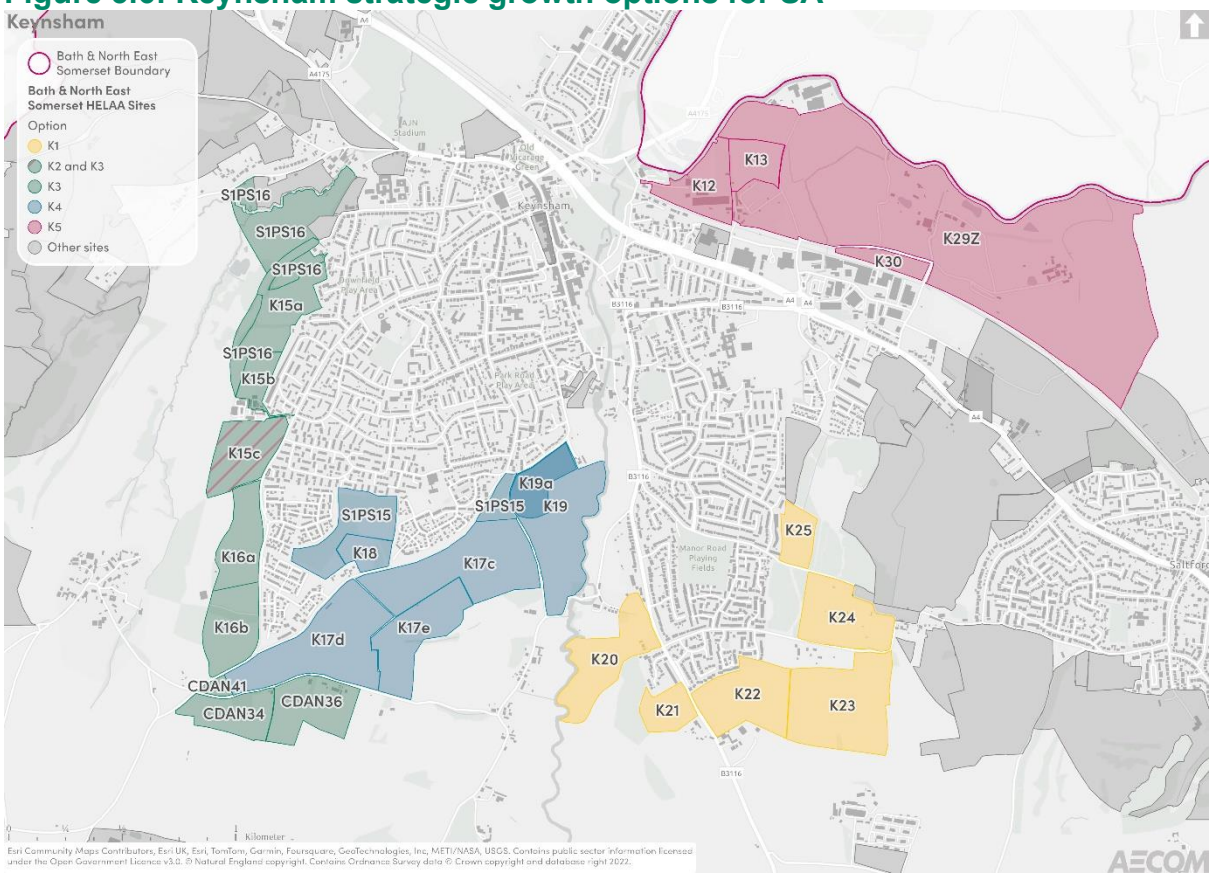
- **Option K1** - Growth to south-east (Sites K20, K21, K22, K23, K24, K25)
- **Option K2** - Growth to the west (Site K15c)
- **Option K3** - Larger-scale growth to the west (Sites K15a, b & c, K16a & b, S1PS16, CDAN34, CDAN36, CDAN41)
- **Option K4** - Growth to the south-west (Sites K17 (all parcels), K18, K19, S1PS15)
- **Option K5** - Growth to the north (Sites K12, K13, K29Z, K30)

Saltford:

- **Option S6** - Growth to the west (Sites S1PS14, SAL27b, SAL28)
- **Option S7** - Growth to the south (Sites S1PS13, SAL02, SAL01/ 01a, S1PS12, SAL03, SAL04)
- **Option S8** - Max growth (Options 6 & 7 combined)

5.45 These alternatives are depicted in Figures 5.6 and 5.7 and have been assessed in detail in Appendix D.

Figure 5.6: Keynsham strategic growth options for SA



5.46 The summary findings for the Keynsham options assessment are provided in Table 5.2.

Table 5.2: Summary findings for Keynsham options assessment

SA theme		Option K1	Option K2	Option K3	Option K4	Option K5
Health and wellbeing	Significant effects?	No	No	Yes – positive	Uncertain	Yes – positive
	Rank	4	3	2	5	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=1	2	=1	=1	=1
Communities	Significant effects?	Yes – positive	No	Yes – positive	Uncertain	Yes – positive
	Rank	=2	4	=2	3	1
Economy	Significant effects?	No	Yes – negative	No	No	Yes – positive
	Rank	2	5	4	3	1
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	3	=1	4	=1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	1	4	3	5

SA theme		Option K1	Option K2	Option K3	Option K4	Option K5
Historic environment	Significant effects?	Uncertain	No	No	Yes – negative	Yes – negative
	Rank	3	1	2	=4	=4
Biodiversity	Significant effects?	Uncertain	No	Yes – negative	Uncertin	Uncertain
	Rank	=2	3	4	=2	1
Natural resources	Significant effects?	Yes – negative	Uncertain	Yes – negative	Yes – negative	Yes – negative
	Rank	3	1	2	4	5
Climate change	Significant effects?	Uncertain	No	Uncertain	Uncertain	Uncertain
	Rank	3	5	1	4	2
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Figure 5.7: Saltford strategic growth options for SA

5.47 The summary findings for the Saltford alternatives assessment are provided in Table 5.3.

Table 5.3: Summary findings for Saltford options assessment

SA theme		Option S6	Option S7	Option S8
Health and wellbeing	Significant effects?	Yes – positive	Yes – negative	Uncertain
	Rank	1	3	2
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive
	Rank	3	2	1
Communities	Significant effects?	Yes – positive	Yes – negative	Uncertain
	Rank	1	3	2
Economy	Significant effects?	No	No	Yes – positive
	Rank	2	3	1
Transportation	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	2	3	1
Landscape	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	2	1	3
Historic environment	Significant effects?	No	No	Uncertain
	Rank	1	1	2
Biodiversity	Significant effects?	No	Yes - negative	Uncertain
	Rank	1	3	2
Natural resources	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	1	2	3
Climate change	Significant effects?	No	No	Uncertain
	Rank	2	1	3
Waste	Significant effects?	No	No	No
	Rank	=	=	=

Whitchurch

5.48 Whitchurch lies close to the edge of Bristol, with key connections to the centre of Bristol (along the A37) and Keynsham to the east. The land surrounding the settlement is Green Belt land and areas to the northeast and northwest are key to maintaining separation between Bristol and Whitchurch. A key ongoing issue associated with growth in Whitchurch is the level of growth that can be achieved in the absence of strategic transport interventions (i.e., new roads). Any new development in Whitchurch will also need to be at a level that can be supported by interventions to improve sustainable transport connections (i.e., small-scale piecemeal growth is likely to exacerbate existing issues).

5.49 The strategic growth alternatives are formed of groupings of connected sites in the north/ north-east, south-east, and south-west.

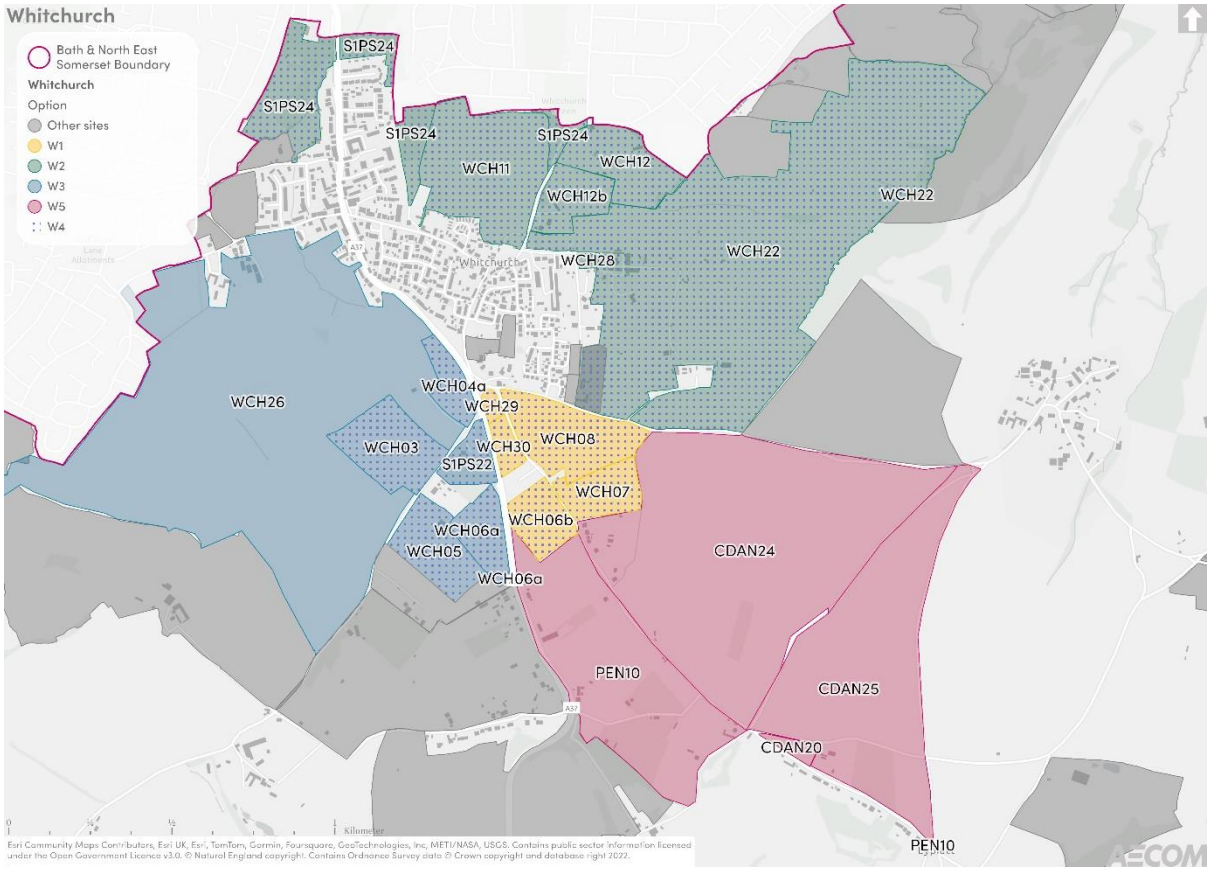
5.50 There is also an option emerging to the south-east for significant scale development that would essentially form a new settlement area and maintain separation from Whitchurch to some extent.

5.51 The alternatives emerging for Whitchurch are as follows:

- **Option W1** - Growth to the south-east (Sites WCH06b, WCH07, WCH08, WCH29, WCH30)
- **Option W2** - Growth to the north/ north-east (Sites WCH11, WCH12, WCH12b, WCH22 in part, WCH28, S1PS24) *(note: this option is expected to reduce the development area to maintain separation with Bristol)*
- **Option W3** - Growth to the south-west (Sites WCH03, WCH04a, WCH05, WCH06a, WCH26 (all parcels), S1PS22)
- **Option W4** – Maximised growth (Options 1 – 3 combined)
- **Option W5** - New settlement area to the south-east (Sites CDAN20, CDAN24, CDAN25, PEN10) (this assumes separation from Whitchurch so excludes WCH06b, WCH07, WCH08, WCH29, WCH30 and is not included in a maximised growth in Whitchurch scenario)

5.52 These alternatives are depicted in Figure 5.8 and have been assessed in detail in Appendix D.

Figure 5.8: Whitchurch strategic growth options for SA



5.53 The summary findings for the Whitchurch alternatives assessment are provided In Table 5.4.

Table 5.4: Summary findings for Whitchurch options assessment

SA theme		Option W1	Option W2	Option W3	Option W4	Option W5
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	4	=2	=2	1	3
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Economy	Significant effects?	No	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	3	=2	=2	1	=2
Landscape	Significant effects?	Uncertain	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=3	=3	4	2
Historic environment	Significant effects?	Uncertain	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=2	3	4	=2
Biodiversity	Significant effects?	No	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	1	=2	=2	3	=2
Natural resources	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	1	=2	=2	3	=2
Climate change	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Hicks Gate & Brislington

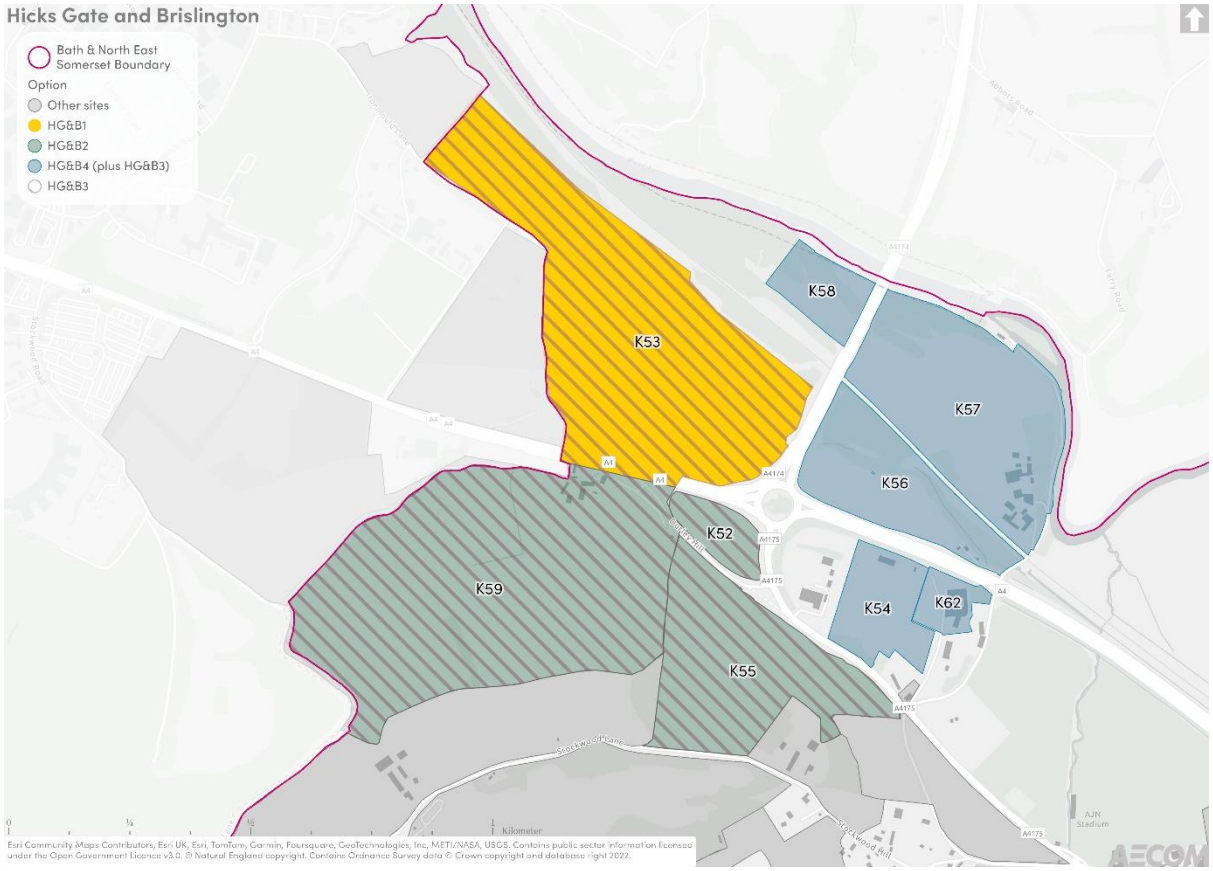
5.54 The Hicks Gate and Brislington area is another area well connected by the A4 (Bath to Bristol corridor), lying close to Keynsham, and including Brislington in Bristol (and the range of services and facilities here). B&NES and Bristol City Councils are in the process of exploring this area and aligning growth objectives here, as part of an exercise to identify the potential for this location to deliver connected homes in an accessible area for both authorities. There are options to test which extend this area to incorporate more land within the B&NES authority area and support the joint delivery of a cohesive strategic development scheme. However, strategic development at this location would require significant Green Belt release, and the latest publication of Bristol City Council's Draft Local Plan proposes removing land from the Green Belt to the south of the A4.

5.55 The alternatives emerging for Hicks Gate & Brislington are as follows:

- **Option HG&B1** – Growth to the north-west (Site K53)
- **Option HG&B2** – Alternative growth to the north-west (Sites K52, K55 and K59)
- **Option HG&B3** – Larger-scale growth to the north-west (Options 1 and 2 combined)
- **Option HG&B4** – Maximised growth to the north-west (Option 3 alongside Sites K54, K56, K57, K58, and K62)

5.56 These alternatives are depicted in Figure 5.9 and have been assessed in detail in Appendix D.

Figure 5.9: Hicks Gate and Brislington strategic growth options for SA



5.57 The summary findings for the Hicks Gate and Brislington alternatives assessment are provided in Table 5.5.

Table 5.5: Summary findings for Hicks Gate & Brislington options assessment

SA theme		Option HG&B1	Option HG&B2	Option HG&B3	Option HG&B4
Health and wellbeing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Housing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Communities	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Economy	Significant effects?	**No**	**No**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Transportation	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**4**	**3**	**2**	**1**
Landscape	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**1**	**2**	**3**	**4**
Historic environment	Significant effects?	**Yes - negative**	**Uncertain**	**Yes - negative**	**Yes - negative**
	Rank	**2**	**1**	**3**	**4**
Biodiversity	Significant effects?	**No**	**Uncertain**	**Yes - negative**	**Yes - negative**
	Rank	**1**	**2**	**3**	**4**
Natural resources	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**2**	**1**	**3**	**4**
Climate change	Significant effects?	**No**	**No**	**Uncertain**	**Uncertain**
	Rank	**2**	**1**	**3**	**4**
Waste	Significant effects?	**No**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**	**=**

Midsomer Norton, Radstock & Paulton

5.58 Midsomer Norton, Radstock, and Paulton form three of six closely connected settlements in the Somer Valley, a more rural area of the district with mining and industrial heritage and a locally distinctive character. Development in this part of the district has largely been delivered on a piecemeal basis, and as such, development of the necessary supporting infrastructure has not kept pace. Out-commuting also places pressure on this area and Midsomer Norton and Radstock town centres are known for limited footfall (associated with a lack of diversity in retail offer and lack of dining/ leisure opportunities).

5.59 Considering the available sites there are no comparative options for alternative growth locations in Midsomer Norton, the only potential for growth exists in the north of the settlement where development could contribute to coalescence with Paulton and extend the settlement closer to the Bowlditch Quarry SSSI (though the associated impact risk zones do not identify housing development as a risk). However, small and medium sites have been identified within Midsomer Norton, the progression of which will be informed by the HELAA.

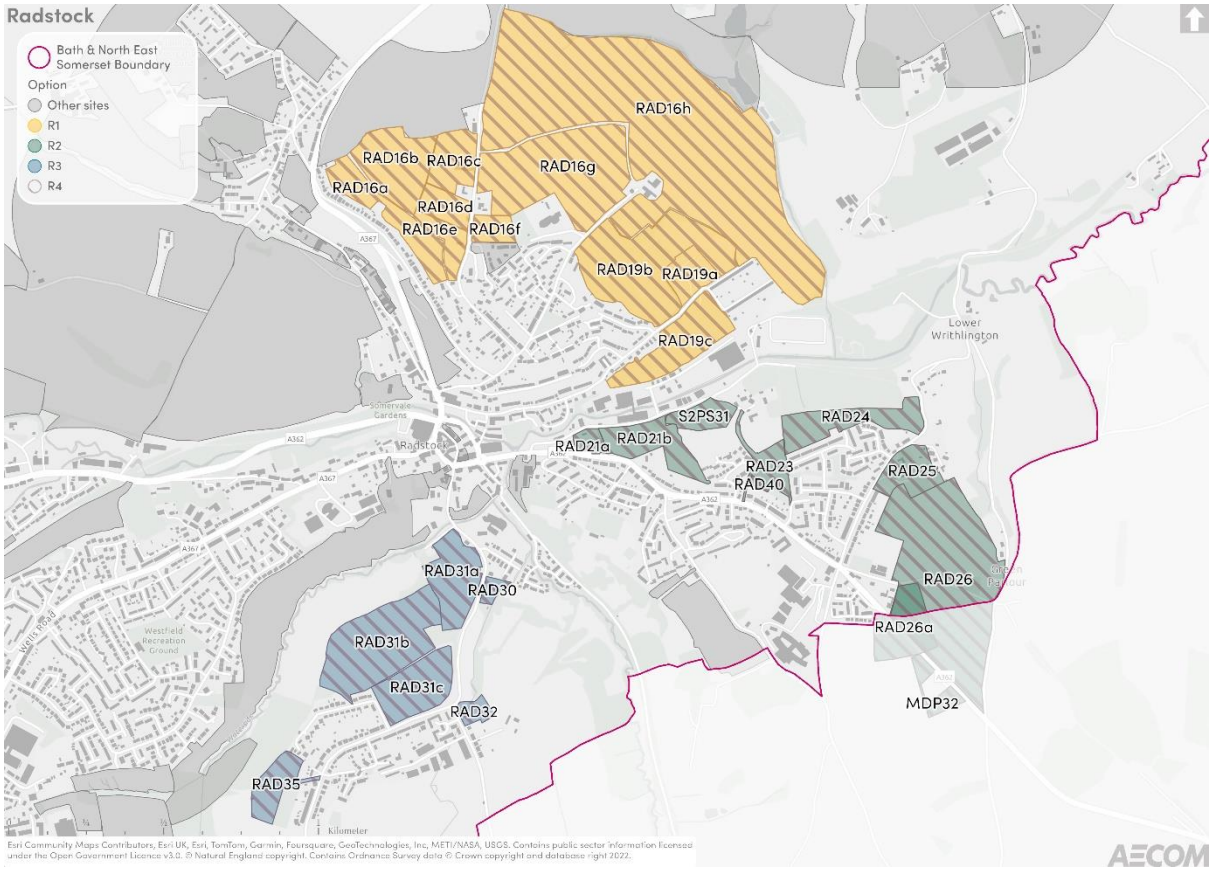
5.60 In Paulton, small or medium sites have been identified, the progression of which will be informed by the HELAA. One area of search is identified but notably constrained by overhead powerlines so it not considered a reasonable option for housing growth at this stage (but may be suitable for renewable energy generation).

5.61 For Radstock, alternatives for strategic growth can be identified in the north, east, and south of the settlement. The options emerging for Radstock are as follows:

- **Option R1** - Growth to the north (Sites RAD16a, b, c, d, e, f, g & h, RAD19a, b & c)
- **Option R2** - Growth to the east (Sites RAD21a, RAD21b, RAD23, RAD24, RAD25, RAD26/ 26a, RAD40, MDP32, S2PS31)
- **Option R3** - Growth to the south (Sites RAD30, RAD31a, b & c, RAD32, RAD35)
- **Option R4** - Max growth (Option 1 – 3 combined)

5.62 These alternatives are depicted in Figure 5.10 and have been assessed in detail in Appendix D.

Figure 5.10: Radstock strategic growth options for SA



5.63 The summary findings for the Radstock alternatives assessment are provided in Table 5.6.

Table 5.6: Summary findings for Radstock options assessment

SA theme		Option R1	Option R2	Option R3	Option R4
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	3	4	1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	1	3	4
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	3	2	1	4
Biodiversity	Significant effects?	No	No	Yes – negative	Yes – negative
	Rank	=1	=1	2	3
Natural resources	Significant effects?	No	No	No	No
	Rank	3	2	1	4
Climate change	Significant effects?	No	No	No	No
	Rank	=	=	=	=
Waste	Significant effects?	No	No	No	No
	Rank	=	=	=	=

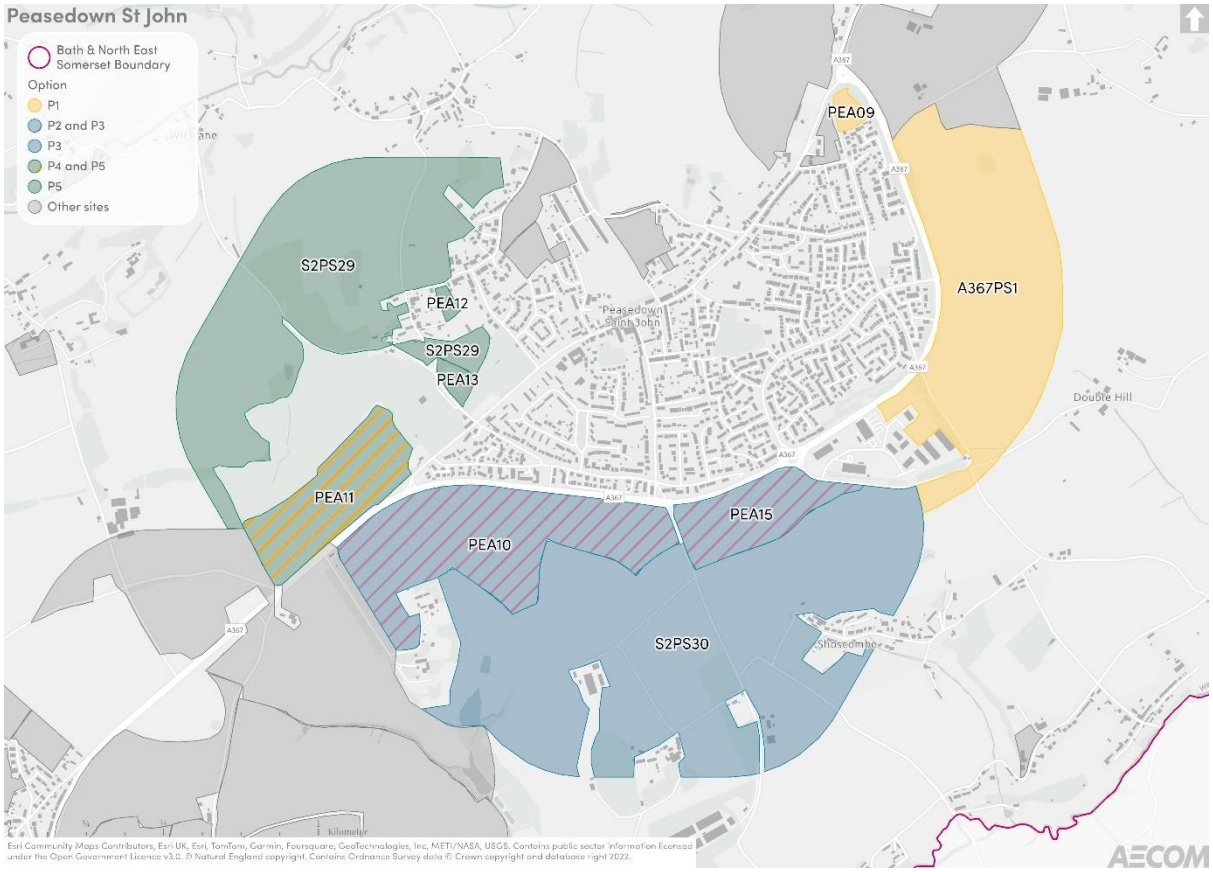
Peasedown St John

5.64 Peasedown St John is another one of the six closely connected settlements in the Somer Valley subject to similar constraints as those identified above for Midsomer Norton and Radstock. It sits on a busy commuter route between Radstock and Bath and the bypass at Peasedown St John provides a hard boundary to the settlement. There is an identified need for employment growth in the area, and strategic growth alternatives can be identified in the east, south, and west of the settlement. The alternatives emerging for Peasedown St John are as follows:

- **Option P1** - Growth to the east (Sites PEA09, A367PS1)
- **Option P2** - Growth to the south (Sites PEA10, PEA15)
- **Option P3** - Larger-scale growth to the south (Sites PEA10, PEA15, S2PS30)
- **Option P4** - Growth to the west (Sites PEA11)
- **Option P5** - Larger-scale growth to the west (Sites PEA11, PEA12, PEA13, S2PS29)

5.65 These alternatives are depicted in Figure 5.11 and have been assessed in detail in Appendix D.

Figure 5.11: Peasedown St John strategic growth options for SA



5.66 The summary findings for the Peasedown St John alternatives assessment are provided in Table 5.7.

Table 5.7: Summary findings for Peasedown St John options assessment

SA theme		Option P1	Option P2	Option P3	Option P4	Option P5
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	=2	=2	1	3	=2
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	5	3	4	1	2
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=2	=2	=3	=3
Biodiversity	Significant effects?	Uncertain	Uncertain	Yes – negative	Uncertain	Yes – negative
	Rank	2	=1	=3	=1	=3
Natural resources	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	=2	=2	3	1	=2
Climate change	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Farrington Gurney

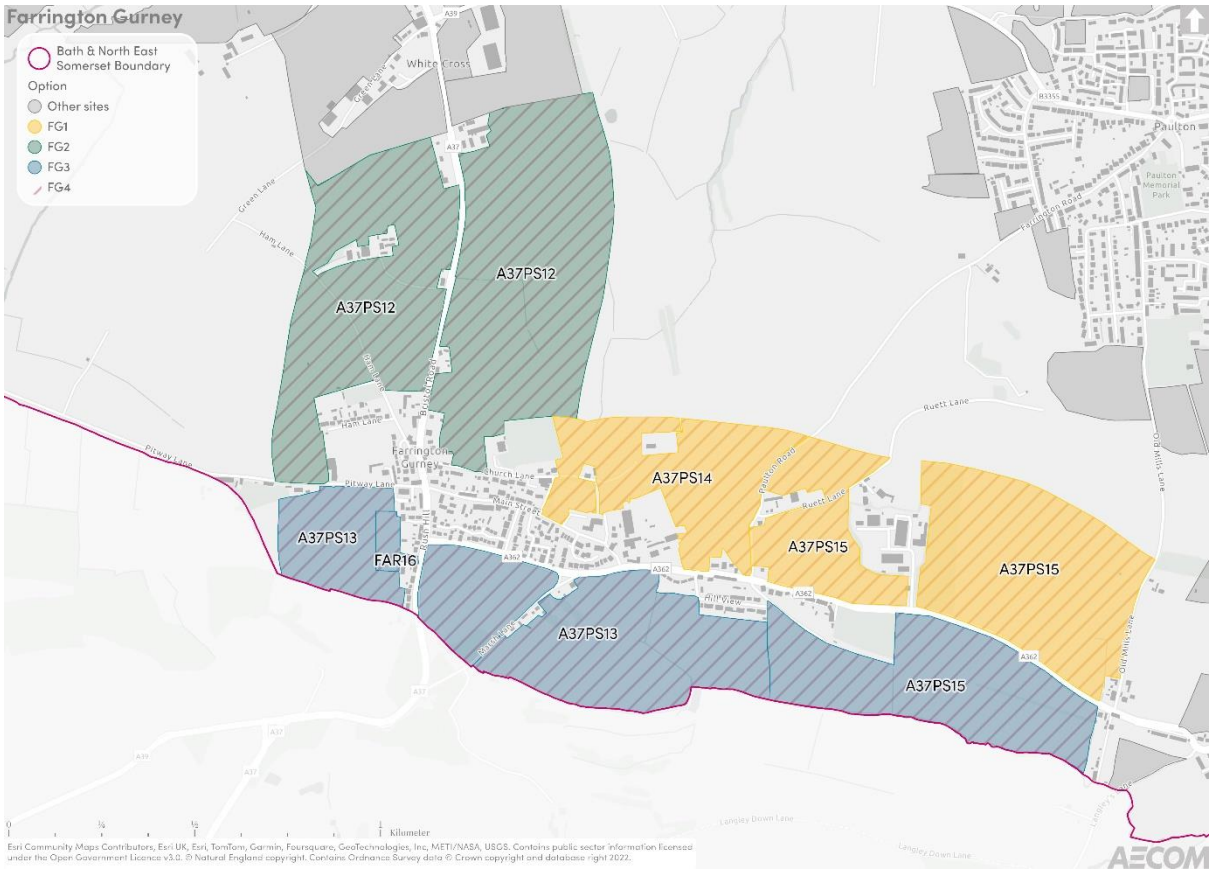
5.67 Farrington Gurney also comprises one of the six closely connected settlements in the Somer Valley and is subject to similar constraints as outlined for the Somer Valley previously. The settlement is relatively well connected, sitting on the junction of the A37 and A362 but the land surrounding it is predominantly formed of the highest quality agricultural land. Farrington Gurney is also a declared Air Quality Management Area (AQMA) which would need to be a consideration for strategic growth.

5.68 Options for strategic growth can be identified in the north and south. The options emerging for Farrington Gurney are as follows:

- **Option FG1** - Growth to the north-east (Sites A37PS14, A37PS15 (in part))
- **Option FG2** - Growth to the north-west (Site A37PS12)
- **Option FG3** - Growth to the south (Sites FAR16, A37PS13, A37PS15 (in part))
- **Option FG 4** - Max growth (Options 1 – 3 combined)

5.69 These options are depicted in Figure 5.12 and have been assessed in detail in Appendix D.

Figure 5.12: Farrington Gurney strategic growth options for SA



5.70 The summary findings for the Farrington Gurney options assessment are provided in Table 5.8.

Table 5.8: Summary findings for Farrington Gurney options assessment

SA theme		Option FG1	Option FG2	Option FG3	Option FG4
Health and wellbeing	Significant effects?	No	No	No	Yes – positive
	Rank	=2	=2	3	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	1
Economy	Significant effects?	No	No	No	Yes – positive
	Rank	2	4	3	1
Transportation	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	4	3	2	1
Landscape	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	3	2	1	4
Historic environment	Significant effects?	Yes - negative	No	No	Yes - negative
	Rank	3	2	1	4
Biodiversity	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	2	3	4	1
Natural resources	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	2	3	1	4
Climate change	Significant effects?	No	No	No	Uncertain
	Rank	2	1	3	4
Waste	Significant effects?	No	No	No	No
	Rank	=	=	=	=

Rural areas and neighbourhood planning

5.71 Rural B&NES accounts for over 90% of the district's land area and is a diverse group of towns, villages, and hamlets. The rural economy is largely based on farming, self-employment, and small businesses, but relatively poor public transport and in some areas poor digital connectivity act as barriers to business and home working. This can contribute to social isolation and continued high levels of commuting by car and thus transport emissions.

5.72 Rural development requires more local employment and sustainable transport options for rural communities, but strategic growth is largely inappropriate in these settings (as it is not proportionate). Furthermore, high house prices and a lack of affordable housing threaten social sustainability and some rural settlements are washed over by the Green Belt.

5.73 The top performing or most sustainable settlements within rural B&NES are likely to contribute towards the identified housing needs over the plan period (recognising a continued need for appropriate rural growth supported by infrastructure development). However, there are options for delivery either as Local Plan allocations or community-led growth (e.g., neighbourhood planning, rural exception schemes, community land trusts). As Local Plan allocations the strategy for rural growth would likely be based on assessment of a village's connectivity to sustainable transport modes and essential services and facilities considered alongside place profiles. Proportionate growth would be expected in the rural villages.

Non-strategic sites and windfall allowances

5.74 The HELAA will continue to be the main evidence behind the progression/ non-progression of non-strategic (small and medium sites).

5.75 The Local Plan Options Document and Housing Topic Paper details how a windfall allowance has been calculated over the plan period. Recognising that the adopted plan continues to plan for development in the period up to 2029 figures from the published housing trajectory are used for most of this period. For sites within the five-year housing supply the total number of permissions for small sites has been divided by five to provide an annual allowance. Beyond the five-year supply, a ten-year average of small site delivery has been used to provide an annual allowance. This equates to a total contribution of around 2,080 new homes over the plan period.

5.76 However, the Council identifies that small sites permissions have reduced over the past two years and require continued monitoring, as such the windfall allowance will be revisited in the next stage of plan-making following the housing count in March to reassess the rate of delivery and to identify any continued trends.

What other policy considerations are there?

5.77 Whilst a framework of development management policies is being developed, in the context of discussions around future growth, there are a few policy areas that stand out for their potential to affect the overall growth strategy. These policy areas warrant further attention as part of options assessment. The key policy focus areas have been developed in collaboration with the Council and cover Purpose Built Student Accommodation (PBSA), renewable energy development, and biodiversity net gain.

Purpose Build Student Accommodation (PBSA)

5.78 The University of Bath (UoB) and Bath Spa University seek to both grow over the plan period and have provided B&NES with projected student growth needs for the period up to 2030. With a longer period being planned for in the Local Plan, there are options to plan for continued growth (or not) post-2030, and options around the location of this growth.

5.79 Two sets of options have therefore been identified in relation to PBSA (relating to both the level and potential location of PBSA growth) as follows:

Level of growth:

- **Option PBSA1** - Growth as projected for UoB and Bath Spa up to 2030, but no growth for either university post 2030 (2,026 PBSA bedspaces or 506 equivalent homes)
- **Option PBSA2** - Growth as projected for UoB and Bath Spa up to 2030, with 1% increase for both universities post 2030 (4,863 PBSA bedspaces or 1,215 equivalent homes)
- **Option PBSA3** - Growth as projected for UoB and Bath Spa up to 2030, with 4.1% increase for UoB post 2030 (13,445 PBSA bedspaces or 3,361 equivalent homes)

Location of growth:

- **Option PBSA4** - Rely on existing policy (LPPU) approach giving educational establishments flexibility to use nomination agreements to bring forward PBSA.
- **Option PBSA5** - Amend LPPU Policy H2A to only allow PBSA to be developed on sites specifically allocated for that purpose, including a review of potential locations outside Bath (Keynsham and Hicks Gate).
- **Option PBSA6** - Amend LPPU Policy H2A to restrict PBSA across the district, other than on-campus (alongside discussions with universities about provision of growth outside B&NES).

5.80 The detailed appraisal of these options is provided in Appendix E. Summary findings are presented in Table 5.9.

Table 5.9: Summary findings for PBSA options

SA theme		Option PBSA1	Option PBSA2	Option PBSA3
Health and wellbeing	**Significant effect?**	**No**	**No**	**Uncertain**
	Rank	**3**	**2**	**1**

SA theme		Option PBSA1	Option PBSA2	Option PBSA3
Housing	Significant effect?	No	No	Yes - positive
	Rank	3	2	1
Communities	Significant effect?	No	No	Yes - positive
	Rank	3	2	1
Economy	Significant effect?	No	No	No
	Rank	3	2	1
Transportation	Significant effect?	No	No	No
	Rank	2	1	3
Landscape	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
Historic environment	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
Biodiversity	Significant effect?	No	No	No
	Rank	1	2	3
Natural resources	Significant effect?	No	No	No
	Rank	2	1	2
Climate change	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	1	2
Waste	Significant effect?	No	No	No
	Rank	=	=	=

SA theme		Option PBSA4	Option PBSA5	Option PBSA6
Health and wellbeing	Significant effect?	No	No	No
	Rank	2	2	1
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	2	1
Communities	Significant effect?	No	No	No
	Rank	2	2	1
Economy	Significant effect?	No	No	No
	Rank	2	2	1
Transportation	Significant effect?	No	No	Yes - positive
	Rank	2	2	1
Landscape	Significant effect?	Uncertain	Uncertain	No
	Rank	2	2	1
Historic environment	Significant effect?	Yes - negative	Yes - negative	Yes - negative
	Rank	1	1	2
Biodiversity	Significant effect?	No	No	No

SA theme		Option PBSA4	Option PBSA5	Option PBSA6
	Rank	3	1	2
Natural resources	Significant effect?	No	No	No
	Rank	3	2	1
Climate change	Significant effect?	No	No	No
	Rank	3	2	1
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Renewable energy development

5.81 B&NES declared a climate emergency in 2019 and is aiming to be carbon neutral by 2030. The Council have developed a Climate Emergency Action Plan which includes district scale actions that are considerations for future growth and development planning in the district. The Local Plan is an important tool in facilitating increased generation of renewable energy – particularly through free standing installations in appropriate locations, but also in/ on buildings. At this stage, the SA can inform plan-development by assessing potential policy directions for renewable energy, particularly where these concern development locations.

5.82 The options that have been identified in relation to renewable energy development are as follows:

- **Option REN1** - Rely on existing policy (LLPU) approach i.e., set criteria for all types of renewable energy, landscape led approach for wind energy and PV (guiding development to the best locations), provide support for community led projects.
- **Option REN2** - Safeguard the best sites for wind.
- **Option REN3** - Allocation of sites (for wind and solar arrays)

5.83 The detailed appraisal of these options is provided in Appendix E. Summary findings are provided in Table 5.10.

Table 5.10: Summary findings for renewable energy development options

SA theme		Option REN1	Option REN2	Option REN3
Health and wellbeing	Significant effect?	No	No	No
	Rank	=	=	=
Housing	Significant effect?	No	No	No
	Rank	2	1	1
Communities	Significant effect?	No	No	No
	Rank	1	2	2
Economy	Significant effect?	No	No	No
	Rank	3	2	1
Transportation	Significant effect?	No	No	No

SA theme		Option REN1	Option REN2	Option REN3
	Rank	=	=	=
Landscape	Significant effect?	No	Yes - negative	No
	Rank	1	2	1
Historic environment	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	3	1
Biodiversity	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	3	1
Natural resources	Significant effect?	No	No	No
	Rank	=	=	=
Climate change	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	=	=	=
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Biodiversity net gain

5.84 Biodiversity net gain (BNG) is an important principle for development which has emerged over recent years as a means of creating and improving natural habitats and reversing biodiversity decline trends. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development.

5.85 BNG is becoming mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) which requires developers to deliver a BNG of 10%. The Local Plan policies can ultimately seek to align with the emerging planning law or look to exceed the requirement (it is not considered reasonable to seek lower percentages given the emerging law).

5.86 The options that have been identified in relation to BNG reflect the status of existing policy provisions, and the potential to push these further and deliver more in the way of BNG. They are as follows:

- **Option BNG1** - Rely on existing policy (LPPU) approach i.e., requiring a Biodiversity Net Gain (BNG) of a minimum of 10% be demonstrated and secured in perpetuity (at least 30 years) subject to meeting the criteria listed within the policy.
- **Option BNG2** - Require a minimum 20% biodiversity net gain on select schemes: previously developed land, (major) strategic allocated sites, major schemes in protected landscapes, ground solar array schemes, and council developments.
- **Option BNG3** - A staggered approach to BNG requirements for different schemes i.e., require a minimum 20% BNG on all major developments, down to 10% on minor applications.

5.87 The detailed appraisal of these options is provided in Appendix E. Summary findings are provided in Table 5.11.

Table 5.11: Summary findings for BNG options

SA theme		Option BNG1	Option BNG2	Option BNG3
Health and wellbeing	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Housing	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Communities	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Economy	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Transportation	**Significant effect?**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**
Landscape	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Historic environment	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Biodiversity	**Significant effect?**	**Yes - positive**	**Yes - positive**	**Yes - positive**
	Rank	**2**	**1**	**1**
Natural resources	**Significant effect?**	**No**	**No**	**No**
	Rank	**2**	**1**	**1**
Climate change	**Significant effect?**	**Yes - positive**	**Yes - positive**	**Yes - positive**
	Rank	**2**	**1**	**1**
Waste	**Significant effect?**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**

What district wide reasonable alternatives can be identified at this stage?

5.88 At this stage, having explored settlement and policy options that have a bearing on strategic growth potential, district-wide spatial alternatives are being explored. Table 5.1 draws together the housing supply situation (commitments, windfall estimates, and known small and medium sites) and provides options for additional growth at the key settlements and rural areas. At key settlements, the strategic opportunities considered reasonable by the Council are identified.

5.89 With regards to Bath City and its environs, the evidence emerging around heritage and landscape impacts shows all options are likely to lead to what constitutes substantial harm, and thus would require the development of a case for 'wholly exceptional' circumstances. This would also lead to the additional risk of an unfavourable impact assessment from UNESCO and potential revocation of World Heritage Site status. At this stage, there is a weak case for wholly exceptional circumstances, recognising the growth opportunities that exist in the wider district, and the risk of strategic development impacting its World Heritage Site status is deemed too high. Bath City and its environs are therefore not considered a reasonable option for strategic growth, although an option for strategic growth west of the city is included in the Options Document for testing with stakeholders, but will continue to contribute to housing supply with small and medium sites within the built-up area. At this stage, the HELAA estimates an urban capacity for around 500 new homes in Bath (in addition to the current commitments for more than 4,000 homes).

5.90 Similarly, no strategic growth options can be identified at Midsomer Norton, but some small and medium settlement sites can be identified. At this stage, the HELAA estimates an urban capacity for around 500 new homes across the Somer Valley, which includes these small sites at Midsomer Norton.

5.91 With regards to rural development, a proportion of growth can be assigned to rural areas but at this stage it is recognised that the delivery vehicle for this growth has not yet been decided.

5.92 Four broad district-wide spatial options are identified in Table 5.12. These options have varying levels of reliance on Green Belt release and include an option that avoids any Green Belt release (though notably this option is likely to result in unmet housing needs). Given the context of Bristol City Council requesting that neighbouring authorities explore potential to accommodate a proportion of their unmet needs, a higher level of growth (exceeding the district's housing needs) is also being explored (though notably this puts significant pressure on the Green Belt).

5.93 The district-wide spatial options for housing growth are taken forward into **Chapter 6** for detailed assessment.

Table 5.12: District-wide spatial options for housing growth

		Option 1: Higher growth (significant GB release)		Option 2: SM[9] growth needs (high reliance on GB release)		Option 3: SM growth needs (lower reliance on GB release)		Option 4: Lower growth (excluding GB release)	
Location	**Supply source**	**Housing capacity**	**AH[10] capacity**	**Housing capacity**	**AH capacity**	**Housing capacity**	**AH capacity**	**Housing capacity**	**AH capacity**
District-wide	Existing commitments	**6,250**	**1,200**	**6,250**	**1,200**	**6,250**	**1,200**	**6,250**	**1,200**
	Windfall estimates	**2,080**	**0**	**2,080**	**0**	**2,080**	**0**	**2,080**	**0**
	Identified small and medium sites[11]	**1,000**	**350**	**1,000**	**350**	**1,000**	**350**	**1,000**	**350**
Keynsham & Saltford	Strategic opportunities: Tesco/ car parks, Avon Mill Lane Industrial, North Keynsham, West Keynsham, South Keynsham, West Saltford, South Saltford	**3,600**	**950**	**3,000**	**900**	**2,100**	**650**	**300**	**100**
Hicks Gate	Strategic opportunities: Hicks Gate	**1,250**	**350**	**1,250**	**350**	**1,100**	**300**	**-**	**-**
Whitchurch	Strategic opportunities: West of Whitchurch, East of Whitchurch (Horseworld), Adj. Bristol (Taylor W)	**700**	**200**	**600**	**200**	**150**	**50**	**-**	**-**
Somer Valley	Strategic opportunities: Peasedown, North Radstock, East Radstock/ Writhlington, Farrington Gurney	**1,950**	**600**	**600**	**200**	**1,950**	**600**	**1,950**	**600**
Rural areas	Additional growth in the top 5 most sustainable villages:	**350**	**100**	**200**	**50**	**350**	**100**	**100**	**50**
	Additional growth in the next 9 most sustainable villages:	**400**	**100**	**250**	**100**	**400**	**100**	**200**	**50**
B&NES Supply Total		**17,580**	**3,850**	**15,230**	**3,350**	**15,380**	**3,350**	**11,880**	**2,350**
SM Total Need		**14,500**		**14,500**		**14,500**		**14,500**	

[9] NPPF Standard Method for calculating housing need.
[10] Affordable housing.
[11] Bath urban capacity and Midsomer Norton urban capacity

	Option 1: Higher growth (significant GB release)	Option 2: SM[9] growth needs (high reliance on GB release)	Option 3: SM growth needs (lower reliance on GB release)	Option 4: Lower growth (excluding GB release)
AH % contribution	**21.9%**	**22%**	**21.8%**	**19.8%**
% above/ below SM Total Need	**+3,080**	**+730**	**+880**	**-2.620**

6. Appraising reasonable alternatives

6.1 The district wide options (or scenarios) as detailed in Table 5.1 are assessed in detail in this chapter. To summarise the options are as follows:

- **Option 1** – Higher growth (significant Green Belt release)
- **Option 2** – Standard Method growth needs (high reliance on Green Belt release)
- **Option 3** – Standard Method growth needs (lower reliance on Green Belt release)
- **Option 4** – Lower growth (excluding Green Belt release)

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see Table 3.1) as a methodological framework.

6.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.4 It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Bath & North East Somerset Council).

6.5 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank not the likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that SA theme compared to an option that is ranked 2. '=' has been used to highlight where options perform equally and cannot be differentiated between. The ranking is against individual SA objectives and objectives are not weighted in the SA. The ranking does not indicate a preferred approach, and the rankings should not be simply added to give the highest/ lowest performing option.

6.6 **Table 6.1** overleaf provides summary assessment findings, with full assessment narrative presented below by SA theme.

Table 6.1 Appraisal of district wide options

SA theme		Option 1	Option 2	Option 3	Option 4
Health and wellbeing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**1**	**3**	**2**	**4**
Housing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**No**
	Rank	**1**	**3**	**2**	**4**
Communities	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**1**	**3**	**2**	**4**
Economy	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**1**	**3**	**2**	**4**
Transportation	Significant effects?	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**
	Rank	**1**	**3**	**2**	**4**
Landscape	Significant effects?	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**
	Rank	**4**	**2**	**3**	**1**
Historic environment	Significant effects?	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**
	Rank	**4**	**2**	**3**	**1**
Biodiversity	Significant effects?	**No**	**No**	**No**	**No**
	Rank	**4**	**2**	**3**	**1**
Natural resources	Significant effects?	**Yes – negative**	**Yes – negative**	**Yes – negative**	**Yes – negative**
	Rank	**4**	**2**	**3**	**1**
Climate change	Significant effects?	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**
	Rank	**4**	**2**	**3**	**1**
Waste	Significant effects?	**No**	**No**	**No**	**No**
	Rank	**4**	**2**	**3**	**1**

Health and wellbeing

6.7 It is recognised that significant growth across the district could place considerable pressure on existing health facilities, particularly in the south of the district where provision is more limited. The highest growth option (Option 1) is most likely to deliver significant new health facilities to address existing capacity issues, supporting improved access and subsequently improving overall health.

6.8 The high growth option (Option 1) is also likely to further support health and wellbeing by maximising opportunities to deliver active travel infrastructure (PRoW and cycle networks), connecting places and encouraging modal shift. As Option 1 delivers growth over a wide area, it presents an opportunity to deliver strategic sustainable transport improvements (noting the Local Plan objective to avoid the creation of any new roads). Other options are considered to perform well in this respect, however they do not benefit from the economy of scale that is provided through Option 1.

6.9 All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities / areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under the higher growth option (Option 1), delivering development that is landscape-led and underpinned by holistic scale masterplanning that can extend across existing and new communities.

6.10 Despite the above, it is recognised that Option 1 would result in a significant release of GB land, which is likely to reduce access to the countryside for existing residents. Conversely, Option 3, which will deliver the second highest level of growth, relies less on GB release whilst still meeting the local housing needs but will reduce access to the countryside for existing residents in the Somer Valley. Option 3 also delivers a very similar level of AH when compared to Option 1. Nevertheless, Option 3 delivers a significantly lower level of growth in Keynsham & Saltford and Whitchurch, which are considered two of the most sustainable locations for growth outside of Bath, with the greatest access to health and recreational facilities and active travel infrastructure. Moreover, the level of growth delivered in Whitchurch (150 homes) under Option 3 is not considered high enough to deliver strategic sustainable transport improvements at this location.

6.11 Overall, it is considered that all options provide a significant opportunity to deliver improvements to support health and wellbeing objectives, facilitating active travel uptake; delivering new and improved areas of multi-functional green infrastructure alongside development; and promoting access to the countryside. Therefore, significant positive effects are predicted under all four options.

6.12 Whilst it is recognised that Option 1 will result in the greatest loss of GB land, it is nonetheless ranked most favourably as a result of the potential to deliver strategic infrastructure interventions (health, GI, transport) to support sustainable, healthy communities.

6.13 The remaining options are ranked according to the quantum of growth, with Option 4 ranked least favourably as the lowest growth option, which would not meet local housing needs nor deliver strategic infrastructure – both of which are essential to support healthy communities. It is also noted that Option 4 does not deliver any growth in Hicks Gate or Whitchurch, and therefore the benefits of growth will likely not be distributed equally across the district.

Housing

6.14 Options 1, 2 and 3 have the potential to lead to significant positive effects, delivering new housing to the meet local need and contributing towards

sustaining sufficient land supply throughout the plan period. Whilst Option 4 will deliver a significant number of new homes, it under delivers in terms of meeting the local housing need for the district; and will likely exacerbate local housing issues including access to affordable housing.

6.15 It is assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups, including affordable housing. A key consideration in this respect is housing needs of older people, i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes.

6.16 Higher levels of growth also increase opportunities for accessibility improvements and other community benefits associated with development (including new and improved services and facilities, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

6.17 Taking the above into consideration, Option 1 is ranked first as it delivers more housing, followed by Options 3, 2 and 4 respectively. Option 4 will not meet the identified local housing need for the district, and delivers the lowest level of AH. This is likely to place increasing pressure on the sub-region, particularly given Bristol's significant unmet need, and therefore minor negative effects are anticipated under this option.

Communities

6.18 It is considered that the settlements located along the roads that benefit from the WECA Bristol to Bath Corridor and Somer Valley Links projects will perform positively from a communities perspective. This is because these projects will improve sustainable access to a broad range of community services and facilities. This is particularly true for settlements in the north of the district, which are already relatively well connected to Bristol and Bath, which are employment hubs, via the A4 and ancillary roads. All the options perform well in this respect, but particularly Options 1 and 2.

6.19 It is recognised that strategic growth in the south of the district will likely have a positive impact on communities as the settlements have been subject to piecemeal growth for some time. Notably, strategic development will help deliver new / improved infrastructure, and could deliver local employment opportunities, increasing self-containment by reducing out-commuting. Options 1, 3 and 4 perform well in this respect.

6.20 Whilst all options perform positively in terms of supporting sustainable communities, the higher growth option (Option 1) presents an increased opportunity to deliver essential infrastructure, such as education, health services, green infrastructure, and allotment space. However, it is recognised infrastructure delivery will be dependent on site masterplanning and choices on developer contributions. Nevertheless, it is likely that strategic growth, which will be delivered under all four options, will support communities and groups, capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places.

6.21 Despite the above, it is recognised that Option 1 would result in a significant release of GB land, which is likely to reduce access to the countryside for existing residents. Conversely, Option 3, which will deliver the second highest level of growth, relies less on GB release whilst still meeting the local housing need. Nevertheless, Option 3 delivers a significantly lower level of growth in Keynsham & Saltford and Whitchurch, which are considered two of the most sustainable locations for growth outside of Bath, with the best access to services and facilities and active travel infrastructure.

6.22 According to the Index of Multiple Deprivation (IMD), pockets of deprivation exist across the district. Lower Super Output Areas (LSOAs) within the 30% most deprived neighbourhoods in the country can be found in Bath (Twerton, Combe Down and Kingsmead), Keynsham and Peasedown St John. Whilst all four options deliver growth in Keynsham and Peasedown St John, Options 1 and 3 are considered to perform most favourably as Option 2 delivers a low level of growth in the Somer Valley (600 homes), whilst Option 4 delivers a low level of growth in Keynsham & Saltford (300 homes).

6.23 Overall, it is considered that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility to neighbouring services and facilities. However, it is considered that as the level of growth increases, so does the likelihood for positive effects of significance. Therefore, Option 1 is ranked most favourably, as it would deliver the highest level of growth across the entire district, maximising opportunities for social engagement and active travel, thereby improving community cohesion and exposure to the natural environment. Furthermore, a likely increased level of supporting infrastructure would better ensure sustainable growth of existing and new communities, providing access to essential services without reliance on the private vehicle.

Economy

6.24 All options perform positively in relation to the economy SA theme, as they will support development that enables access to economic opportunities across the district. However, it is considered that the higher growth Option (Option 1) performs most favourably as it will likely support the highest number of new jobs and associated new / improved employment sites across the widest area. However, it is recognised that a high level of employment growth will likely require a large amount of employment land in suitable and sustainable locations, which could be a barrier if there is not enough available land. This will be explored further at the next stage of the SEA process.

6.25 The Somer Valley Enterprise Zone (SVEZ) was established in April 2017 to support existing local businesses and to attract new business to the area; and its long-term delivery is a key objective of the Local Plan. Enterprise Zones are designated areas across England which encourage business growth and new jobs. The SVEZ site is located at Old Mills, a greenfield area extending to 13.5ha on the north-western edge of Midsomer Norton. Therefore, higher growth in Somer Valley could present an opportunity to capitalise upon the SVE and support the local economy, although it is recognised that out-commuting has increased in the Somer Valley in recent decades. Options 1, 2 and 4 perform broadly positively in respect.

6.26 It is also noted that that retail centres in the south of the district currently lack footfall and diversity. Therefore, higher levels of growth in the Somer Valley under Options 1, 2 and 4 has the potential to support the viability of the retail offer in this part of the district. Higher growth in these locations also present an opportunity to capitalise upon the Somer Valley Enterprise Zone, supporting development of the local economy and higher levels of self-containment.

6.27 Focusing growth to the north of the district (Options 1, 2, and 3) presents an opportunity to potentially provide for Purpose Built Student Accommodation (PBSA) outside the city, recognising that there is an increased demand that cannot be met within Bath. The options document (and the SA – Appendix E) discusses the potential for PBSA to be provided at sustainable settlements along the A4 corridor, that are well connected to Bath. This is likely to focus on Keynsham and Hicks Gate and would lead to positive effects in terms of supporting the City's two Universities (subject to discussion with both Universities); enhancing opportunities for education and training opportunities and investing in long-term growth of the district's economy.

6.28 More broadly, Keynsham plays an important role in supporting sustainable economic growth across B&NES, with its absolute employment numbers having increased over the period 2011 – 2021. Keynsham also benefits from its own railway station, which improves the regional connectivity of the area. Investment in Keynsham, and neighbouring settlements well-connected via the A4 corridor (Options 1, 2 and 3) are therefore seen to perform positively in terms of building a strong, competitive economy and enabling local businesses to prosper.

6.29 It is considered that the settlements located along the roads that benefit from the WECA Bristol to Bath Corridor and Somer Valley Links projects will perform positively from an employment perspective. This is because these projects will improve sustainable access to employment opportunities across the district. This is particularly true for settlements in the north, which are already better connected to Bristol and Bath, which are employment hubs, via the A4 and ancillary roads. All the options perform well in this respect, but particularly Options 1 and 3.

6.30 The lower growth option (Option 4) is least likely to support the delivery of the WECA Bristol to Bath Corridor and Somer Valley Links projects, particularly as it delivers a low level of growth in Keynsham & Saltford (300 homes) and no growth in Hicks Gate and Whitchurch, which are considered sustainable locations.

6.31 In light of the above, significant long-term positive effects are anticipated under all options, which are ranked according to the quantum of growth they deliver. All options are sustainably located to capitalise upon accessible employment in either Bath or Bristol, with potential to deliver infrastructure improvements and support a range of housing to meet demographic imbalances.

Transportation

6.32 It is considered that the settlements located along the roads that benefit from the WECA Bristol to Bath Corridor and Somer Valley Links projects will perform positively from a transportation perspective. This is because these projects will improve sustainable access to services and facilities, and employment across

the district. All the options perform well in this respect, but particularly Options 1, 2 and 3 as these options will support increased growth at Keynsham & Saltford and Hicks Gate, which are located along the A4 linking Bath and Bristol. These settlements are therefore likely to benefit from the WECA Bristol to Bath Corridor project to the greatest degree.

6.33 The lower growth option (Option 4) delivers the majority of growth in the Somer Valley. Whilst this part of the district will benefit from the WECA Somer Valley Links project, this part of the district is considered less sustainable than the northern part of the district (which will benefit from the WECA Bristol to Bath Corridor project) as it is in a relatively rural location, further afield from Bath and Bristol, where a significant proportion of B&NES residents commute to for work. The level of growth which will be delivered through this option is also less likely to support strategic transport interventions (noting the Local Plan objective to avoid the creation of any new roads).

6.34 Despite the above, it is noted that as the level of growth increases, it is assumed that the number of private vehicles on local roads will also increase. This is a key issue throughout the district, with congestion and journey time delays affecting rural communities as well as urban areas. The A4 through Keynsham is notably subject to high levels of congestion, and it is therefore considered that high growth option (Option 1) will lead to the greatest increase in private vehicular use, with potential to significantly exacerbate existing congestion if not appropriately mitigated. It is noted that all options have the potential to lead to significant effects in this respect.

6.35 However, it is considered that sustainable transport interventions proposed through the WECA Bristol to Bath Corridor project and Somer Valley Links projects, alongside appropriately masterplanned strategic development, could reduce the potential for significant adverse effects. In this respect, it is considered that higher growth option (Option 1) will likely provide greater critical mass to enable more significant infrastructure improvements, supplementing the WECA and Somer Valley projects and better connecting the district's key settlements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition. This includes the expansion of the EV network; relocating road space; and extending active travel networks including cycle route connectivity.

6.36 Overall, at this stage without further details in terms of infrastructure delivery, mitigation and masterplanning, all options are considered to lead to significant negative effects overall. Options are ranked according to the quantum of growth they deliver.

Landscape

6.37 Option 1 would result in a significant release of GB land, which evidence suggests is likely to impact on the sensitive open landscape between settlements in the district. For example, Green Belt Parcel P85 extending south and west of Saltford has been identified through the WECA Strategic Green Belt Assessment (2021) as making significant contribution to three of the five Green Belt purposes.

6.38 Conversely, Option 3, which will deliver the second highest level of growth, relies less on GB release whilst still meeting the local housing need. Notably, the level of growth delivered in Whitchurch (150 homes) under Option 3 is considered low enough to avoid the coalescence of Whitchurch and Bristol. However, this is dependent on the sites carried forward under this option, which is not known at this stage.

6.39 B&NES overlaps with and therefore contains part of two National Landscapes (previously known as Areas of Outstanding Natural Beauty (AONBs)). These are the Cotswolds National Landscape in the east of the district, and the Mendip Hills National Landscape in the west of the district. Settlements which are particularly sensitive in this respect include Bath, Saltford, Peasedown St John, and Farrington Gurney. Therefore, all four options have the potential to adversely impact the setting and significance of these National Landscapes. Notably, both National Landscapes are associated with areas of higher topography. The majority of the settlements, with the exception of Peasedown St John, sit at lower elevations. In this respect, whilst future growth is unlikely to impact views to the National Landscapes, it does have the potential to impact views from the National Landscapes.

6.40 It is recognised that the north of the district (i.e. Keynsham, Saltford) is more constrained than the south of the district (i.e. Peasedown St John, Farrington Gurney). This is because the settlements in the north of the district are in close proximity to Bristol, with only a small area of open landscape separating these settlements. Due to this, growth in the north is more likely to contribute to the coalescence of, or reduce green gaps between, settlements. Conversely, the south of the district is more rural, with settlements relatively well dispersed, but strategic development has implications for rural character.

6.41 Strategic growth under all four options presents an opportunity to link green buffer zones, which will not only benefit the local landscape but also biodiversity through supporting BNG and nature recovery. It will also benefit the health and wellbeing of residents by improving access to the countryside.

6.42 Overall, it is considered that all four options have the potential to lead to significant negative effects. However, mitigation is most likely to be effective under the lower growth option (Option 4). Hence, the options are ranked according to the quantum of growth they will deliver. Ultimately, the impact of future growth on the local landscape will largely depend on the sites carried forward; the design and layout of development; and the application of landscape-led masterplanning to ensure adverse impacts on the landscape are mitigated where possible. Further consultation with Natural England will likely be required under all four options.

Historic environment

6.43 Option 1 would result in a significant release of GB land, which is likely to have a significant impact on the setting of heritage assets, particularly those currently in the GB or at / near the edges of settlements. Conversely, Option 3, which will deliver the second highest level of growth, relies less on GB release whilst still meeting the local housing need. Nevertheless, it is recognised that the impact of future growth on the historic environment is dependent on the sites carried forward under each option, which is not known at this stage.

6.44 The eastern part of the district is arguably the most sensitive part of the district from a heritage perspective as this is the location of the City of Bath World Heritage Site (WHS). Outside of Bath, whilst there are more scheduled monuments in the north of the district, significant clusters of listed buildings can be found in the majority of settlements. Therefore, all four options have the potential to adverse impact the setting and significance of the historic environment. However, it is considered that as the level of growth increases, so does the potential for development to impact heritage assets. Considering the above, Option 4 is identified as performing most favourably of the options.

6.45 Overall, it is considered that all four options have the potential to lead to significant negative effects. However, it can be broadly assumed that mitigation is most likely to be effective under the lower growth option (Option 4). Hence, the options are ranked according to the quantum of growth they will deliver.

6.46 Ultimately, the impact of future growth on the historic environment will largely depend on the sites carried forward; the design and layout of development; and the application of sensitive masterplanning to ensure adverse impacts on heritage assets are mitigated where possible. Further consultation with Historic England will likely be required under all four options.

Biodiversity

6.47 B&NES only contains three internationally designated sites for biodiversity. These are the Chew Valley Lake Special Protection Area (SPA) and a small part of the North Somerset & Mendip Bats Special Area of Conservation (SAC), both in the west of the district, and parts of the Bath & Bradford on Avon Bats SAC, in the east of the district. The impact of any future growth on these sites will be informed by the Habitats Regulations Assessment (HRA).

6.48 Similar to the above, Sites of Special Scientific Interest (SSSI) are concentrated in the east and west of the district. Ancient woodland is more evenly distributed across the district but is most prevalent in the east. Therefore, all four options have the potential to adversely impact nationally designated sites for biodiversity, as well as more local site-level biodiversity constraints. Nevertheless, it is considered that as the level of growth increases, so does the potential for development to impact the local biodiversity resource. Therefore, Option 4 is considered to perform most favourably.

6.49 It is noted that all options will have to deliver a minimum of 10% biodiversity net gain (BNG) from January 2024, in accordance with the Environment Act 2021.

6.50 Overall, it is considered that all four options have the potential to lead to minor negative effects. This is because potential significant negative effects are likely to be mitigated in line with national planning policy. Nevertheless, it is recognised that this is subject to the findings of the HRA that will also inform the Local Plan as it progresses.

Natural resources

6.51 There are five AQMAs in B&NES, which are located in Bath, Keynsham, Saltford, Temple Cloud, and Farrington Gurney. These were all declared due to high levels of nitrogen dioxide (NO_2). Whilst growth in these locations has the potential to exacerbate air quality issues by increasing the number of private cars on local roads, it is also recognised that strategic level growth has the

potential to deliver strategic sustainable transport interventions, particularly through the WECA projects. This is particularly true for Keynsham and Saltford, which are located on the A4 linking Bath and Bristol, which will be a focus of the WECA Bristol to Bath project.

6.52 It is noted that the higher growth option (Option 1) is more likely to deliver strategic transport improvements, which could include new bus stops, improved bus lanes, and better-quality walking and cycling infrastructure. Combined with district-wide green infrastructure enhancements and measures to achieve BNG, this could support improved air quality in the longer-term. Nevertheless, as noted above, it is also likely that high growth will lead to the greatest increase in private vehicles on local roads (notably key transport routes with existing capacity issues). It is therefore difficult to differentiate options in relation to air quality objectives at this stage.

6.53 The key consideration in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Data from the provisional ALC shows that the majority of B&NES is underlain by Grade 3 (good to moderate quality) land; however, it is not clear whether this land is Grade 3a (BMV) or Grade 3b (poorer quality). Parts of the west of the district are underlain by Grade 1 (excellent) agricultural land, including Farrington Gurney. Therefore, Option 2, which delivers a lower level of growth in the Somer Valley, has the greatest potential to reduce the loss of BMV agricultural land.

6.54 It is considered that as the scale of growth increases, as does the potential for the increased loss of BMV agricultural land. Therefore, the options are ranked accordingly. However, uncertainty is still noted with regards to whether or not the Grade 3 land across the district is Grade 3a (BMV) or Grade 3b (poorer quality).

6.55 In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

6.56 The northeastern part of the district, around Bath and Keynsham, falls within the Avon Bristol Urban Operational Catchment. The rest of the district falls within the Avon Bristol Rural Operational Catchment. Notable waterbodies that pass through the district are the River Avon, which passes through Bath and Keynsham, and its tributaries and the Chew Valley Lake, in the west of the district.

6.57 It is considered that there is scope for the Local Plan to implement an appropriate approach to development within minerals safeguarding areas.

6.58 Overall, it is considered that all four options will lead to significant negative effects. This is due to the potential impacts of growth on air quality and the

extensive loss of BMV land. The options are ranked according to the quantum of growth they deliver. Nevertheless, it is noted that plan policies will likely mitigate adverse impacts to some degree, particularly with regards to air quality and water resources.

Climate change

6.59 It is considered that the settlements located along the district's key road network will benefit from the WECA Bristol to Bath Corridor and Somer Valley Links projects, which will deliver positive effects from a climate change perspective; delivering a range of strategic measures to support modal shift and reduce emissions from private vehicles. All options perform well in this respect, however Options 1, 2 and 3 perform more positively than Option 4 as these options will support increased growth at Keynsham & Saltford and Hicks Gate, which are located along the A4 linking Bath and Bristol (where transport interventions are being invested).

6.60 The lower growth option (Option 4) delivers the majority of growth in the Somer Valley. Whilst this part of the district will benefit from the Somer Valley Links project, this part of the district is also considered less sustainable than the north, as it is in a relatively rural location, further afield from and more poorly connected via sustainable modes of transport to employment hubs Bath and Bristol. The level of growth which will be delivered through this option is also less likely to support strategic transport interventions (noting the Local Plan objective to avoid the creation of any new roads).

6.61 Despite the above, it is recognised that as the level of growth increases, there is an assumption that the number of private vehicles on local roads will also increase. Therefore, higher growth option (Option 1) could have the greatest potential to increase congestion and emissions, as a result of increased vehicles on the roads.

6.62 Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

6.63 Despite the above, the higher growth option (Option 1) offers greater potential to secure high levels of resource efficiency; to plan for sequestration and for development-wide solutions to energy provision, such as decentralised energy schemes. As such, though the climate impact is greater than through the other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy and sequestration measures. This is in addition to district-wide active travel networks and green infrastructure (including SuDS), which will address both climate change mitigation and adaptation through improved resilience to extreme weather events such as flooding and heatwaves. This will have knock-on positive effects for biodiversity, health and wellbeing, and landscape.

6.64 It is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example

through the delivery of sustainable drainage systems in accordance with the provisions of the NPPF and sustainable drainage systems (SuDS) legislation.

6.65 In light of the above, it is difficult to differentiate the options, and therefore uncertainty is noted across the board and all four options are ranked equally. Notably, all of the options could deliver strategic interventions. However, it is not clear at this stage how transport impacts will be mitigated, and the climate-focused interventions are also not known at this stage.

Waste

6.66 It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities locally. The options therefore cannot be differentiated at this stage in relation to meeting waste objectives. Whilst minor negative effects are predicted at this stage, due to the increased amount of waste that will be an inevitable byproduct of growth, it is assumed that the Local Plan will align with the objectives of the WECA Joint Waste Core Strategy Development Plan Document (2011) and the B&NES Waste Strategy Review (2014).

7. Developing the preferred approach

7.1 At this stage, the Council are not identifying a preferred approach for the Local Plan and are consulting on a range of spatial and policy options. It is intended that consultation will inform the development of the preferred approach, which will be presented at the next stage of plan-making. Further consultation on the full draft plan and preferred approach will occur at that stage.

7.2 At this point in time, the SA has sought to explore a range of spatial options that can inform consultation and stimulate conversation and feedback on the options for future growth in the district. The SA does not identify a preferred approach and has only identified a range of options that can inform consultation whilst remaining concise and accessible. The development of these options will be informed by feedback through this consultation stage.

Part 2: What are the SA findings at this current stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an appraisal of the Local Plan Options Document, as currently published under Regulation 18 of the Planning Regulations.

Methodology

8.2 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3.1**) as a methodological framework.

8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Options Document in more general terms.

8.4 Within the appraisal narrative below specific policies are referred to only as necessary and relevant to each SA theme (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

8.5 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.[12] So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

[12] Environmental Assessment of Plans and Programmes Regulations 2004

9. Appraisal of the Local Plan Options Document

Health and wellbeing

9.1 Whilst a generally affluent district, pockets of deprivation exist along with inequality and in these areas resident life expectancy is affected along with other key health indicators. There is a need to plan for development that can reduce inequalities and deprivation, particularly by providing good access to decent and affordable homes, in locations that provide access to improved healthcare facilities, active travel connections, sport and recreational opportunities, and nature and green spaces.

9.2 It is expected that the Local Plan will be supported by an aligned Health and Wellbeing Strategy, Health Improvement Plan, and Health and Wellbeing Implementation Plan which will help to deliver against core priorities. The Local Plan is also underpinned by the 'Doughnut Economics Model' – an approach that places equality and community priorities, including 'healthy lives and places' at the heart of future planning. Notably, the Options Documents seeks to locate most development in the most accessible locations in the district, which will ultimately support the creation of healthy places. Additionally, the spatial priorities for the settlement areas in the district highlight a focus on health and wellbeing, particularly by improving access to green infrastructure and open spaces and ensuring the necessary provision of healthcare infrastructure.

9.3 The Local Plan Options Document identifies a dedicated policy to guide the development of healthy places. This seeks to build places that are supported by healthcare infrastructure (Policy HVC/H: Healthy Places), encourage active travel (Policy ST2a: Active Travel Routes), provide an inclusive and accessible public realm (Policy HVC/H: Health Impact Assessments; and Policy HD/PR: Public Realm), and provide good access to green space (Policy HVC/LGS: Local Green Space). Options relate to whether to incorporate the requirement for health impact assessments in major developments or have a standalone policy for this. Additionally, options are presented for restricting hot food takeaways in proximity to schools and other places where children congregate, unless potentially located within a designated local centre (Policy HVC/H: Hot Food Takeaways).

9.4 Additional proposed policy measures seek to protect key community and green spaces that contribute to health and wellbeing, including Local Green Spaces, allotments, and cemeteries (Policy HVC: Community Facilities; Policy HVC: Safeguarding Land for Cemeteries; Policy HVS: Protecting Allotments; Policy HVC/LGS: Local Green Space). Design and place policies also recognise the importance of health considerations (including public health and amenity) and equitable access to nature and green space (including delivering new green spaces as necessary to support future growth). Existing policy in relation to environmental quality is also sought to be retained.

9.5 The Options Document recognises the role of planning in delivering healthy places that support improved health outcomes, with health embedded as a key consideration, including as part of the vision and objectives of the plan.

Dedicated policy provisions and stipulations for future growth will embed key health considerations and design principles that will deliver against the vision for healthy places. **Significant positive effects** are considered likely in this respect.

Housing

9.6 One of the key issues across the district with regards to housing is affordability, affecting those who wish to buy or rent. Linked with median wages that are lower than those nationally, the average house price in the district is twelve times average earnings, or nineteen within the city of Bath. The housing and economy SA themes are strongly linked in this respect. Furthermore, there are a range of differing housing needs across the district, that equate to a need for a range of housing types and sizes. Future growth will need to consider specialist housing needs for the elderly and disabled, student housing needs, first-time buyer needs, gypsy and traveller pitch needs, and the needs of lower income households.

9.7 It is expected that the Local Plan will be supported by an aligned Housing Delivery Plan which will help to deliver against core priorities. These are underpinned by the 'Doughnut Economics Model' – an approach that places community priorities, including 'the right homes in the right places' at the heart of future planning. By identifying a range of housing development options in the most accessible areas of the district, the Local Plan Options Document identifies how the forecasted growth needs of the district could be met (calculated using the Government Standard Methodology) aligned with the core priorities. A strategy that is progressed to meet needs in full would be expected to lead to significant positive effects.

9.8 A Local Housing Needs Assessment (LHNA) has been developed to support planning for future growth, and importantly this assessment projects relatively significant growth in the student population. With respect to housing needs, this indicates an increased need for Purpose Built Student Accommodation (PBSA) potentially supported by other housing options such as Houses of Multiple Occupation (HMOs) (which tend to provide solutions for students in later years). However, HMOs can reduce the availability and affordability of family homes and are usually capped in terms of concentration levels in any given area (as the proposed approach is within the Options Document). In response to these issues, the Local Plan Options Document separates these differing student housing needs to the general housing needs of the rest of the district and seeks to manage them as distinctively different elements of housing supply. This will likely ensure that the needs of students are met without undermining the general housing strategy across the rest of the district and positive effects are considered likely in this respect.

9.9 Furthermore, the Local Plan Options Document outlines that a key spatial strategy principle is to facilitate the delivery of housing that is more affordable. The document identifies policy provisions will guide on-site provision of affordable housing in developments of 10 or more dwellings (or 0.5ha or above) and provide stipulations relating to affordability in perpetuity, phasing, and design as well as exception sites (Policy H/AH: Affordable housing (Large sites); H/RES: Rural Exception Sites (Location); H/RES: Rural Exception Sites (Scale); H/RES: Rural Exception Sites (Cross Subsidy); and H/RES: First

Homes Exceptions Sites). Additionally, recognising the constraints to housing delivery in some of the most sensitive landscape areas of the district, the Local Plan Options Document proposes small sites (of less than 10 dwellings) in protected landscapes such as the National Landscape. These sites should also be required to deliver on-site affordable housing options (Policy H/AH: Affordable housing (Small sites)). The document identifies an option to update the existing affordable housing viability policy, highlighting the presumption that there should be no need for further viability assessment at the decision-making stage, and where an application fails to provide the full affordability housing policy requirement effective review mechanisms should be in place (Policy H/AH: Affordable housing (Viability)). The Options Document is therefore considered to give great weight to ensuring affordable housing delivery over the plan period.

9.10 The Local Plan Options Document further identifies that policy will guide the development of specialist housing and homes for older people, particularly their design, and ensure an element of affordable specialist housing (Policy H/SH: Specialist Housing and Homes for Older People Design; and Policy H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (Including Extra Care)). Additionally, plan policies will encourage high-quality design, appropriate space standards, accessible homes, and an appropriate mix of housing. Gypsy and Traveller needs have been investigated and identified through an update note to the 2021 Gypsy and Traveller Accommodation Assessment (GTAA), this identifies a need for an additional two pitches and recommends this is met by intensifying existing private pitches (in-line with the identified needs).

9.11 The city of Bath will be a crucial location in the context of future growth in the district, and it is recognised that there is a limited and premium land supply here with competing housing needs. This includes PBSA needs with Bath housing the two universities in the district. The Options Document highlights this conflict, and the potential options for PBSA growth that is not located on university grounds (H/PBSA: Purpose Built Student Accommodation – Provision and Location). Options for off-campus locations are identified along the connecting Bath-Bristol transport corridor which could ensure suitable access by sustainable transport modes, including cycling. The Options Document also explores options that seek to incorporate affordable PBSA provisions or alternatively contributions towards off-site conventional affordable housing (H/PBSA: Purpose Built Student Accommodation – Affordable Housing or Rent).

9.12 The housing strategy and policy framework therefore seeks to meet the varying housing needs of residents across the district, and potentially contribute homes to the wider Housing Market Area. **Significant positive effects** are therefore considered most likely.

Communities

9.13 The Options Document highlights how the core Local Plan values and priorities relate directly to creating and maintaining sustainable, vibrant, and healthy communities. The Plan is being prepared through consulting and involving communities and local people are encouraged to participate in ongoing engagement. A core objective is to plan for housing, employment, and

infrastructure growth that will meet the needs of communities whilst ensuring that the key characteristics of places that help to maintain community and settlement identities are not lost. Sustainable communities would be supported by good access to public transport, community services and facilities (including schools), and local green and open spaces.

9.14 One of the key pressures for communities in the context of future growth will be the approach to Green Belt release with key tensions in the north of the district. The Bath-Bristol corridor provides an opportunity for connected development giving residents good access to both cities and key settlements like Keynsham and Saltford in between which are connected by sustainable transport modes, including the rail line at Keynsham. However, the Green Belt ultimately maintains a degree of separation between Bristol and B&NES, and growth in this area would need to be managed to ensure that key contributing land parcels are kept open and free from inappropriate development and continue to protect settlement identities. In the absence of further Green Belt release the focus of development would need to shift south in the district, with a focus on improving sustainable transport connections within and around the Somer Valley. The Somer Valley is characterised as a more rural area of the district, and strategic growth here similarly would need to be managed to protect settlement identities. The Options Document does not identify a preferred growth strategy at this stage but highlights the potential growth options that are emerging that could be utilised to meet local needs and presents these key issues to the community.

9.15 The city of Bath is ultimately highly constrained by key cultural heritage and landscape values that significantly reduce the potential for strategic growth or settlement expansion. However, there are acute community needs that need to be met here, including affordable housing needs (Policy H/AH: Affordable Housing (Large Sites); H/AH: Affordable Housing (Small Sites)), PBSA (Purpose Built Student Accommodation) needs (Policy H/PBSA: Purpose Built Student Accommodation – Provision and Location; H/PBSA: Purpose Built Student Accommodation – Affordable Housing or Rent), economic development needs (Policy J/4: Employment and Skills), and infrastructure development needs (Policy HVC/2: Development within Centres; Policy HVC: Community Facilities). The Options Document highlights key locations within Bath that could be developed to meet some of these needs.

9.16 In the context of the above, the spatial strategy will seek to develop the most accessible areas or areas that can be made more accessible to support future community needs. The delivery of a range of housing types and tenures (including affordable housing) is expected, and this will be aligned with the emerging evidence around community needs. Strategic growth could also deliver benefits for communities, such as new/ improved healthcare (Policy HVC/H: Healthy Places) and educational facilities (HVC: Safeguarding Land for Primary School Use; Policy HVC: Primary School Capacity) and/ or new green spaces (Policy HVC/LGS: Local Green Spaces). Such growth and improvements can positively contribute to reducing deprivation and improve equitable access.

9.17 The spatial strategy will be supported by a wider policy framework to guide development, and notable policies in this respect includes dedicated policies for local character and distinctiveness (Policy HD/LCD: Local Character and

Distinctiveness), retention and expansion of community services and facilities (Policy HVC/2: Development within Centres; Policy HVC: Community Facilities), protection and expansion of the green infrastructure network, design (including design codes) (Policy HD/DC: Design Codes), the public realm and urban fabric, streets and spaces, cultural heritage (Policy HD/HE: Historic Environment), and connectivity and infrastructure provision.

9.18 Considering these points, the overall effects for communities are considered likely to be **significant positive effects**. However, it is recognised that accommodating a spatial growth strategy will have implications for different settlements across the district and will need to be carefully managed to avoid impacts arising in relation to settlement identities.

Economy

9.19 The Options Document recognises the role of the Local Plan in preparing for the future in terms of the economy and outlines principles for a resilient, sustainable economy that is fair, green, creative, and connected. The Local Plan Options are supported by an aligned Economic Strategy, Future Economic Needs Assessment and Office and Industrial Market Review, and will be aligned with a Cultural Strategy which will help to deliver against core priorities. These priorities are underpinned by the 'Doughnut Economics Model' – an approach that places equality and respect, including 'good jobs' and the 'skills to thrive' at the heart of future planning.

9.20 The draft Economic Strategy (subject to approval at the same time as the Options Document) shows that within the district there is a highly skilled workforce and unemployment levels are low. The district is home to some nationally leading and significant businesses and economic sectors. Tourism, along with cultural and creative industries, also play a key role. However, evidence indicates the economy is underperforming and median wages in the district are lower than those nationally. This makes access to local housing more difficult (with high house prices across the district) and the lack of affordable housing for residents and workers is known to have a direct impact on the economy. The Future Economic Needs Assessment and Office and Industrial Market Review indicates that the district has experienced relatively weak economic performance over the 20-year historic period compared to both the sub-region and national averages and it is likely that a lack of supply of suitable employment sites and premises has contributed to this position (including industrial, warehousing, and offices). It reports of firms unable to locate or expand in the area, and some companies having to relocate outside the district to find suitable accommodation.

9.21 One way in which the Local Plan will seek to address these issues is through the identification of land for further economic development (Policy J/2: Strategic and Locally Significant Industrial Sites; Policy J3: Undesignated Industrial Sites). This is alongside the protection of existing employment sites and floorspace. Development will seek to deliver against the forecasted economic and jobs growth needs whilst responding to a climate emergency and transitioning towards carbon neutrality. This will mean ensuring new development is located in areas that reduce the need to travel and encourage travel by sustainable transport modes, including active travel.

9.22 The city of Bath is recognised as the main economic centre in the district, home to key employment and educational establishments, and attracting economic benefits associated with tourism and cultural activities. Bath is expected to be a focus for new economic or employment space (particularly high-quality office space and industrial floorspace) whilst working within the constraints of a limited and premium land supply here. Key opportunities include Bath Quays North, where options are exploring the potential to deliver a greater range of economic uses, including start up space and research and development space alongside office space. The potential to intensify economic development at Newbridge Riverside is also being explored. Additionally, the core characteristics of Bath that continue to attract many visitors and investment associated with tourism and cultural activities will continue to be promoted and enhanced where possible.

9.23 Additionally, the Bath-Bristol corridor is likely to be a key area for further economic growth, recognising the beneficial and sustainable links to both cities and their economic bases, alongside key local economic centres such as Keynsham and Hicks Gate.

9.24 The Somer Valley Enterprise Zone will likely be a key focus for improving local employment opportunities in the south of the district, and the Options Document highlights the need for significant investment in the Somer Valley to improve public transport connections.

9.25 The Options Document recognises that poor access to public transport affects the functionality of the rural economy which is largely formed of farming, self-employment and small businesses. The rural economy needs support to grow and maintain vitality, including planning support to improve digital connectivity, improve sustainable transport connections (Policy ST1: Promoting Sustainable Travel And Heathy Streets; Policy ST2a: Active Travel Routes; and Policy ST7: Transport Requirements for Managing Development), and provide opportunities for rural diversification.

9.26 The wider policy framework recognises the need across the district, to manage, upgrade, and increase the supply of office space (Policy J/1: Change of use of Office use to other uses (existing ED1B, ED1C)), particularly reflecting the post-pandemic trend towards high-quality spaces that draw workers back to the workplace. It also recognises the links to a highly-skilled workforce and the universities, seeking to improve the provisions of training schemes and graduate access to jobs (J/EM: Employment and Skills).

9.27 With regards to the policy framework, the Options Document proposes tightening up policies on loss of employment floorspace. In relation to offices, the policy approach is to encourage the development of Grade A offices to meet the need for high quality floorspace and upgrading of Grade B offices. With regard to smaller premises within Georgian buildings these should not be retained where they are of poor quality, however, retaining some Georgian stock will provide diversity in supply and meet the needs of certain small occupiers and sectors. Hence, the policy Option J/O aims to protect office stock on a case by case basis. Issues relating to the quality and demand for the floorspace, the suitability for modern business requirements, and viability will be taken into account.

9.28 In relation to industrial floorspace the Options Document presents a list of strategically and locally significant industrial/ warehousing sites to be protected for industrial and warehousing uses, plus builders' merchants only under Option J/I. For smaller undesignated industrial sites, Options J/UI sets out criteria to be taken into consideration in assessing proposals for non-industrial uses, including the record of maintenance, occupation status of existing tenants, and viability. It is acknowledged that higher value uses may enable upgrading of sites, where there is no net loss of employment floorspace.

9.29 Considering these points, particularly the proposals to deliver new economic development land to meet growth needs, **significant positive effects** are considered likely overall.

Transportation

9.30 B&NES can be broadly divided into three main areas: the Bath to Bristol Corridor and South East Edge of Bristol; the Somer Valley; and the rural areas. The Bath to Bristol Corridor is defined by the A4 and is the best-connected part of the district in terms of sustainable transport, with two railway stations located in Bath and one in Keynsham. Bath is a regional hub for transport and economic activity; however, traffic congestion is a significant issue both here and across the Bristol to Bath Corridor, especially during peak times. The South East Edge of Bristol contains Whitchurch, which is well connected to Bristol despite being a separate settlement. The Somer Valley is connected to Bath and Bristol via the A367 and A37 respectively and is relatively well served by public transport (only buses). However, due to its distance from these cities, it is not considered as well connected as the Bath to Bristol Corridor and South East Edge of Bristol. The rural areas make up the remainder of the district; here public transport is variable to poor depending on the village. In both the rural areas and the Somer Valley, a greater proportion of people travel to work by car and travel a greater distance.

9.31 The Options Document highlights that the council's approach to future development within the district follows the sustainable transport hierarchy. In the first instance, this involves utilising the spatial strategy, and following a site selection process, to locate people close to the services and facilities that they need, e.g. employment, education, retail, leisure, public transport. It is considered that by reducing the distances that people need to travel for their everyday needs, more people are likely to decide to make these journeys on foot or by bicycle. The Options Document performs well in this respect, identifying potential sites for substantial growth in Keynsham, Saltford, Hicks Gate and Whitchurch, which outside of Bath are considered to be the most sustainable locations from a transport perspective.

9.32 Many of the sites within Bath set out within the Options Document are already allocated in the adopted Core Strategy / Placemaking Plan. There is a strong focus on the improvement of brownfield sites and change of use, e.g. the Milsom Quarter Masterplan, Manvers Street and Bath Quays North. Whilst all these sites are likely to perform positively from a transport perspective, Bath Quays North is a particular standout given its proximity to the railway station and the services, facilities and amenities and employment opportunities on offer in the city centre.

9.33 Another site of note is 'South of Burnett, adjacent to the A39', a greenfield site located adjacent to the A39 just outside of Bath. This site has been identified as a potential long-term opportunity for a standalone development or new community. It would be reliant on improvements to public transport and active travel routes, and therefore a degree of uncertainty is noted in this respect. However, if delivered, it would also benefit other existing communities along this route and in the wider area.

9.34 Whilst congestion is a key issue throughout the district, focusing growth to the Bath to Bristol Corridor and the South East Edge of Bristol is most likely to deliver positive effects in relation to the above. As Bath is heavily constrained from a historic environment and landscape perspective, growth will be focused in Keynsham, Saltford, and Hicks Gate, which will all benefit from the WECA Bath to Bristol Corridor project. Whilst the site options generally perform well from a transport perspective, some still have constraints. These largely relate to access and active travel infrastructure, which the Local Plan is likely to help overcome. However, constraints that are not necessarily possible to overcome also exist. For example, Whitchurch Village Options 1, 2, 3 and 4 are not in proximity to a secondary school, meaning pupils would not be able to walk or cycle to school.

9.35 It is recognised that Keynsham has an incomplete walking and cycling network, with missing links within the town itself as well as between Keynsham and Whitchurch to the west and Saltford to the east. The proposed high growth in these settlements through the Local Plan provides an opportunity to connect the currently fragmented active travel infrastructure, with positive implications for transport. This is likely to be strengthened through the WECA Bath to Bristol Corridor project.

9.36 Whilst the Somer Valley will benefit from the WECA Somer Valley Links project, this part of the district is considered less sustainable as it is in a relatively rural location, further afield from Bath and Bristol, where a significant proportion of B&NES residents commute to for work. Combined with the level of growth proposed here, investment through the WECA Somer Valley Links project is unlikely to be as significant as through the WECA Bristol to Bath Corridor project. With regards to the site options, Peasedown St Jonh and Farrington Gurney (North) – Option 1 are not in proximity to a secondary school, meaning pupils would not be able to walk or cycle to school. In addition, Farrington Gurney (North) – Option 1, as well as Farrington Gurney (South) – Option 2, are within an Air Quality Management Area (AQMA).

9.37 It is noted that as the level of growth at each settlement increases, it is assumed that the number of private vehicles on local roads will also increase. This is a key issue throughout the district, with congestion and journey time delays affecting rural communities as well as urban areas. The A4 through Keynsham is notably subject to high levels of congestion, and it is therefore considered that high growth in this location will lead to the greatest increase in private vehicular use, with potential to significantly exacerbate existing congestion if not appropriately mitigated. It is noted that all options have the potential to lead to significant effects in this respect.

9.38 Despite the above, it is considered that sustainable transport interventions proposed through the WECA projects, alongside appropriately masterplanned strategic development, could reduce the potential for significant adverse

effects. In addition, a key aspect of the plan is "a presumption against building new roads for general traffic and increasing traffic capacity to deliver Local Plan growth", which further strengthens this. It is therefore considered that high growth will likely provide greater critical mass to enable more significant infrastructure improvements, supplementing the WECA projects and better connecting the district's key settlements. This is particularly important given the wider ambitions to transition to a lower-emission infrastructure network, where development will be a key delivery vehicle for the technological and infrastructure advances which underpin the transition. This includes the expansion of the EV network; relocating road space; and extending active travel networks including cycle route connectivity.

9.39 Reflecting the above, a key issue identified by the Options Document is transport and connectivity, with a particular focus on traffic congestion, access to walking and cycling opportunities / infrastructure, and frequent and reliable public transport. In line with this, one of the spatial priorities for the Local Plan is to "reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities". In order to meet this priority, the Options Document is accompanied by a Transport Vision and Objectives, which set out in greater detail what the council are seeking to achieve in respect of their transport policies and projects.

9.40 Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022 and a key priority of the Local Plan is to help, where possible, with its delivery. The JTNZ sets out a plan to tackle some of the biggest challenges society faces, including combating climate change; improving air quality; improving health and wellbeing; and tackling congestion. The JTNZ identifies the changes needed to the transport system to deliver better connected, healthier and sustainable communities, and alongside the new transport strategies, helps to underpin and support the Local Plan.

9.41 With regards to the policy framework, the Options Document proposes changes to a suite of policies on sustainable transport. These seek to deliver well-connected places accessible by sustainable means of transport (policy ST/HS); protect and enhance publicly accessible active travel routes (policy ST/AT); and set out the framework for considering the requirements and implications of development for the highway, transport systems and their users (policy ST/RMD). These changes include, but are not limited to, the use of more proactive wording, i.e. 'enabling' and 'delivering' as opposed to 'encouraging', 'promoting' or 'supporting' (policy ST/HS). This is in addition to referencing the council's Active Travel Masterplan (policy ST/AT) and promoting the "decide and provide" approach (policy ST/RMD). The SA supports these changes as they will all positively contribute towards sustainable transport.

9.42 More broadly, proposed changes to policy HVC/TCD: Development within Centres include encouraging the use of upper floors for offices, residential and other uses, which will capitalise on the availability of services within walking distance and accessibility by public transport. In addition, policy C/EC: Embodied Carbon is closely linked to transport, and one of the proposed options – to alter the standards to require an embodied carbon assessment on major and minor development – is likely to lead to positive effects on transport by encouraging developers to source building materials locally and transport

them via sustainable modes of transport. The SA supports the changes to these policies proposed through the options document.

9.43 Overall, transport and congestion is a key issue for the whole district and is therefore naturally a focus of the options document, as reflected in the discussion above. The Options Document seeks to highlight these issues and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. It is underpinned by key evidence and it is considered that as the plan evolves, further evidence will likely come forward and inform the next stage of plan making and SA. Therefore, **uncertainty** is noted at this stage.

Landscape

9.44 The district has exceptional landscape character, as reflected by the presence of the Cotswolds National Landscape and Mendip Hills National Landscape (previously known as Areas of Outstanding Natural Beauty (AONBs)). Settlements which are particularly sensitive in this respect include Bath, Saltford, Peasedown St John, and Farrington Gurney. Green Belt is also a key constraint covering 70% of the district, and plays an important role in preventing the merging of a number of settlements.

9.45 In terms of Bath, the Options Document does not seek to deliver new significant growth to the city, recognising the sensitivities present. As well as the National Landscape and its associated higher topography, this also includes the presence of the World Heritage Site, of which the landscape is a significant contributor to the Outstanding Universal Value (see the WHS Setting SPD for further detail, alongside Appendix D of this report). The Bristol to Bath Green Belt is another key constraint for the area, designated to keep land permanently open.

9.46 For all of the Bath site allocations it is therefore proposed, where relevant, to update the range of development requirements to include references to the need for a transformational approach to the protection and enhancement of biodiversity. The integration of green infrastructure can lead to positive effects for landscape, contributing to local identity and landscape character; particularly at a wider scale.

9.47 Many of the sites/areas within Bath considered through the Options Document are already allocated in the adopted Core Strategy/Placemaking Plan, with options proposed focusing on improvement of brownfield sites within the city. Notably, support is given to the Bathscape vision, underpin by policies and guidance seeking to protect, promote and deliver the ambitions for a landscape city. This will support the protection and enhancement of Bath's natural assets, particularly the attractive and distinct landscape and settlement character (e.g the Cotswolds National Landscape).

9.48 Options proposed present opportunities to deliver multifunctionality and more meaningful landscape spaces within Bath, recognising that the Local Plan is required to manage the evolution of the city whilst avoiding harm to the OUV of the WHS. Further examples of relevance include protecting sensitive landscapes such as green hillsides from development, and guiding the height of new buildings.

9.49 It is necessary here to specifically highlight the potential long-term opportunity for a standalone development or new community at South of Burnett, adjacent to the A39 just outside Bath. This site is constrained from a landscape perspective, falling within the Green Belt, adjacent to the WHS setting boundary and within the setting of the Chew Valley to the west. The Options Document identifies the site for "causing less harm to the landscape than other locations close to Bath", and proposes mitigation in the form of woodland planting, to provide screening to the Chew Valley. It is considered that the site has the potential to lead to significant adverse effects on the landscape and should be supported by further evidence gathering to inform any decision making.

9.50 The majority of the district's wider settlements, with the exception of Peasedown St John, sit at lower elevations than Bath, and therefore future growth is unlikely to significantly impact views to the National Landscapes, particularly when considered alongside mitigation proposed through the Options Document (site specific and development management policy). Views from the National Landscapes are likely to be more of an issue for forthcoming development, as explored through the assessment of settlements within Appendix D.

9.51 More widely, consideration is given to the north of the district (i.e. Keynsham, Saltford and Whitchurch), being located within the Bristol and Bath Green Belt which extends along the Bath to Bristol A4 corridor, and at the south east edge of Bristol. The Options Document sets out options for growth around each settlement, recognising that the impact of removing parcels from the Green Belt will need to be considered on both an individual and cumulative basis. WECA have published the Strategic Green Belt Assessment, and this document has been used as a starting point by the Council to understand the contribution that parcels across the area make to the five purposes of the green belt set out in the NPPF. Following this Options consultation, further assessment will be carried out in relation to the impact of removing preferred site allocations from the Green Belt, and will also consider opportunities for enhancing land retained in the Green Belt. This evidence will inform the next stage of plan-making and SA.

9.52 While the landscape within the Somer Valley to the south of the district is less constrained, the rural character of settlements remains of high quality and therefore further assessment of landscape impact and mitigation is required to inform decision making. Nonetheless, the Options Document highlights that the area has the potential to be developed for residential uses, together with landscape and habitat enhancement/creation which could deliver improvements. The landscape setting surrounding Radstock for example is identified as important, with green links to the countryside and landscape-led screening vital for any future growth.

9.53 In terms of the wider development management policy framework, it is recognised that Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the district. This is supported by Policy NE2A which seeks to protect, conserve and enhance the landscape setting of settlements.

9.54 Policy NE2B provides specific control over the enlargement of residential curtilages, recognising that such enlargement can, depending on the circumstances, have a detrimental effect on the special landscape qualities and

character of the area and lead to 'suburbanisation' of the countryside. While the current policy accords with national policy and local strategies, the Options Document highlights that changes could be incorporated to ensure the policy has clear links to wider natural environment policy, including reference to non-designated landscapes. This reflects the sensitive nature of the district's landscape outside of landscape which are designated (as discussed within Appendix D). This policy approach is supported through the SA.

9.55 The suite of design policies are of relevance to landscape, recognising that a well-designed place comes about through considering landscape character, and how places or developments sit within the landscape. This influences the siting of new development and how natural features are retained or incorporated into it. Updates to Policy HD/DC 'Design Codes' are supported, while Policy HD/GUDP: General Urban Design Principles and Policy HD/LCD: Local Character and Distinctiveness are noteworthy; with no major changes proposed.

9.56 It is recognised that a Local Nature Recovery Strategy (LNRS) is currently being prepared covering the West of England (Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire), in accordance with the Environment Act (2021). This will likely address issues of fragmentation and ecological connectivity, providing opportunities to integrate wide-ranging landscape considerations as part of the Strategy. Policy option 1 is therefore supported in relation to policy N/EN: Ecological Networks.

9.57 It is important to discuss the wider Green Infrastructure (GI) and natural capital options presented, recognising that well planned green infrastructure contributes to high quality and accessible landscapes, benefiting people and places. The Urban Greening Factor (UGF) is an important planning tool in this respect, designed to improve the provision of GI and increase the level of greening in urban environments. As such, Policy N/GI: Green Infrastructure Option 3, which seeks to include a new GI policy with a separate policy for the GI Framework UGF, is supported. Having an UGF will assist in securing no loss of green infrastructure, and can be used alongside Biodiversity Net Gain (BNG) to help set the quantity and functionality of GI that should be delivered on-site. This could help inform design principles, responding to landscape character and contributing to high quality and accessible landscapes to benefit people and wildlife.

9.58 Looking specifically at options for proposed for BNG, it is recognised that delivering biodiversity and wider environmental net gains has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. The options which seek to introduce a 20% requirement of BNG for schemes (Option 2 and 3) are therefore supported in respect of landscape objectives.

9.59 The Options Document highlights that the NPPF now requires authorities to make new streets tree-lined, supported by Natural England evidence. The option to revise Policy N/TWC: Trees and Woodland Conservation to include a requirement for new street lined trees is therefore supported, delivering design principles that support character and place.

9.60 Options supported reflect the current and up to date guidance set out within NE GI Framework. Also noteworthy in this respect is Policy N/ES 'Ecosystem

Services', which proposes that policy NE4 better address/require a nature-based solutions approach; again aligning with NE GI Framework – Principles and Standards, alongside landscape quality objectives and design principles.

9.61 In terms of renewable energy options, depending on the scale, design, and prominence; renewable energy proposals have the potential to adversely impact the district's nationally important landscapes and their settings, alongside local landscapes and features. While it is recognised that higher level policy provides a level of protection to landscape, the medium and high RERA options could lead to adverse effects, with uncertainty concluded at this stage.

9.62 In conclusion, the nature of likely effects on landscape as a result of the Options Document are **mixed**. This reflects the sensitivity of the landscape within and surrounding the district's settlements, and that notably any growth to constrained settlements could adversely impact upon intrinsic qualities and setting of NLs, as well as the OUV of the WHS, and the purposes of the Green Belt. However the development management policy framework seeks to ensure the landscape is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of the landscape and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development.

9.63 More broadly, options in respect of town/ village centres and renewable energy development could have implications for the landscape, which will need detailed consideration moving forward.

Historic environment

9.64 Bath is unique in having two world heritage site designations: the city of Bath World Heritage Site, and it is also part of Great Spa Towns of Europe World Heritage Site. This transnational inscription spans 11 spa towns from seven different countries and was inscribed on the list in 2021. Local Plan Policy B4 seeks to prevent harm to the Outstanding Universal Value (OUV) of the city of Bath World Heritage Site (WHS) and its setting and is a material consideration when making planning decisions. The protection of the surrounding landscape of the property has also been strengthened by adoption of the WHS Setting Supplementary Planning Document (SPD), as referenced through the Options Document and Policy B4.

9.65 The Options Document considers that Policy B4 (underpinned by the WHS SPD) is fit for purpose, and subsequently does not seek to allocate new significant growth in Bath. This is reflective of the spatial objective 'to respect, conserve and enhance our heritage assets and their landscape settings, in particular the World Heritage Site.'

9.66 Many of the sites/areas within Bath considered through the Options Document are already allocated in the adopted Core Strategy/Placemaking Plan. For all of the site allocations it is proposed, where relevant, to update the range of development requirements to include references to the need for a transformational approach to the protection and enhancement of biodiversity. The integration of green infrastructure can lead to positive effects for the

historic environment, for example strengthening or restoring historic links between heritage assets; and improving the setting of assets (recognising the role GI plays in this).

9.67 Within the city of Bath, options focus on the improvement of brownfield sites and change of use e.g. the Milsom Quarter Masterplan is a major regeneration project led by the Council. Another example is Manvers Street which forms part of a wider major regeneration project (Bath Riverside). It is recognised that heritage-led regeneration and heritage-inspired design can bring a multitude of benefits, enhancing historic assets with innovative and creative solutions.

9.68 It is however noted that options to further consider Bath Central Riverside as a sports stadium could adversely impact the WHS and its OUV, alongside the wider sensitive historic environment within and surrounding Bath.

9.69 Another site of note is South of Burnett, a greenfield site located adjacent to the A39, 6km outside of Bath. There is the potential for development of the site to impact upon Stantonbury Hill SAM and its setting, alongside the wider setting of the WHS.

9.70 Outside of Bath, the north of the district is considered more constrained by designated assets than the south, although significant clusters of listed buildings can be found in the majority of settlements. Directing growth to the north has the potential to impact upon the historic settlements of Keynsham and Saltford, both of which are focused around historic cores including Conservation Areas, and the River Chew Valley and River Avon, respectively. There is also a significant green gap between Keynsham and Saltford, which contributes towards the historic setting of settlements. The Options Document identifies as a priority that new development retain the gap, and seek to improve the quality of the gap, making it more accessible and useable to all.

9.71 Key priorities for Keynsham and Saltford could be revisited to include the protection and enhancement of the historic environment, reflecting the extent of assets present and the settlements' origins.

9.72 The importance of Whitchurch's heritage is reflected through the area's Statement of Heritage Significance and Appraisal of Risk of Harm (2023). This evidence document has been carried out to inform the preparation of the Whitchurch options which are set out in the options document. The Options Document highlights that options presented for Whitchurch Village have been directed to locations where harm to heritage assets would likely fall within the NPPF definition of 'less than substantial harm' and could be reduced by appropriate mitigation such as landscape design solutions. Any future development on land parcels assessed to cause less than substantial harm to a heritage asset will need to weigh this harm against any public benefits that are provided by developing the parcel.

9.73 To the south, the Somer Valley area has a rich industrial and mining history, and this heritage is visible in both the settlements and landscape (see SA of settlements in Appendix D). The Options Document highlights that the heritage of settlements could be better promoted and curated, and therefore proposes that any new development work with the Radstock Town Centre Regeneration Action Plan, and the Midsomer Norton Heritage Action Zone, aiming to increase

footfall to these town centres. This is anticipated to positively impact upon local heritage, improving access to and understanding of assets.

9.74 Policy HE1 is anticipated to lead to positive effects in respect of the above discussion, managing the historic environment in “the most efficient and effective way, and to sustain its overall value to society”. The policy also seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting in the development process. Adjustments are suggested through the Options Document to improve the clarity of Policy HE1 and ensure consistency with national policy and guidance, and effectiveness. This includes aligning with Policy B4 with reference to the WHS, further reinforcing the asset’s OUV (the importance of which is reiterated above and within Appendix D).

9.75 Design policies are a key consideration in addressing the Local Plan’s spatial priorities, with specific reference made to NPPF Para 131 ‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.’

9.76 From a historic environment perspective, there is an argument for tempering change within town and village centres, particularly where the effect could be to erode historic character strongly associated with retail and other traditional town/ village centre uses. This approach aligns with the National Design Guide (2021), which recognises the need to “respond positively to the pattern of uses and activities, including community facilities and local services”. The Options Document subsequently requires that all policies will need to be updated to reflect the national policy context, particularly the National Design Guide and the requirement for Design Codes.

9.77 Updates to Policy HD/DC ‘Design Codes’, further reflect NPPF (para 133-134), which sets out that local authorities should seek to provide maximum clarity about design expectations at an early stage. As such, all guides and codes “should be based on effective community engagement and reflect local aspirations for the development of their area”, with detailed background and evidence set out in the Heritage and Design Topic Paper. In this context, there is an argument that change can be positive in terms of providing an active use for heritage assets and preventing deterioration of traditional town and village centre character.

9.78 Policy HD/GUDP: General Urban Design Principles and Policy HD/LCD: Local Character and Distinctiveness are also key policies in this respect and are considered fit for purpose with no major changes required.

9.79 Further updates suggested to area specific policies include the Somersetshire Coal Canal and the Wansdyke earthwork; two important linear historic assets in Bath and North East Somerset. The approach set out seeks to offer a solution which allows the canal to be restored to navigation while minimising the impact of that restoration on landowners/homeowners. This is reflective of evidence updates and seeks to ensure consistency across policies.

9.80 In terms of sustainable construction and zero carbon, updates to Policy C/RD: Sustainable Construction for New Residential Development seek to introduce

ambitious standards for proposals which may increase the cost of the development to the detriment of other requirements. However, going over and above those required nationally, can help to i) secure a sustainable future for designated and non-designated heritage assets, and ii) conserve and where appropriate enhance the design, character, appearance and historical significance of features and areas of historic environment interest. Similar effects can be drawn in relation to updates being explored to Policy C/RD: Sustainable Construction for New Residential Development; with support given to options which seek to tighten requirements.

9.81 In terms of renewable energy options, depending on the scale, design and prominence, renewable energy proposals within the setting of a heritage asset may cause harm to the significance of the asset, and there can also be impacts on historic landscapes. While it is recognised that higher level policy provides a level of protection to heritage, the medium and high RERAS options could lead to adverse effects, with uncertainty concluded at this stage; particularly given the sensitive nature of B&NES's historic environment.

9.82 The options which seek to include a 20% BNG requirement (for at minimum major development) are also supported, alongside the introduction of a new GI policy consolidating NE1 and CP7 which presents Natural England GI Framework, and a separate policy for the GI Framework Urban Greening Factor (UGF). These options have the potential to enhance and improve the quality of the public realm, which may support the setting of the historic environment and contribute to historic landscape character.

9.83 In conclusion, the nature of likely effects on the historic environment as a result of the Options Document are **mixed**. This reflects the sensitivity of the historic environment throughout the district, recognising that any impact on the OUV of the Bath City WHS or its setting could in turn impact upon its UNESCO listing. Outside of Bath and its environs, many of the district's settlements have rich heritage resources and therefore growth has the potential to lead to adverse effects. However, the development management policy framework seeks to ensure the historic environment is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of a heritage asset and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development.

9.84 More broadly, options in respect of town/ village centres and renewable energy development could have implications for the historic environment, which will need detailed consideration moving forward.

Biodiversity

9.85 B&NES is constrained by international, national, and local biodiversity sites, and as such protecting habitats and supporting nature's recovery are important objectives for the Council, as reflected through the options document.

9.86 In terms of international designated sites, the Local Plan Options Document is not a formal Planning Policy Document or plan and therefore a formal Habitat Regulations Assessment (HRA) is not required at this stage. An initial scoping of potential issues was considered helpful and appropriate at this stage to

support consideration of options and the next stage of plan making. This HRA scoping (2024) has been undertaken to scope the possible impact and environmental outcomes of the policies and site allocations being considered. The scoping further identifies if policies/ sites would be likely to have a significant effect on any European Site, and presents changes and mitigation measures for the further drafting and refining of sites and policies.

9.87 The European sites of considered through HRA scoping to be of relevance to the new Local Plan are:

- Chew Valley Lake SPA
- Bath & Bradford on Avon Bat SAC
- North Somerset & Mendips Bat SAC
- Mendip Woodland SAC
- Avon Gorge SAC

9.88 The HRA scoping review of policies suggests that whilst some policy options could potentially cause some impact on European sites, there is likely to be scope to add clauses to minimise or avoid any significant effect. This includes the re-drafting of policies to include additional mitigation measures, with an awareness of the need to safeguard European sites and functionally linked land.

9.89 The review of site allocation options concludes that none of the options raise outright concerns alone, (although the options for West of Bath and south of Burnett may need bat activity surveys to inform site development requirements) and it is considered that potential impacts of individual sites could be minimised through the development of specific site development requirements.

9.90 However, the HRA scoping further concludes that the potential cumulative impacts to the Bradford on Avon Bat SAC, and to the Chew Valley Lake SPA, cannot be ruled out and there may be requirements for contributions to costed action plans for these sites. Consultation with Natural England to explore this need is recommended.

9.91 National and local biodiversity sites extend throughout the district, with Sites of Special Scientific Interest (SSSI) concentrated in the east and west of the district, while Ancient Woodland is more evenly distributed across the district - but most prevalent in the east. While the Options Document presents a range of options for growth within the district's settlements (which are assessed in further detail in Appendix D); notable in this respect is options presented for Keynsham. Keynsham is constrained by national and local biodiversity sites, as well as being bisected by the River Chew, which provides an important wildlife and recreational corridor through the town.

9.92 Key priorities for Keynsham include to restore the natural connectivity and functioning of the river and flood plain for key species; and to explore the green infrastructure opportunities provided by the River Chew Valley through Keynsham, the River Avon corridor, and Stockwood Vale. This is reflected through options proposed for the area, with a range of development requirements set out to ensure the delivery of outcomes that "genuinely contribute to nature recovery". All options are also required to maximise

ecological mitigation and Biodiversity Net Gain (BNG), with site specific mitigation provided where relevant.

9.93 However, further consideration is given to the site presented at North Keynsham, which is constrained by Stidham Farm SSSI and Site of Nature Conservation Interest (SNCI) located to the east of the site, and Broadmead Field SNCI and River Avon SNCI both located within the site boundary. While ecological mitigation would be mandatory, further evidence required should include an ecological assessment to better understand any residual impacts on designated and undesignated sites and features. This recommendation extends to any site constrained in this respect; recognising that this evidence can better inform the current and changing condition of areas. This can in turn inform masterplanning and design to ensure the positive integration of biodiversity within development proposals.

9.94 This approach is more widely supported through the options document, with the document highlighting that “biodiversity sites will be positively integrated where possible, for example creating green links throughout the residential areas to enhance local biodiversity and provide a high-quality public realm and direct access to the countryside.”

9.95 Options presented for north and east Radstock, for example, further reiterate the importance of green links through development. Benefits highlighted include to create biodiversity links, support habitat improvement, provide views to the countryside, and improve the connectivity within the neighbourhood. Options proposed seek to support the protection of high quality woodland in the area, as well as identifying opportunities such as improving the quality of the public realm and providing direct access to the countryside.

9.96 In terms of the development management policy framework, key policy context includes the Government’s recent commitment to an internationally agreed '30 by 30' target to protect 30% of all land and seas by 2030. This is reflected in the nature recovery targets set for the west of England, which have been adjusted for Bath and North East Somerset. As set out in the Ecological Emergency Action Plan (EEAP), and reiterated through the options document, there is a need to:

- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset
- Increase the abundance and distribution of key species across Bath and North East Somerset
- Enable more people to access and engage with nature

9.97 Placemaking Plan policy NE3 Sites Habitats and Species is the overarching policy in this respect, according with national and local strategies. Policy NE3 seeks to conserve and increase the abundance and diversity of Bath and North East Somerset’s wildlife habitats and species, and to minimise adverse effects where conflicts of interest are unavoidable. However the Options Document highlights that amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement; including measures to help increase the abundance and distribution of key species, and in general meeting the guiding priorities of the EEAP. This would likely lead to positive effects in relation to biodiversity objectives.

9.98 It is recognised that there is a focus nationally on ensuring that steps are taken through the planning application process to avoid and mitigate negative effects and realise opportunities – both onsite and offsite – delivering a net positive effect for biodiversity. This approach, known as securing biodiversity 'net gain', has been introduced through the Environment Act, and mandates that all qualifying schemes secure a net gain of 10%. Once the mandatory requirement for BNG is in place (February 2024), there is no technical need to repeat the legal requirements in local policy.

9.99 Many local authorities are therefore being seen to set policy requiring a higher percentage net gain, where there is evidence to support such an approach. Requiring 'at least 10% measurable BNG', or an exceedingly ambitious '20% BNG', can be calculated using Natural England's biodiversity metric, to ensure the delivery of maximum biodiversity on site.

9.100 Options are presented through the Options Document to this effect, setting policy to guide the local approach to securing BNG. To deliver the Council's ambitions as set out above, the requirement for 20% BNG for all or some types of development is being considered. These options (Option 2 and 3) presented for Policy N/BNG: Biodiversity Net Gain are supported in respect of meeting biodiversity objectives.

9.101 The production of a West of England Local Nature Recovery Strategy (LNRS) is also anticipated to deliver positive effects, particularly where the LNRS be available to guide and inform the delivery of action for nature recovery regionally across B&NES, Bristol, North Somerset and South Gloucestershire. The areas mapped that could become, of particular importance for biodiversity within the LNRS will also be used to define areas recognised as being of Strategic Significance within formal BNG calculations. This reflects the national focus on building a Nature Recovery Network, with efforts spatially targeted at priority areas.

9.102 The council is also considering Natural England's 'Green Infrastructure Framework - Principles and Standards for England' (Green Infrastructure Framework), which includes standards for accessible greenspace, urban nature recovery, urban greening and urban tree canopy cover. This will require a prioritising of a revised GI policy, and investment in green infrastructure on a par with grey infrastructure.

9.103 Planning for biodiversity is essential for securing natural capital and flows of ecosystem services, delivering nature-based solutions; and therefore the revised GI policy is supported. Furthermore, the introduction of urban greening into the policy will bring benefits including increased habitat area and diversity, increased populations of rare or protected species and habitats, and increased opportunities for species for longer distance movement. Setting conservation principles and identifying opportunities for habitat restoration and green links will be key in this respect, and is reflected through the site allocation policy options presented through the document (and briefly touched on above).

9.104 It is also considered that delivering measures to improve health and wellbeing, underpin by the B&NES Joint Health and Wellbeing Strategy; will lead to positive effects in relation to biodiversity. Options proposed for Policy HVC/H: Healthy Places notably places emphasis on creating inclusive and accessible public realm, while the option to revise Policy N/TWC: Trees and

Woodland Conservation seeks to include a requirement for new street lined trees.

9.105 Finally it is worth touching upon the option for Policy HD/DC: Design Codes, which places focus on design code principles and delivery requirements. The preparation of a 'design code' should refer to the importance of GI as a network of multi-functional green and blue spaces and other natural features, urban and rural. Notably the National Design Guide states that well designed places should integrate into their surroundings, connecting GI and supporting rich and varied biodiversity. All design guides and code should place emphasis on the ability of GI to deliver a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities, and prosperity.

9.106 In conclusion, the findings of the HRA scoping recommends updates to the wording of site and policy allocations to avoid significant adverse effects on European designated sites. However, the HRA scoping also concludes potential cumunlative impacts to the Bradford on Avon Bat SAC, and to the Chew Valley Lake SPA, cannot be ruled out and consultation with Natural England is recommended. While the spatial strategy hasn't been fully determined yet, and will inevitably influence the potential for significant effects, taking a precautionary approach, **minor negative effects** are concluded at this stage.

9.107 It is however recognised that more broadly, the Options document performs well through placing emphasis on connecting places through the LNRS, planning for BNG, urban greening, and capitalising upon natural capital and ecosystem services. Therefore, options discussed above could lead to **minor positive** effects on biodiversity if opportunities were maximised and recommendations set out through the HRA scoping are adopted; in consultation with Natural England. It is likely this will be explored through the next stage of plan-making and evidence gathering.

Natural resources

9.108 There are five AQMAs in B&NES, which are located in Bath, Keynsham, Saltford, Temple Cloud, and Farrington Gurney. These were all declared due to high levels of nitrogen dioxide (NO_2). As noted above under the transportation SA theme, traffic congestion is a significant issue across the district, particularly in Bath and along the Bath to Bristol Corridor, and this has adversely affected air quality in these locations. Poor air quality in the rural area (Temple Cloud) and Somer Valley (Farrington Gurney) is likely a result of a high level of out commuting and associated traffic congestion along the A37 to Bristol.

9.109 The Options Document highlights that the council's approach to future development within the district follows the sustainable transport hierarchy. In the first instance, this involves utilising the spatial strategy, and following a site selection process, to locate people close to the services and facilities that they need. It is considered that by reducing the distances that people need to travel for their everyday needs, more people are likely to decide to make these journeys on foot or by bicycle. The Options Document performs well in this respect, identifying potential sites for substantial growth in Keynsham, Saltford, Hicks Gate and Whitchurch, which outside of Bath are considered to be the most sustainable locations from a transport perspective. This will have positive implications for air quality in these locations, whilst noting there are some sites

in these locations which are not located within easy walking distance of local facilities that may require interventions to improve access.

9.110 Whilst growth has the potential to exacerbate air quality issues by increasing the number of private cars on local roads, it is also recognised that strategic level growth has the potential to deliver strategic sustainable transport interventions, particularly through the WECA projects. This is particularly true for Keynsham and Saltford, which are located on the A4 linking Bath and Bristol, which will be a focus of the WECA Bristol to Bath Corridor project. However, out of the site options, those that fall within an AQMA – Farrington Gurney (North) – Option 1, Farrington Gurney (South) – Option 2 and Temple Cloud – are all within the Somer Valley (Farrington Gurney) or rural areas (Temple Cloud). Here, strategic sustainable transport interventions are less likely to take place given their rural locations and the lower level of growth proposed in both the Somer Valley and rural areas.

9.111 It is considered that as the level of growth at each settlement increases, so does the potential to deliver strategic transport improvements, which could include new bus stops, improved bus lanes, and better-quality walking and cycling infrastructure. Combined with district-wide green infrastructure enhancements and measures to achieve BNG, this could support improved air quality in the longer-term. Nevertheless, as noted above, it is also likely that high growth will lead to the greatest increase in private vehicles on local roads.

9.112 Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022 and a key priority of the Local Plan is to help, where possible, with its delivery. The JTNZ sets out a plan to tackle some of the biggest challenges society faces, including combating climate change; improving air quality; improving health and wellbeing; and tackling congestion. The JTNZ identifies the changes needed to the transport system to deliver better connected, healthier and sustainable communities, and alongside the new transport strategies, helps to underpin and support the Local Plan.

9.113 The Options Document concludes that policy PCS/AQ: Air Quality remains fit for purpose. However, it outlines that amendments could be made to ensure the policy is clearer, particularly regarding planning balance and judgement. Also of relevance to air quality are the sustainable transport policies, which seek to deliver well-connected places accessible by sustainable means of transport (policy ST1); protect and enhance publicly accessible active travel routes (policy ST2a); and set out the framework for considering the requirements and implications of development for the highway, transport systems and their users (policy ST7).

9.114 The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Data from the provisional ALC shows that the majority of B&NES is underlain by Grade 3 (good to moderate quality) land; however, it is not clear whether this land is Grade 3a (BMV) or Grade 3b (poorer quality). Parts of the west of the district are underlain by Grade 1 (excellent) agricultural land, including Farrington Gurney. Therefore, the plan has the potential to lead to the loss of some BMV land. Similar to the above, it

is considered that as the level of growth at each settlement increases, so does the potential for the increased loss of BMV agricultural land.

9.115 Several of the site options explored through the Options Document would lead to the loss of agricultural land; however, Farrington Gurney (North) – Options 1 and 2 have the greatest potential to lead to the loss of BMV land.

9.116 In Bath, most of the significant brownfield sites across the district have been redeveloped or are already committed for development and therefore, relatively few new brownfield sites available for development exist. Outside of Bath, the Options Document only explores three brownfield sites, which are all located in Keynsham. These are East of Avon Mill Lane and Central Keynsham – Options 1 and 2.

9.117 With regards to the policy framework, under policy C/RE: Renewable Energy Approach the Options Document explores two options. The second option, which is supported by the SA, proposes that the best potential sites for wind energy are safeguarded. The Options Document however recognises that by doing so, it may limit alternative land uses, such as agriculture, which could lead to conflicts with other interests. Also of relevance to the efficient use of land is policy N/ES: Ecosystem Services, as well as policies PMP:RE2: Agricultural Development, and PMP:RE5: Agricultural Land, which have been retained from the Local Plan Partial Update.

9.118 In terms of water resources and quality, the northeastern part of the district, around Bath and Keynsham, falls within the Avon Bristol Urban Operational Catchment, whilst the rest of the district falls within the Avon Bristol Rural Operational Catchment. The River Avon flows between Bristol and Bath, in parallel with the A4 corridor. The River Cam flows between Coley, in the southwest of the district, and Keynsham in the north. The Cam Brook flows between Farrington Gurney, in the south of the district, and Monkton Combe in the east of the district. Both of these watercourses are tributaries to the River Avon.

9.119 With regards to the site options proposed through the options document, West Keynsham Options 1 and 2 require further evidence with regards to the potential risk to a nearby watercourse due to the elevated position of the sites.

9.120 Focusing on the policy framework, and with regards to policy N/FRSD: Flood Risk Management and Sustainable Drainage, the Options Document considers an option which relies on the existing policy approach supplemented by national planning policy. However, the Options Document recognises that this comes with several disadvantages. This relates to existing surface water runoff concerns; the limited uptake in natural / open water SuDS; and the fragmentated management of rainwater. Due to this, the Options Document also considers a second option which requires that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers. The SA supports this option.

9.121 Also of relevance is policy PCS/BHS: Bath Hot Springs, which the Options Document concludes remains fit for purpose. This policy seeks to ensure that both the quality and quantity of the groundwater source is protected from development that is likely to have any adverse effect on this resource. It is also

important to have this policy in place should the Council receive any planning applications for energy mineral exploration and extraction which may impact on hot springs and their sources. The SA also supports this policy.

9.122 In relation to the above, policy M/HC: Conventional and Unconventional Hydrocarbons employs the precautionary principle in setting out a stringent framework within which development involving the exploration and/or appraisal of oil and gas resources will be considered. This is important given fracking could have implications for the hot springs, which rely on underground water resources from a wide geographical area. The Options Document proposes to tighten up the policy to indicate a presumption against development involving the exploration and/or appraisal of oil and gas resources in B&NES. The SA supports these changes.

9.123 Notably, in preparing the Options Document, the Council have engaged with infrastructure providers, including water companies, to understand the implications of growth and to identify how any infrastructure capacity constraints might have implications for the Local Plan spatial strategy. Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

9.124 With regards to mineral resources, limestone is the principal commercial mineral worked in B&NES. There are currently two active sites – one surface working and one underground mine. Upper Lawn Quarry at Combe Down in Bath and Stoke Hill Mine near Limpley Stoke (Hayes Wood to Hog Wood) both produce high quality Bath Stone building for renovation projects and are designated Mineral Safegarding Areas (MSAs). The district also has a legacy of coal mining and there are still coal resources within the area. The coal reserves between Keynsham and Radstock, and to the east of Bishop Sutton, surrounding the former Stowey Quarry, are also designated MSAs. However, the Coal Authority no longer requires the safeguarding of coal resources. Nevertheless, the MSA to the east of Bishop Sutton will likely be retained through the Local Plan to ensure development that would sterilise the reserves does not take place in case there is future interest in working in this area.

9.125 With regards to the policy framework, policy M/M: Strategic Approach to Minerals sets out the strategic approach to minerals for B&NES and seeks to ensure that mineral resources continue to be safeguarded. It also requires that potential ground instability issues, and the need for related remedial measures, are addressed as part of any proposal. The Options Document proposes minor changes to this policy, including supporting secondary and recycled aggregate facilities and progressive and effective restoration of mineral sites. The SA supports these changes.

9.126 In addition, policy M/M clarifies how applications for non-mineral development within MSAs will be considered. The Options Document proposes that additional clarity on what is covered in an MSA is added to the policy. This is in addition to making clear that important minerals infrastructure should be protected and therefore safeguarded in the same way that minerals reserves are. Finally, it is proposed that the Hayes Wood to Hog Wood MSA is extended

southwards and westwards. In relation to this, the Options Document proposes that the Upper Lawn Quarry allocation is amended to include the quarry extension area under policy M/A: Mineral Allocations. The SA supports these changes.

9.127 Policy M/RF: Aggregate Recycling Facilities clarifies the policy approach to considering proposals for aggregate recycling facilities. The Options Document proposes to retain the existing criteria-based approach. In addition, policy M/WW: Winning and Working of Minerals provides a framework against which all minerals developments will be determined and seeks to ensure full consideration is given to minerals related planning applications. The Options Document proposes to retain the existing policy, with minor amendments to ensure that restoration 'enhances' as opposed to 'maintains or enhances' its value to the environment and/or community. The SA supports both of these policies and the proposed changes.

9.128 Finally, the Options Document proposes a new policy – M/WW: Minerals Development: Environmental Enhancement through Restoration – which aims to ensure that minerals development is supported by reclamation and restoration proposals that prioritise environmental enhancement, seeking positive improvements and a net gain in biodiversity. This will relate to the WECA Nature Recover Network and Joint Green Infrastructure Strategy. The SA supports this new policy.

9.129 In terms of waste, and with regards to Policy I/I: Infrastructure Provision, the Options Document proposes to retain a generic policy requiring that new developments must be supported by the delivery of the required infrastructure to provide balanced and more self-contained communities. The policy will ensure that infrastructure is delivered at the earliest opportunity and in a co-ordinated way prior to occupation of new development. The SA supports this policy.

9.130 Overall, it is considered that there is potential for the options presented in the Options Document to lead to **significant negative effects**. Whilst impacts on air quality, water resources and quality, and minerals and waste will likely be mitigated through the policy framework, the plan will inevitably lead to the extensive loss of greenfield / BMV land. Nevertheless, it is recognised that where brownfield sites are available, particularly in Bath and Keynsham, these are being considered for development through regeneration schemes. It is also noted that in the Somer Valley and rural areas, brownfield land is sparse and therefore to meet the identified local housing need, development of greenfield / BMV land is largely unavoidable.

Climate change

Climate change mitigation

9.131 One of the largest contributors to climate change, which the Local Plan has the potential to mitigate, is transport. As noted above, the Options Document highlights that the council's approach to future development within the district follows the sustainable transport hierarchy. The Options Document performs well in this respect, identifying potential sites for substantial growth in Keynsham, Saltford, Hicks Gate and Whitchurch, which outside of Bath are

considered to be the most sustainable locations from a transportation perspective.

9.132 Many of the sites within Bath set out within the Options Document are already allocated in the adopted Core Strategy / Placemaking Plan. There is a strong focus on the improvement of brownfield sites and change of use, e.g. the Milsom Quarter Masterplan, Manvers Street and Bath Quays North. Whilst all these sites are likely to perform positively from a climate change mitigation perspective, Bath Quays North is a particular standout given its proximity to the railway station and the services, facilities and amenities and employment opportunities on offer in the city centre.

9.133 Another site of note is 'South of Burnett, adjacent to the A39', a greenfield site located adjacent to the A39 just outside of Bath. This site has been identified as a potential long-term opportunity for a standalone development or new community. As it is some distance away from any large settlements, it would need to be at a big enough scale in order to be a new settlement. Whilst this is a challenge in itself, if delivered, it would also benefit other existing communities along this route and in the wider area. Whilst there is the opportunity to deliver highly sustainable development on greenfield land, this will likely be associated with higher embodied carbon and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. However, it is noted that a significant portion of this area is owned by the Duchy, who have a proven track record of delivering high quality, sustainable and mixed-use development.

9.134 From a climate change mitigation perspective, it is considered that the Bath to Bristol Corridor and South East Edge of Bristol is the most sustainable location given its proximity to services and facilities, employment opportunities, and sustainable transport hubs. This will likely be enhanced as a result of the WECA Bristol to Bath Corridor project, which will deliver a range of strategic measures to support modal shift and reduce emissions from private vehicles. The Options Document performs well in this respect, identifying potential sites for high growth in Keynsham, Saltford, Hicks Gate and Whitchurch.

9.135 Whilst the Somer Valley will benefit from the WECA Somer Valley Links project, this part of the district is considered less sustainable as it is in a relatively rural location, further afield from Bath and Bristol, where a significant proportion of B&NES residents commute to for work. Combined with the level of growth proposed here, investment through the WECA Somer Valley Links project is unlikely to be as significant as through the WECA Bristol to Bath Corridor project. In this respect, the Somer Valley performs less favourably from a climate change mitigation perspective.

9.136 It is noted that as the level of growth at each settlement increases, it is assumed that the number of private vehicles on local roads will also increase. This is a key issue throughout the district, with congestion and journey time delays affecting rural communities as well as urban areas. The A4 through Keynsham is notably subject to high levels of congestion, and it is therefore considered that high growth in this location will lead to the greatest increase in private vehicular use, with potential to significantly increase transport emissions if not appropriately mitigated. It is noted that all options have the potential to lead to significant effects in this respect.

9.137 Despite the above, high growth offers greater potential to secure high levels of resource efficiency; and to plan for sequestration and for development-wide solutions to energy provision, such as decentralised energy schemes. As such, high growth has the potential to be offset by opportunities for sustainable design, renewable energy and sequestration measures. This is in addition to district-wide active travel networks and green infrastructure (including SuDS), which will address both climate change mitigation and adaptation through improved resilience to extreme weather events such as flooding and heatwaves. This will have knock-on positive effects for biodiversity, health and wellbeing, and landscape.

9.138 Reflecting the above, the Options Document identifies the climate and ecological emergencies as a key issue. Notably, B&NES declared a climate emergency in 2019 and is aiming to be carbon neutral by 2030. Key B&NES strategies include the adopted Climate Emergency Strategy and Climate Emergency Action Plan. The Climate Emergency Strategy sets out the four strategic priorities, which are to: decarbonise buildings, decarbonise transport, increase renewable energy generation, and decarbonise the council's own operations.

9.139 With regards to the policy framework, policy C/RD: Sustainable Construction for New Residential Development currently sets limits on space heating and energy consumption in new build residential dwellings. The policy also requires energy needs to be met through on-site renewable energy to match total energy use. The Options Document explores three options for this policy. The second option looks at setting stricter standards for space heating and energy use, whilst continuing for energy needs to be met on site through renewables. Meanwhile, the third option would alter the metric used from space heating and energy use intensity to a percentage carbon reduction from the target emission rate of the building as assessed by the standard assessment procedure (SAP) and as referenced in the recent Written Ministerial Statement. This option will also explore the addition of requiring no use of on-site fossil fuels. Both of these options are supported through the SEA, as they go above retaining the existing standards (the first option), resulting in more efficient homes and contributing towards climate change mitigation.

9.140 In addition to the above, policy C/NRB: Sustainable Construction for Non-Residential Buildings requires a 100% reduction in operational carbon emissions from the buildings regulation standard in part L. The policy requires that energy efficiency should be maximised through efficient fabric and services with energy use being met through on-site renewables. The Options Document explores three options for this policy. The second option looks at setting a space heating standard for non-residential buildings, which will result in a more accurate assessment of the building's operational energy. The third option considers the use of BREEAM standards to assess the efficiency of buildings, requiring all applications to achieve an 'Excellent' BREEAM rating as a minimum. Both of these options are supported through the SEA, as they go above retaining the existing standards (the first option).

9.141 Policy C/EC: Embodied Carbon requires an embodied carbon assessment on sub-structures, super-structures and finishes. The Options Document proposes three options for this policy. The second option includes setting a stricter standard, which will require more sustainable materials to be used in

construction. The third option seeks to ensure buildings are only demolished when reuse is not a viable option, reducing embodied carbon emissions. Both of these options are supported through the SEA, as they go above retaining the existing standards (the first option).

9.142 Policy C/RE: Renewable Energy sets out the criteria for all standalone renewable energy projects, as well as specific criteria for wind energy and ground mounted solar. The Options Document presents options for how both the target and approach to the policy could be revised to plan positively for renewable energy while ensuring that adverse impacts are addressed satisfactorily. With regards to the target, the Options Document proposes three options for this policy. Option 1b proposes meeting the equivalent of 33% of demand in B&BES by 2030, whilst option 1c proposes meeting the demand in full by 2030. An alternative approach is also presented, which involves a flexible target. However, the adaptive nature of this approach could lead to delays in implementation and flexibility is inherently associated with uncertainty. Therefore, the SEA supports options 1b and 1c, as they go above the first option whilst maintaining a degree of certainty.

9.143 With regards to the options for the policy approach, the first option proposes to keep the broad areas of search approach established through the LPPU, with scope to review or add new elements. The second option proposes to safeguard the best potential sites for wind energy; the SEA supports this option as it will ensure the optimal utilisation of resources.

Climate change adaptation

9.144 Fluvial flood risk varies across the district. The River Avon flows between Bristol and Bath, in parallel with the A4 corridor. Areas of flood risk exist along parts of the River Avon, and Bristol City Council are currently preparing a Bristol Avon Flood Strategy, to consider potential areas of mitigation required along the river. B&NES Council and Bristol City Council are in regular correspondence to discuss any impact that flood defence works in the Bristol area might have cross-boundary in B&NES, particularly in the north Keynsham area. The River Cam flows between Coley, in the southwest of the district, and Keynsham in the north. The Cam Brook flows between Farrington Gurney, in the south of the district, and Monkton Combe in the east of the district. Both of these watercourses are tributaries to the River Avon and are also associated with areas of flood risk, particularly to the west of Bishop Sutton.

9.145 A particularly constrained site, from a flood risk perspective, explored in the Options Document is North Keynsham. This northwestern part of the site is located in Flood Zone 3, and other parts of the site are located in Flood Zone 2. However, the Options Document recognises that there are significant opportunities for nature recovery and wetland habitat within the part of the site located in Flood Zone 3.

9.146 The Options Document sets out spatial strategy principles, one of which is flood risk. It highlights that ensuring that flood risk is properly considered is an important factor influencing the location of development and resilience to climate change. Flood risk is initially considered through reference to the Level 1 Strategic Flood Risk Assessment in identifying flood risk areas. This informs a sequential approach to development locations, seeking to avoid locating vulnerable uses (e.g. residential development) in those areas at higher level of

risk from flooding. For some potential development areas or options a more detailed or Level 2 Flood Risk Assessment may be needed and this will be undertaken to inform the next stages of the Local Plan.

9.147 Flood risk is highlighted as a key issue in the option document, which sets out that flood risk and surface water run-off will need to be managed to respond to increasing frequency of extreme weather events, using nature-based solutions wherever possible.

9.148 A focus of flood risk is policy N/FRSD: Flood Risk Management and Sustainable Drainage, which, in line with the NPPF, seeks to avoid inappropriate development in areas at risk of flooding and directing development away from areas at highest risk. As an alternative to relying on the existing policy approach, the Options Document proposes that it is required that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers. This not only benefits climate change adaptation by reducing flood risk, but also BNG by increasing the cover of green / blue infrastructure across the district with support from the Green Infrastructure (GI) Strategy. The SA therefore supports this option.

9.149 Also of relevance is policy N/ES: Ecosystem Services, which seeks to protect and enhance supporting services, provisioning services, regulatory services and cultural services. The Options Document explores two options for this policy. The first proposes to leave the policy as is, whilst the second proposes to adapt the policy to better address / require a nature-based solutions approach as set out within Natural England's GI Framework – Principles and Standards. The SA supports the second option as it takes account of the most current and up to date guidance and will ensure that developments maximise opportunities to contribute to nature recovery.

9.150 Overall, as climate change is an important issue globally it is naturally a focus of the options document, as reflected in the discussion above. The Options Document seeks to highlight the main contributors to climate change (e.g. transport, energy and the built environment) and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. It is underpinned by key evidence and it is considered that as the plan evolves, further evidence will likely come forward and inform the next stage of plan making and SA. Therefore, **uncertainty** is noted at this stage.

Waste

9.151 With regards to waste, it is recognised that a wider policy framework influences how waste will be managed in the context of future growth. This includes the WECA Joint Waste Core Strategy Development Plan Document (2011) and the B&NES Waste Strategy Review (2014).

9.152 With regards to the growth strategy (both housing and employment allocation site options), it is considered that all options can promote waste management in accordance with the waste hierarchy, and all options would provide access to recycling facilities locally. None of the spatial options are therefore considered likely to lead to significant negative effects.

9.153 This is supported by proposed policies that will guide wastewater management and treatment and ensure the timely provision of any necessary infrastructure upgrades.

9.154 Given these points and considering the wider policy framework influencing this SA objective, **broadly neutral effects** are considered most likely.

10. Conclusions and recommendations

10.1 **Table 10.1** overleaf sets out summary conclusions for the appraisal of the Local Plan Options Document, as presented in **Chapter 9** above.

Table 10.2 Summary SA of the Local Plan Options Document

SA theme	Summary of conclusions and recommendations
Health and wellbeing	The Options Document recognises the role of planning in delivering healthy places that support improved health outcomes, with health embedded as a key consideration, including as part of the vision and objectives of the plan. Dedicated policy provisions and stipulations for future growth will embed key health considerations and design principles (including public health and amenity) and equitable access to nature and green space (including delivering new green spaces as necessary to support future growth), that will deliver against the vision for healthy places. **Significant positive effects** are concluded overall.
Housing	The housing strategy and policy framework seeks to meet the varying housing needs of residents across the district, including specialist groups ranging from older people to the Gypsy & Traveller community. In this context it is recognised that there is a limited and premium land supply with competing housing needs, which includes PBSA needs with Bath - housing the two universities in the district. The Strategy also provides an opportunity to potentially contribute homes to the wider Housing Market Area. **Significant positive effects** are therefore concluded overall.
Communities	The Options Document highlights how the core Local Plan values and priorities relate directly to creating and maintaining sustainable, vibrant, and healthy communities. Sustainable communities would be supported by good access to public transport, community services and facilities (including schools), and local green and open spaces. As such, the overall effects for communities are considered likely to be **significant positive effects**. However, it is recognised that accommodating a spatial growth strategy will have implications for different settlements across the district and will need to be carefully managed to avoid impacts arising in relation to settlement identities.
Economy	The emerging Economic Strategy shows that within the district there is a highly skilled workforce and unemployment levels are low, however limited affordable housing for residents and workers is known to have a direct impact on the economy. The Local Plan will seek to address these issues is through the identification of land for further economic development. The options document highlights the role of the city of Bath as a main economic centre for the district, the economic growth of the Bath to Bristol corridor, and proposed investment in the Somer Valley Enterprise Zone, and wider sustainable transport network. Considering these points, and others made in Chapter 9 above**, significant positive effects** are considered likely overall.

SA theme	Summary of conclusions and recommendations
Transportation	Transport and congestion is a key issue for the whole district, as discussed in Chapter 9 above, and is therefore naturally a focus of the options document. Future development within the district will be required to follow the sustainable transport hierarchy, utilising the spatial strategy, and following a site selection process to locate people close to the services and facilities that they need, e.g. employment, education, retail, leisure, public transport. The Options Document highlights spatial issues and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. The Options Document performs well in this respect, identifying potential sites for substantial growth in Keynsham, Saltford, Hicks Gate and Whitchurch, which outside of Bath are considered to be the most sustainable locations from a transport perspective. The Document is underpinned by key evidence and it is considered that as the plan evolves, further transport evidence will likely come forward and inform the next stage of plan making and SA. Therefore, **uncertainty** is noted at this stage.
Landscape	The nature of likely effects on landscape as a result of the Options Document are **mixed**. This reflects the sensitivity of the landscape within and surrounding the district's settlements, and that notably any growth to constrained settlements could adversely impact upon intrinsic qualities and setting of NLs, as well as the OUV of the WHS, and the purposes of the Green Belt. However the development management policy framework seeks to ensure the landscape is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of the landscape and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development. More broadly, options in respect of town/ village centres and renewable energy development could have implications for the landscape, which will need detailed consideration moving forward.
Historic environment	The nature of likely effects on the historic environment as a result of the Options Document are **mixed**. This reflects the sensitivity of the historic environment throughout the district, recognising that any impact on the OUV of the Bath City WHS or its setting could in turn impact upon its UNESCO listing. Outside of Bath and its environs, many of the district's settlements have rich heritage resources and therefore growth has the potential to lead to adverse effects. However, the development management policy framework seeks to ensure the historic environment is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of a heritage asset and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development.

SA theme	Summary of conclusions and recommendations
	More broadly, options in respect of town/ village centres and renewable energy development could have implications for the historic environment, which will need detailed consideration moving forward.
Biodiversity	The findings of the HRA scoping exercise recommends updates to the wording of site and policy allocations to avoid significant adverse effects on European designated sites. However, the HRA scoping also concludes potential cumulative impacts to the Bradford on Avon Bat SAC, and to the Chew Valley Lake SPA, cannot be ruled out and consultation with Natural England is recommended. While the spatial strategy hasn't been fully determined yet, and will inevitably influence the potential for significant effects, taking a precautionary approach, **minor negative effects** are concluded at this stage. It is however recognised that more broadly, the Options Document performs well through placing emphasis on connecting places through the LNRS, planning for BNG, urban greening, and capitalising upon natural capital and ecosystem services. Therefore, options discussed above could lead to **minor positive** effects on biodiversity if opportunities were maximised and recommendations set out through the HRA scoping are adopted; in consultation with Natural England. It is likely this will be explored through the next stage of plan-making and evidence gathering.
Natural resources	The options presented in the Options Document have the potential to lead to **significant negative effects** in relation to natural resources. Whilst impacts on air quality, water resources and quality, and minerals and waste will likely be mitigated through the policy framework, the plan will inevitably lead to the extensive loss of greenfield / BMV land. Nevertheless, it is recognised that where brownfield sites are available, particularly in Bath and Keynsham, these are being considered for development through regeneration schemes. It is also noted that in the Somer Valley and rural areas, brownfield land is sparse and therefore to meet the identified local housing need, development of greenfield / BMV land is largely unavoidable.
Climate change	The Options Document seeks to highlight the main contributors to climate change (e.g. transport, energy and the built environment) and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. From a adaptation perspective, it is recognised that a number of sites are constrained by flood risk, however, the Options Document recognises that there are significant opportunities for nature recovery, and highlights that ensuring that flood risk is properly considered is an important factor influencing the location of development and resilience to climate change. Sites and policies presented through the Options Document

SA theme	Summary of conclusions and recommendations
	are underpinned by key evidence and it is considered that as the plan evolves, further evidence will likely come forward and inform the next stage of plan making and SA. Therefore, **uncertainty** is noted at this stage.
Waste	It is recognised that a wider policy framework influences how waste will be managed in the context of future growth. With regards to the growth strategy (both housing and employment allocation site options), it is considered that all options can promote waste management in accordance with the waste hierarchy, and all options would provide access to recycling facilities locally. Given these points and considering the wider policy framework influencing this SA objective, broadly **neutral** effects are considered most likely.

Part 3: What happens next?

11. Next steps

11.1 This Interim SA Report will accompany the Local Plan 2022-2042 Options Document for public consultation (Regulation 18). Any comments received will be reviewed and then considered as part of the iterative plan-making and SA process.

11.2 The representations received, as well as ongoing engagement and further evidence base work, including further SA work, will be used to help shape the Draft Local Plan before further consultation (at the Regulation 19 stage). An SA Report will accompany the draft Local Plan for consultation at the Regulation 19 stage.

Appendices

Appendix A - Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** provides a checklist of where and how the requirements have been met in this report.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	• An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the SA?	• Relevant environmental protection objectives, established at international or national level. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. • Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. • The environmental characteristics of areas likely to be significantly affected. • Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ SA involved up to this point?	• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). • The likely significant effects associated with alternatives. • Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the SA findings at this current stage?	• The likely significant effects associated with the Plan. • The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	• A description of the monitoring measures envisaged.

Table B: Questions answered by the SA Report, in accordance with regulatory requirements

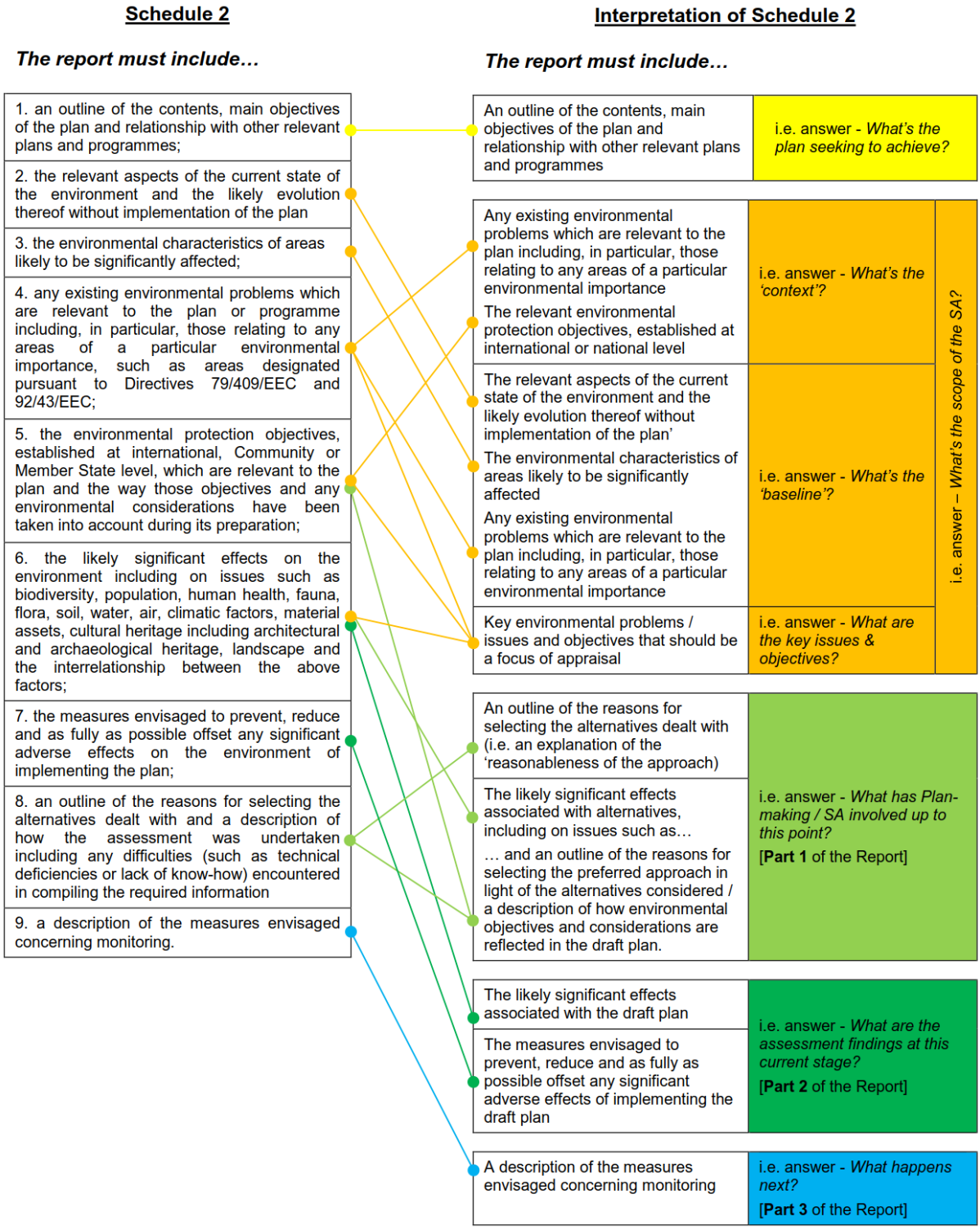


Table C: 'Checklist' of how (throughout the SA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 ('What's the plan seeking to achieve') presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2023. The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA'). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Appendix B. This also includes updates to scoping since the publication of the Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected.	
4. 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.	
5. The environmental protection objectives established at international, national, or community 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.	The Scoping Report (2023) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an 'SA framework'. Key scoping information is presented in Appendix B and includes any relevant updates. The context review informed the development of the SA framework and topics, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how… considerations have been taken into account" - • Chapter 5 explains how reasonable alternatives were established in-light of available evidence. • Chapter 5 sets out the summary findings of the appraisal of settlement options and policy options, with the detailed appraisal provided in Appendices D and E. • Chapter 6 sets out the detailed appraisal of district wide options. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such	• Chapter 5 explains how reasonable alternatives were established in-light of available evidence.

Regulatory requirement	Discussion of how the requirement is met
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).	• Chapter 5 sets out the summary findings of the appraisal of settlement options and policy options, with the detailed appraisals provided in Appendices D and E. • Chapter 6 sets out the detailed appraisal of district wide options. • Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/ dimensions.
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.	Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6 and Appendices D and E) and appraisal of the Draft Local Plan (Chapters 9 and 10).
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.	Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
9. A description of the measures envisaged concerning monitoring in accordance with Article 10.	It is expected that monitoring measures will be explored in later stages of the SA, once a preferred spatial strategy and plan has been identified.
10. A Non-Technical Summary of the information provided under the above headings.	A Non-Technical Summary (NTS) is provided separately.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: 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 SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).	At the current time, this Interim SA Report is being published alongside the Regulation 18 Local Plan Options Document for public consultation.
The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council will take into account this Interim SA Report when preparing the Regulation 19 version of the Local Plan for publication.

Appendix B - Scoping information update

Introduction

As discussed in **Chapter 2**, the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The detailed scoping information was presented in a scoping report sent to statutory consultees in April 2023.

This appendix presents a summary of scoping key issues, and provides an update where new evidence has emerged. The aim is to ensure that the information required under Schedule 2 of the SEA Regulations is provided.

Relationship with other plans and programmes

The following international and national plans and programmes provide the key policy context for the Bath and North East Somerset Local Plan. Wider policy context, including local plans and programmes, can be found in the March 2023 Scoping Report.

National Planning Policy Framework (NPPF): sets out the Government's planning policies for England and how these are expected to be applied. The framework acts as guidance for local planning authorities, covering a range of environmental, social and economic themes, including:

- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Adopting proactive strategies to adaptation and manage risks through suitable adaptation measures, including through the planning of green infrastructure;
- Considering the potential cumulative impact of individual sites in local areas on air quality as well as more substantial ones;
- Ensuring opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised; to reduce the need to travel;
- Encouraging land use and transport development which support reductions in greenhouse gas emissions and reduced congestion; and
- Supporting new and emerging business sectors, including positively planning for 'clusters or networks of knowledge and data driven, creative or high technology industries'.

National Planning Practice Guidance (NPPG): provides relevant, technical planning practice guidance for local authorities, including:

- Local Plans should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area;

- Local Plans should support the delivery of appropriately sited green energy and the management of greenhouse gas emissions through energy efficiency measures;
- Local Planning Authorities should "adopt proactive strategies to mitigate and adapt to climate change". Climate change can be mitigated through Local Plans by reducing the need to travel, providing opportunities for renewable and low carbon energy technologies, identifying opportunities for decentralised energy and heating and through the design of new development to reduce energy demand;
- Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to those of a higher quality; and
- It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

The Environment Act 2021 supplements the NPPF and PPG, providing provisions in relation to biodiversity, including parameters for biodiversity gain as a condition of planning permission. This is furthered through the 25 Year Environment Plan which also sets out how the Government will address the effects of climate change, supported by a range of policies and initiatives, which the new Local Plan will need to align with. The Environmental Improvement Plan 2023 is the first revision of the 25 Year Environment Plan, and sets out a new plan on how the government will work with landowners, communities and businesses to deliver the ten goals for improving the environment, matched with interim targets to measure progress.

The Clean Growth Strategy, Clean Air Strategy and the Net Zero Strategy are a collection of documents seeking to progress the Government's commitment to becoming net zero by 2050 under the UK Climate Change Act 2008. The documents outline how the Government will tackle air pollution sources whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25 Year Environment Plan, which seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents interlink with the Government's commitment to decarbonising transport, which recognises the need to undertake action to adapt the transport sector and increase resilience to climate change risks.

The UK Climate Change Act 2008 established a framework to develop an economically viable emissions reduction path. The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 put in place the legally binding target of achieving net-zero emissions by 2050. The Climate Change Act includes the following:

- The UK Government must reduce greenhouse gas emissions by a minimum of 100% of 1990 levels by 2050.
- The Act requires the Government to produce legally binding carbon budgets – a cap on the amount of greenhouse gases emitted in the UK over a five-year period.
- The Committee on Climate Change was set up to advise the Government on emissions targets and report any progress to parliament.

- The Act requires the Government to assess and prepare for the risks and opportunities linked to climate change for the UK. The Committee on Climate Change's Adaptation Sub-Committee advises on these risks.

The Flood and Water Management Act 2010 provides for better and more comprehensive management of flood risk for people, homes, and businesses, in addition to aiding in safeguarding safeguard community groups from unaffordable rises in surface water drainage charges and protecting consumer water supplies. The review for implementation of Schedule 3 to the Flood and Water Management Act provides a framework for the approval and adoption of drainage systems an approving body (SAB), and national standards on the design, construction, operation, and maintenance of SuDS. Also, it makes the right to connect surface water runoff to public sewers conditional upon the drainage system being approved before any construction work can start. A public consultation later this year will help to shape the new approach, with implementation expected during 2024.

The UK Low Carbon Transition Plan: National strategy for climate and energy outlines a five-point plan to tackle climate change, with the following points being of relevance to climate change adaptation:

- Protecting the public from immediate risk; spending money on flood protection, implementing a heat wave plan in the NHS and aiding communities affected by coastal erosion.
- Preparing for the future; factoring climate risk into the decision-making process, changing infrastructure methods, managing water, and adjusting farming practices.
- Supporting individuals, communities, and businesses to play their part, raising awareness, and providing a variety of support for individuals, communities, and businesses.
- The plan outlines working towards these five points through several chapters: transforming our power sector, transforming our homes and communities, transforming our workplaces and jobs, transforming transport, and transforming farming and managing our land sustainably.

The European Landscape Convention promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues.

The 'Healthy and safe communities' planning practice guidance considers ways in which planning can positively contribute to healthier communities. The guidance describes a healthy place as: "one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It is a place which is inclusive and promotes social interaction. The National Design Guide sets out further detail on promoting social interaction through inclusive design including guidance on tenure neutral design and spaces that can be shared by all residents.

Currently in its report stage[13], the government's Levelling Up and Regeneration Bill seeks to address disparities between different parts of the UK aiming to spread opportunity more equitably by growing the economy in the places that need it most and regenerate towns and cities.

[13] As of 2023

In terms of the sub-regional policy context, key plans, strategies and programmes (including those emerging) are set out in the table below.

Table AB.1 Latest sub-regional policy context

Strategy/ delivery plan	Status	Owner
Corporate Strategy	Adopted	B&NES
Climate Emergency Strategy	Adopted	B&NES
Health and Wellbeing Strategy and Implementation Plan	Adopted	Health and wellbeing Board
Economic Strategy	In development	Future Ambition Board
Green Infrastructure Strategy	In development	B&NES
Integrated Care Strategy	Adopted	BSW Together
Children and Young People's Plan	Adopted	Health and wellbeing Board
Bath Swindon Wiltshire Implementation Plan	Adopted	BSW Together
Health Improvement Framework	In development	B&NES
School Organisation Plan	Adopted	B&NES
Ecological Emergency Action Plan	Adopted	B&NES
Climate Emergency Action Plan	Adopted	B&NES
Journey to Net Zero Transport Plan	Adopted	B&NES
Housing Delivery Plan	In development	B&NES
Transport Delivery Plan	In development	B&NES
Active Travel Masterplan	In development	B&NES
Tree and Woodland Strategy & Action Plan	In development	B&NES

SA scope

Key issues are presented under each of the SA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Health and wellbeing

- There are significant levels of obesity amongst both children and adults in the district meaning that whilst obesity is below the national average more adults in the district are overweight than not.
- Large numbers of both children and adults are not physically active. In relation to cardiovascular and respiratory health, Bath and North East Somerset has high numbers of residents with hypertension and asthma.

- Residents also self-report higher rates of anxiety and loneliness compared to the England average. In addition, the rate of hospital admissions in those under 18 years for mental health conditions is significantly higher in Bath and North East Somerset than nationally.

See further key issues identified under 'communities' below.

Housing

- The Local Plan must provide homes to meet identified needs, guided by a growth strategy for the area taking into account affordable housing needs and economic growth objectives
- Respond to housing shortages including affordable housing and bring forward a suitable mix of housing types and sizes to meet the range of needs, including from an ageing population, in a timely manner.
- Need to consider accessibility standards to support independence
- Delivering affordable housing which is appropriate to the local housing market and income profile
- Ensure appropriate types of accommodation are provided to address student and other needs, and contribute towards reducing the pressure on HMOs.
- Review of Policy H4 to enable self/custom-build

Communities

- Need to prioritise active travel (cycling, walking and use of public transport) to increase physical activity levels and improve physical and mental wellbeing.
- B&NES Council remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation. However, there are inequalities within the district, communities that experience deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally) and patterns of rural poverty are growing.
- Life expectancy is 9 years lower for men and 5 years lower for women in the most deprived areas of the District than in the least deprived areas.
- An estimated 19% of children and young people (equating to 7,167 residents aged 0-15) in B&NES live in relative poverty. With the cost of living set to continue to rise, it's estimated 4,000 people will fall into absolute poverty in 2022-23.
- This will exacerbate existing needs including fuel poverty (11% of households live in fuel poverty in the district) and food insecurity
- Need to ensure streets and the public realm are safe, attractive, and accessible for all ages.

Economy

- While B&NES district is not among the most deprived in England, there are pockets of deprivation.

- The main indicator of the overall competitiveness of the B&NES economy and its businesses is productivity. B&NES' has lower productivity as it has relatively large concentrations of employment in sectors such as retail and tourism. This is further exacerbated by above average part-time employment.
- There is a need for a shift to a more environmentally sustainable economy with clean economic growth.
- The economy needs to be more diverse, productive and resilient facilitated by an increase in innovative technology related jobs
- There is a need to enable increased local employment, with less overall commuting.
- There is a need for improved accessibility to jobs, particularly from and to the Somer Valley.
- There is need to develop education and skills of workforce to support increased productivity
- Despite strong demand for flexible modern office accommodation, Bath's inability to deliver an adequate supply of office floorspace has constrained the city's capacity for employment growth and to retain occupiers
- There is a requirement to protect employment and business space, however the changes in planning legislation to the use classes order and permitted development rights limit the control that the Plan has to protect employment space.
- Due to lack of existing affordable city centre workspace in Bath, smaller town centres are becoming more important in compensating for this lack of space. There is therefore potential for Keynsham and the Somer Valley.
- There is a need to bring forward new employment locations to enable future local economic growth.
- Changes to the Use Class Order and affect the role of town centres.
- There is need to ensure policy protects the vitality and viability of town centres.
- Maintaining Bath's role as a successful and sustainable international visitor destination
- Ensuring the delivery of the employment objectives of the Economic Strategy review are achieved where possible, including delivering more Higher Value Added jobs.
- There is a need to diversify the employment base
- The Local Plan must ensure the Market Towns retain their role as sustainable local service and employment centres.
- There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 20% of local jobs are accounted for in manufacturing, a declining sector.
- Infrastructure, including gigabit capable broadband, is key to encouraging investment in business, in areas where there is an imbalance between housing and jobs.

- There is a need to ensure the vitality and viability of town centres (including Bath city Centre district and local centres) is enhanced and that town centres can adapt to the changes as retail (sales of goods) and some functional needs e.g. e-banking are increasingly met online and large chain stores are closing. Town centre businesses focused on the person (e.g. beauty, leisure facilities, and hospitality venues) and multi-use spaces offer a chance for high streets and town centres to become more explicitly community focused – offering multiple uses beyond the purely commercial. This will require measures including improving public realm, utilities, space for events and markets.
- Rising localism, with people working from home and not commuting to larger commercial centres, offers opportunities for district and local centres to benefit but they will need to adapt.
- Pedestrianising high streets can help turn town centres into broader attractions – adding community and leisure spaces to areas currently associated with commercial shopping however there are drawbacks of pedestrianisation (especially around public transport provision).

Transportation

- Notwithstanding achievements to date, the B&NES highway network remains heavily trafficked with a high dependency on car travel, highlighting the need to fundamentally change the way we travel, with a strong focus on mode shift away from the private car usage.
- Large areas of the District suffer from traffic congestion. Congestion and journey time delays affect rural communities as well as urban areas.
- There are still high levels of out-commuting from Midsomer Norton and Radstock. It is envisaged that the introduction of the Somer Valley Enterprise Zone will reduce the levels of out commuting within the Somer Valley.
- Managing parking provision within the city. The Draft Transport and Development Supplementary Planning Document will set revised parking standards for all uses.
- The B&NES highway network remains heavily trafficked, highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement particularly in areas of historic significance.
- The need for new development is balanced with minimising traffic congestion and making places more accessible by sustainable modes of transport

Landscape

- The district has a richly varied landscape and increasing pressures for new development as urban extensions into the countryside or as entirely new settlements have inevitable impacts on this varied landscape and its character. New development should respect, complement and where possible enhance both its immediate landscape setting and the landscapes which overlook or are impacted by it including making a positive contribution to the landscape setting at new settlement edges.

- In relation to development in an around the City of Bath, there are both national and international landscape and heritage designations which surround the city. The setting of the City of Bath WHS, which is largely a landscape setting, including landscape views, has equivalent protection in law to the WHS itself. Similarly, the Cotwolds National Landscape (previously AONB) wraps around three sides of Bath and the remaining excluded area is potentially included in the setting of the AONB depending on the nature and location of individual proposals. Protections relating to these designations are very strong Ref para 176 of NPPF. Responding to the climate and ecological emergencies is like to increase pressures for renewables developments on greenfield sites within the rural landscapes of B&NES and for new woodland creation. The landscape sensitivity assessments for these including the woodland opportunity mapping should be used to guide development to the most suitable locations.
- There is continuing evidence that completed development projects and in particular residential developments do not reach the expectations of high quality design especially in relation to urban design, external works hard and soft, GI provision, quality of SuDS in relation to nature and landscape, high quality response to landscape setting.

Historic environment

- The Local Plan must recognise that heritage assets are an irreplaceable resource and need to be conserved in a manner appropriate to their significance. There are threats to the character of the district from the cumulative impact of development proposals and associated infrastructure requirements
- Ensure development in or adjacent to conservation areas or listed buildings (and their settings) respects the character and context and enhances the quality of the built environment
- In relation to development in and around the City of Bath, there are both national and international landscape and heritage designations which surround the city. The setting of the City of Bath WHS, which is largely a landscape setting, including landscape views, has equivalent protection in law to the WHS itself.

Biodiversity

- The Environment Bill sets out the Government's approach to some of the key issues raised around climate change, loss of biodiversity and environmental risks to public health. There will be new opportunities and obligations to the Council. One of the key requirements will be to achieve a 10% biodiversity net gain from new development, with 30 years positive habitat management. This will require appropriate planning policy. In addition there is the requirement to produce and report on a B&NES Local Nature Recovery Strategy.
- There is a government toolkit and calculation metric to calculate net gain within development proposals. The approach demands adoption of the mitigation hierarchy to ensure impacts are first avoided and then minimised before residual habitat losses and gains are calculated. Policy will need to be reviewed to ensure use of the mitigation hierarchy and the government metric is used in all major and minor developments.
- Statutory and non-statutory sites need to be protected and enhanced.

- Where possible sites should be enlarged and buffered with supporting habitat, and habitat connections and networks should be enhanced.
- There is a need to safeguard protected species and to restore priority habitats.
- Use of agreed habitat buffers around key habitat features retained by or adjacent to new developments should be adopted as best practice so that those features can continue to function for wildlife.
- External lighting of buildings and the impact of light spill from new developments on light sensitive species including bats needs to be addressed local policy and site allocations.
- Policies should promote the maintenance and increase of populations of key species in the South West in line with UK Species Action Plan targets.
- There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends but as part of the need to deliver BNG, baseline habitat data has been updated from desk top resources.
- The 25yr Environment Plan and Environment Act require the identification, protection and restoration of Nature Recovery Networks, and the development of Local Nature Recovery Strategies. The WENP has mapped a Nature Recovery Network for the WoE and this will form the starting point for the development of the WoE LNRS. Measures will be required to protect, restore and enhance these networks.
- Up to habitat mapping, including irreplaceable habitat and priority habitat will be needed to be included within Local Plan.

Natural resources

- The Council declared a Climate Emergency in March 2019 and pledged to provide the leadership to enable carbon neutrality in the district by 2030.
- There are five AQMAs identified in the plan area. The need to avoid further deterioration in these areas is an essential consideration for new development, with the particular importance of considering cumulative effects.
- The Local Plan should help to address air and noise pollution issues through sensitive site selection and good site design to ensure problems do not get worse. The plan should also aim to reduce car traffic and encourage sustainable transport where possible.
- There remain data gaps in relation to noise data
- There is the potential for adverse impacts on health and wellbeing if inappropriate new development is located near a major source of noise, for example new roads or locations of high traffic flow and/or congestion.
- Consideration should be given to construction impacts such as exposure to land contamination, deterioration in air quality from noise, dust, and vibration. Use of construction management plans can lessen these impacts, particularly hours of working and construction traffic movements.
- There are 53 wet-spots' (key flooding locations) were identified in the 2015 B&NES regional Surface Water Management Plan.

- According to the Environment Agency there are approximately 5,255 properties within Bath and North East Somerset at risk of fluvial (river) flooding, 21% at high risk, 19% at medium risk, and 60% at low risk.
- The Plan should prioritise the remediation of and redevelopment of previously developed land.
- Urban creep throughout the District (urban creep is the conversion of permeable surfaces to impermeable surfaces)
- Urbanisation and climate change have the potential to significantly impact surface water flood risk within the B&NES area.
- Climate change is likely to increase surface water flood risk throughout the B&NES area, particularly in those areas that are already at risk and identified as flooding wet-spots.
- Future development also has the potential to increase flood risk. It is therefore important that surface water flood mitigation measures are included in any development plans, following B&NES Sustainable urban drainage systems policy.
- Appropriate development management policies are already in place to minimise the potential impact of urbanisation and climate change and it will be important for these to continue to be implemented for all new developments within the B&NES area.
- Sub catchments heavily modified due to flood protection and urbanisation – need more natural solutions to avoid impact further downstream, impact on ecology (barriers to fish passage, fisheries and pollution) and sense of place.

Climate change

- Carbon emissions have been in decline in B&NES but are still higher than target.
- Significant under achievement of the renewable energy targets.
- Transport emissions remain challenging to reduce.
- The plan should help to address climate and energy issues through limiting energy use and banning fossil fuels in new buildings, reduce existing buildings' energy use, use renewable and low carbon technologies, whilst simultaneously improving resilience and increase uptake of adaptation measures.
- The need to establish and growth of the environmental & low carbon business sector as a business sector in its own right which can in turn help to facilitate:
  - The opportunity to encourage businesses and business supply chains to adopt efficiency measures which will use fewer resources and boost profits through associated cost savings.
  - The opportunity to encourage businesses to explore their exposure and risk to problems associated with climate change, and to undertake appropriate mitigation and adaptation It is important to consider the influence that the Local Plan can have on the issues.

Waste

- Ensure new development incorporates space for waste sorting and storage to aid recycling.
- Encourage sustainable construction making use of recycled and recyclable building materials.
- Promote development of more sustainable waste treatment facilities, including sorting, recycling and reuse.
- The development of sustainable markets in the local region for materials currently not recycled e.g. carpets, plastic film.
- There is a need to reduce waste generation and to continue with increases in recycling and composting.
- The Local Plan should help to address waste issues through ensuring appropriate provision of waste management services, for example space for recycling and through encouraging good design that minimises waste.

Updates to scope

Since the publication of the Scoping Report earlier in 2023, it is acknowledged that several evidence base documents have been prepared which have informed the development of the plan. This additional evidence (alongside what is presented in the full Scoping Report) is presented below.

Additionally, further baseline and policy context has been provided to reflect the addition of the equalities focussed SA objective within the SA Framework.

Indices of Multiple Deprivation (IMD)

The IMD was updated in 2019[14]. Key findings include:

- 29.6% of LSOA's within Bath and North East Somerset fall within the top 10% least deprived neighbourhoods in the country. Notably, 60.1% of LSOA's within Bath and North East Somerset fall within the top 30% least deprived neighbourhoods. The district is therefore not considered to be deprived as a whole.
- Just 1.7% of LSOA's within Bath and North East Somerset fall within the top 10% most deprived neighbourhoods in the country. The two LSOA's identified as most deprived are 011C (Twerton West) and 015D (Whiteway, Southdown). Just 7.8% of LSOA's within Bath and North East Somerset fall within the 30% most deprived.

Equalities – policy context

- Bath City Centre Accessibility Study
- Race Charter
- B&NES Gender and Ethnicity Pay Gap
- B&NES Council Equality Improvement Plan
- People Strategy 2019-23

[14] English indices of deprivation 2019 - GOV.UK (www.gov.uk)

- The State of Ageing 2022
- Strategic Evidence Base for Bath and North East Somerset

Equalities - baseline

Age

Latest ONS population projections suggest:

- The population of B&NES is projected to increase by 8% from 2018 to 2028, from 192,106 to 207,919.
- The working age population (15-64) is projected to increase by 7% by 2028.
- The 65+ population is projected to increase by 15% over the same period.
- Within the 65+ group, the largest increase is projected to be in the 75-84 age range (33%), followed by the 85+ age group (20%).

Nationally, although the proportion of older people living with a social care need has fallen, the projected increase in numbers of older persons still represents a potential demand increase for health care.

The state of ageing 2022 report suggests that 'the experience of being older in England is getting considerably worse for many' across a number of domains including financial security, life expectancy, disability and loneliness. It recommends the appointment of an ‘older people’s commissioner’. The key findings were;

- Almost 1 in 5 people of pension age were living in relative poverty in 2019/20.
- The pandemic has reversed progress on the employment of older people.
- The number of older private renters is at an all-time high.
- Disability-free life expectancy is falling.

The West of England Housing Needs Assessment notes that there is a predominant demographic trend towards an ageing population, with up to 54% of houses required by 2040 potentially needing to be adapted for people with limited mobility.

Disability

In the 2021 Census, 6.1% (11,717) of Bath and North East Somerset residents identified themselves as 'Disabled and limited a lot', a decrease when compared with 7.0% in 2011.

10.4% (20,061) of residents identified themselves as 'Disabled and limited a little' an increase when compared with 9.1% in 2011.

The proportion of residents that identified themselves as 'Not disabled' was 83.6% (161,631) a slight decrease when compared with 83.9% in 2011.

The percentage of residents who were identified as 'Disabled and limited a lot', 6.1%, is lower than the overall percentage across England and Wales (7.5%).

The percentage of residents who were identified as 'Disabled and limited a little',10.4%, is slightly higher than the overall percentage across England and Wales (10.0%).

The percentage of residents who were identified as 'Not disabled', 83.6%, is higher than the percentage across England and Wales (82.5%).

B&NES Staff Network Groups are established for Disabled, LGBT+ & Ethnic Minority Menopause staff. These groups provide development sessions (including a managers training package (40 females attended Menopause Awareness session, 24 managers attended Managers session (4 males),19 male employees attended Men: Let's talk menopause June 2021). There is also an active closed group on Yammer that offers ongoing peer support.[15]

B&NESC's workforce profile is published on the council's website here. Data from the past 4 years shows that figures for disability remain at 3%.

Race/ ethnicity

In the 2021 Census, 85.6% of people in B&NES identified their ethnic background within the White British category, compared with 90.1% in 2011.

In contrast, across the whole of England and Wales in 2021, 74.4% of people identified their ethnic background within the White British category.

Increases can be observed across the other ethnic backgrounds and the area has become more diverse since 2011.

The largest ethnic group in B&NES other than White British (165,409) is 'White: Other White' (11,114), which excludes White British, Irish, Travellers and Roma.

The 'ethnicity pay gap' is the difference between the average earnings of employees who self-identify as white and the average earnings of employees who self-identify as any other ethnicity, excluding any employees who prefer not to state their ethnicity or whose ethnicity is not known. The B&NES Gender and Ethnicity Pay Gap Report includes ethnicity pay gap information since 2021.

In 2022, ethnic minority groups made up 5% of the B&NESC workforce. However, the number of full pay relevant employees decreased between 2017 and 2022, from 2401 to 2,303 (-4.5%). The ethnicity pay gap, in 2022, was 6.7%; indicating that white employees are paid 6.7% more per hour than ethnic minority employees, on average.

B&NESC's workforce profile is published on the council's website here. Data from the past 4 years shows that the Council have increased diversity slightly in relation to ethnicity.

Religion / belief

In the 2021 Census, for the first time since 2001 'No religion' (47.9% (92,567)) was the highest response in Bath and North East Somerset followed by 'Christian' (42.2% (81,553)).

Since 2011 in Bath and North East Somerset there has been an increase of 34,941 people that describe themselves as 'No religion' from 32.7% to 47.9%; and a decrease of 17,915 people that describe themselves as 'Christian' from 56.5% to 42.2%.

[15] https://beta.bathnes.gov.uk/sites/default/files/bnes_council_equalities_improvement_plan_sept_2022.pdf

The percentage of people in Bath and North East Somerset who described themselves as having 'No religion' (47.9%) is higher than the overall percentage across the South West (44.1%) and across England and Wales (37.2%).

The percentage of people in Bath and North East Somerset who described themselves as 'Christian' (42.2%) is lower than the overall percentage across the South West (46.2%) and across England and Wales (46.2%).

Compared to 2011, there were increases in the number of people who described themselves as Hindu (875), Jewish (325), Muslim (1,909), other religion (1,097), Buddhist (996) and Sikh (162). Figures in brackets denote numbers in 2021, while percentages are shown in the chart opposite (noting that percentages shown did not increase for Buddhist and Sikh).

In 2021, 7.2% (13,930) of people did not state their religion, down from 8.5% (14,938) in 2011.

Gender reassignment

In the 2021 census,45.7 million people in England & Wales answered the question on gender identity. In B&NES, 5.8% of people did not answer the question, similar to the proportion in England & Wales (6.0%).

In B&NES, 93.7% of people answered "Yes" to whether their gender they identified with was the same as their sex registered at birth, similar to England & Wales (93.5%).

In B&NES, 0.5% of people answered "No" to whether their gender was the same as their sex registered at birth, the same proportion as in England & Wales.

The gender pay gap is different to equal pay. Equal pay relates to men and women receiving equal pay for equal work. The gender pay gap is concerned with differences in the average earnings of men and women, regardless of their role or seniority. It is a broader measure that captures the pay inequalities resulting from differences in the sorts of jobs performed by men and women in the workforce. In March 2022 the B&NESC workforce comprised of 60.7% female and 39.3% male employees.

As at the snapshot date of 31 March 2022, the mean average hourly rate of pay of female employees across the council increased to £15.78 and males increased to £16.09. It means that the mean gender pay gap (ie. the difference in average earnings between men and women) is 1.9%. This has decreased from 2017 to 31 pence (from 79p).

It is difficult to compare with other local authorities as pay gaps between authorities are varied and will be influenced by differences in structures, the types of services provided and the extent of insourcing/outsourcing activity. However, the mean gender pay gap in local government for 31 March 2018 was 6.1%. Furthermore, according for the Office for National Statistics (ONS), median hourly pay for full-time employees was 8.3% less for women than for men in April 2022.

Sex/ sexual orientation

In the 2021 Census, 44.9 million people answered the question on sexual orientation in England and Wales. In B&NES, 7.7% did not answer the question, a similar percentage compared to national (England & Wales) at 7.5%.

In B&NES, 88.3% identified as straight or heterosexual, which aligns closely with the national figure of 89.4% for England & Wales.

In B&NES, 4.0% identified with an LGB+ orientation ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"), a higher proportion when compared to England & Wales (3.2%).

In B&NES, 2.0% identified as Bisexual, a higher proportion compared to England & Wales (1.3%).

Benefit claimants

Poverty

The percentage of individuals in relative low income/poverty (after housing costs) in the UK has changed little since around the turn of the millennium, with a little over 1 in 5 living in poverty (22% during the period 2015/16 to 2019/20, which dropped to 20% during 2020/21, but due to data collection issues during the pandemic this was not significantly different to previous year).

In the UK children have had the highest relative poverty (after housing costs) rates throughout the last 25 years. Since 2013/14 child poverty has been rising, reaching around 3 in 10 (31% during 2019/20, which dropped to 27% during 2020/21, but due to data collection issues during the pandemic this was not significantly different to previous year).

The biggest improvement in UK relative poverty (after housing costs) rates since the 1990s has been seen in pensioner poverty – falling from a high of 28% and 29% in the mid to late 1990s to 13% in 2012/13. However, pensioner poverty in 2019/20 stood at 18% (which dropped to 15% during 2020/21, but due to data collection issues during the pandemic this was not significantly different to previous year).

There are several measures of local child poverty available:

- 1 in 5 (20%) children and young people in B&NES in 2019/20 were estimated to be living in relative poverty (after housing costs), amounting to some 6,500 children and young people aged 0 to 15.
- 1 in 11 (9%) children and young people in B&NES in 2020/21 were estimated to be living in relative poverty (before housing costs), some 3,000 children and young people aged 0 to 15. The comparable figure for the UK using this measure is 19%, two percentage points higher than the comparable figure for Twerton ward (17%). Other wards with relatively high child poverty rates include Radstock (14%), Keynsham South (14%) and Westfield (13%).
- The current cost of living crisis is likely to force more people into poverty. In May 2022, 88% of UK adults reported an increase in their cost of living. The Resolution Foundation estimates an extra 1.3 million people will fall into absolute poverty in 2023, including 500,000 children
- Based on these estimates, it would mean nearly 4,000 more people in B&NES in absolute poverty, including 1,500 children.

Food insecurity

Food insecurity is defined by the FAO (Food and Agricultural Organisation) as lacking regular access to enough safe & nutritious food for normal growth and development and an active and healthy life. This could be due to unavailability of food and/or lack of resource to obtain food.

There is currently no routine measurement of Food Insecurity in the UK. In 2019, the FRS2 estimated 6% of households in the South West were food insecure compared to 8% nationally.

The University of Southampton Food Insecurity Tool estimates the relative rank of food insecurity risk across local neighbourhoods in England. Risk is estimated based on benefits claimants, low-income at a household level, mental health and adult educational attainment.

Based on this tool, the ten areas with the highest food insecurity risk ranks in B&NES are: Whiteway, Whiteway West, Twerton West, Twerton, Fox Hill North, Westfield North, Clandown, South Paulton, Midsomer Norton West & Keynsham Wellsway.

Marriage / civil partnership

In B&NES, according to the 2021 Census, 41% of the population (aged 16+) have never been married and never registered a civil partnership, while 43% are married or in a civil partnership. 8% are divorced or formerly in a civil partnership, and 5.6% are widower or surviving partner from a civil partnership. Just 1.67% are separated, but still legally married, or still legally in a civil partnership.

Pregnancy / maternity

Vaccination

Flu vaccination coverage rates in all pregnant women (healthy and in at-risk groups combined) are higher in B&NES than nationally but have shown declines both nationally and in B&NES over recent years. Provisional figures for 2021-22 show 46% of B&NES pregnant women received a flu vaccination compared to 38% nationally.

Nationally, Covid-19 vaccination rates among pregnant women have been a concern but this has improved in recent months with 53.7% of women giving birth in England having received at least one dose in Dec 2021, up from 22.7% in Aug 2021.

Under 18s conception

The under-18 conception rate per 1,000 in B&NES has been significantly better than the England rate every year since 2012 (excluding 2017 & 2018) and was 7.1 per 1,000 in 2020. Rates have been steadily falling nationally since the late 90's. This is considered a proxy measure for good access to contraception.

The total prescribed LARC (Long-Acting Reversible Contraception) excluding injections rate per 1,000 in B&NES has been significantly higher than the England rate every year since 2014 and was 50.1 per 1,000 in 2020.

Research has shown that teenage pregnancy is associated with poorer outcomes for both young parents and their children. Teenage mothers are less likely to finish their

education, more likely to bring up their child alone and in poverty and have a higher risk of mental health problems.

A recent study has related declining rates of teenage pregnancies in England to local areas experiencing less youth unemployment, growing Black or South Asian teenage populations, more educational attainment, unaffordable housing, and a lack of available social housing.

Smoking during pregnancy

Smoking during pregnancy increases the risk of stillbirth, and babies born to mothers who smoke are more likely to be born with low birthweight, born prematurely with the associated risks, develop asthma, chest infections, glue ear and learning difficulties.

Maternal smoking after birth is associated with a threefold increase in the risk of sudden infant death.

Pregnant women smoking at time of delivery has been decreasing year on year in England.

Prevalence in B&NES has followed a similar trend at a generally lower rate compared to the national rate.

Pregnant women smoking at time of delivery in B&NES in 2020/21 was estimated to stand at 8.5% of mothers. This equates to ~130 women. Contrary to the existing trend, this figure is an increase of 1.9 percentage points compared to 2019/20.

Stillbirths

The stillbirth rate reflects a population's quality of maternity care and women's health. In November 2014, the Secretary of State for Health announced a new ambition to reduce the rate of stillbirths by 50% in England by 2030. The NHS Long Term Plan (2019) accelerated this ambition, bringing the target year forward from 2030 to 2025 (target rate is 2.6 per 1,000 live births and stillbirths by 2025).

In England the rate of stillbirth fluctuated around 5.7 stillbirths per 1,000 live births and stillbirths between 1993 and 2005. Since then, stillbirth rates have fallen steadily. In 2021, the stillbirth rate fell to 4.1 stillbirths per 1,000 live births and stillbirths, corresponding to 2,451 stillbirths.

During the three years 2019 to 2021 there were 12 stillbirths registered in B&NES equating to a stillbirth rate of 2.3 per 1,000 live births and stillbirths (roughly half the comparable rate for England).

In a landmark study of more than 1 million births in England, 24% of stillbirths would not have occurred if all women had the same risk of adverse pregnancy outcomes as women in the least deprived socioeconomic group.

Breastfeeding

A review of existing studies published in The Lancet in 2016 highlights the benefits of breastfeeding for the child, including protection against child infections and malocclusion (misaligned teeth), increases in intelligence, and probable reductions in overweight and diabetes (although there were also associations found with allergic disorders such as asthma or with blood pressure or cholesterol, and there was an increase in tooth decay with longer periods of breastfeeding). There are also benefits

for nursing women, including protection against breast cancer, improved birth spacing, and it may also protect against ovarian cancer and type 2 diabetes.

During 2020/21 in B&NES 64% of infants at six to eight weeks were totally or partially breastfed, which is significantly higher compared to England (48%).

A recent study highlighted that inequalities exist in maintaining breastfeeding - "Among mothers breastfeeding at one week, those who were younger, White or had fewer years of full-time education were at greatest risk of discontinuing before six weeks. This risk persisted over time and was independent of their high risk of not initiating breastfeeding."

Safety and security

From July to December 2021, Anti-social behaviour and violent crime was concentrated in Bath City Centre, specifically the Kingsmead and Abbey areas. This is likely closely linked with the Night-Time Economy.

The Joint Community Safety Plan 2022 highlights that the Coronavirus pandemic impacted on crime and the demand for policing services during 2021, and levels of crime and demand for police services are returning to pre-pandemic levels.

Complex crimes with high levels of associated risk, such as Child Abuse, Child Sexual Exploitation (CSE), modern slavery and human trafficking are increasing and this rise is expected to continue.

County lines are becoming more prevalent in the Avon and Somerset region.

Results from a resident community safety survey (2021) found that:

- 85% felt very safe or safe from violence outside the home in B&NES during the day and 5% outlined they felt not very safe or not safe at all.
- Just over half (56%) felt very safe or safe from violence outside the home in B&NES during the night and nearly a quarter (23%) felt not very safe or not safe at all.
- 71% felt children are very safe or safe from violence outside the home in B&NES during the day and 11% outlined they felt children are not very safe or not safe at all.
- 38% felt children are very safe or safe from violence outside the home in B&NES during the night and 37% outlined they felt children are not very safe or not safe at all.
- 62% said they would be very or fairly confident about reporting concerns about violence in their local area and 18% said they would be not very confident or not confident at all.
- 46% said they would be very or fairly confident about recognising the signs of child exploitation e.g., county lines, online grooming and 27% said they would be not very confident or not confident at all.

The Violence Reduction Unit commissioned an update to its problem profile of serious violence in 2021, covering the impact of the Covid-19 pandemic on the serious violence landscape in B&NES. The key findings from the 2020 update were:

- Despite the temporary drop-off in night-time economy violence due to the closure of the night-time economy, it has been reported that ‘gang’ and organised violence have become more prevalent.
- B&NES has a high proportion of offences where victims do not support further action which may be linked to domestic abuse and young people’s willingness to engage with the police.
- The data on Domestic Abuse suggests only a small increase in volume but this may be due to challenges in reporting.
- There has been a large increase in BAME referrals to IRIS (specialist domestic violence and abuse programme for General Practices).
- The pandemic has had a general exacerbating effect on all drivers of serious violence (e.g. drug misuse, vulnerability and decline in effective enforcement) and has increased most forms of vulnerability. This is particularly true for financial need and mental health and opportunities for early intervention may have been lost.
- The cohort of offenders involved in serious and violent crime are getting younger (under 24) and there is a perceived increase in the involvement of young females in violent offending.
- Services are geographically concentrated in Bath City Centre and can be hard to access for more rural populations. (e.g. preventative and restorative domestic abuse perpetrator services and trauma counselling).

Community cohesion and participation

The percentage of those satisfied with their local areas as a place to live has remained broadly stable since 2017 with a slight decrease from 87% in 2020 to 84% in 2021. This is higher than the national rate reported (75%).

The percentage of those satisfied with the way the Council runs things decreased from 64% in 2020 to 52% in 2021, similar to the rate reported in 2018 (49%).

The percentage of those agreeing that the council provides value for money decreased from 37% in 2020 to 31% in 2021 and is now at a similar level reported in 2018 (30%), the lowest level reported over the five-year period.

Equalities - Key issues

- The 65+ population is projected to increase by 15% from 2018 to 2028
- The percentage of B&NES residents who were identified as 'Not disabled’, 83.6%, is higher than the percentage across England and Wales (82.5%).
- In the 2021 Census, the percentage of people identifying their ethnic background within the White British category decreased by 4.5% compared with 2011 figures. However at 85.6%, this is considerably higher than across the whole of England and Wales in 2021 (74.4%).
- In the 2021 Census, for the first time since 2001 'No religion' (47.9% (92,567)) was the highest response in Bath and North East Somerset followed by 'Christian' (42.2% (81,553)). This is higher than the overall percentage across the South West (44.1%) and across England and Wales (37.2%).

- In B&NES, 4.0% identified with an LGB+ orientation (“Gay or Lesbian”, “Bisexual” or “Other sexual orientation”), and 2.0% identified as Bisexual; both higher than England & Wales (3.2% and 1.3% respectively).
- The percentage of children and young people in B&NES estimated to be living in relative poverty has decreased since 2019/2020, however levels are still significant at 9% (2020/21). It is considered that the current cost of living crisis is likely to force more people into poverty.
- The ten areas with the highest food insecurity risk ranks in B&NES are: Whiteway, Whiteway West, Twerton West, Twerton, Fox Hill North, Westfield North, Clandown, South Paulton, Midsomer Norton West & Keynsham Wellsway.
- The number of pregnant women smoking at time of delivery in B&NES has increased in 2020/21 (estimated to stand at 8.5% of mothers).
- Resident community safety survey results (2021) indicate a considerable proportion of B&NES residents (23%) felt not very safe or safe at all during the night.
- The percentage of those satisfied with their local area as a place to live has been broadly stable since 2017, and is higher than the national rate (75%) although there was a slight decrease from 87% in 2020 to 84% in 2021.

Equalities SA objective and appraisal questions (to be included under ‘communities’ SA theme):

SA objective	Appraisal questions
Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services.	Will the option/ proposal help to: • Lead to direct or indirect benefits for groups with protected characteristics? • Reduce barriers to access to housing services and facilities? • Ensure that decisions are inclusive? • Improve the quality of the living environment, particularly within areas of higher deprivation? • Ensure that areas and communities which require greater attention and need of services are accommodated? • Support and promote social inclusion and social cohesion? • Encourage local participation and active engagement?

Appendix C - Site options assessment

Introduction

As identified in Chapter 5 of the main report, all suitable, available, and achievable HELAA sites have been subject to high-level 'quantitative' GIS analysis. This does not seek to assess the potential significance of effects for each of the sites, but rather is intended to indicate potential high-level constraints and opportunities that should be scrutinised further in assessment of growth options ('qualitative' analysis).

The GIS analysis of site is provided in a separate technical annexe to the SA titled the 'Sustainability Appraisal (SA) for the Bath and North East Somerset Local Plan Interim SA Report - Technical Annexe GIS analysis of sites'. This annexe has also been made available for consultation.

The output for this assessment is a series of site proformas. The site proformas are presented in a separate technical annexe to the SA titled the 'Interim SA Report Technical Annexe – Site proformas'. This annexe has also been made available for consultation.

A number of graphs have subsequently been produced to demonstrate the accessibility of sites across the spread of data. These can be found following the methodology, overleaf.

Methodology

In developing the approach to identifying alternatives for the purpose of SA it is recognised that given the number of site options and limited site-specific data availability it is not practical to simply discuss ('qualitative analysis') the merits of each site option under the SA framework. As such, work is being undertaken to develop a methodology that reflects the SA framework topics and objectives and provides high-level indicators that highlight potential considerations in progression of sites forming SA options for settlement and district growth. The methodology essentially involves employing GIS datasets and measuring ('quantitative analysis') how each site option relates to various constraint and opportunity features.

Three GIS tools are being used to undertake the appraisal of site options depending on the feature and measurements required. These provide either a:

- Straight line distance from a feature to a site option and percentage overlap of any features within a site option, with measurements being taken from the closest boundary of the site option and the feature.

  or

- Distances calculated from a buffer of the site option capturing the extent of features surrounding the site.

  or

- Distances calculated from a site option to a feature along a real world network of roads and urban footpaths using Open Route Service Network. The network analyst tool helps to provide approximate real world walking distances. Measurements are taken from the boundary of the site where it is within 20m of

the road/ footpath network and is therefore assumed to have access. Multiple access points are created for larger sites taking the average across these points.

The site options appraisal methodology is presented in the table below. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The table recognises data limitations. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e., to highlight instances of site options performing relatively well/ poorly, in isolation, it does not provide an indication of 'significant effects'. A red/ amber/ green ('RAG') approach is taken, symbolised by '**R**', '**A**', and '**G**'.

Table B: Site options appraisal methodology

Criteria	'RAG' rules	Data and measurement	Commentary
AQMA	**R** = Site lies within or adjacent to declared AQMA. **A** = Site lies within 1km of declared AQMA. **G** = Site lies beyond 1km of declared AQMA	AQMA boundaries provided by DEFRA and includes AQMAs outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from closest boundaries (AQMA and site option).	Sites within 1km of declared AQMA may be considered in greater detail in terms of potential connections with the AQMA, in the next stage of SA (consideration of alternatives).
Noise	**R** = Site lies adjacent to/ within 10m of an A road or active railway line **A** = Site lies within 200m of an A road or active railway line **G** = Site lies beyond 200m of an A road or active railway line	Data provided by national dataset. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	There are no motorways or airports within the District, so the focus for noise impacts relates to major roads and railway lines.
International sites (SAC, SPA, Ramsar)	**R** = Site lies within or adjacent to designated site **A** = Site lies within 15km of designated site **G** = Site lies beyond 15km of designated site	Designated sites boundary data provided by Natural England and includes designated sites outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from closest boundaries (designated site and site option).	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This will be dependent on a variety of information, some of which is not available at this stage, such as the precise scale, type, design and layout of development as well as level of mitigation to be provided. It is also important to note that the Local Plan will be subject to Habitats Regulations Assessment and this will consider the likelihood of proposed

Criteria	'RAG' rules	Data and measurement	Commentary
			development having a significant effect on European sites. The HRA buffer at its furthest extent covers 15km, which has been utilised to inform the SA.
SSSI	**R** = Site lies within or adjacent to designated site **A** = Site lies within 200m of designated site **G** = Site lies beyond 200m of designated site	Designated sites boundary data provided by Natural England and includes designated sites outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from closest boundaries (designated site and site option).	As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects at designated sites. All sites that form part the subsequent options will be considered in greater detail (in qualitative assessment).
RIGS	**R** = Site lies within or adjacent to designated site **A** = Site lies within 50m of designated site **G** = Site lies beyond 50m of designated site	Designated sites boundary data provided by B&NESC focused on designated sites within the district. Measured using straight line distance/ percentage overlap measurement, taken from closest boundaries (designated site and site option).	As above.
SNCIs	**R** = Site lies within or adjacent to designated site **A** = Site lies within 50m of designated site **G** = Site lies beyond 50m of designated site	Designated sites boundary data provided by B&NESC focused on designated sites within the district. Measured using straight line distance/ percentage overlap	As above.

Criteria	'RAG' rules	Data and measurement	Commentary
		measurement, taken from closest boundaries (designated site and site option).	
Priority Habitats	**R** = Site is wholly Priority Habitat **A** = Site is partially Priority Habitat or lies adjacent to Priority Habitat **G** = Site does not contain or lie adjacent to any Priority Habitat	Data provided by Natural England and includes habitats outside the district. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (habitat and site option).	As above.
Fluvial flood risk	**R** = Site intersects or lies adjacent to FRZ3a and b **A** = Site intersects or lies adjacent to FRZ2 **G** = Site intersects or lies adjacent to FRZ1/ Site does not fall within an area at risk.	Data provided by B&NESC/ Environment Agency. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (flood risk area and site option).	This will help to identify sites that fall within high flood risk areas. N.B. While it is important to avoid development in flood zones, there may be potential to address flood risk at the development management stage, when a 'sequential approach' can be demonstrated to ensure that uses are compatible with flood risk. There is also the potential to design-in Sustainable Drainage Systems (SuDS). The assumpion is that development of the site would include vulnerable uses.
Surface water flood risk	**R** = More than 50% of the site is impacted by high or medium surface water flood risk **A** = Up to 50% of the site is impacted by high or medium surface	Data provided by B&NESC/ Environment Agency. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries	This will help to identify sites that fall within areas at risk of surface water flooding. N.B. While it is important to avoid development in areas of high flood risk, there is the potential to address risk of surface water flooding at the development

Criteria	'RAG' rules	Data and measurement	Commentary
	water flood risk / Site is impacted by low surface water flood risk / Site lies adjacent to an area of surface water flood risk **G** = Site is not constrained by surface water flood risk	(flood risk area and site option).	management stage through the use of appropriate mitigation, such as SuDS.
Brownfield land use	**R** = Site is wholly greenfield **A** = Site is partially greenfield **G** = Site is wholly brownfield	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	This will highlight whether the site is a previously developed or greenfield site.
Access to designated Local Green Space	Closest distance reported.		
Loss of designated Local Green Space	**R** = Whole site is designated Local Green Space that would be repurposed for housing **A** = Site contains an area of designated Local Green Space that could be lost in development **G** = Site does not contain any designated Local Green Space	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	This will highlight options that could result in the loss of Local Green Space.
Access to parks	Closest distance reported.		

Criteria	'RAG' rules	Data and measurement	Commentary
Green Belt land	**R** = Site lies wholly within the Green Belt **A** = Site lies partially within the Green Belt **G** = Site does not intersect the Green Belt	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	This will highlight options falling within the Green Belt.
Access to GP or healthcare facility	Closest distance reported.		
Loss of allotments	**R** = Whole site is allotment land that would be repurposed for housing **A** = Site contains an area of allotment land that could be lost in development **G** = Site does not contain any allotment land.	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	This will highlight options which could result in the loss of allotment land.
Primary School access	Closest distance reported.		
Secondary School access	Closest distance reported.		
World Heritage Site (WHS) and indicative extent	**R** = Site lies within or immediately adjacent to WHS **A** = Site lies within WHS indicative extent (buffer zone) **G** = Site lies outside of the WHS and its indicative extent	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	This will identify sites falling within the designated WHS and within the indicative extent buffer identified by B&NESC. These options may need to consider enhanced mitigation to ensure development is appropriate in its historic setting and does not undermine the significance of the designation.
Scheduled monument	**R** = Site intersect or lies adjacent to	Data provided by Historic England and includes	This will flag sites that could impact Scheduled Monument and below

Criteria	'RAG' rules	Data and measurement	Commentary
	a Scheduled Monument **G** = Site does not intersect or lie adjacent to a Scheduled Monument	assets outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	ground heritage. Direct impacts are the focus, with less emphasis on the setting of these assets.
Registered Park and Garden (RPG)	**R** = Site intersects or lies adjacent to an RPG **A** = Site lies within 100m of RPG **G** = Site lies beyond 100m of RPG	Data provided by Historic England and includes assets outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to desingated heritage assets such as RPG, Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of these assets and a 100m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets. Subsequent SA stages will consider these points in more detail.
Conservation Area	**R** = Site intersects or lies adjacent to a designated conservation area **A** = Site lies within 100m of a designated conservation area **G** = Site lies beyond 100m of a designated conservation area	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	As above.

Criteria	'RAG' rules	Data and measurement	Commentary
Battlefield	**R** = Site intersect or lies adjacent to Lansdown Hill Battlefield **G** = Site does not intersect or lie adjacent to Lansdown Hill Battlefield	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	Like above, this will identify where sites intersect a registered battlefield. Direct impacts are the focus, with less emphasis on the setting of these assets.
Listed Building	**R** = Site contains one or more Listed Buildings **A** = Site lies within 100m of a Listed Building **G** = Site lies beyond 100m of a Listed Building	Data provided by Historic England and includes assets outside of the district. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	See RPG and Conservation Area commentary.
National Landscape (formerly AONB)	**R** = Site lies within or adjacent to an AONB **A** = Site lies within 1km of an AONB **G** = Site lies beyond 1km of an AONB	Data provided by Natural England and extends the district. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	Whilst there is a defined boundary for each AONB, it is recognised that the landscape setting can extend into the surrounding areas. A 1km buffer is applied to capture sites that may require consideration of the setting of an AONB.
Ancient woodland	**R** = Site intersects or lies adjacent to ancient woodland **G** = Site does not intersect or lie adjacent to ancient woodland	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries	Highlights where sites contain Ancient Woodland, and where mitigation may be required to protect these areas.

Criteria	'RAG' rules	Data and measurement	Commentary
		(area and site option).	
Nature Reserve	**R** = Site intersects or lies adjacent to a Nature Reserve **G** = Site does not intersect or lie adjacent to a Nature Reserve	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	As above.
TPOs	**R** = Site contains TPOs **G** = Site does not contain TPOs	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	As above.
ALC	**R** = More than 50% of site is Grade 3 or above **A** = Less than 50% of the site is Grade 3 or above **G** = Site is formed of lower quality or non-agricultural land	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	Data provided by B&NESC does not provide a distinction between Grade 3a (i.e. land classified as the 'best and most versatile') and Grade 3b land (i.e. land which is not classified as such). Taking the above into account it is appropriate to 'flag' red those sites that may include Grade 1 to 3a agricultural land.
Mineral Safeguarded Area	**R** = Site intersects a Mineral Safeguarded Area **G** = Site does not intersect a Mineral Safeguarded Area	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries	Highlights where options intersect Mineral Safeguarded Areas, to identify the potential extent of impacts (e.g., how many sites this applies to) and highlight enhanced mitigation or avoidance needs.

Criteria	'RAG' rules	Data and measurement	Commentary
		(area and site option).	
Mineral Search Area	**R** = Site intersects a Mineral Search Area **G** = Site does not intersect a Mineral Search Area	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	Highlights where options intersect Mineral Search Areas, to identify the potential extent of impacts (e.g., how many sites this applies to) and highlight enhanced mitigation or avoidance needs.
Waterbody	**R** = Site intersects or lies adjacent to a waterbody **G** = Site does not intersect or lie adjacent to a waterbody	Data provided by Environment Agency. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a waterbody. This criterion will help to highlight the waterbodies and watercourses that lies in closest proximity to the site for the purposes of differentiating between sites.
Access to train station	Closest distance reported.		
Access to bus stop	Closest distance reported.		
Access to cycle network	Closest distance reported.		
PRoW	Closest distance reported.		
Historic landfill	**R** = Site intersects or lies adjacent to a historic landfill site **G** = Site does not intersect or lie adjacent to a historic landfill site	Data provided by B&NESC. Measured using straight line distance/ percentage overlap measurement, taken from the closest boundaries (area and site option).	Highlights where options intersect a historic landfill site, to identify the potential extent of impacts (e.g., how many sites this applies to) and highlight enhanced mitigation or avoidance needs.

Analysis of the site assessment output

The site assessment output has been analysed and graphs have subsequently been produced to demonstrate the accessibility of sites across the spread of data.

Figures overleaf show that walking distance to local green space varies significantly across the district, although a good proportion of sites are within 800m walking distance. Parks appear to be less accessible, with a significant proportion (80+) sites being within 10-15km walking distance. A considerable proportion of sites are within 3-6km of health and fitness facilities, however education facilities ate much more accessible; with a high proportion of sites within 1100m walking distance of primary schools. However the data also shows approximately 100 sites being 2-6km walking distance of a primary school. Findings are similar for secondary schools, with a high proportion of sites being 2-8km from a secondary school.

In terms of public transport, only a limited amount of sites are within 2km of a train station. However conversely, almost all sites are within 800m of a bus stop, and over 60 sites are within 50m of the cycle network. Almost all sites have excellent access to the Public Rights of Way network (within 50m).

Figure C.1 Walking distance to local green space

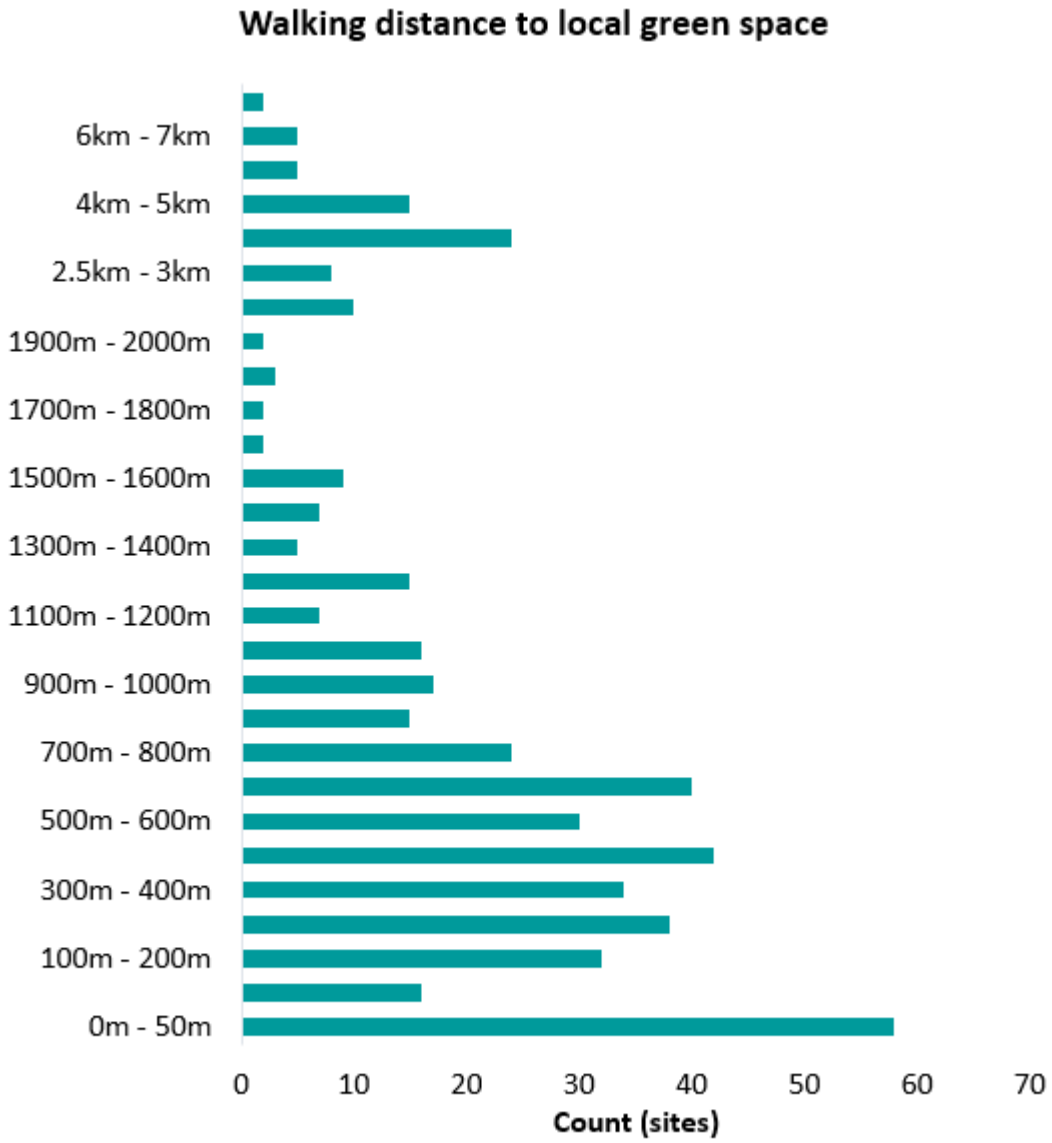


Figure C.2 Walking distance to parks

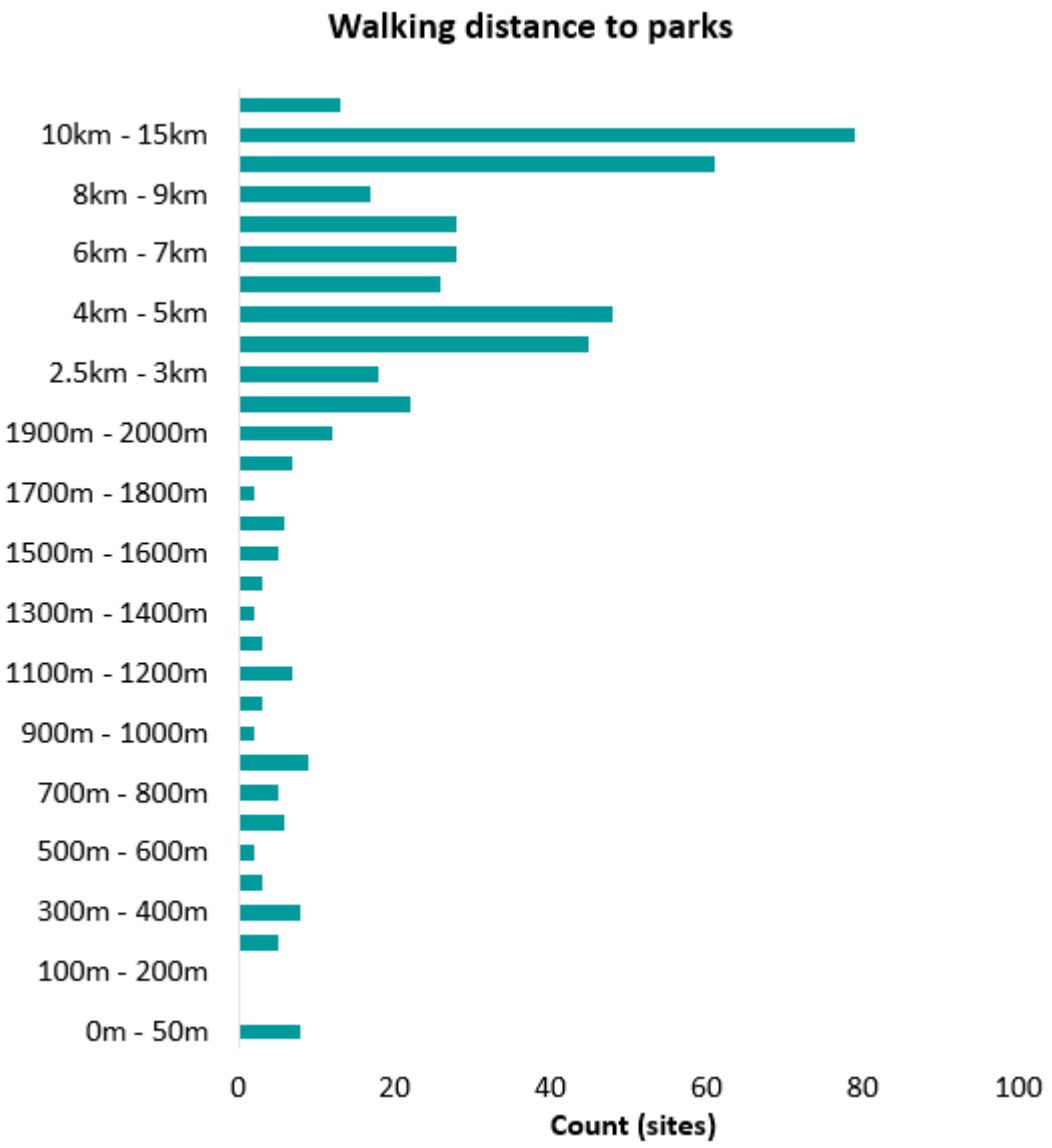


Figure C.3 Walking distance to health and fitness facilities

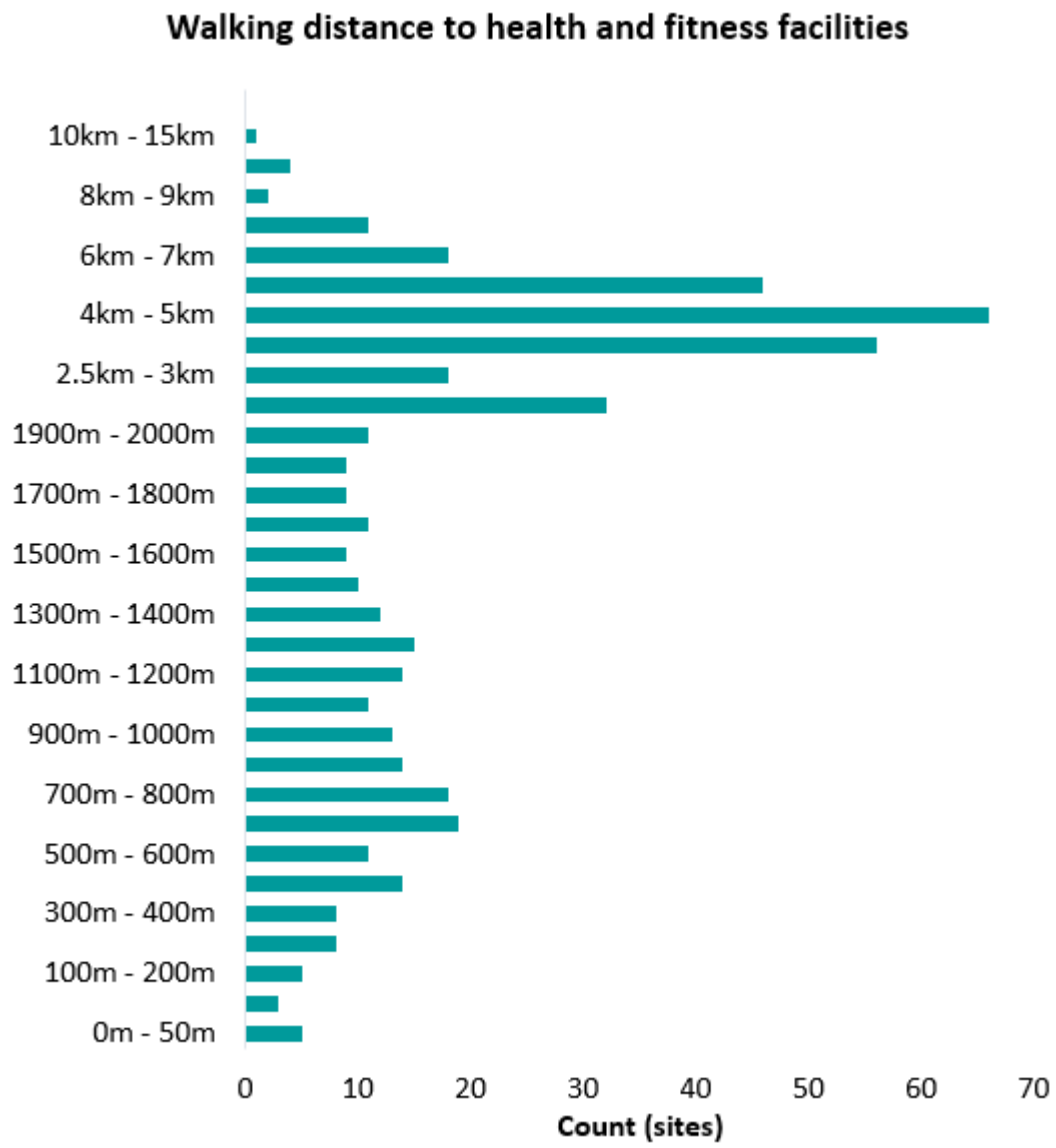


Figure C.4 Walking distance to primary schools

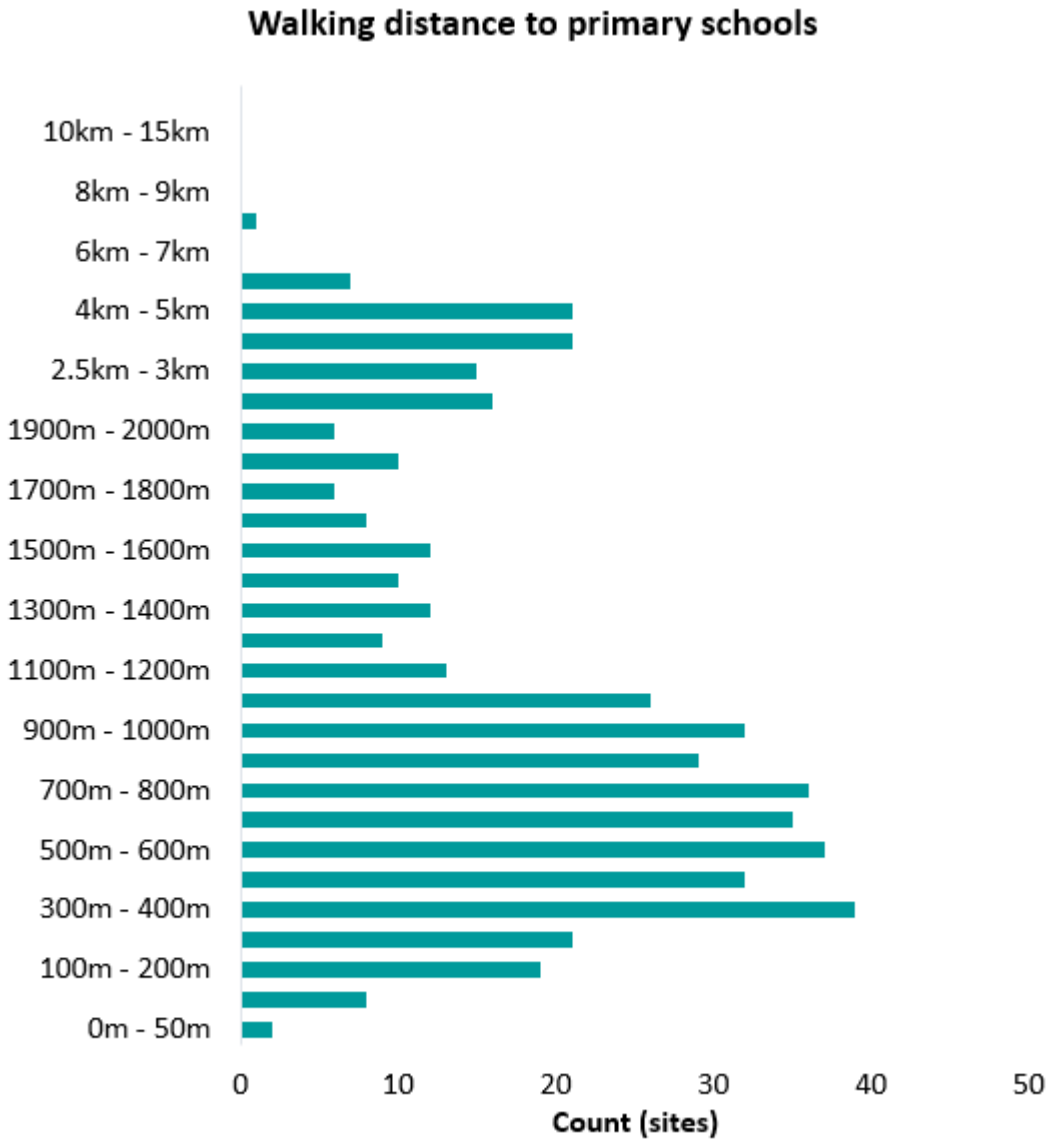


Figure C.5 Walking distance to secondary schools

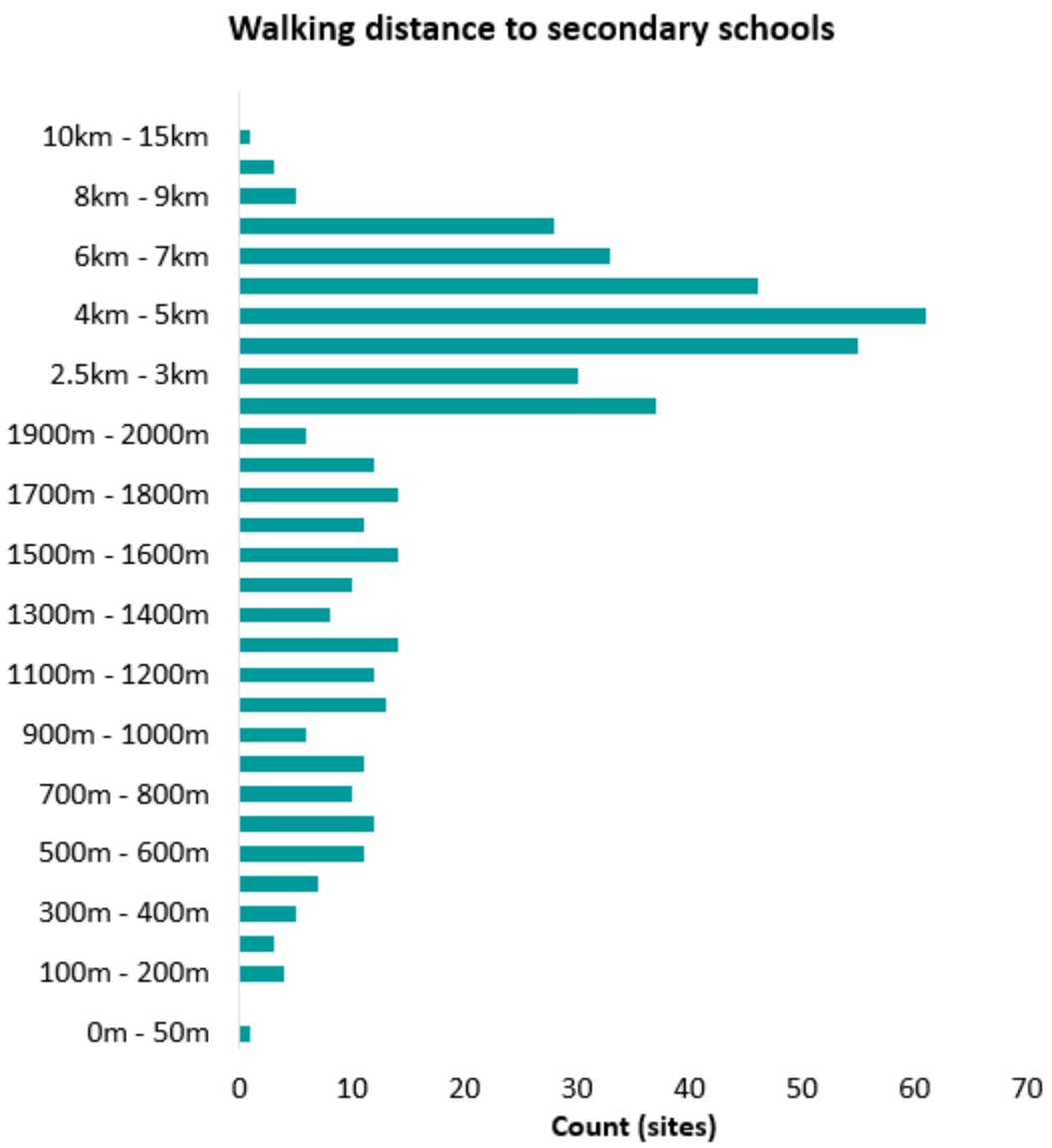


Figure C.6 Walking distance to train stations

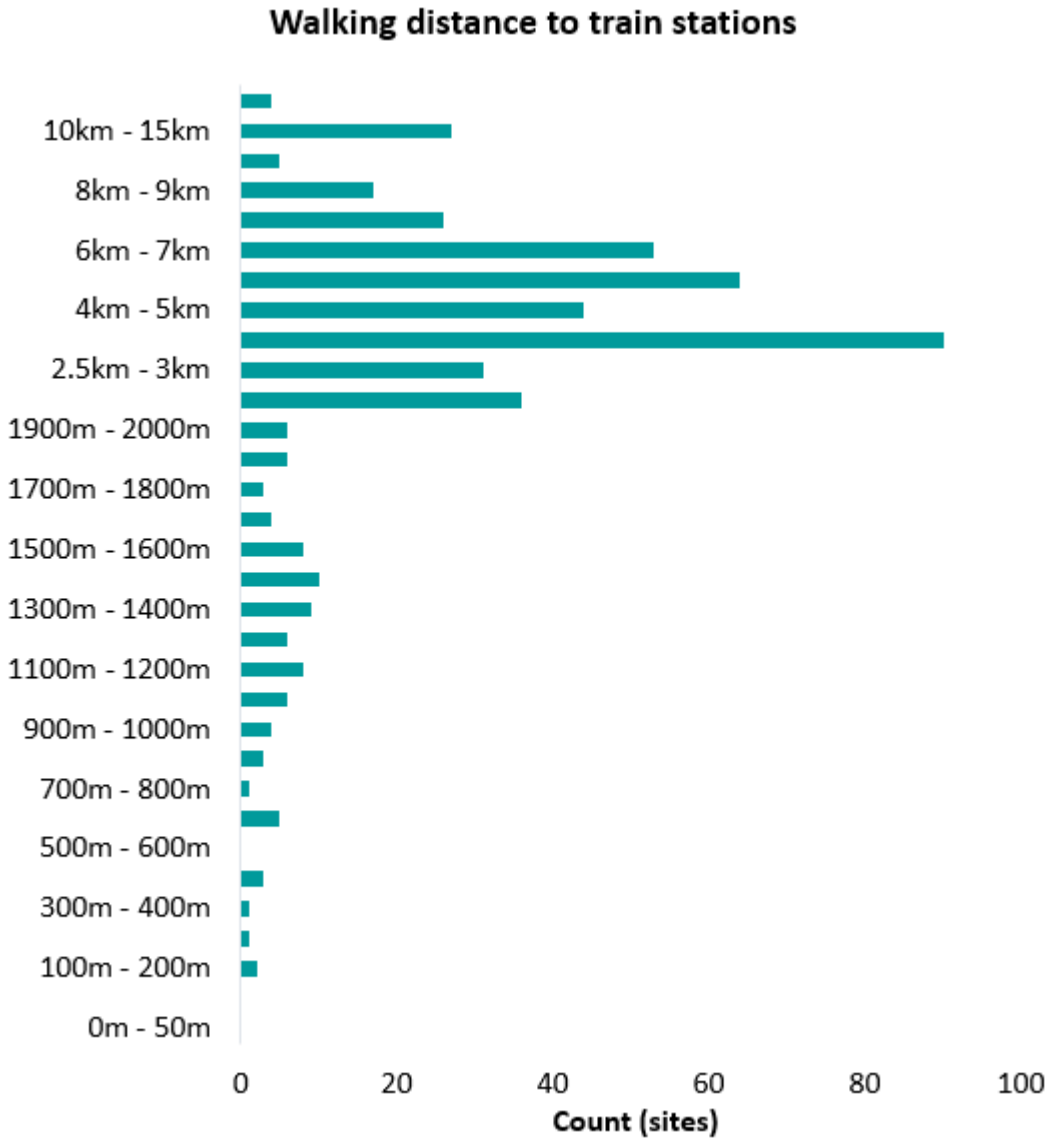


Figure C.7 Walking distance to bus stops

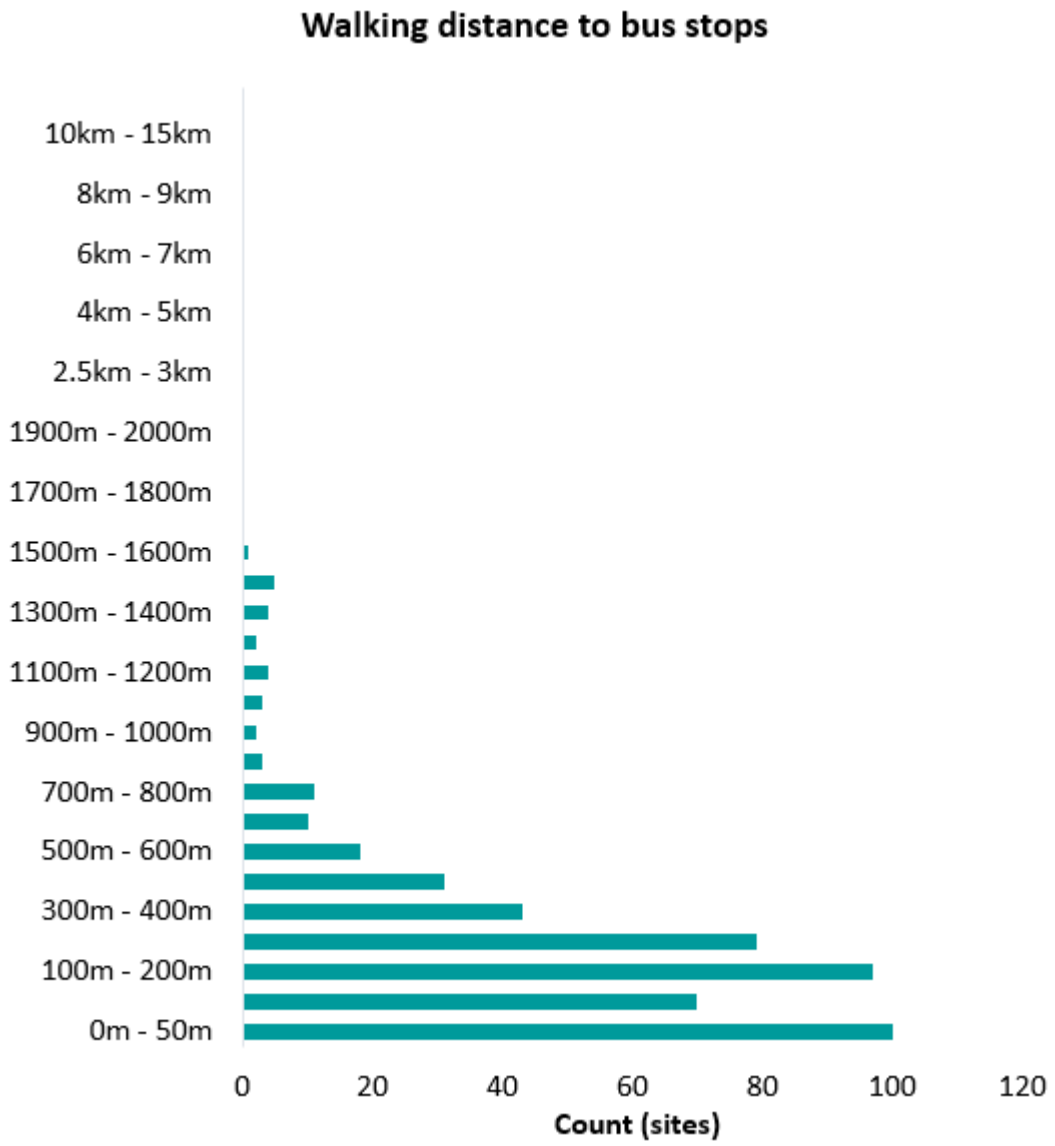


Figure C.8 Walking distance to cycle network

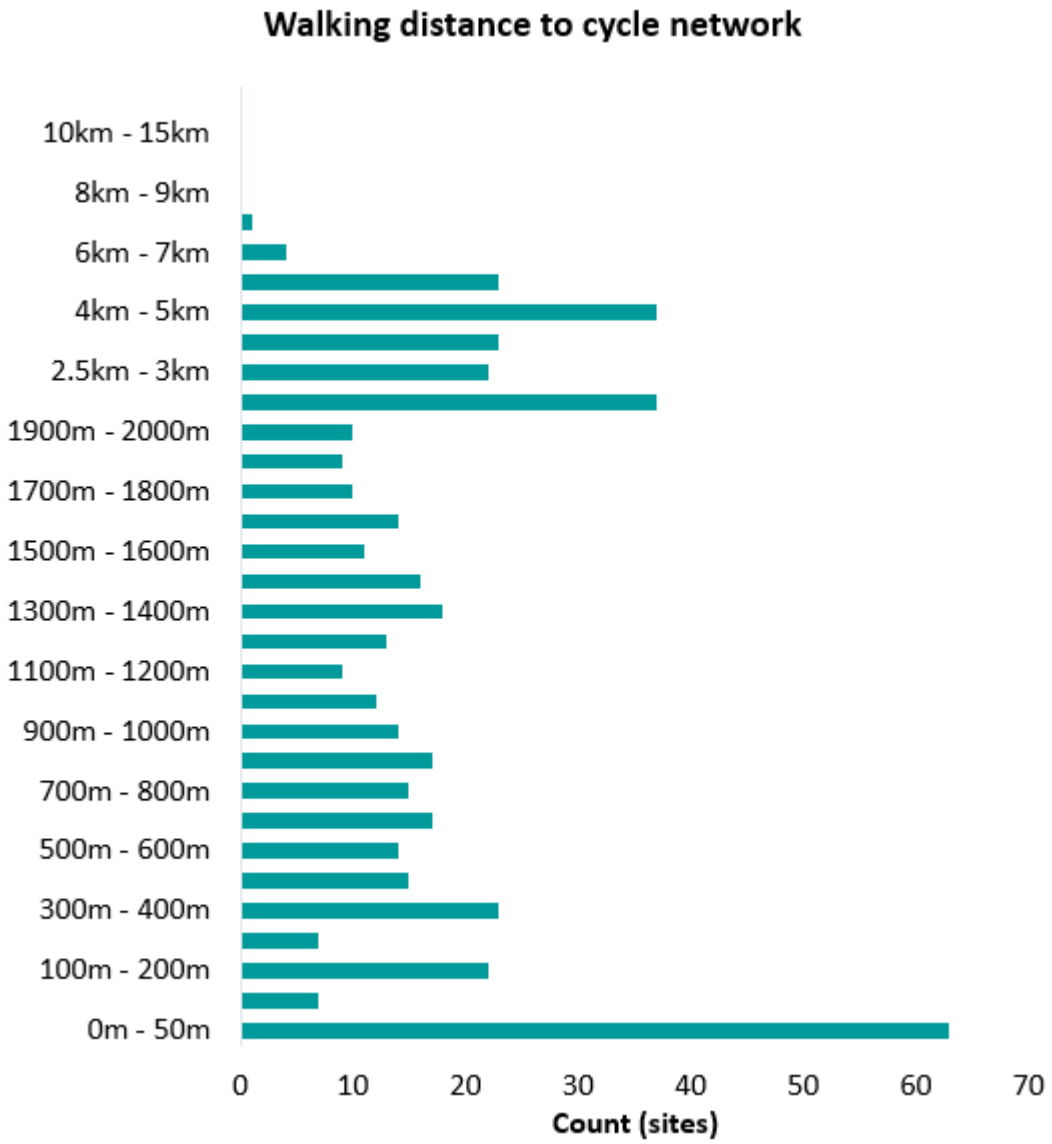
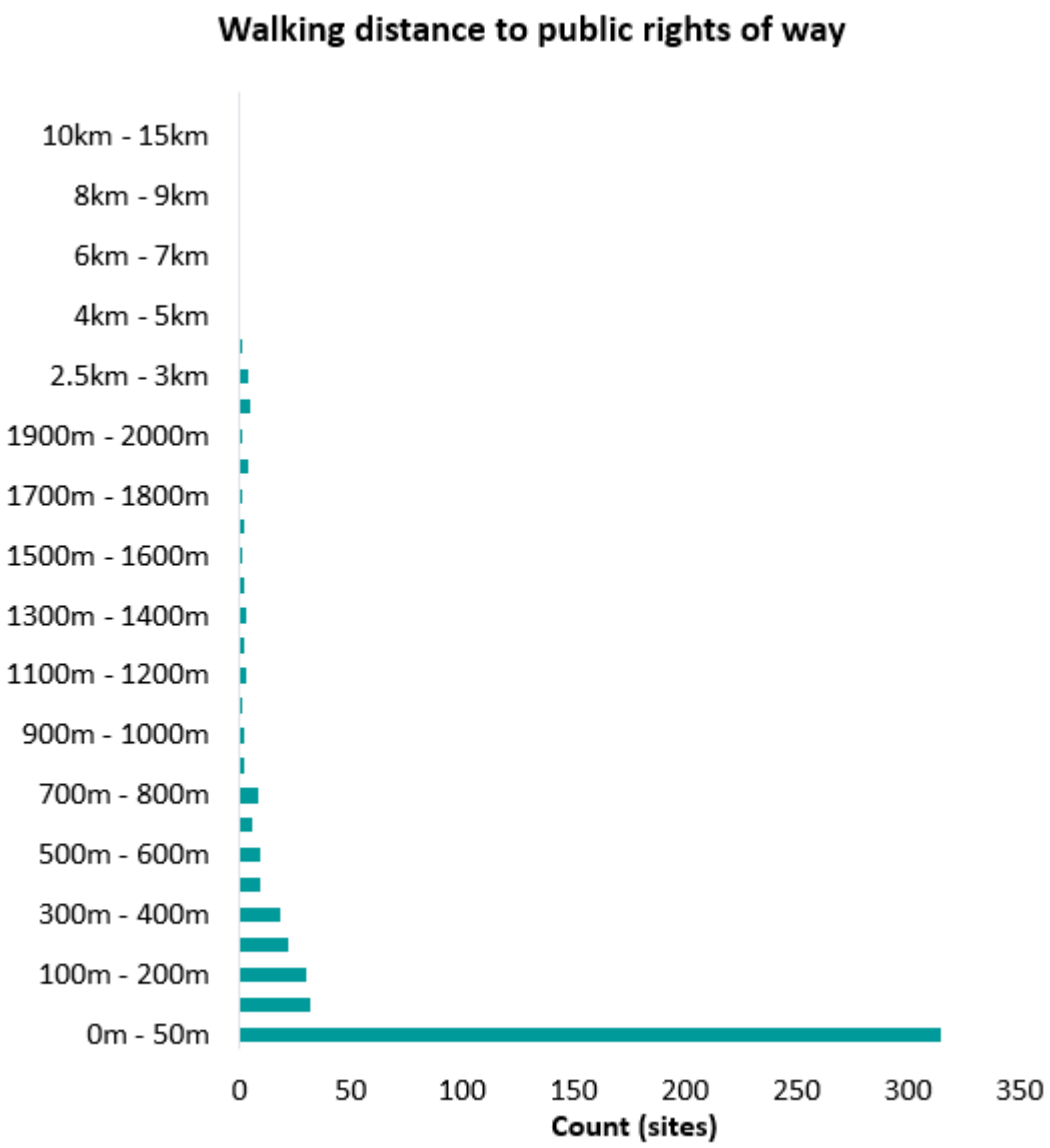


Figure C.9 Walking distance to public rights of way



Appendix D - Settlement options assessments

Introduction

Chapter 5 identifies growth options for each of the district's key settlements. These options have been subject to a comparative appraisal under each SA theme and the detailed findings are presented in this Appendix.

Linking to Chapter 5, this appendix presents detailed appraisal findings in relation to each of the District's key settlements.

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the text. Where appropriate neutral effects, or uncertainty will also be noted.

However, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '**1**' being the highest ranking. '**=**' has been used to highlight where options perform equally, and cannot be differentiated between.

Bath City and environs

The options for assessment are:

- **Option BC1** – Growth within Landscape Character Area ELV1 (Sites S1PS54, S1PS53, S1PS52, B06, A02B, B05, S1PS55, A03i, S1PS56, S1PS58, A03iiA, WSTN07, S1PS57, LAN07)
- **Option BC2** - Growth within Landscape Character Area ELV2 (Sites B04c, S1PS60, B04a, B04b, B04, S1PS60, LAN06, S1PS59, S1PS61, LAM07, LAM10, LAM06, S1PS62, LAM11)
- **Option BC3** - Growth within Landscape Character Area ELV5 (Sites S1PS63, S1PS64, S1PS65, BES13, BES04, BES03, BES14, BES02, BES02a, BES07, BES10, BES11, BES12, BES09, S1PS66, BFD06, BFD10, S1PS67, BFD03, BFD02, BFD01, S1PS68, LAM08, LAM09, S1PS73, S1PS74, S1PS71, S1PS72, S1PS75, D09a, BHM02, S1PS70, D08, BHM06, S1PS69)
- **Option BC4** - Growth within Landscape Character Area HWDS4 (Sites B07, S1PS77, BWK02, S1PS76, S1PS78, S1PS79, D09b, WID25, S1PS80, S1PS81, S1PS83, CDN05, CDN06)
- **Option BC5** - Growth within Landscape Character Area ELV7 (Sites WID28, D12, S1PS82, WID26)
- **Option BC6** - Growth within Landscape Character Area ELV8 (Sites S1PS84, MKC04, S1PS85, S1PS86, S1PS88, S1PS87, S1PS89, E14c, E14a, E14b)
- **Option BC7** - Growth within Landscape Character Area HWDS5 (Sites S1PS90, E14Z, E14Y, S1PS90, CHY01, A367PS7, E15, A367PS6, A367PS5)
- **Option BC8** - Growth within Landscape Character Area EPV1 (Sites E16a, b, and c, S1PS91, S1PS92, ODN07, S1PS93, TWT18, S1PS94)
- **Option BC9** - Growth within Landscape Character Area SORV1 (Sites A4PS2, NSL05, NSL04, F18, S1PS95, TWT19, TWT17, NEW08, NEW07, S1PS54)

Assessment findings (see overleaf):

SA theme		Option BC1	Option BC2	Option BC3	Option BC4	Option BC5	Option BC6	Option BC7	Option BC8	Option BC9
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes - negative	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=1	=1	=1	3	=1	=1	=2	=2	=1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	=2	=1	=2	=2	=2	=1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – negative	Yes – positive	Yes – positive	No	No	Yes – positive
	Rank	=1	=1	=1	4	=1	=1	3	2	=1
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank									
Transportation	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	=1	=1	=1	=1	=1	=1	2	2	=1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	=3	=3	=3	=3	=3	=3	1	=2	=2
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank							1		
Biodiversity	Significant effects?	No	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	No	No	Yes – negative
	Rank	1	2	=4	=4	=4	=4	=3	=3	=4

SA theme		Option BC1	Option BC2	Option BC3	Option BC4	Option BC5	Option BC6	Option BC7	Option BC8	Option BC9
Natural resources	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	=2	=3	=2	=2	=2	1	=2	4	=3
Climate change	Significant effects?	Uncertain	No	Yes – negative	No	Uncertain	Uncertain	Uncertain	Uncertain	Yes – negative
	Rank	=2	=2	3	=1	=1	=1	=1	=2	4
Waste	Significant effects?	No	No	No	No	No	No	No	No	No
	Rank	=	=	=	=	=	=	=	=	=

Health and wellbeing

Bath City and its environs has a range of accessible health care facilities and public services. As such, growth around the city proposed through any option is considered likely to have at minimum, reasonable access to health facilities (pharmacies, GP surgeries, etc.) either within Bath or in neighbourhoods on the outskirts of the city. Bath Royal United Hospital on the west of the city is also considered accessible from all options, serving a population of 500,000 throughout the wider district. Furthermore, reflecting the strategic nature of options, all options will be of a scale to support upgrades to/ improved health infrastructure as required.

All options are also likely to further support health and wellbeing by maximising opportunities to deliver active travel infrastructure (capitalising upon Bath's extensive PRoW, cycle, and waterways), connecting new homes with the City Centre and encouraging reduced private vehicle use. Options located along the river (namely Option BC9 and west of BC1) notably have good access to the 13-mile Bath to Bristol cycle path and have access to the city.

Options located along the river and its tributaries (BC9, BC1, and part of BC3 closest to the City Centre) also benefit from access to significant green/ blue infrastructure; namely the river corridor, alongside wider assets such as open spaces, parks and gardens, and allotments that support healthy communities. It is recognised that green infrastructure exists throughout the city, and that under any option green infrastructure assets would be protected, underpinned by holistic scale masterplanning that can extend across existing and new communities.

Despite the above, it is recognised that all options would result in release of Green Belt (GB) land, which could slightly reduce access to the countryside surrounding the city for existing residents. This is particularly important to the health of communities, recognising that the landscape surrounding Bath is valued nationally and of significant importance to residents for recreation and leisure.

Consideration is also given to the loss of Bath Golf Club under Option BC4. The Golf Course is designated under Policy LCR5 Safeguarding existing sport and recreational facilities, and therefore development will lead to loss of these community uses; contradicting with the adopted policy. The loss of community uses notably extends further than the direct users of the golf course, impacting users of the PRoW and more broadly users of the site as a recreational space.

Overall, it is considered that Option BC4 is worst performing of the options, with the loss of Bath Golf Course leading to significant negative effects in relation to health and wellbeing objectives. Otherwise, it is considered that all options provide a significant opportunity to contribute positively towards health and wellbeing objectives, supporting development in accessible locations; facilitating active travel uptake; and capitalising upon and delivering improvements to Bath's multi-functional green infrastructure network alongside development. Therefore, significant positive effects are predicted under all the remaining eight options. Of the positive options, Option BC9 to the west of Bath, and the southwestern extent of BC1 stand out as having the potential to deliver positive effects of greatest significance. This reflects the location of the options along the river which provides access to green/blue infrastructure, access to the Bristol to Bath cycle path, and the close location of options to RUH hospital. Options BC7 and Option BC8 perform less positively than other options as are less well connected than other options to health facilities and the City Centre. This is reflected in the ranking of the options.

Housing

Nearly half the overall need for affordable housing in B&NES is concentrated in Bath City. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals, and this is likely to be increased through strategic growth, as proposed under all options.

The 2019 Index of Multiple Deprivation shows that Option BC9 includes three LSOAs, all of which are within the top 10-20% deprived areas in the country. These are the most deprived LSOA's in Bath, in contrast to options BC2, BC3 and BC4 which include numerous LSOA's within the 10% least deprived areas in the country. Option BC5 is also noted as being deprived, falling within the 20% most deprived LSOAs in the country.

It is considered that stimulating housing growth in more deprived areas can ensure an element of affordable housing delivery in these areas, to help tackle deprivation locally. The options document also highlights that there could be opportunities to explore the potential for improvement in the Foxhill and Twerton areas in Bath (Option BC5 and Option BC9 respectively). Regeneration offers the opportunity to improve the quality of place and increase the number of homes in these areas, including providing additional affordable housing which is needed.

While options to the east of the city would deliver housing to affluent areas where existing house prices are high, there will nonetheless be a requirement to deliver a level of affordable housing which would contribute towards meeting local need within the city. As such all options are considered to lead to significant positive effects in terms of meeting housing objectives.

Similarly, strategic growth in Bath (under all options) provides the chance to address competing housing needs, including accommodating a forecasted growth in the student population. Purpose Built Student Accommodation (PBSA) forms a distinct part of housing needs in Bath, that would be difficult to cater for outside of university grounds in the absence of strategic growth.

Communities

Bath is the most accessible settlement in the district, and the city is recognised as a regional retail hub and key employment location. Bath also includes the World Heritage Site of Bath which is the main commercial and recreational centre and international tourist destination and is surrounded by a highly valued natural environment (notably including the Cotswold National Landscape).

It is considered that all options are well located around the City of Bath with the potential to utilise services, facilities, and employment in the city and on the outskirts; supporting sustainable communities. On the outskirts, neighbourhoods include Bathampton and Batheaston (Option BC3), Fairfield Park & Larkhall (Option BC2), Bathwick and Widcombe (Options BC4 and BC5), Southstoke (Option BC6 and eastern extent of BC7) Weston & Newbridge (Options BC1 and northern extent of BC9) and Odd Down (northern extent of Option BC7 and eastern extent of Option BC8); all of which have local high streets with ranging facilities and services utilised daily by residents nearby. There are notably existing housing allocations in Odd Down, and as a location which is already being invested in, this area could present an opportunity to sustainably manage increased growth.

While the north of Option BC7 connects well to Odd Down, it is noted that sites within the southern extent of the option are disconnected from Bath and would not connect as well to the city centre and local centres. Similarly, Option BC8 is distant from existing communities when compared with other options.

Bath is also supported by excellent sustainable transport infrastructure and is served by extensive PRoW and cycle networks, as well as including two rail stations (Bath Spa and Oldfield Park), which connect the city with neighbouring centres; and connect the wider city to the City Centre (i.e. services run from Oldfield Park to Bath every 30 minutes and travel time is less than two minutes. This service also extends further throughout the district to Keynsham and Bristol). Oldfield Park station is situated west of the city in East Twerton, with Options BC8 and BC9 likely to most benefit from this station and its services.

While sustainable transport accessibility is good within Bath, there remains heavy traffic congestion during the day and more so at peak times (recognising that 75% of people driving to work in Bath do so from outside the city). While this congestion could be exacerbated by growth under any of the options, it is noted that the Bath to Bristol corridor is being heavily invested in through strategic sustainable transport interventions (notably the WECA Bristol to Bath Corridor Project). The WECA interventions are considered to be most beneficial to options to the west of the city, namely Option BC9, BC8 and BC1.

Furthermore, some of the options benefit from Park and Ride facilities at Lansdown (Option BC2), Newbridge (Option BC9) and Odd Down (Option BC7/8); connecting options to the centre of Bath via regular bus services (every 12-15 minutes).

Options to the west of Bath also connect well to the city centre via the river, and the 13-mile Bristol to Bath cycle path notably extends through Option BC9. However, the west of Option BC9 is considered less well connected via wider public/ active travel (buses and footpaths), and the option is also constrained by capacity issues on the main roads into Bath from the west, namely the Lower Bristol Road and Upper Bristol Road.

Option BC9 is more broadly considered to be more isolated than other options (i.e., less well connected to schools and shops, etc.). There is a social argument that focusing growth here would best achieve wider infrastructure objectives, tackling deprivation which is a key issue for the area. There is a clear range in deprivation levels between wards within Bath, seen through an increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district. The west of Bath includes two LSOAs within top 10% deprived areas in the country, and therefore presents an opportunity to promote stronger, more cohesive communities through focusing growth in these deprived areas. This would likely also lead to improvements to the public realm and vibrancy within communities, an example being the Bath Weston Riverside redevelopment.

While options to the west are merited for investment proposed through the WECA BBCP, options to the north and northeast also connect reasonably to the A4, for example from the villages of Batheaston, Bathampton and Bathford. These villages connect reasonably well to the City Centre, despite development extending into the rural area. It is further recognised that the strategic nature of all options presents an opportunity to support the delivery of improved sustainable transport and connectivity between sites and the City Centre.

It is crucial that new development in and around the City is served by the timely provision of necessary supporting infrastructure e.g. schools, health facilities, utilities, green infrastructure, etc. All options are strategic in nature, and therefore it is reasonable to assume that the level of proposed housing would support the delivery of a new primary school (reflecting existing capacity issues), and the provision of other local facilities as required. High growth options could also support a level of investment in Bath City Centre, recognising that there is room for improvement in the centre as a place for entertainment, culture, and shopping. In this respect it is recognised that evidence is ongoing to identify and understand current deficiencies or surpluses in provision within Bath and will inform the next stage of plan making and SA.

In relation to community facilities, and as set out above under health and wellbeing, it is recognised that the loss of Bath golf Course under Option BC4 has the potential to lead to significant negative effects. This is through the loss of important community assets; green space and recreational facilities, recognising the course is designated under Policy LCR5 (Safeguarding existing sport and recreational facilities).

In terms of impact on settlement identity, it is considered that growth to the north (Option BC2), northeast (Option BC3), and east (BC4) seeks to deliver piecemeal development along the existing settlement edge, and would more easily integrate with existing communities, leading to less of an impact on settlement pattern. However, it could be harder under these options to achieve synergistic goals, for example in relation to infrastructure delivery and connectivity. Options which seek to concentrate growth in a single location (site/ group of neighbouring sites, such as Option BC5, and Options BC7, BC8 and BC9) could perform more positively in this respect. These options are however further from the existing settlement and would extend Bath into the open landscape to the west/ southwest. Option BC9 notably would reduce the green gap between Bath and Saltford to the west, which could significantly impact upon settlement identity in the longer term.

Moreover, larger site options would lead to increased open greenfield/ Green Belt land take, which could impact upon recreation opportunities (for example site NSL05 within Option BC9). Conversely, these options may also support increased opportunities to deliver connected GI through well-planned, strategic masterplanning, further supporting the health and well-being of communities and providing active travel routes within GI.

Active travel opportunities could be more difficult to deliver through a piecemeal approach to development, particularly in the east of the City where congestion is a key issue (notably along London Road). Strategic intervention would be required to improve accessibility and support modal shift. Nonetheless, although development is seen to be piecemeal in nature under some of the options, there is an assumption that all options would deliver strategic, coordinated development.

Taking the above into consideration, it is concluded that all options will lead to positive effects, delivering strategic growth close to Bath City Centre where residents can capitalise upon a wide range of services, facilities, employment, and recreation opportunities. All options are also merited for their strategic nature, as will likely deliver a range of supporting infrastructure to meet local needs and ensure new development is sustainable (including GI, transport infrastructure, and a primary school).

The above narrative sets out pros and cons for options, for example, many options benefit from having local centres close by (to the north and south) and sustainable connectivity with the City Centre (all options perform well although ongoing City Centre congestion is noted); while others are further from the City Centre but connect well along the river (Option BC9 and to a lesser extent BC8 and BC1). Option BC9 further stands out as an opportunity to address areas of major deprivation in Bath, reducing inequalities suffered by enhancing the role of local centres alongside the City Centre.

Option BC4 is identified as worst performing of the options, with the loss of Bath Golf Course leading to significant negative effects in terms of access to community facilities. It is difficult to otherwise rank options at this stage and therefore the majority of options perform equally against communities SA objectives. These options are considered to lead to significant positive effects either through being broadly sustainably located or presenting an opportunity to invest in Bath's most deprived neighbourhoods. After Option BC4, Options BC7 and BC8 perform less positively than other options as they are less well connected to the City Centre or local neighbourhood centres. Option BC7 is worst performing of the two as would also impact upon settlement pattern.

Economy

The City of Bath is the main economic centre and largest settlement within the district. As such it is the driver for much of the housing needed in B&NES (as discussed above) and a focus for economic/ employment space. It will be important to maintain an appropriate supply of land in Bath for industrial processes and services to ensure the city retains a mixed economy. As such, strategic growth (under any of the options) is likely to perform positively in terms of supporting a strong, competitive economy and enabling local businesses to prosper.

Key sites such as the Royal United Hospital (RUH), University of Bath (UoB) and Bath Spa University help increase the provision of employment, as significant employers for the area. The RUH is located in the west of Bath, with Option BC1 followed by BC9 benefitting from excellent accessibility. Option BC4, and the southern extent of Option BC3 benefit from being closest to the UoB. Bath Spa University is to the west of Bath, approximately 2km west of Option BC9. Options BC9 and BC8 are considered to have good access to Bath Spa University.

To the west of the city along the river corridor, Newbridge Riverside is the only strategic industrial area in Bath. The area is protected by Local Plan policy for industrial uses, with an aspiration to intensify land uses and optimise development capacity in this area. This is likely to be capitalised upon through strategic growth Options BC1 and BC9, contributing towards the vitality and vibrancy of the wider area. Notably Twerton is the most deprived neighbourhood in the city and would benefit significant from investment and improvement in the wider area.

The Economic Needs Assessment is very clear that the city needs to protect existing office space and deliver a level of grade A office space in central locations, and protect and enable the development of industrial land. Strategic growth options in and around the City are likely to support economic objectives in this respect, delivering a scale of housing growth that could be supported by a level of employment provision to further support high levels of self-containment.

While self-containment is high, many residents out-commute to neighbouring settlements within the district as well as outside to Bristol. Bristol is accessible by train in 10-15 minutes (from Bath Spa and Oldfield Park every 30 minutes). Options located with good access to Bath's train stations therefore perform positively in terms of supporting access to employment.

Bath is a University City, providing two universities. The availability of training and access to learning is therefore high, and there is an opportunity for all options to capitalise upon this through delivering new homes in accessible locations. However, the presence of the universities also creates tensions, including ability to meet employment needs through new office and industrial development. As such any scope to intensify economic development opportunities through strategic growth within/ close to the City Centre (all options) would perform particularly positively in relation to economic objectives.

However, when considering wider education, it is recognised that primary school capacity varies across the city. Some primary schools are currently at capacity, including to the south and west of Bath. However, to the west of Bath opportunities have been identified to expand in Newbridge close by, providing increased capacity for new residents. As set out above, it is considered reasonable to assume that sufficient housing would be required to support the development of a new primary school as necessary. This is likely to be deliverable through all strategic growth options around the city.

The city has a vibrant cultural offer which supports its important role as an international visitor destination that attracts over six million visitors annually. It is also a regional shopping destination. Investment in Bath through any of the strategic growth options has the potential to attract more visitors and new development promoting tourism and other economic benefits. The Bath WHS management plan notably identifies Bath as a home for residents, businesses, education, and visitors. Conversely, it is recognised that strategic growth within/ surrounding the city could lead to significant negative effects on the Outstanding Universal Value (OUV) of the WHS and/ or its setting, alongside associated designated assets which contribute to the local tourism offer. This includes Prior Park, Royal Victoria Park, the Roman Baths, the Royal Crescent, and other key historic features of the city.

Overall, it is difficult to differentiate between the options in relation to economic objectives. It is broadly considered that all options will perform positively through directing growth to the economic hub of the district, where access to jobs and sustainable transport connectivity is high. Furthermore, it is recognised that strategic growth presents an opportunity to support economic investment in Bath, addressing deficiencies in sectors as identified through the Economic Needs Assessment. Significant positive effects are therefore predicted under all options.

In terms of ranking options, it is considered that the west of Bath (particularly Option BC9) would benefit most significantly from economic investment (reflective of its deprivation level), supporting the vitality and vibrancy of the wider area. West of Bath (including Option BC1) also benefits from access to the RUH, one of the City's main employers, and connects to the A4 corridor, as well as the Bristol to Bath cycle path. Option BC9 however is less well connected to the city centre via bus and foot. Options to the east and south connect well to the city centre and employment opportunities, while options to the south perform least positively in this respect. Notably Option BC7 is disconnect from the city and sustainable travel opportunities to the south of Odd Down.

Transportation

In general, it is considered that focusing strategic development adjacent to Bath city boundary (under all options) will contribute towards reducing the need to travel by car. Options seek to provide homes near the city centre where a range of employment, services and facilities are available, which will maximise use of public transport and incentivise modal shift.

Options will benefit from the existing strong public transport network, notably including a mainline railway station with a half hourly service to London and frequent connections to Bristol, Keynsham, and towns in Wiltshire. It is a very walkable city, with options likely to benefit from a number of strategic cycle routes: the Bristol to Bath Railway Path, the Kennet and Avon Canal to Bradford on Avon, and the Two Tunnels Greenway. The strategic nature of all options further presents an opportunity to invest in sustainable transport within and surrounding Bath (noting the WECA Bristol to Bath Corridor project), maximising infrastructure upgrades/ improvements to support accessibility throughout the city.

While public transport throughout the city is extensive, major link roads (A4, A36 and A46) pass through the centre of Bath. As such, Bath has a very high level of through traffic, including large numbers of HGVs, and therefore all options have the potential to exacerbate this to an extent. Any proposal for further development within the area will need to address this by bringing relief from current congestion and promoting more sustainable forms of transport. The strategic nature of options presents an opportunity to deliver supporting transport infrastructure with the potential for positive effects. This includes through minimising the need to travel by car and encouraging movement by walking, cycling and public transport.

One of the benefits of options to the west of Bath (Option BC9, and Options BC1 and BC8 to a lesser extent) is the accessibility to the A4 corridor, recognising that the Bristol to Bath Corridor project (BBCP) seeks to focus investment in this location. This could include a Transport Interchange which is being explored, or the relocation/ expansion of the Newbridge Park and Ride site (accessible via Options BC1 and BC9), which would better manage traffic into the city. Options BC1 and BC9 also have good access to the National Cycle Network and River Avon GI corridor, providing a level of access to the city centre. However, the west of Option BC9 is considered less well connected via public/ active travel, and the option is also constrained by capacity issues on the main roads into Bath from the west, namely the Lower Bristol Road and Upper Bristol Road. Despite this, the strategic nature of option could deliver infrastructure to ensure no significant increases in traffic volume; for example through improvements to the Park & Ride services.

More widely, options are merited for being well connected to PRoW routes which provide connections to the surrounding rural and urban areas. Notably Options to the north of the city (Options BC1, BC2 and BC3) have greatest accessibility. It is recognised that strategic growth under all options present an opportunity to capitalise upon existing connections and close the gaps in this network, supporting green infrastructure and active travel objectives.

Outside of the PRoW network, north of Bath (Options BC2 and BC3) have good access to sustainable transport, notably bus services including the Lansdown Park & Ride connecting into Bath city centre. It is noted that Lansdown Road could see increased vehicular traffic however development could include junction improvements to ease congestion to an extent. Furthermore Lansdown Park & Ride

is located within Option BC2 and has the potential to be further invested in, which would provide further relief on the city centre corridor.

Option BC3 to the east of Bath is considered reasonable for sustainable transport connectivity. There is a local centre within Batheaston, with regular buses connecting to the city centre, and the area is supported by active travel. The east of the city is also well connected to the motorway/ strategic transport network, neighbouring settlements such as Corsham and Chippenham. It is also noted that bus services are being improved between Chippenham and Bath.

Options BC4 and BC5 have good access to the city centre via sustainable travel (namely the PRoW and national cycle network), and therefore also connect well to the rail station, supporting reduced private vehicle use.

Similar conclusions can be drawn for the south of Bath as have been identified above for the north. This is reflective of Odd Down Park & Ride and established PRoW networks within the area. However the A36/ A367 experience congestion and it is considered that the southern extent of Option BC7 and Option BC8 are less well connected to the City, and could exacerbate private vehicle use out of and into Bath.

Overall, it is considered that all options will perform positively against transport objectives as are focusing growth within/ on the outskirts of the district's most sustainable settlement of Bath, which is a regional hub for employment and retail, supported by a range of sustainable transport infrastructure. While it is recognised that the city experiences a level of congestion throughout the day, options are notably strategic in nature and therefore present an opportunity to further invest in sustainable transport infrastructure within and surrounding the city; supporting modal shift and accessible neighbourhoods.

All options are well located in terms of the City's extensive PRoW network, and mostly connect well to the city centre (with the exception of Option BC7 and BC8). Many options also benefit from a nearby Park & Ride service, which could help alleviate any potential additional congestion into the City. Notably options to the west will provide increased critical mass to enable more significant infrastructure improvements and supplement the WECA BBCP, capitalising upon the A4 corridor connecting the two cities of Bath with Bristol (via Saltford and Keynsham). However, it is noted that options to the east also connect well to the A4, and will likely benefit from any future investment in the corridor.

At this stage, while there is the potential for options to lead to positive effects, uncertain effects are concluded. This reflects the absence of detail regarding masterplanning and infrastructure delivery; which would be required to ensure adverse effects on existing congestion in the City, and on the surrounding strategic road network is avoided. Options BC7 and BC8 are worst performing as these options do not wholly connect as well to the City and could exacerbate private vehicle use.

Landscape

The City of Bath is significantly constrained in relation to landscape designations, as two thirds of it is wrapped around by the Cotswolds National Landscape (NL). Bath is also unique in having two world heritage site designations: the City of Bath World Heritage Site (WHS), and as a Great Spa Town of Europe WHS. The landscape and topographic setting of Bath is of upmost importance to the character of the WHS, as

identified through the World Heritage Site Setting Supplementary Planning Document (SPD), 2013.

Bath's landscape is characterised by strong dramatic landforms, with its topographical setting contributing to its compact urban form and unique character. The containment of the city by the bowl form of the landscape has given it one of its distinct characteristics of being compact and inward looking, physically quite hidden from the wider countryside. The high quality of the landscape around Bath is signified by the NL status.

B&NES has carried out a study into the setting of the WHS (World Heritage - Site Setting Study 2009), with key characteristics identified. Those that are of importance to the landscape and topographic setting of Bath include:

- Strong landform features and distinctive character zones, reinforcing the containment of the city within its landscape.
- High quality surrounding landscape character; and
- Abrupt edge between built development and the countryside.

It is considered that these characteristics could be applied to all options surrounding Bath, reflective of the bowl formation and steep topography. These key landscape features also contribute to the special features of the NL designation, as reflected through the Cotswold AONB Management Plan (2022).

When identifying differences between options, it is highlighted that to the north of the city (Options BC1/BC2) lies the high Cotswold plateau incised by the steep sided River Avon tributaries. Option BC1 is notably within an elevated position with open views, and as such the topography of this option is a key constraint for development, reflective of the sensitivity of the NL and WHS and their settings.

To the northeast, Option BC2, BC3 and BC4 marks a transition from the residential areas of Bath to more open, rural landscape of the Cotswolds NL and Green Belt designations. The landscape sensitivity here is also considered to be high due to the designations present, topography, and land use. Steep slopes are characteristic of this part of the city, including Sion Hill and Upper Lansdown. The wide, steep sided Limpley Stoke valley act as a constraint to development extending east/ south (options BC3 – BC5).

It is anticipated that development to the east of the city would permanently change the open character of the area, having adverse effects on the nationally designated landscape and its setting.

To the south, the city lies close to the southern outer edge of the Cotswold plateau, which includes Combe Down and Odd Down (Options BC6 and BC7), effectively forming the sides or lip of the characteristic 'bowl'. Development further south is currently prevented by the strong, steep sided Midford and Cam Brook valleys, which form an abrupt edge to the high plateau. The topography to the south of Bath has historically defined the form and character of the city and presents constraints with regards to the urban-rural fringe.

To the west (Option BC8 and BC9) a steep sided tributary valley of the Newton Brook and the brook itself runs up against the western outer scarp slope of the Cotswold plateau and similarly prevents the city spreading over the lip of the bowl.

Notably development above the ridgeline under Option BC9 would lead to an unacceptable impact on the setting of the WHS. This study area is constrained by the visual sensitivity of this location, including the WHS, NL and Green Belt. Additionally in relation to Option BC9, it is noted that the river corridor and flood plain, along with the valley containing Newton Brook to the east, form a landscape 'gap' to the west of the city which are strongly perceived from a range of receptors in and around the area.

While constraints have been identified for all options (reflective of the sensitivity of the landscape surrounding Bath) it is recognised that the strategic nature of options presents an opportunity to deliver green infrastructure benefits. Options could link via green infrastructure to the city (i.e. recognising that some options present a more piecemeal approach to development than other options focussed on larger sites). The use of green corridors could accommodate biodiversity enhancements and deliver biodiversity planting and screening to mitigate adverse effects. It is considered that piecemeal options including a range of smaller sites on the settlement edge could better deliver this, for example incorporating mature vegetation along existing site boundaries.

Taking the above into consideration, it is concluded that all options have the potential to significantly affect the landscape and would likely lead to significant adverse effects.

In terms of ranking options, options to the west/ southwest (Option BC9, BC8 and BC7) are ranked highly as they do not fall within the NL designation. Option BC7 performs more positively than Options BC8 and BC9 as it does not contribute as significantly to the Green Belt purposes. All other options are ranked equally at this stage.

While significant negative effects are concluded, it is recognised that this will depend on the design and layout of any new development, including the incorporation of green infrastructure; recognising that strategic growth would be underpinned by landscape-led masterplanning. Consideration should also be given to the WHS Setting SPD, Green Belt Assessment, and AONB Management Plan.

Historic environment

Bath is unique in having two world heritage site designations: the City of Bath World Heritage Site, and as a Great Spa Towns of Europe World Heritage Site (WHS). This transnational inscription spans 11 spa towns from seven different countries and was inscribed on the list in 2021. It is reasonable to assume that harm to the City of Bath WHS is also likely to result in some level of harm to the Great Spa Towns of Europe WHS.

It is however recognised that Local Plan Policy HE1 Historic Environment, states that development that has an impact upon a heritage asset will be expected to enhance or better reveal its significance and/or setting and make a positive contribution to its character and appearance. Furthermore, in line with the WHS Management Plan (2013), the impact upon the Outstanding Universal Value will be a key consideration in all proposals for change, recognising that small-scale incremental change can be as influential as major interventions. There will be a strong presumption against development that would harm the Outstanding Universal Value (OUV) of the WHS itself, or its setting.

In addition to the WHS status, the city has over 5,000 listed buildings and an extensive conservation area that covers two thirds of the city. Bath Conservation Area is the largest conservation area in the district. Bath has many Registered Parks and Gardens (RPG) including the Royal Victoria Park and Prior Park. There are also numerous Scheduled Monuments (SM) including the Roman Baths and site of Roman town and Bath City Walls.

The landscape of the city and its surroundings has been instrumental in the location, form, and special character of the WHS. The setting is protected through planning policy, supplemented by the WHS Setting Supplementary Planning Document (SPD), which defines what is important about the setting of the WHS and provides an overview of the international and national context for the management and protection of the setting of heritage assets. This should be considered alongside the progression of any growth option around Bath, as reflected in the emerging options document.

With the exception of Option BC7, all options fall partly within the WHS, with Option BC5 falling wholly within the designation. Options are similarly constrained by Bath Conservation Area, with Option BC8 overlapping slightly with Englishcombe Conservation Area, rather than Bath. Option BC7 does not fall within the WHS or a Conservation Area, however, it is within the indicative extent of the WHS setting (as defined through the WHS Setting SPD). It is also considered that Option BC5 followed by BC4 and BC1 are the most constrained to the north and east of the city, as these options are wholly/ predominantly overlain by the WHS and Conservation Area; whereas other options to the south and west intercept less with these assets. Options are also constrained by Listed Buildings, RPGs and SMs as eluded to above. However, given the extent of assets present across the city it is difficult to differentiate between options in this respect. Notably, a large SM is present within Option BC5, which also falls within the Conservation Area and WHS; constraining this option further. There are also two large RPGs adjacent to options BC8 and BC9 to the west of Bath, and another to the southeast of Bath adjacent to options BC5 and BC6. Options BC1 and BC2 to the north are also notably constrained by Grade I Listed Beckford Tower.

It is clear that options are significantly constrained from a heritage perspective. Where options are located within the WHS, development has the potential to lead to significant adverse effects on its OUV, which could be irreversible, and threaten the WHS designation. Furthermore, in terms of the WHS setting, any proposal should be mindful of the impact they will have on the WHS's characteristic 'bowl'. Any development would need to be kept away from the more exposed areas of the WHS to prevent the appearance of the city spilling beyond the contained hollow of Bath into rural views and open setting. The landscape and topographic setting to the WHS notably identifies the following key features, which are applicable to all options surrounding the city:

- The undeveloped landscape surrounding the City.
- The open elements of landscape both beyond and within the WHS boundary; and
- A variety of landscape character areas adjoining the settlement.

The north and east of the city is seen to be particularly constrained, reflective of the steep topography and long-distance views, alongside key features such as the Grade I Beckford Tower which contribute to the character of the WHS's northern

fringe (Options BC1 – BC3). The tower is a significant and recognised landmark from much of the surrounding area and has its own role as a long-distance viewpoint.

Options to the east and south (BC4 – BC6) are further constrained by the WHS's characteristic 'bowl' formation, topography, and long-distance views from within Bath urban area. These options link into Bath and the open countryside, contributing significantly to the protected character.

Options to the west of bath could be seen to be less constrained from a heritage perspective, with a slightly less steep topography, although also holds important viewpoints, and is integral to the WHS's green setting. Development would fundamentally alter the character and appearance of the areas, which are broadly undeveloped greenfield/ agricultural land.

Additional technical evidence and sensitivity testing is emerging in relation to the historic environment, which will likely to be available to inform the next stage of plan-making/ SA.

Finally, consideration is given the potential benefits of options in relation to the historic environment, for example opportunities to enhance existing Green Infrastructure both within the area and linking into Bath and the open countryside. The strategic nature of options could ensure the delivery of stronger connections to the wider landscape and historic environment, improving accessibility to and understanding of assets. Particular care, including good design and appropriate mitigation (i.e. screening and planting), would need to be taken, however it is unlikely this would outweigh potential harm to the WHS and its setting (as well as other assets present and discussed above).

Overall, it is concluded at this stage that all options have the potential to lead to significant negative effects on the historic environment. Any strategic development within/ within the setting of Bath WHS is predicted to cause significant harm to the Outstanding Universal Value of the WHS and wider assets. This reflects the nature of the type of development proposed, and the potential harm that development could cause to the attribute of 'the green setting of the city in the hollow in the hills'.

It is difficult to rank options at this stage without a detailed heritage assessment, and therefore all options are ranked equally, with the exception of Option BC7 which is does not fall within the WHS and is therefore considered best performing. The option does however fall within the WHS setting alongside other assets.

Biodiversity

There are a number of designated biodiversity sites within and surrounding Bath, including components of the internationally designated Combe Down and Bathampton Mines forming part of the 'Bath & Bradford-on-Avon Bats Special Area of Conservation (SAC)', designated primarily for horseshoe bat interest. The area includes importantly flight lines and foraging habitat associated with this SAC and with other Bat SACs within and outside of the district. Grazed permanent pastures; woodlands and linear features such as waterways and hedgerows are notably important and prevalent around Bath. In terms of the options, Option BC4 (site BC07) is notably constrained by the SAC, falling slightly with the site boundary to the east. Option BC3 is also constrained, with another area of the SAC extending east of the option in close proximity to site BFD02. Options BC5 and BC6 are also notably located in close proximity to smaller components of the SAC, extending to the south

east of the city, between sites within options. Any option progressed would need to be appropriately assessed through the Habitats Regulations Assessment (HRA) process.

Nationally designated SSSIs extend within a number of options, notably overlapping with SAC designations discussed above (therefore impacting upon options BC3 – BC6). In addition to this, Option BC9 includes a SSSI within site NSL05, and Option BC3 is constrained by another SSSI (adjacent to site S1PS69).

In terms of wider national designations, Options BC2-4 and BC6-9 are constrained by Ancient Woodland either falling within site boundaries or adjacent to.

All options are constrained by locally designated SNCIs within or adjacent to sites, extending extensively throughout Bath. All options are also constrained by varying extent of priority habitat, including significant areas of deciduous woodland, woodpasture and parkland.

Finally, all options also fall partly/ wholly within Local Plan policy designations NE1 ‘Green Infrastructure’ and NE3 ‘Ecological Networks’, being identified as part of the district wide green infrastructure and ecological networks. While this is a constraint to development, strategic growth under all options also presents an opportunity to maximise the potential of sites/ options as a green infrastructure resource for the wider area, increasing ecological value and biodiversity net gain. Notably, options could support the delivery of strategic green infrastructure and nature recovery projects such as Bath River Line and Bathscape.

It is difficult to conclude on significance of effects at this stage without knowing the exact design and layout of new development. Taking a precautionary approach, options BC3 – BC6 and BC9 are considered to have the potential to lead to significant negative effects, reflecting the depth of constraints present across the options, and uncertainty regarding mitigation.

Overall, Option BC1 is ranked most favourably as it is not constrained by internationally or nationally designated sites/ habitats. Option BC2 followed by Options BC7 and BC8 also perform better than the remainder of options, as international/ national sites/ habitats do not overlap with options, although Ancient Woodland is adjacent. These options are also constrained by local designations and features, and therefore minor adverse effects are concluded.

While a precautionary approach has been taken at this stage, it is also recognised that strategic scale development under all options can correlate with higher planning contributions, which could be utilised to mitigate any impacts of higher growth and enhance / protect designated sites and/or areas identified for habitat creation / improvement schemes. This is likely to be explored further at the next stage of plan making/ SA, for example recognising that opportunities to better facilitate nature’s recovery are being identified through a Local Nature Recovery Strategy and will be supported by new and amended planning policy.

Natural resources

When considering air quality, it is recognised that Bath suffers from significant traffic congestion with many people commuting into the city daily and of these a considerable proportion of them travel by private car. Many people also leave the city each day by private car to travel to work, and at peak times the roads also include

school traffic. A clean air zone was introduced in Bath in 2021 due to exceeding legal limits of nitrogen dioxide in some locations.

The NPPF (2023) states that "*planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement*."

It is considered that the delivery of any option around Bath would cause pressure on the existing road network due to growth associated with new development. This would be associated with greater air and noise pollution from increased vehicles on main routes into Bath; for example, the A4 and A36 to the north/ east, A367 to the south, and A4 to the west.

While all options have the potential to exacerbate congestion and subsequent air quality issues, the strategic nature of options also presents an opportunity for well-located options to focus on sustainable travel. This would include capitalising upon Bath's existing extensive PRoW network, bus routes (including Park & Rides) and rail services (frequent services running from Oldfield Park and Bath Spa stations as discussed above). This would provide genuine travel choice for residents and reducing car dependence to reduce carbon emissions and improve air quality in the city centre.

Options are considered to perform equally at this stage against air quality objectives, with much uncertainty relating to the design and layout of development and infrastructure delivery. This reflects the potential for options to deliver growth around the city that could exacerbate congestion issues, and deliver strategic interventions to support air quality objectives and modal shift.

In terms of noise and disturbance, Options BC2, BC3 and BC9 all include sites located adjacent to the A4/ A46, which are key transport corridors out of Bath, and could have significant issues of noise and disturbance to development. Options therefore have the potential to lead to negative effects in this respect, however mitigation could reduce the significance; for example, through sensitive masterplanning and design.

The key considerations for supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. None of the options surrounding Bath have had had recent (post 1988) land classification undertaken, and therefore at this stage there is a need to rely on provisional (pre 1988 data). Provisional data indicates that broadly, all greenfield land surrounding the urban area of Bath is Grade 3 land, which could be Grade 3a (BMV) or Grade 3b (not BMV). The exception to this is to the southeast (Option BC6) which appears to be Grade 4 land (not BMV). Grade 4 land also extends along the urban boundary to the northeast, including the south of option BC3 (south of the A4). The other area identified as Grade 4 is to the northwest (western extent of Option BC1). Finally, a small amount of Option BC8 appears to fall within an area of Grade 2 land, which is considered to be BMV.

While it is difficult to rely on provision data, options are ranked based on this evidence given greenfield land take is similar under all options. Option BC8 is therefore identified as worst performing, falling partially within Grade 2 land. Option BC6 is considered best performing as is within Grade 4 land which is not BMV, followed by BC3. All other options are ranked equally against land resource objectives.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Overall, Option BC8 is worst performing, followed by Options BC2 and BC9 as these options could lead to loss of high-quality agricultural land, and could lead to noise disturbance being located close to the strategic road network. Option BC6 is best performing, with all other options ranked equally given similar effects are predicted in relation to loss of BMV land and air quality.

Significant negative effects are concluded for all options given the high level of greenfield loss.

Climate change

All options involve increasing amounts of growth at Bath, which is a regional economic hub, supported by an extensive range of amenities and facilities, accessible via numerous sustainable travel networks. However, congestion in the city remains high, particularly at peak times, noting the designation of a Clean Air Zone in 2021.

It is considered that public transport interventions likely to be delivered through strategic options will contribute to creating an improved public transport network within and surrounding Bath, supporting commitments for transitioning towards net-zero targets. All options are merited in this respect, being strategic in nature with reasonable accessibility. When ranking options in this respect, options BC7 and BC8 perform less positively than other options as their location could exacerbate existing transport issues.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation/offsetting of carbon sequestration opportunities that may be ‘sterilised’ by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Broadly speaking, strategic growth options offer greater potential to secure high levels of resource efficiency, to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than all other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy, and sequestration measures. While all strategic options are likely to perform positively in this respect, an example is the potential to maximise opportunities provided by the River Avon corridor, for nature recovery and climate adaptation and mitigation.

It is recognised that Bath is 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). Flood risk and surface water runoff will need to be managed within Bath to respond to increasing frequency of extreme weather events, using nature-based solutions wherever possible (riverside locations).

In terms of the options, Option BC9 and Option BC3 are significantly constrained by Flood Zone 3 which is of high risk of flooding. This relates to the location of options coinciding with the River Avon. Notably site NSL05 (Option BC9) north of the A4 is within Flood Zone 3, along with the whole of site LAM08 (Option BC3) and part of sites S1PS69 and S1PS67.

Other options constrained to a lesser extent include Option BC1, where a small area of Flood Zone 3 overlaps with sites S1PS52 and A02B. Options BC8 and BC2 include sites that are adjacent to high flood risk areas, reflective of the presence of Newton Brook and Lam Brook, respectively.

Overall, options are ranked in relation to flood risk, as it is difficult to rank options at this stage in relation to climate mitigation objectives. Option BC9 is therefore worst performing, followed by Option BC3, with both options identified as having the potential to lead to significant adverse effects. Option BC1, BC8 and BC2 also perform negatively as are constrained by higher flood risk areas. Options BC4, BC5, BC6 and BC7 are therefore considered best performing.

However, it is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and sustainable drainage systems (SuDS) legislation.

Furthermore, it is noted that strategic development offers increased opportunity for flood betterment. This will be explored further at the next stage of plan-making/ SA.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in nearby Bristol. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Keynsham

The options for assessment are:

- **Option K1** - Growth to south-east (Sites K20, K21, K22, K23, K24, K25)
- **Option K2** - Growth to the west (Site K15c)
- **Option K3** - Larger-scale growth to the west (Sites K15a, b & c, K16a & b, S1PS16, CDAN34, CDAN36, CDAN41)
- **Option K4** - Growth to the south-west (Sites K17 (all parcels), K18, K19, S1PS15)
- **Option K5** - Growth to the north (Sites K12, K13, K29Z, K30)

Assessment findings:

SA theme		Option K1	Option K2	Option K3	Option K4	Option K5
Health and wellbeing	Significant effects?	No	No	Yes – positive	Uncertain	Yes – positive
	Rank	4	3	2	5	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=1	2	=1	=1	=1
Communities	Significant effects?	Yes – positive	No	Yes – positive	Uncertain	Yes – positive
	Rank	=2	4	=2	3	1
Economy	Significant effects?	No	Yes – negative	No	No	Yes – positive
	Rank	2	5	4	3	1
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	3	=1	4	=1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	1	4	3	5
Historic environment	Significant effects?	Uncertain	No	No	Yes – negative	Yes – negative
	Rank	3	1	2	=4	=4
Biodiversity	Significant effects?	Uncertain	No	Yes – negative	Uncertin	Uncertain
	Rank	=2	3	4	=2	1
Natural resources	Significant effects?	Yes – negative	Uncertain	Yes – negative	Yes – negative	Yes – negative
	Rank	3	1	2	4	5
Climate change	Significant effects?	Uncertain	No	Uncertain	Uncertain	Uncertain
	Rank	3	5	1	4	2

SA theme		Option K1	Option K2	Option K3	Option K4	Option K5
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Health and wellbeing

In terms of access to health facilities, there are three pharmacies and a GP surgery in Keynsham. The nearest hospital with an A&E department to Keynsham is Royal United Hospital, Bath, which is approximately 5 miles east. Options to the north (K5) and to the west (K2 and K3) of Keynsham are best located in this respect, being within proximity to the town centre and public transport facilities. Option K4 and Option K5 are less well connected to the town centre and could see a continued reliance on the private vehicle in the town centre if progressed unsupported by sustainable transport upgrades.

Option K3 also performs positively as is strategic in nature, presenting the greatest opportunity to deliver critical mass to support local services and facilities. Option K4 and K5 are also considered to perform well in this respect, although it is recognised that both options are less well connected to the town centre. Notably Option K5 is disconnect by the River Avon and rail line, while Option K4 is located on the southern edge of the town, over 2km from the town centre. Capitalising upon their strategic nature, both options would therefore require investment to secure pedestrian access/ improved routes from the sites to the town centre and support healthy travel choices.

Option K4 is considered worst performing in this respect as any access would be via the Charlton Road / Parkhouse Lane junction, and could place stress on the existing junction. Traffic modelling is likely to be required if this option were to be considered further, particularly to explore the effects of additional traffic along Charlton Road through Keynsham town centre – for example to access the A4 corridor (Bristol, Bath, etc.).

Bus routes extend through the town centre, connecting relatively well to the north (Option K5), and (Option K2 and K3), but less well to options to the south (Option K1 and K4, and the southern extent of Option K3). It is recognised that the WECA Bristol to Bath Corridor Project (BBCP) will include bus priority improvements and is likely to also include active travel measures. As part of this project, there is proposed to be a Keynsham Interchange Hub situated on the A4 Keynsham bypass, with access via Memorial Park, providing a 3-to-5-minute walk from Keynsham High Street. If delivered, this service will provide a high frequency ‘turn up and go’ public transport option for those travelling from Keynsham to Bath and Bristol for work, leisure and access to other key services. Strategic interventions such as this favour high growth options, as will contribute positively towards ensuring the delivery of public transport investment. This has the potential to deliver positive effects, avoiding increased congestion and facilitating modal shift to support healthy places.
An existing constraint in terms of active travel is limited access from Keynsham town centre to the Sustrans National Cycle Network (NCN) Route 4, which passes north of Keynsham linking east Bristol with Bath. Strategic growth options (K1, K3, K4 and K5) present an opportunity to better utilise the proximity of the settlement to the route through provision of additional and dedicated cycle paths.

In terms of wider access to the countryside, recreation, and green infrastructure, Keynsham's offer includes Abbots Wood Ecological Park, Manor Road Community Woodland Local Nature Reserve (LNR), Avon Valley Adventure and Wildlife Park, the blue-green infrastructure networks of the River Chew and River Avon and golf courses at Saltford and Stockwood Vale. All options have reasonable access to a level of green infrastructure including sites identified above. Notably Option K5 to the north of the settlement and K1 and K4 to the south are connected to the River Avon and/ or the River Chew. Strategic growth under each option could present an opportunity to enhance access to the rivers for leisure and recreation. The rivers provide rich ecological and placemaking contributions to the area, as support well-used public access/space and green/blue corridors through Keynsham. Opportunities to enhance these spaces have the potential to lead to significant positive effects in terms of health and wellbeing objectives.

Overall, it is considered that Option K5 to the north of the settlement is best performing, being relatively well connected to the town centre and the wider sustainable transport network; and is of a scale that can support new/improved infrastructure and amenities to serve both the new and existing communities. This could include maximising links to the river and supporting improved green corridors, which Option K1 could also support. However, Option K1 is less well connected to the town centre, services and amenities; and therefore performs less positively than Option K2 and K3 which are better located to support sustainable integration with the town's core. Option K3 performs more positively than Option K2 as is of strategic scale and could therefore deliver appropriate infrastructure such as improved pedestrian routes and links into Keynsham and to connect more widely with, for example, the Bath to Bristol cycle path.

Option K4 is worst performing as it would extend the settlement south, distant from the town centre, and into the open countryside. While strategic in scale, and therefore presents an opportunity to improve connectivity between the south of the town and the town centre, development could further exacerbate local issues such as congestion, recognising that access is currently limited.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs, and contributing towards sustaining sufficient land supply throughout the plan period.

It is considered that Option K2 is a low growth option, while all other options would deliver growth that is of a strategic scale. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups, including affordable housing. A key consideration in this respect for Keynsham is the slightly older population present, with the percentage over 70's (19%) notably higher than this category in both B&NES (14.6%) and England (13.5%).

Additionally, high growth options (K1, K3, K4, and K5) could help meet the accommodation needs of any increase in demand for PBSA; recognising that this is being explored within sustainably located settlements along the Bristol to Bath corridor.

Increasing the level of growth also increases opportunities for accessibility improvements and other community benefits associated with development (including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm). Options K1, K3, K4 and K5 are therefore best performing overall.

Communities

Keynsham is a thriving market town, with a population of around 20,000 people. Its town centre is characterised by variety of local independent retailers, many of which have evolved and set up on the High Street in more recent years. Keynsham is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by public transport in terms of access to nearby employment and services and facilities. Crucially Keynsham is well linked to Bristol and Bath by public transport, both bus and train from Keynsham.

All options will likely support local communities, focusing growth in a sustainable location along the Bath to Bristol corridor, which is being heavily invested in through strategic sustainable transport interventions (WECA Bristol to Bath Corridor Project).

The BBSC will include bus priority improvements and is likely to also include active travel measures. As part of this project, there is proposed to be a Keynsham Interchange Hub situated on the A4 Keynsham bypass, providing a 3-to-5-minute walk from Keynsham High Street. If delivered, this service will provide a high frequency ‘turn up and go’ public transport option for those travelling from Keynsham to Bath and Bristol for work, leisure and access to other key services.

The strategic nature of options presents an opportunity to further invest in sustainable transport and connectivity between sites, the town centre, and neighbouring Bristol, Saltford, and Bath (albeit further along the A4 corridor). Options to the north (K5) and to the west (K2 and K3) of the town perform most positively in this respect, connecting well to the A4 and town centre, and therefore will best capitalise upon transport improvements identified above.

Larger growth options (K1, K3, K4 and K5) also perform positively as will deliver an increased critical mass to enable more significant infrastructure improvements, including for example the Keynsham Interchange Hub proposed through the BBCP. Options K4 and K1 perform well in this respect as the southern extent of the town is currently less well-connected to the town centre, and therefore strategic intervention could have the most positive effect on the baseline. Traffic modelling is likely to be required if Option K4 were to be progressed, particularly to determine the effects of potential additional traffic along Charlton Road and through Keynsham town centre to access the A4.

Conversely, options to the north and west are wholly better connected, and therefore perform well through connecting to the town centre via pedestrian and cycle routes. It is recognised that strategic growth in these locations presents an opportunity to further invest in this infrastructure and maximise connectivity/ modal shift. Options K1, K4, and the southern extent of Option K3 are less well connected to the town centre via active/ sustainable travel. However, reflecting the scale of growth proposed, options could provide a walking and cycling route into Keynsham, alongside improved pedestrian access to bus stops; supporting the BBCP to alleviate accessibility constraints in the wider town.

In terms of local services and facilities, primary school provision is unbalanced across Keynsham and Saltford, with three primary schools in the west and one in the east, causing additional commuting across the area. The provision of a new primary school is a key required from any new development in the area, as those existing are at capacity. This is likely to be delivered through larger growth Options K1, K3, K4 and K5, however less likely under smaller scale option K2.

Keynsham is also deficient in a cultural space such as a hall with theatre for use by the community. As above, there is an opportunity for this to be delivered through strategic growth options K1, K3, k4 and K5, for example as part of new neighbourhood centre, such as a hall with theatre for use by local communities.

When considering deprivation across the town, it is recognised that Keynsham South ward is relatively more deprived than Keynsham East, containing one Lower Super Output Area (LSOA) in the 30% most deprived nationally. Keynsham East conversely is among the least deprived areas nationally. As such, focusing growth to the east under Options K1 and K5 perform positively in terms of reducing inequalities suffered and improving access services and facilities for all groups including minority groups.

More broadly, there is a need to consider the impact of growth options on Keynsham's existing settlement pattern and subsequent impact to community identity. The physical separation of Keynsham from Bristol (to the west) and Keynsham and Saltford (to the east) are of great importance to the respective communities. In considering locations for development the need to retain, strengthen and enhance green infrastructure settlement gaps is crucial.

Keynsham has expanded at a rapid rate to cater for development associated with the growth of Bristol. Expansion eastwards along Wellsway saw growth of the settlement on either side of the Chew Valley, presenting limitations in settlement connectivity. Despite development growth and pressures exerted by its proximity to Bristol, Keynsham currently remains separated from Bristol to the northwest by the Green Belt. Option K3 is considered to perform negatively as would extend the settlement further west, placing further pressure on the Green Belt and reducing the gap between the two settlements. Similarly, to the east, Options K1 and K5 seek to extend into the green gap between Keynsham and Saltford. Development of these options would encroach on the land separating the settlements; land which contributes to the important identity of each community.

While unlikely to contribute towards the coalescence of settlements, the development Option K4 would adversely impact upon the existing settlement pattern. Option K1 forms part of Green Belt Parcel P83 from the WECA Strategic Green Belt Assessment (2021), and is identified as making significant contribution to two of the five Green Belt purposes – namely safeguarding the countryside from encroachment. Development of the option would undoubtedly extent the settlement into the open countryside, altering the settlement pattern and settlement identity, which as stated above is important to the local community.

It is considered that the effect of development on settlement identity is likely to be most significant under Option K3, with Options K1, K4 and K5 providing an increased opportunity to take a holistic approach to placemaking, connecting green infrastructure to the north and south of the settlement. Mitigation will nonetheless be important under all options to ensure a green buffer is maintained, and to reduce the potential for adverse effects overall.

Taking the above into consideration, it is concluded that strategic growth options (K1, K3, K4, and K5) are likely to perform most positively overall; reflective of the opportunities presented by increased critical mass to enable more significant infrastructure improvements in sustainable locations in/ around Keynsham. Of the strategic options, Option K5 to the north of the town performs most positively at this stage. This reflects the connectivity of the option to the town centre, sustainable transport, and the A4; and that mitigation could minimise adverse effects on the green gap between Keynsham and Saltford.

It is difficult to differentiate between Option K1 and K3 as Option K1 is less well connected to the town centre and the A4 but would support investment in the south of the town. Option K3 is more constrained by the Green Belt to the east and could lead to coalescence between Bristol and Keynsham; however, is well connected to the town centre, Bristol and the A4. Options are therefore ranked on a par at this stage and are considered likely to lead to significant positive effects.

Option K4 is the worst performing of the strategic options as has accessibility issues, is disconnect from the town centre to the south of the town, and is constrained by the Green Belt and could therefore adversely impact upon settlement pattern and identity.

Options K2 is considered to lead to minor negative effects in relation to community objectives. Although located on the settlement edge, the site is not well located to access the town centre, and would likely exacerbate existing issues surrounding accessibility, congestion, and capacity of services/ facilities (notably inability to deliver a primary school). Option K2 would also encroach on the Green Belt separating Keynsham and Bristol.

Economy

Keynsham plays an important role in supporting sustainable economic growth across the district, with its absolute employment numbers having increased over the period 2011 – 2021. This includes sectoral increases in wholesale and retail, administrative and support services, public administration and defence, and human health and social work. A key objective for the area is to create opportunities to enable Keynsham to attract new employers and generate a range of jobs suitable to the resident workforce. Net employment land requirements for the town over the new Local Plan period comprise around 11K sqm office space, 7K – 9K sqm industrial floorspace, and 19K sqm warehousing / logistics floorspace.

Keynsham is highly accessible, benefitting from its own railway station, which improves the regional connectivity of the area. From Keynsham, there are regular services at peak times to Bath Spa and Bristol Temple Meads railway stations, which have connections to the wider network across the country. The town also benefits from its strategic location along the A4 corridor, which is being invested in through the WECA BBCP as discussed above.

In light of the above, it is considered that there is opportunity for strategic residential development in Keynsham, and therefore larger growth options (K1, K3, K4 and K5) perform most positively overall, supporting sustainable economic growth of the town and overall levels of self-containment. Option K5 is considered best performing with the potential for significant positive effects. This reflects the option’s location close to the A4, the town centre, and the railway station, and access to existing employment land to the north. Option K1 is less well connected to the town centre or railway

station into the north of the town, however as discussed above, strategic growth could present an opportunity for investment in the south of the town to improve overall accessibility/ connectivity.

Option K3 and K2 would lead to the loss of employment land at Lays Farm industrial estate. Strategic growth under Option K3 could present an opportunity to relocate or replace this employment land, however this is unlikely to be the case for Option K2 given the size of the option. The loss of employment land is considered to lead to significant negative effects against employment objectives; with Option K2 performing worst of the options overall.

Option K4 performs reasonably, delivering strategic growth adjacent to the existing settlement; however is located some distance from Keynsham town centre, Keynsham train station, and the A4 corridor. and would likely be able to access existing and new employment opportunities within the town.

Transportation

Keynsham occupies a strategic location on the A4 between Bath and Bristol, linking to both cities by the A4; part of the Major Road Network (MRN) that provides direct access west to Bristol and east to Bath via the A36 and A4174 to the Avon Ring Road, which connects via the M32 to the M4.

In terms of sustainable travel, Keynsham also connects the two cities by rail, having its own railway station with regular services to Bath Spa and Bristol Temple Meads railway stations. Keynsham is served by regular bus services, linking Keynsham residential areas to Keynsham town centre, other key settlement locations such as Ashton Way, and wider areas such as Bath and Bristol including Bristol Airport. Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing closely to the north of Keynsham.

However, while the town is well connected, the Bath to Bristol Strategic A4 corridor experiences significant congestion in both directions during peak times, including through the centre of Saltford. To date, insufficient public transport provision and easy and cheap parking within Keynsham has resulted in an over-dependence on travelling by car within Keynsham and Saltford. Currently no public transport options exist between the two settlements, and congestion on the A4 is causing delays in Keynsham town centre.

As discussed above, the WECA BBCP seeks to deliver strategic, sustainable transport interventions along the A4, providing upgrades to active travel modes and bus services to improve connectivity. Amongst others, improvements would provide continuous and designated walking and cycling routes along the A4, continuous designated bus lanes on both sides of the bypass for much of the corridor, and mobility hubs located along the corridor providing facilities to easily transfer between different modes of transport. A new cycling and walking route is also proposed along Station Road in Keynsham, providing good connectivity between the A4, Keynsham Railway Station and Keynsham Town Centre.

It is recognised that strategic growth presents an opportunity to increase critical mass to maximise accessibility improvements, particularly under option K3 where the option connects well to Bristol, and the A4; and Option K5 which is well located for access to the train station and the A4. Options K1 and K4 perform less positively in this respect although would connect well with the A39 to the south. These options are also recognised as opportunities to invest in the south of the town, capitalising

upon WECA proposed improvements to address localised congestion issues and support modal shift. This includes significant improvements to walking and cycling routes between the options, Keynsham train station, the town centre, and neighbouring centres (notably Saltford where accessibility via active travel is currently limited).

However, Option K4 performs less positively than Option K1 as is constrained by existing accessibility issues. Access to the option would be via the Charlton Road / Parkhouse Lane junction, and strategic growth could place further stress on this junction. Traffic modelling is likely to be required if this option were to be explored further. Modelling traffic for the site should include analysis of the potential additional traffic along Charlton Road having to travel through Keynsham town centre (also already particularly congested) to access the A4.

A key constraint for Keynsham in respect of active travel is the poor connectivity to the Bristol to Bath cycle route. Strategic growth presents an opportunity to improve walking/ cycle links to the Bristol to Bath cycle routes, with positive effects of greatest significance likely under Options K1 and K5. This reflects the cycle route extending north and east of the settlement, and therefore Options K1 and K5 are most likely to provide opportunities to utilise the proximity to the cycle route through provision of additional and dedicated cycle paths.

In terms of lower growth option K2, this option is not well located to access the town centre, and would likely lead to a further reliance on the private vehicle for all journeys. This would likely exacerbate existing congestion issues within and surrounding the town.

In conclusion, while there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth in and around Keynsham is considered, at this stage, to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A4 and throughout the town, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth close to the A4 (Option K3 and K5) to capitalise upon sustainable transport interventions proposed through the WECA BBCP; and to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA BBCP. Options K1 and K4 are also noted in this respect; particularly as opportunities to invest in the south of the town and improve connectivity with Saltford. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA. This is a key concern for Option K4, recognising that accessibility is a key constraint at this option. Option K4 is therefore worst performing overall.

Non-strategic growth option K2 performs less well than most options, focusing growth away from the town centre and would exacerbate existing congestion issues without opportunity to provide strategic transport interventions.

Landscape

Keynsham is an area of gently sloping plateaus, edged by steep sided valleys of the Chew Valley and Stockwood Vale, running roughly south-north to meet the floodplain of the River Avon to the north. The Cotswolds National Landscape is situated to the northeast, and the Mendip Hills lie in the distance, to the south and west.

Views vary throughout the area, with long-distance, open views experienced from ridgelines, across the plateaus and within the River Avon floodplain. The hills of the Cotswolds form an important visual landmark to the northeast, with views from the hills playing a significant contribution to the NL designation. Strategic Option K5 to the north is most constrained in this respect, with the potential for development to alter views if not appropriately mitigated.

Keynsham is also surrounded by the Bristol and Bath Green Belt, which plays an important strategic role in separating Keynsham and Saltford; alongside other settlements between Bristol and Bath. Additionally, a local designation (Policy NE2A) relating to the 'Landscape Setting of Settlements' wraps around much of Keynsham (notably to the south, east and west of the town, including Options K1-K4).

Reflective of the above, concern has been raised locally that further expansion of Keynsham would result in the loss of/ change to landscape character and village feel, with the potential to contribute towards the merging of settlements.

To the south, Option K4 is also constrained by the River Chew in the south east. Development would be visually prominent, reflective of the topography of the option, and extend the settlement boundary towards the Chew Valley; disrupting rural landscape character and views.

Consideration is also given to opportunities presented, particularly through strategic growth options (K1, K3, K4 and K5), to take a holistic approach to development and deliver landscape-led, masterplanned development that strengthens the local landscape. This could include the delivery of green infrastructure buffers to mitigate adverse effects on views, and capitalising upon landscape/ biodiversity features to enhance landscape character and setting.

Further landscaping could seek to reduce the potential adverse effects on key viewpoints within the National Landscape, particularly through Option K5 to the north, and help maintain the visual separation between Keynsham and Bristol (Option K2/3), and Keynsham and Saltford (Option K1 and K5). A green corridor separating the settlements could be crucial to maintaining settlement character.

Overall, it is considered that strategic growth under Options K1, K3, K4 and K5 would result in the scale and the character of the settlement changing significantly, leading to the loss of significant greenfield land in the Green Belt, and/ or in the setting of the National Landscape. However, strategic growth options do present opportunities to make new connections to the wider network of open space and, importantly, deliver improved access to the countryside for residents, that forms the setting for Keynsham.

Nonetheless, taking a precautionary approach and considering the findings of the Green Belt assessment, significant negative effects are predicted at this stage for all options, with strategic options identified as worse performing than non-strategic options given the increased greenfield/ Green Belt loss. Option K5 is worst performing overall as is constrained by the National Landscape and would reduce the green gap between Keynsham and Saltford. Option K3 is next worst performing as would encroach on Green Belt separating Keynsham and Bristol, which is limited in its extent. Option K4 would disrupt the rural landscape character of the Chew Valley and would be potentially visually prominent. Option K1 extends south and southeast towards Saltford, encroaching on the settlement gap to the east.

Non-strategic Option K2 would also encroach on the Green Belt separating Keynsham and Bristol, however is best performing of the options, reflective of its size and scale of growth proposed.

Historic environment

Keynsham's settlement origins are demonstrated by the location of its historic core and Conservation Area fronting onto and within the River Chew Valley. Heritage assets are clustered throughout the Conservation Area in the town centre, as well as scattered along the edges of the settlement.

Option K1 is constrained by a number of Grade II Listed Buildings: three north of site K20 and one west of K20 (Chewton Pack Horse Bridge, also a Scheduled Monument). Uplands Farmhouse Grade II Listed Building is located south of sites K21 and K22, and Grade II Listed Keynsham Manor is west of site K24. Assets are broadly open in nature, and it is considered that development could change the setting of assets from open rural landscape to built development, if not appropriately masterplanned and screened.

Option K2 is not constrained by designated heritage assets in proximity, nor Option K3. However, is noted that the southern extent of Option K3 could be constrained by Grade II Listed Parkhouse Farmhouse. While 500m from the option (specifically sites CDAN 24 and CDAN36), the setting surrounding the asset is open in nature with long distance views which could likely be impacted by development.

Option K4 is also constrained by Grade II Listed Parkhouse Farmhouse, with the potential to adversely impact upon the setting of the asset. Option K4 (site K19) is located at the southern extent of the Keynsham Conservation Area, which extends along the Chew Valley. There are several Grade II listed structures to the northeast in the Conservation Area, and the Chew Valley contributes to Keynsham's historic character as a settlement framed by valleys. Development has the potential to significantly impact upon the setting of the Conservation Area, any views from listed structures and the historic character of the Chew Valley.

Option K5 is the most constrained of the options, with Keynsham conservation area (including Grade I Listed Keynsham Abbey, and The Abbey Scheduled Monument) located to the southwest, and Saltford conservation area to the east. There are also seven Grade II Listed Buildings to the west, along the option's boundary, and to the north there are four Grade II Listed Buildings including Avondale House and Avondale Wharf. There are also Grade II Listed Buildings further north, which although further from the option would likely be impacted in terms of long-distance views and setting.

It is recognised that development under Options K4 and K5 would change the setting of the rural landscape to the north and south of Keynsham that surrounds and contributes to the character and setting of the designated assets identified above. While it is recognised that masterplanning and screening could reduce the significance of effects, for example through providing a green buffer and appropriate planting; the delivery of such is uncertain at this stage.

Taking a precautionary approach, Options K5 and K4 are identified as having the potential to lead to significant negative effects on the historic environment (recognising at this stage that this does not consider policy directions such as masterplanning, design and layout of development). Option K1 is considered to perform less positively than other options, being constrained by assets to the south

of the settlement and towards Saltford. Option K3 is best performing of the strategic options, however, is worse performing than non-strategic option K2. K2 is best performing as is not constrained by heritage assets.

Biodiversity

Keynsham is not constrained by internationally or nationally designated biodiversity sites, however Stidham Farm SSSI and SNCI located to the east of K5. Broadmead Field SNCI and River Avon SNCI are also located within the option boundary, with the potential to be adversely impacted as a result of damage to the sites or biodiversity loss. Avon Valley Wildlife Park is also located to the east of K5, and Abbots Wood Ecological Park is located north of Option K4, and could be adversely impacted through increased recreational pressure placed on the asset.

It is however noted that the West of England Nature Partnership has identified a regional Nature Recovery Network which runs through the area. It is a joined-up network of marine, water and terrestrial habitats which identifies opportunities to deliver nature's recovery. As such, and in accordance with local and national policy, strategic development will also provide an opportunity to maximise nature recovery, restoring habitats and expanding wildlife to deliver a range of benefits.

In this respect, it is recognised that the northern extent of Option K5 is located along the River Avon, which provides further opportunity for creating wetland habitats to maximise nature recovery, building resilience to flood risk and deliver wider benefits for nature and people. Similar effects can be predicted for strategic options K1 and K4, which are located adjacent to the River Chew (which is a SNCI). It is highlighted that ecological buffer zones should be maintained on hedgerows, woodlands, the River Avon/ River Chew and tributaries to ensure negative impacts on their ecological function are avoided.

The potential for options S4 and S5 to maximise ecological value in the area is further reflected through the options falling within an area of Green Infrastructure designated as part of the district wide green infrastructure network through LPPU Policy NE1. Notably this only includes sites K17c (eastern extent), K19a and K19 within Option S4. While this is a constraint to development in this location, strategic growth also presents an opportunity to maximise the potential of these sites as a green infrastructure resource for the wider area, increasing ecological value and biodiversity net gain. Option S5 performs most positively in this respect, followed by Option K4. It is noted that a small part of Option K1 is also included in this designation with the potential to deliver positive effects.

In terms of strategic Option K3, there is a SNCI located adjacent to the option (K15a), and there is another which extends north to south alongside the option to the west. This area forms part of the grassland strategic network and, as set out above, presents an opportunity for strategic growth to support nature recovery and maximise connectivity of green infrastructure around the settlement. An ecological buffer zone should be maintained where possible, and this is also the case for Option K2, which is also near SNCI's to the west of the settlement.

However, Option K3 (sites CDAN34 and CDAN36) are wholly priority habitat deciduous woodland, and as such this option performs least positively overall, with the potential for significant negative effects as a result of loss of this important habitat.

Option K5 performs well overall, reflective of the opportunities presented to maximise nature recovery, taking strategic approach to development to the north of the town. However, Option S5 is also the most constrained option, and without further details regarding masterplanning, site layout and design, residual effects are uncertain at this stage.

Option K1 and K4 perform similarly to Option K5, with biodiversity constraints and opportunities presented to the south of the town.

Option K2 performs less positively than Option K3 as does not provide the strategic mechanisms that Option K3 does to potentially deliver a more continuous and robust ecological corridor to the west of the settlement. However as above, effects are uncertain at this stage.

Natural resources

In terms of air quality, Option K5 and Option K3 focus strategic growth close to the A4 transport corridor where sustainable transport interventions are being focused. This could deliver positive effects in terms of reducing vehicular use and facilitating modal shift between Keynsham and Bristol to the west, and Saltford to the east. Option K5 will also likely provide active travel connectivity between the option and Keynsham train station, and the town centre, which will reduce travel by private vehicle in the town centre and the Keynsham AQMA. Option K3 performs less positively in this respect, given the option extends to the south of the settlement which connects less well to the town centre and station in the north.

Options K1 and K4 focus growth in the south (distant from the town centre and train station) however as discussed above, strategic growth could present an opportunity for investment in the south of the town to improve overall accessibility/ connectivity. These options could capitalise upon WECA proposed improvements to address localised congestion issues (notable in the Keynsham High Street AQMA) and support modal shift. This includes significant improvements to walking and cycling routes throughout the town, connecting to Keynsham train station, the town centre, and neighbouring centres. WECA improvements also focus on connectivity between Keynsham and Saltford, where accessibility via active travel is currently limited.

However as set out above, Option K4 has known accessibility issues which could further exacerbate congestion in the town centre (including Keynsham High Street AQMA) via Charlton Road. Option K4 therefore performs less well than Option K1 in this respect.

While larger growth options could capitalise upon WECA proposals, non-strategic growth under Option K2 could increase private vehicle use in Saltford village centre, adversely impacting upon Saltford AQMA through worsened congestion. Similar effects are likely to be seen for Keynsham High Street AQMA if Option K2 were taken forward, given the options are on the edge of the town with limited connectivity with the town centre/ train station, and therefore likely increased use of the private vehicle.

It is further recognised that the potential delivery of larger-scale developments (Option K1, K3, K4 and K5) will likely be accompanied by necessary infrastructure to alleviate the risk of strategic growth leading to exacerbated air quality issues along the A4 corridor between Bath and Bristol.

Conversely, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Option K2 would be best performing, with Options K1, K3, K4 and K5 performing less positively overall.

Taking the above into consideration, Option K5 performs most positively against air quality objectives, directing growth to a sustainable location that (assuming necessary infrastructure interventions are delivered) will likely reduce private vehicle use in the AQMA. Option K3 performs similarly positively, although it is recognised that the southern extent of the option is less well connected than the north.

Option K4 is worst performing as is not well connected to the town centre nor rail station, although is of a size to be supported by necessary transport infrastructure. However, the option would likely facilitate further reliance on the private vehicle, reflective of limited access opportunities from the option via Charlton Road.

Option K2 similarly is expected to lead to increased vehicular use in the town centre (and within the AQMA), and as a non-strategic option, performs less well than Option K1 which could support improved connectivity in the south of the town.

In terms of noise and disturbance, Option K5 (and north of Option K3) focuses development adjacent to the A4 which is a key transport corridor and could have significant issues of noise and disturbance to development. It is considered that both options have the potential to lead to negative effects in this respect, however mitigation could reduce the significance; for example, through sensitive masterplanning and design.

The key considerations for supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality ‘Best and Most Versatile’ (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural’ and ‘urban’), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. All options (with the exception of the northern extent of Option K4) have had recent (post 1988) land classification undertaken. This shows that Option K1 is made up of Grade 4 and Grade 3b, Option K4 is Grade 3b (with the exception of the unsurveyed area to the east), while Options K2 and K3 are wholly Grade 4 land; all of which are not seen to be high quality. Option K5 falls within Grade 3a agricultural land (which is BMV), and Grade 3b (which is not).

For the east of Option K4 there is a need, at this stage, to rely on provisional (pre 1988 data). Provisional data indicates that Option K4 falls within Grade 3 and urban land, which could be Grade 3a (BMV) or Grade 3b (not BMV).

Option K5 is therefore ranked as worst performing as contains areas of Grade 3a agricultural land which is BMV. Following this, options are ranked based on their level of greenfield land take, with Option K3, K4 and K5 ranked equally (all being strategic in nature), and Option K2 best performing.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Overall Option K5 is worst performing, given the significant loss of greenfield land including BMV agricultural land. Option K4 is next worst performing option, constrained by accessibility issues which could exacerbate congestion in the town including within the AQMA. However the strategic nature of the option does present opportunities to address this to an extent.

Non-strategic option K2 is ranked as best performing, as the increased loss of greenfield land is likely to be more significant than the difference between options from an air quality perspective (recognising that masterplanning and design will have a significant role to play in this respect).

Climate change

All options involve increasing amounts of growth in Keynsham, which is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by public transport (bus and train services). Public transport interventions likely to be delivered through strategic options (K1, K3, K4 and K5) will contribute to creating an improved public transport network across Keynsham and with neighbouring settlements, which is important for transitioning towards net-zero targets. Strategic growth options are merited in this respect, while low growth option K2 is considered to perform negatively through exacerbating existing transport issues.

A potential caveat to this however is Option K4 which experiences accessibility constraints, and could exacerbate transport issues locally, although the opportunities presented by strategic interventions are not overlooked. This will be explored through transport modelling if taken forward for further consideration through the plan-making/ SA process.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation/offsetting of carbon sequestration opportunities that may be ‘sterilised’ by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Broadly speaking, strategic growth options K1, K3, K4 and K5 offer greater potential to secure high levels of resource efficiency, to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than all other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy, and sequestration measures. An example of this is the potential to deliver a continuous and robust ecological corridor to the open spaces and arable landscape to the south and west of the settlement. This could include utilising wetland habitat along the River Avon and River Chew (Option K1, K4 and K5) to build resilience to flood risk and deliver wider benefits for nature and people.

In terms of flood risk, areas of flood risk exist along parts of the River Avon to the north of Keynsham (coinciding with Option K5), and along the River Chew which extends north to south through the centre of Keynsham, just west of Option K1, and east of Option K4. Option K5 is worst performing of the options in terms of flood risk, with much of the option to the north falling with Flood Zone 3 which is of high risk of flooding, and an area to the south, just north of the railway line, with Flood Zone 2 (medium risk). Within Option K1, a considerable area of site K20, to the west, falls within Flood Zone 3. This is where the option extends up to the River Chew and is

therefore at high risk of flooding. Similarly, Option K4 (site K19) is constrained by flood risk along the eastern extent of the site, coinciding with the River Chew. All other options are not constrained by flood risk.

While Options K1, K4 and K5 are constrained by flood risk, it is assumed that susceptible development proposed under options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and Sustainable Drainage (SUDs) legislation.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in Keynsham. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Saltford

The options for assessment are:

- **Option S6** - Growth to the west (Sites S1PS14, SAL27b, SAL28)
- **Option S7** - Growth to the south (Sites S1PS13, SAL02, SAL01/ 01a, S1PS12, SAL03, SAL04)
- **Option S8** - Max growth (Options 6 & 7 combined)

Assessment findings:

SA theme		Option S6	Option S7	Option S8
Health and wellbeing	Significant effects?	Yes – positive	Yes – negative	Uncertain
	Rank	1	3	2
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive
	Rank	3	2	1
Communities	Significant effects?	Yes – positive	Yes – negative	Uncertain
	Rank	1	3	2
Economy	Significant effects?	Yes – positive	No	Yes – positive
	Rank	2	3	1
Transportation	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	2	3	1
Landscape	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	2	1	3
Historic environment	Significant effects?	No	No	Uncertain
	Rank	1	1	2
Biodiversity	Significant effects?	No	Yes - negative	Uncertain
	Rank	1	3	2
Natural resources	Significant effects?	Yes - negative	Yes - negative	Yes - negative
	Rank	1	2	3
Climate change	Significant effects?	No	No	Uncertain
	Rank	2	1	3
Waste	Significant effects?	No	No	No
	Rank	=	=	=

Health and wellbeing

In terms of access to health facilities, there is a pharmacy in Saltford, and GP Surgery in Keynsham, to the west of the village. The nearest hospital to the options is Royal United Hospital, Bath; which is three miles east of Saltford.

Walking and cycling routes into the village would need to be delivered alongside new development at all options, recognising that pedestrian is currently limited, particularly from Option S6 to the west of the village. There is likely to be an opportunity to deliver active travel links / improved routes through strategic growth at all options, with max option (S8) performing most positively in this respect; supporting healthy travel choices.

Option S6 (and max growth Option S8) will benefit from increased access to neighbouring town Keynsham, being located on western settlement edge; and connected by the A4 and PRoW network. Access to Keynsham is more limited from Option S7, however given the strategic nature of options, there are opportunities for Options S7 and S8 to invest in better connecting the south of Saltford to Keynsham via Manor Road. This will enable existing and future residents to access health (and wider) services and facilities more readily, and via sustainable travel.

Consideration is also given to the potential for the max growth option (Option S8) to deliver significant new infrastructure (such as health facilities) to support healthy communities. However, Options S6 and S7 are also considered to be of a size to deliver a level of health infrastructure or provide support to existing services where necessary. This should help ensure no further pressure is placed on the capacity of existing health services in Saltford (and Keynsham), and support more resilient, healthy communities.

Strategic growth can also contribute positively towards delivering critical mass of the resident population to support public transport investment. Notably all options have reasonable access to Keynsham and Bristol, being focused on the A4 Bath to Bristol corridor, which is being invested in through the West of England Combined Authority (WECA) Bristol to Bath Corridor Project (BBCP). The BBPC seeks to deliver improved sustainable and active travel connectivity between Saltford and surrounding centres such as Keynsham, Bristol, and Bath; improving sustainable access and modal shift to support healthy lifestyles.

Notably the Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing closely to the north of Keynsham and east Saltford. There is currently poor connectivity to the Bristol to Bath cycle route from the centre of Saltford, and strategic growth under all options presents an opportunity to better utilise the proximity of the settlement to the route through provision of additional and dedicated cycle paths.

Accessibility improvements to the south of the village (Option S7 and S8) could also connect the area to the Manor Road Community Woodland, improving access to the countryside for recreation and improving the overall health of residents. In terms of Option S6, it will be important for the edge of the option to form a green buffer to development and assist in visually integrating it into the surrounding area (see landscape discussion below). This will provide opportunities for biodiversity enhancement and recreation, connecting residents with the countryside to the south of the settlement.

It is also noted that site options SAL04 and SAL03 (Option S7) fall within an area of Green Infrastructure designated as part of the district wide green infrastructure network through LPPU Policy NE1. It will therefore be important for any development proposals to be appropriately masterplanned, to ensure the maintenance and enhancement of publicly accessible green infrastructure at this location. This has the potential to lead to positive effects, recognising that the creation, maintenance and enhancement of publicly accessible multi-functional green infrastructure can improve mental and physical health and wellbeing of communities, by providing opportunities for exercise, active travel, social interaction, community food growing, and education.

In Saltford there is a deficit of play space for children, although when considered within the wider area there is no deficit. Strategic development proposals presented under all options provide the opportunity to address these deficits and create new open spaces that are easily accessible to both existing and future communities. Max growth Option S8 performs most positively in this respect.

Consideration is also given to the loss of Saltford Golf Course under Option S7 and S8. The golf course is designated under Policy LCR5 Safeguarding existing sport and recreational facilities, and therefore development will lead to loss of these community uses; contradicting with the adopted policy. The loss of community uses notably extends further than the direct users of the golf course, and also impacts users of the PRoW and more broadly users of the site as a recreational space.

Overall, it is considered that Option S7 is worst performing of the options, with the loss of Saltford Golf Course leading to significant negative effects in relation to health and wellbeing objectives. Option S8 is ranked less negatively than Option S7, as under max growth this options could support the creation of new amenities to serve both the new and existing communities. Option S6 is best performing overall, with the potential to lead to significant positive effects. The option will support accessibility by sustainable travel, improve direct access to the countryside, and is of a scale to deliver new/ upgraded community facilities to support healthy places.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs, and contributing towards sustaining sufficient land supply throughout the plan period.

It is considered that Option S6 is the lowest growth option, followed by Option S7, with S8 being the highest (max) growth option. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups; including affordable housing. A key consideration in this respect for Saltford is the delivery of affordable housing, responding to social and economic needs.

Additionally, high growth options (noting that all are strategic) could help meet the accommodation needs of any increase in demand for PBSA; recognising that this is being explored within sustainably located settlements along the Bristol to Bath corridor.

Increasing the level of growth also increases opportunities for accessibility improvements and other community benefits associated with development (including new and improved service and facility provision, extended green infrastructure,

transport and infrastructure upgrades, new open spaces, and an improved public realm). Option S8 is therefore best performing overall.

Communities

Saltford is a large village located to the east of Keynsham, fronting the river Avon with community amenities located along the A4. Saltford is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by public transport (bus and train from Keynsham) in terms of people's journeys for employment and services and facilities. However key issues for the village relate to vehicle traffic and a lack of safe, attractive and accessible pedestrian space; with reliance on the private vehicle currently high.

While congestion is a local issue, the Bath to Bristol corridor is being heavily invested in through strategic sustainable transport interventions (WECA Bristol to Bath Corridor Project). Furthermore, the strategic nature of options presents an opportunity to support the delivery of improved sustainable transport and connectivity between sites, the village centre, and Keynsham.

Option S6 (to the west of Saltford) is located adjacent to the A4, providing direct access to Keynsham, its services and facilities. This option could also connect well with Saltford village centre via pedestrian and cycle routes through Manor Road; recognising that strategic growth presents an opportunity to invest in this infrastructure. Option S7 to the south of the village is less well connected to the village centre and Keynsham, although strategic growth, particularly through Option S8 could present opportunity to deliver new facilities and active travel routes to serve the south of the village (new and existing residents).

Saltford has a discrete centre, with relatively few local services and amenities focused to the north of the village. Access to education is a key constraint for the village, with capacity of the existing village primary school limited. However all options are considered to be strategic in nature and therefore of a scale to deliver a new primary school to meet local needs. The existing secondary school has enough capacity to accommodate new development proposed under Option S6 or S7, however it is uncertain whether this would accommodate high growth Option S8. High growth option S8 does however present an opportunity to deliver an increased scale of infrastructure, although the extent of this is unknown at this stage.

In terms of wider community facilities, as set out above under health and wellbeing, the loss of Saltford Golf Course and Clubhouse under Option S7 and S8 has the potential to lead to significant negative effects. This is through the loss of important community assets; green space and recreational facilities, recognising the course is designated under Policy LCR5 Safeguarding existing sport and recreational facilities).

In terms of supporting cohesive communities, Option S7 to the south of the village contributes towards Green Belt separation between Bath and Saltford, while Option S6 provides a green gap between Saltford and Keynsham. The options separate the settlements, contributing to the important identity of each community. The development of any option could therefore see merging of settlements, which would significantly alter settlement pattern and identity. While this is likely to be most significant under Option S8, Option S8 also provides an opportunity to take a holistic approach to placemaking, connecting green infrastructure around the settlement.

Mitigation will be important under all options to ensure a green buffer is maintained, to reduce the potential for adverse effects overall.

Taking the above into consideration, it is concluded that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility for all to existing centres, services, and facilities.

A key objective for Saltford is to ensure provision of community infrastructure and sustainable transport initiatives that serve existing residents as well as new – this is achievable through all options reflective of the level of growth proposed, however max growth Option S8 will deliver positive effects of increased significance. Furthermore, consideration is given to the loss of Saltford Golf Course; which contradicts with objectives established for the area; and therefore Option S7 is considered worst performing of the options. Option S8 is ranked less negatively than Option S7, as under max growth this options could support the creation of new amenities to serve both the new and existing communities.

Option S8 is also merited for delivering residential development to the south and west of Saltford, maximising opportunities for place-making interventions. This will improve the quality of the environment and the offer in terms of services and amenities with a primary school, alongside other community infrastructure, to serve existing and new residents.

Economy

Saltford is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by sustainable travel options; facilitating a considerable proportion of residents' journeys for work. Saltford is also well linked to Keynsham, just 2.5 miles to the west, with many residents utilising the bus and train from Keynsham to access Bristol, Bath and further afield.

While Bristol and Bath are the key economic hubs serving the district, Keynsham also supports a number of employment sectors, and is an employment investment location for the forthcoming plan period. Option S6 is likely to perform most positively in terms of ability to capitalise upon economic growth of Keynsham; being well connected to the A4 corridor. It is further recognised that the A4 is a key travel route between Bristol and Bath, with improvements for active modes and bus services proposed as part of the Bristol to Bath Corridor Project (BBCP). Option S6 is therefore most likely to capitalise upon sustainable travel improvements between Keynsham and Saltford, including connections provided to Keynsham Railway Station and the town centre.

Option S7 however (to the south of the village) is located further from Keynsham and the A4 corridor and is therefore is considered less well connected to employment opportunities via sustainable travel. However, strategic scale growth does present opportunities to deliver improvements to transport infrastructure; which could better support accessibility in the south of the village. Option S8 clearly performs most positively in this respect, capitalising upon the opportunities presented to the west of the village, while also enabling investment in the south.

There is currently poor connectivity to the Bristol to Bath cycle route from both Keynsham and Saltford, which is a key issue for both areas. Strategic growth presents an opportunity to improve walking/ cycle links to the cycle route, and while all options perform positively in this respect, critical mass is greatest under Option

S8. Investment in the cycle route would help remove the accessibility barriers to active travel between Saltford, Bath and Bristol, and support sustainable economic growth throughout the district.

Overall option S8 is best performing, while Option S7 is worst performing given its less well connected location to the south of the village.

Transportation

Saltford is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by public transport in terms of residents' journeys for employment, services and facilities. While good public transport links are an important characteristic of this part of B&NES, the Bath to Bristol Strategic A4 corridor experiences significant congestion in both directions during peak times, including through the centre of Saltford. The A4 at Saltford provides direct access west to Bristol and east to Bath via the A36 and A4174 to the Avon Ring Road, which connects via the M32 to the M4. As such, private vehicle use remains high.

To date, insufficient public transport provision and convenient, low cost parking within Keynsham has resulted in an over-dependence on travelling by car within Keynsham and Saltford. The west of Saltford (Option S6) is well located to access the railway station in Keynsham, 2.5 miles west. However there is currently poor access to Keynsham Railway Station on foot, bicycle, and bus from Saltford. Investment is needed to further improve sustainable transport services including walking and cycling links between the two settlements.

The WECA Bristol to Bath Corridor Project (BBCP) seeks to deliver strategic, sustainable transport interventions along the A4, providing upgrades to active travel modes and bus services to improve connectivity. Amongst others, improvements would provide continuous and designated walking and cycling routes along the A4, shared between the two active travel modes in locations where space is limited, continuous designated bus lanes on both sides of the bypass for much of the corridor, and mobility hubs located along the corridor providing facilities to easily transfer between different modes of transport.

Strategic growth presents an opportunity to further increase sustainable transport improvements, with positive effects likely to be greater under Option S6 which connects well to the A4 corridor and Keynsham. Strategic growth to the west of the village can improve accessibility and connectivity by sustainable modes, and deliver infrastructure to help alleviable congestion along the A4 at peak times (delivering growth close to the village centre and accessible to Keynsham to support modal shift). While this is arguably less achievable through Option S7 given the increased distance from the village centre and Keynsham/ the A4, strategic growth would deliver investment in this part of the village to improve accessibility and support connectivity into the village to reduce reliance on the private vehicle.

A key constraint for Saltford in respect of active travel is the poor connectivity to the Bristol to Bath cycle route. Strategic growth presents an opportunity to improve walking/ cycle links to the Bristol to Bath cycle routes, with positive effects of greatest significance likely under max growth Option S8. The vast extent of the option extending west to south of the village will provide opportunities to better utilise the proximity of these settlement to the cycle route through provision of additional and dedicated cycle paths.

In conclusion, while there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth in and around Saltford is considered, at this stage, to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A4 and throughout the village, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth close to the A4 (Option S6 and S8) to capitalise upon sustainable transport interventions proposed through the WECA BBCP; and to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA BBCP. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Option S7 is identified as worst performing as focuses growth to the south of the village where existing transport connections are less sustainable than under Option S6.

Landscape

Saltford is located in an area of high landscape sensitivity. The Cotswolds National Landscape is located directly east of Saltford, with views across the settlement, and a local designation relating to the 'Landscape Setting of Settlements' extends to the north, east, and south of Saltford. Options are also wholly within the Green Belt, and are strategically an important part of the Green Belt in separating Bath and Bristol and the settlements that lie in between.

All options fall within Green Belt Parcel P85 from the WECA Strategic Green Belt Assessment (2021), which has been identified as making significant contribution to three of the five Green Belt purposes. Encroachment on the countryside (Purpose 3) is considered the most significant consideration for the parcel when determining potential release of land from Green Belt. Saltford is however, considered to have a relatively weak inset settlement edge, so adjacent land makes a weaker contribution to Purpose 3. Nonetheless, generally the assessment concludes any release would weaken the remaining Green Belt in the narrow Keynsham-Saltford gap.

Taking the options in turn, Option S6 to the west of the village lies within the landscape setting of Keynsham, and if fully developed would adjoin existing dwellings on the edge of Keynsham to the west, leading to the merging of settlements. Maintaining the physical separation of Keynsham and Saltford is therefore a key constraint for any development under this option, reflective of the Green Belt Assessment findings set out above. Development should seek to retain, strengthen and enhance the green infrastructure settlement gap through landscape-led design and masterplanning. Notably to the west of Option S6, existing hedgerows, lines of trees, scrub and small woodlands could be strengthened to reinforce the landscape setting of the development, protecting the settlement gap and mitigating views from the Cotswolds National Landscape.

Further landscaping could seek to reduce the potential adverse effects on key viewpoints within the National Landscape and help maintain the visual separation between Keynsham and Saltford. Nonetheless, taking a precautionary approach, significant negative effects are concluded at this stage without further details regarding masterplanning and development design/ layout.

Option S7 to the south of the settlement forms part of the Green Belt separation between Saltford and Bath; the loss of which could impact upon the landscape

setting of existing settlements. If this option were to be progressed, residential development should seek to concentrate along the existing settlement edge, minimising development along the southern edge of the option. It is however considered that this option is less constrained than Option S6, which could lead to the coalescence of Saltford and Keynsham.

Strategic growth under Option S8 would result in the scale and the character of the settlement changing significantly, leading to the loss of significant greenfield land in the Green Belt, and in the setting of the National Landscape. However, a max growth option does present an opportunity to make new connections to the wider network of open space and, importantly, deliver improved access to the countryside for residents, that forms the setting for Saltford. Nonetheless, taking a precautionary approach and considering the findings of the Green Belt assessment, significant negative effects are predicted at this stage for all options, with Option S8 identified as worst performing overall.

Historic environment

Saltford is a large village with a historic core. Saltford Conservation Area fronts the River Avon to the north of the village, with numerous heritage assets located within this area. The adjacent Saltford Brass Battery Mill is also designated a Scheduled Monument.

Grade II Listed Manor House is located close to the site boundary of SAL27b (Option S6), and development would significantly change the setting of the asset from open rural landscape to built development. Option S7 is also constrained by the same asset, and to a similar extent, significantly changing the setting of the Listed Building to the south. Any new development around the Manor House should provide an appropriate setback to protect its setting and reduce the significance of effects. Taking a precautionary approach, minor adverse effects are concluded at this stage under both options.

Option S8 is considered to be worst performing of the options, recognising that this option would change the setting of the rural landscape surrounding the Grade II Listed Manor House from west to south. A green buffer alongside appropriate planting and screening could reduce the significance of residual effects, however the delivery of such is uncertain at this stage without detailed masterplanning, and understanding the proposed design and layout of development.

Biodiversity

Saltford is not constrained by internationally or nationally designated biodiversity sites, however Ancient Woodland (including Folly Wood SNIC) is present within site S1PS12 (Option S7 and S8) to the south of the village. Option S7 is also adjacent to Manor Road Community Woodland Local Nature Reserve, connected via a row of trees along Manor Road, and therefore has the potential to lead to adverse effects on biodiversity assets through disturbance, loss, and fragmentation.

However, the option also presents an opportunity through mitigation and management solutions to ensure existing biodiversity assets are protected and, where possible, enhanced or extended to make new connections to the wider network of green infrastructure. Woodland connectivity notably could contribute to the Strategic Nature Recovery Network, for example utilising linear hedgerows/ trees extending through the site; and utilising hedgerows and other natural features to deliver joined up, connected green infrastructure.

Max growth option S8 notably presents an increased opportunity for the creation of ecological corridors surrounding the settlement, which would improve connectivity between the existing network of woodlands and hedgerows.

The potential for option S7 and S8 to maximise ecological value in the area is further reflected through site options SAL04 and SAL03 (Option S7) which fall within an area of Green Infrastructure designated as part of the district wide green infrastructure network through LPPU Policy NE1. While this is a constraint to development in this location, strategic growth also presents an opportunity to maximise the potential of these sites as a green infrastructure resource for the wider area; increasing ecological value and biodiversity net gain. Option S8 performs most positively in this respect.

Option S7 also contains significant areas of Priority Habitat, primarily amenity grassland (Saltford Golf Course) with discontinuous mature hedgerows and continuous mature hedgerows. Priority habitat should be maintained where possible, and it is recognised that there is the potential for development to lead to adverse effects (loss and fragmentation) at this stage.

Site SAL27b (Option S6) is adjacent to Manor Road Community Woodland to the west. There is also a small area of Ancient Woodland to the northern corner of the site. As set out above, while constrained by the Nature Reserve and Ancient Woodland, the option also presents an opportunity to strengthen and enhance green infrastructure between Saltford and Keynsham, maintaining the green buffer between settlements (as discussed under landscape above). Option S6 is considered less constrained than Option S7 and therefore is ranked as best performing of the options overall.

Option S8 (max growth) offers an increased opportunity (than Option S6 and S7) to deliver a more continuous and robust ecological corridor to the south and west of the settlement. This could involve utilising the open spaces present, delivering enhanced opportunities for nature recreation. However, Option S8 is also most constrained, and without further details regarding masterplanning, site layout and design, residual effects are uncertain at this stage.

Option S8 is considered to rank higher than Option S7 given an increased level of growth will likely present an opportunity to best mitigate habitat loss and maximise nature recovery.

Natural resources

In terms of air quality, Option S6 focuses additional growth adjacent to the A4 strategic transport corridor where sustainable transport interventions are being focused. This could deliver positive effects in terms of reducing vehicular use, and facilitating modal shift between Saltford and Keynsham. Option S6 will also improve active travel connectivity between the option and village centre, which will reduce travel by private vehicle in the village centre and the Saltford AQMA.

Further positive effects are anticipated through the potential delivery of larger-scale developments which will be accompanied by necessary infrastructure to alleviate the risk of strategic growth leading to exacerbated air quality issues along the A4 corridor between Bath and Bristol.

Option S7 performs less positively than Option S6 as although will deliver strategic growth, is not as well located to access the A4 and the village centre. While there is

the potential that growth under S7 could increase vehicular use within the Saltford AQMA (negatively impacting air quality), the strategic scale of growth could present an opportunity to deliver transport interventions to improve access in the south of the village. This is most likely to be seen through Option S8 given the increased scale of development proposed.

Conversely, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Option S6 would be best performing, with Option S8 performing most positively overall.

Option S6 therefore performs most positively against air quality objectives, directing growth to a sustainable location that will likely reduce private vehicle use in the AQMA, and being smallest of the growth options (although still strategic in scale to deliver necessary infrastructure interventions). Option S7 is worst performing as max growth Option S8 would likely deliver sustainable transport infrastructure to mitigate any adverse effects of development on the Saltford AQMA from growth to the south of the village.

In terms of noise and disturbance, Option S6 (and to a lesser extent Option S8) seek to focus development adjacent to the A4 which is a key transport corridor, and could have significant issues of noise and disturbance to development. It is considered that both options have the potential to lead to negative effects in this respect, however mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations for supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality ‘Best and Most Versatile’ (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural’ and ‘urban’), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Sites to the west of Saltford have had recent (post 1988) land classification undertaken, which show that Option S6 and the western half of S7 (sites SP13 and SAL02) are wholly within Grade 3b agricultural land, which is not seen to be high quality.

However all other land parcels surrounding Saltford have not had recent (post 1988) land classification undertaken, and therefore there is a need to rely on provisional (pre 1988 data) for the remainder of Option S7. Provisional data indicates that the remainder of the option falls within Grade 3 land, which could be Grade 3a (BMV) or Grade 3b (not BMV). At this stage, options are therefore ranked based on their level of greenfield landtake, with Option S6 being best performing, and Option S8 worst performing.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Overall Option S6 is best performing, and Option S8 is worst performing as the increased loss of greenfield land is likely to be more significant than the difference

between Options S7 and S8 from an air quality perspective (recognising that masterplanning and design will have a significant role to play in this respect).

Climate change

All options involve increasing amounts of growth in Saltford, which is a key settlement within the transport corridor that connects Bath and Bristol and is accessible by public transport (bus and train from Keynsham). Public transport interventions likely to be delivered through all options will contribute to creating an improved public transport network across Keynsham and Saltford, which is important for transitioning towards net-zero targets. Option S8 (max growth) is considered to perform most positively in this respect.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation/offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Broadly speaking, max growth option S8 offers greater potential to secure high levels of resource efficiency, to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than all other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy, and sequestration measures. An example of this is the potential to deliver a continuous and robust ecological corridor to the open spaces and arable landscape to the south and west of the settlement. This could include utilising wetland habitat along the River Avon and River Chew to build resilience to flood risk and deliver wider benefits for nature and people.

It is however recognised that options S6 and S7 are also of a strategic nature and will likely have the potential to deliver positive effects in this respect, albeit to a lesser extent.

Finally in terms of flood risk, all options are located predominately within Flood Zone 1, which is of low risk of flooding. The exception to this is an area of Flood Zone 3b (land at high risk of flooding) present within Option S6 (and Option S8). This is reflective of the watercourse that runs through the site. Option S7 is therefore best performing in this respect.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in Keynsham. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Whitchurch

The options for assessment are:

- **Option W1** - Growth to the south-east (Sites WCH06b, WCH07, WCH08, WCH29, WCH30)
- **Option W2** - Growth to the north/ north-east (Sites WCH11, WCH12, WCH12b, WCH22 in part, WCH28, S1PS24) *(note: this option is expected to reduce the development area to maintain separation with Bristol)*

- **Option W3** - Growth to the south-west (Sites WCH03, WCH04a, WCH05, WCH06a, WCH26 (all parcels), S1PS22)
- **Option W4** – Maximised growth (Options 1 – 3 combined)
- **Option W5** - New settlement area to the south-east (Sites CDAN20, CDAN24, CDAN25, PEN10) (this assumes separation from Whitchurch so excludes WCH06b, WCH07, WCH08, WCH29, WCH30 and is not included in a maximised growth in Whitchurch scenario)

Assessment findings:

SA theme		Option W1	Option W2	Option W3	Option W4	Option W5
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	4	=2	=2	1	3
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Economy	Significant effects?	No	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	=2	=2	1	=2
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	3	=2	=2	1	=2
Landscape	Significant effects?	Uncertain	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=3	=3	4	2
Historic environment	Significant effects?	Uncertain	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=2	3	4	=2
Biodiversity	Significant effects?	No	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	1	=2	=2	3	=2
Natural resources	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	1	=2	=2	3	=2
Climate change	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Health and wellbeing

In terms of access to health facilities, whilst there is not a GP surgery in Whitchurch, there are two nearby in Bristol; one in Hengrove & Whitchurch Park and the other in Stockwood. The nearest hospital is South Bristol Community Hospital, also in Hengrove & Whitchurch Park. However, the nearest hospital with an A&E unit is located in the north of Bristol. Whilst all options have good access to Bristol, Options W1 performs most favourably as all of the sites within this option are located adjacent to / near the A37 (Bristol Road), which is the main road running through Whitchurch, connecting it with Bristol. This enables residents to walk to the bus stop along the A37, which provide a sustainable mode of transport into Bristol.

Whilst it is recognised that significant growth in Whitchurch could place considerable pressure on existing services and facilities, it is noted that where options are looking to deliver strategic growth (particularly Options W2, W3 and W5) or high growth (Option W4), this may trigger the need for a GP surgery (and potentially other health facilities) to be delivered alongside development.

Options delivering strategic growth (Options W2, W3 and W5) and higher growth (Option W4) are likely to support health and wellbeing by delivering improved active travel infrastructure, encouraging active travel uptake and modal shift. As Option W4 delivers not only the highest level of growth but also growth across the widest area, it is most likely to deliver the greatest strategic sustainable transport improvements (noting the Local Plan objective to avoid the creation of any new roads).

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities / areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under the highest growth options, delivering development that is landscape-led and underpin by holistic scale masterplanning that can extend across existing and new communities.

Finally, opportunities also exist to integrate Public Rights of Way (PRoW) and cycle networks, further supporting healthy lifestyles. All of the options are connected to the PRoW network, either via the road network or dedicated PRoWs.

Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments, and community cohesion.

It is noted that sites WCH12 and WCH12b (Option W2) are currently used as sports pitches, and therefore the development of these sites has the potential to result in the loss of this recreational facility.

Overall, it is considered that all options provide a significant opportunity to deliver improvements to support health and wellbeing objectives, providing an opportunity to support active travel uptake, deliver new and improved areas of multi-functional green infrastructure alongside development; and promote access to the countryside. Given all the options are similarly located and would support sustainable, accessible, development, options are ranked in terms of level of growth. However, it is noted that Option W5 would be disconnected from the existing settlement boundary. The level of infrastructure delivery is expected to be greatest under the high growth option (Option W4), with the benefits seen across a wide area. Low growth option (Options W1) is ranked least positively overall as it is less likely to deliver strategic

sustainable transport interventions. However, it is recognised that this option is best located in terms of its proximity to Whitchurch.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs, and contributing towards sustaining sufficient land supply throughout the plan period.

It is considered that Option W1 is the lowest growth option, followed by Options W2, W3 and W5, which could deliver similar levels of growth, with Option W4 being the highest growth option. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups, including affordable housing. A key consideration in this respect is housing needs of older people, i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes.

High growth could also potentially contribute towards meeting any unmet need in neighbouring Bristol. However, the Draft Local Plan will first need to establish a strategy and locations to meet housing need arising within B&NES, before consideration is given as to whether sustainably located sites or capacity could also be allocated to help accommodate a proportion of Bristol's unmet needs.

Higher levels of growth also increase opportunities for accessibility improvements and other community benefits associated with development (including new and improved services and facilities, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

Taking the above into consideration, Option W4 is ranked most favourably, followed by Options W2, W3 and W5, which are ranked equally, and finally Option W1.

Communities

All options will likely support local communities, focusing growth in a relatively sustainable location adjacent to Bristol, which is well connected via public transport. There are four bus stops in Whitchurch, and apart from one on Staunton Lane, these are all located along the A37 (Bristol Road). These bus stops are serviced by the 172 (Bristol / Wells – Paulton – Midsomer Norton – Bath), the 376 (Bristol – Wells – Glastonbury – Street), and the less frequent SB3 (Stockwood – Hartcliffe – Knowle – St. Brendan's). Notably, the bus stop on Staunton Lane is only serviced by the SB3. Option W1, and to a lesser extent Options W3 and W4, perform most favourably by locating growth nearest to these bus stops. However, it is noted that the strategic options (Options W2, W3 and W5) and high growth option (Option W4) are more likely to deliver new transport infrastructure, which could include new bus stops.

Interventions proposed through the WECA Bristol to Bath Corridor will help ensure sustainable access to a broad range of community services and facilities, including leisure, and recreation within neighbouring centres. This includes the A37 / A4108 Corridor and the A37 / A367 Corridor between Midsomer Norton and Bristol or Bath.

While all options perform positively in terms of supporting sustainable communities, high growth (Option W4) presents an increased opportunity to deliver essential infrastructure such as education, health services, green infrastructure, allotment space etc. However, it is recognised infrastructure delivery will be dependent on site

masterplanning and choices on developer contributions. Nevertheless, it is likely that strategic growth will best support communities and groups, capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places. In this respect, Options W2, W3 and W5 also perform well.

In terms of supporting cohesive communities, Options W1 and W5 deliver growth to the southeast of Whitchurch, thereby preserving the Green Belt land to the northeast and northwest of Whitchurch. This land is key to maintaining separating between Bristol and Whitchurch. However, it is noted that Option W5 would be separated from the existing settlement boundary of Whitchurch. Conversely, Option W2, and to a lesser extent Option W3, would contribute to the merging of Bristol and Whitchurch, which would significantly alter settlement pattern and identity. Nevertheless, it is noted that there is an assumption that a landscape buffer would be delivered to prevent complete coalescence between Bristol and Whitchurch.

The primary school in Whitchurch currently has capacity to accommodate pupils from around 150 new homes. Any development of a higher capacity would need to bring with it a new primary school, and therefore be of a scale for this to be sustainable (i.e. approximately 500-600 homes). All options could deliver new infrastructure, such as a new primary school. However, the higher growth (Option W4) and strategic growth (Options W2, W3 and W5) options are more likely to deliver new infrastructure.

Overall, it is considered that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility to neighbouring services and facilities. However, it is considered that as the level of growth increases, so does the likelihood for positive effects of significance. Option W4 would deliver growth across the widest area, maximising opportunities for social engagement and active travel, thereby improving community cohesion and exposure to the natural environment. Furthermore, a likely increased level of supporting infrastructure would better ensure sustainable growth of existing and new communities, providing access to essential services without reliance on the private vehicle. Whilst Options W2, W3 and W5 would deliver strategic growth, they would either contribute to coalescence (Options W2 and W3) or be separated from the existing settlement boundary (Option W5). Notably, Option W4 would suffer the same issues as Option W2 as it comprises Options W1-W3. However, it is noted that mitigation would reduce the significance of effects in accordance with higher level policy.

Economy

All options perform positively in relation to the economy SA theme, as all will support development that enables access to economic opportunities. Bristol is easily accessible via the A37 (Bristol Road), which is a hub for employment opportunities, whilst Keynsham is accessible via Stockwood Lane or Charlton Road.

Whitchurch is primarily a commuter settlement, with the majority of residents commuting into Bristol via private car to access employment opportunities. A key issue identified through SA Scoping is the need to enable increased local employment, with less overall commuting. This could be delivered through high growth Option W4, supporting future local economic growth.

In light of the above, significant long-term positive effects are anticipated under high growth Option W4. Strategic growth Options W2, W3 and W5 also perform positively, whilst lower growth Option W1 is ranked lowest with no significant effects anticipated. Nevertheless, all options are sustainably located to capitalise upon accessible employment in Bristol, with potential to provide a level of employment alongside housing; deliver infrastructure improvements; and support a range of housing to meet demographic imbalances.

Transportation

Whitchurch is considered relatively sustainable in transport terms; it lies close to the edge of Bristol, with key connections to the centre of Bristol (along the A37 (Bristol Road)) and Keynsham to the east. However, current capacity on the A37 is critical. Traffic and congestion along the A37 corridor is high, particularly at peak times, and there is a perception that any level of growth would exacerbate this issue. It is also noted that the A37 severs the north and south of the village, and there are limited pedestrian crossings across the busy road.

The A37 is also a public transport route, with regular bus services running to Bristol. There are four bus stops in Whitchurch, and apart from one on Staunton Lane, these are all located along the A37 (Bristol Road). These bus stops are serviced by the 172 (Bristol / Wells – Paulton – Midsomer Norton – Bath), the 376 (Bristol – Wells – Glastonbury – Street), and the less frequent SB3 (Stockwood – Hartcliffe – Knowle – St. Brendan's). Notably, the bus stop on Staunton Lane is only serviced by the SB3. Option W1, and to a lesser extent Option W3, perform most favourably by locating growth nearest to these bus stops. However, it is noted that the strategic options (Options W2, W3 and W5) and the high growth option (Option W4) are more likely to deliver new transport infrastructure, which could include new bus stops.

Sustainable transport improvements are ongoing through the WECA Bristol to Bath Corridor. This includes improvements to bus services and walking and cycling opportunities along the A37 / A4108 Corridor and the A37 / A367 Corridor between Midsomer Norton and Bristol or Bath.

A key ongoing issue associated with growth in Whitchurch is the level of growth that can be achieved in the absence of strategic transport interventions (i.e., new roads). This is because the Local Plan introduces a presumption against building new roads to deliver future growth; instead the focus is on rebalancing the transport network in favour of sustainable modes of transport. Therefore, any new development in Whitchurch will need to be at a level that can be supported by interventions to improve sustainable travel.

There is a network of Public Rights of Ways and cycleways around the area, connecting to neighbouring centres. Specifically, Sustrans National Cycle Network (NCN) Route 3 links central and south Bristol to the Chew Valley and Wells, passing through Whitchurch along Staunton Lane and Sleep Lane. However, there are inadequate walking and cycling facilities on the A37 corridor, owing to the constrained carriageway and narrow footway widths at certain points. Footpaths and cycleways are being invested in through the WECA Bristol to Bath Corridor.

In conclusion, whilst there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth at Whitchurch under all five options is considered, at this stage, likely to lead to significant negative effects on

transport objectives. This reflects the existing significant capacity issues along the A37 and throughout the village, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth along the A37 (under all options) to capitalise upon existing public transport provisions, as well as new sustainable transport interventions proposed through the WECA BBCP. Ultimately, the high growth option (Option W4) has the greatest potential to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA BBCP. Due to this, the options are ranked according to the quantum of growth they deliver. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Landscape

All options fall within the Bristol and Bath Green Belt, with the exception of part of site S1PS24 (Option W2). The B&NES Green Belt Review (2013) states that the Whitchurch land parcel of the Green Belt encircles the village of Whitchurch and extends east towards Keynsham and Queen Charlton. Green Belt in the western portion of this land parcel is of particular importance for preventing the sprawl of Bristol into open countryside that could result in the coalescence of Bristol with Whitchurch. The Green Belt designation within this land parcel also serves the purposes of protecting the countryside from encroachment and assisting urban regeneration in south Bristol. Green Belt in the southern part of the land parcel is of lower importance as it does not prevent the merger of towns and the land parcel does not preserve the special character of a historic town.

Options W1 and W5 deliver growth to the southeast of Whitchurch, thereby preserving the Green Belt land to the northeast and northwest of Whitchurch which are key to maintaining separating between Bristol and Whitchurch. However, it is noted that Option W5 would be separated from the existing settlement boundary of Whitchurch. Conversely, Options W2 and W3 (and therefore also Option W4) would contribute to the merging of Bristol and Whitchurch, which would significantly alter settlement pattern and identity. This could lead to significant negative effects, recognising that a key purpose of Green Belt land is to prevent neighbouring towns merging into one another. It is noted that there is an assumption that a landscape buffer would be delivered to prevent complete coalescence between Bristol and Whitchurch.

The West of England Landscape Sensitivity Assessment (2015) shows that the land to the southeast of the existing settlement boundary of Whitchurch falls within area BN5/1 (Southeast of Whitchurch), which has a medium landscape sensitivity. From a landscape perspective, there is potential for development in this area with suitable mitigation. The assessment outlines that there is a need to protect the setting of Maes Knoll, as well as the skylines to the adjoining valley landscapes and the setting of Queen Charlton village. However, any development in the vicinity of Maes Knoll requires careful landscape buffering. Queen Charlton Lane is visually important due to its tree line – it requires sensitive treatment and protection of character. Sensitive landscape and structural planting will be required to integrate new development with the landscape to the south and southeast, especially close to Queen Charlton.

Alongside the potential for negative effects, it is recognised that there is there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to improve green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning

gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. It is recognised that the nature and significance of effects will ultimately be dependent on the exact location, design and layout of development, and the implementation of mitigation measures.

Taking the above into consideration, it is concluded that Options W2, W3, W4 and W5 have the potential to significantly affect the landscape with the potential for significant adverse effects. Option W4 is ranked least favourably as it delivers growth over the widest area, leading to the greatest loss of Green Belt land. This is followed by Options W2 and W3, which would contribute to the coalescence of Bristol and Whitchurch. This is followed by Option W5, which would reduce the green gap between Whitchurch and Queen Charlton / Keynsham. Conversely, Option W1 is the least likely to lead to significant adverse effects and is ranked most favourably. Nevertheless, uncertainty is still noted under these options as they still have the potential to impact the local landscape to some degree depending on the design and layout of development.

Historic environment

All of the options are constrained by designated heritage assets to varying degrees; however, Option W3 is one of the most constrained. The northern boundary of site WCH26 is adjacent to two grade II* listed buildings (Lyons Court Farmhouse and Church of St Nicholas). It is also in proximity to ten grade II listed buildings to the north, east, south and west; however, five of these are screened by existing development. Site WCH26 is approximately 500m northeast of scheduled monument ‘Maes Knoll camp’, 750m north of scheduled monument ‘Part of the linear boundary known as the Wansdyke 425m south of New Barn Farm’, and 800m northeast of scheduled monument ‘Wansdyke: section E of Maes Knoll camp’.

Option W5 is also one of the most constrained options. Sites CDAN24 and CDAN25 are approximately 225m southwest of the edge of a cluster of 18 listed buildings (including two grade II*) in Queen Charleton, and 300m southwest of scheduled monument ‘Queen Charlton village cross’, also in Queen Charleton. Notably, Queen Charleton is covered by a conservation area. In addition, Site PEN10 is approximately 550m north of scheduled monument ‘Part of the linear boundary known as the Wansdyke 210m north west of Cottles’.

Option W2 is also one of the most constrained options. Site WCH22 is adjacent to grade II listed building ‘Milestone at National Grid Reference St 6198 6703’ on Queen Carlton Lane. It is also approximately 425m south of a cluster of four grade II listed buildings in Stockwood (South Bristol), and 675m west of the edge of a cluster of 18 listed buildings (including two grade II*) in Queen Charleton. As noted above, Queen Charleton is covered by a conservation area. In addition, site WCH11 is approximately 25m north of the edge of a cluster of three grade II listed buildings. The two western parts of site S1PS24 are approximately 250m south of the edge of a cluster of another three grade II listed buildings. Finally, the part of site S1PS24 west of site WCH11 is approximately 200m northeast of a cluster of three listed buildings, including one grade II*. Notably, some of these listed buildings are screened by existing development.

Option W1 is only near one designated heritage asset; site WCH08 is adjacent to grade II listed building ‘Milestone at National Grid Reference St 6198 6703’ on Queen Carlton Lane.

A Heritage Assessment carried out for the area (2023) concludes that the area immediately to the southwest of Whitchurch (part of Option W3), as well as the areas to the southeast and northeast of Whitchurch (Option W1 and part of Options W2 and W5), are medium risk to the significance of heritage assets. Meanwhile, the areas to the northeast and northwest of Whitchurch (part of Option W2) are low risk to the significance of heritage assets.

Notably, the sites within Options W1, W2 and W3 which are constrained by designated heritage assets are also relevant to Option W4.

Overall, it is considered that Options W2, W3, W4 and W5 have the potential to lead to significant adverse effects on the historic environment. Option W4 is considered most likely to lead to significant adverse effects as it delivers the highest level of growth over the widest area. This is followed by Option W3, which is particularly sensitive with regards to its proximity to scheduled monument 'Maes Knoll camp'**.** This is followed by Options W2 and W5 which are ranked equally. Option W1 is considered the least constrained; however, uncertainty is still noted as the impact of this option on the historic environment is largely dependent on the design and layout of development, which is not known at this stage.

Biodiversity

None of the options overlap with internationally, nationally or locally designated sites for biodiversity. Whilst site WCH22 (Option W2) is approximately 700m south of Stockwood Open Space LNR, this is separated from the site by the built-up area of Stockwood (South Bristol). All of the options overlap Impact Risk Zones (IRZs) for SSSIs; however, these do not impact the types of development likely to come forward through these options (i.e. residential or rural residential development).

Only a few of the options overlap with Biodiversity Action Plan (BAP) priority habitats. All four parts of site S1PS24 (Option W2) contain deciduous woodland. Notably, the part of site S1PS24 to the west of site WCH11 is almost entirely covered by deciduous woodland. Sites PEN10, CDAN24 and CDAN25 (Option W5) also contain areas of deciduous woodland. However, these areas are small in comparison to the total area of each of these three sites.

All of the sites that make up Option W2 overlap to varying degrees with Network Expansion Zone of the National Habitat Network. This is land beyond the Network Enhancement Zones with potential for expanding, linking / joining networks across the landscape.

Sites PEN10, CDAN20 and CDAN25 (Option W5) partially overlap with a priority area for Countryside Stewardship (CS) measures addressing Brown Hairstreak habitat issues.

Overall, whilst it is difficult to conclude on significance of effects without knowing the exact design and layout of new development, it is considered that Option W1 is likely to perform well in terms of avoiding significant negative effects. Taking a precautionary approach, Options W2, W3, W4 and W5 are worst performing at this stage, reflecting the constraints present and uncertainty regarding mitigation. Option W5 is ranked least favourably as it has the potential to impact biodiversity across the widest area. However, these constraints are not considered significant, and therefore no significant adverse effects are predicted. It is also recognised that strategic scale development (Options W2, W3, W4 and W5) can correlate with higher planning contributions, which could be spent to mitigate any impacts of higher growth and

enhance / protect designated sites and/or areas identified for habitat creation / improvement schemes.

Natural resources

In terms of air quality, as above, it is considered that by focusing additional growth adjacent to the strategic transport corridor (A37), where strategic sustainable transport interventions are being focused, Option W1 performs well. However, it is also noted that strategic growth (Options W2, W3 and W5) and high growth (Option W4) are more likely to deliver strategic transport improvements, which could include new bus stops or improved walking and cycling infrastructure. This will have positive implications for air quality if appropriately delivered.

However, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Option W1 would be best performing, with Option W4 performing least positively overall. It is therefore difficult to rank options in relation to air quality objectives at this stage.

Options W1 lies adjacent to / near the A37 (Bristol Road), which is a busy road which could lead to noise pollution to nearby sites. However, this is not considered likely to be significant, and mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Only site WCH22 (Option W2) – which is primarily underlain by Grade 4 (poor quality) land – is covered by data from the post-1988 ALC. However, data from the provisional ALC shows that all of the options are underlain by Grade 3 (good to moderate quality) land. It is not clear whether this land is Grade 3a (BMV) or Grade 3b (poorer quality), and therefore development has the potential to lead to the loss of BMV land. This should be investigated as a prerequisite to development.

Despite the above, it is considered that as the scale of growth increases, as does the loss of land (whether that be BMV land or not). Therefore, the options are ranked accordingly. However, uncertainty is still noted with regards to whether or not the Grade 3 land in this location is 3a (BMV) or Grade 3b (poorer quality).

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Climate change

All options involve growth at Whitchurch, which is a sustainable development located on the edge of Bristol, with good access to the services and facilities available here.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Despite the above, the high growth option (Option W4) offers greater potential to secure high levels of resource efficiency; to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than through the other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy and sequestration measures. Strategic options (Options W2, W3 and W5) also perform well by delivering substantial growth.

In terms of flood risk, Whitchurch is entirely within Flood Zone 1. Whilst there are isolated areas at medium-high risk of surface water flooding, these do not intersect with any of the sites which make up the options.

In light of the above, it is difficult to differentiate the options, and therefore they are all ranked equally. It is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and sustainable drainage systems (SuDS) legislation.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in nearby Bristol. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Hicks Gate & Brislington

The options for assessment are:

- **Option HG&B1** – Growth to the north-west (Site K53)
- **Option HG&B2** – Alternative growth to the north-west (Sites K52, K55 and K59)
- **Option HG&B3** – Larger-scale growth to the north-west (Options 1 and 2 combined)
- **Option HG&B4** – Maximised growth to the north-west (Option 3 alongside Sites K54, K56, K57, K58, and K62)

Assessment findings:

SA theme		Option HG&B1	Option HG&B2	Option HG&B3	Option HG&B4
Health and wellbeing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**

Housing	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Communities	Significant effects?	**Yes – positive**	**Yes – positive**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Economy	Significant effects?	**No**	**No**	**Yes – positive**	**Yes – positive**
	Rank	**4**	**3**	**2**	**1**
Transportation	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**4**	**3**	**2**	**1**
Landscape	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**1**	**2**	**3**	**4**
Historic environment	Significant effects?	**Yes - negative**	**Uncertain**	**Yes - negative**	**Yes - negative**
	Rank	**2**	**1**	**3**	**4**
Biodiversity	Significant effects?	**No**	**Uncertain**	**Yes - negative**	**Yes - negative**
	Rank	**1**	**2**	**3**	**4**
Natural resources	Significant effects?	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**2**	**1**	**3**	**4**
Climate change	Significant effects?	**No**	**No**	**Uncertain**	**Uncertain**
	Rank	**2**	**1**	**3**	**4**
Waste	Significant effects?	**No**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**	**=**

Health and wellbeing

In terms of access to health facilities, there is a GP surgery in Keynsham (2km east) which is accepting new patients. There are also a number of hospitals within 5 miles, predominately focused within Bristol. All options have good access to Keynsham and Bristol, being focused in proximity to the A4/ A4174 Bath to Bristol corridor, which is being invested in through the West of England Combined Authority (WECA) Bristol to Bath Corridor Project (BBCP). The BBPC seeks to deliver improved sustainable and active travel connectivity between Hicks Gate and surrounding centres such as

Keynsham, Bristol, and Bath; improving accessibility to health services in these locations.

While it is recognised that significant growth in Hicks Gate could place considerable pressure on existing services and facilities, it is noted that where options are looking to deliver strategic growth (particularly Option HG&B4) this may trigger the need for a GP/ surgery to be delivered alongside development.

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities/ areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under the highest growth options, delivering development that is landscape-led and underpin by holistic scale masterplanning that can extend across existing and new communities.

However, it is noted that sites K57 and K58 within Option HG&B4 are identified within the LPPU (Policy NE1) as Green Infrastructure, and therefore appropriate masterplanning would need to ensure the maintenance and enhancement of publicly accessible green infrastructure at this location. This has the potential to lead to positive effects, recognising that the creation, maintenance and enhancement of publicly accessible multi-functional green infrastructure can improve mental and physical health and wellbeing of communities, by providing opportunities for exercise, active travel, social interaction, community food growing, and education.

Finally, opportunities also exist to integrate Public Rights of Way (PRoW) and cycle networks; further supporting healthy lifestyles. The majority of sites within options are connected to the PRoW network, with the exception of sites K59 and K55 (Options HG&B2- 4) south of the A4, which would need to connect through neighbouring sites. The PRoW network north of the A4 is well connected to Keynsham to the east and Brislington to the west. Furthermore, the River Avon trail extends north of site K57 (Option HG&B1) along the river.

Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments, and community cohesion.

Overall, it is considered that all options provide a significant opportunity to support health and wellbeing objectives; incentivising active travel uptake, delivering new and improved areas of multi-functional green infrastructure alongside development; and promoting access to the countryside for recreation. Given all options are similarly located and would support sustainable, accessible, development; options are ranked in terms of level of growth.

The level of infrastructure delivery is expected to be greatest under a high growth option (Option HG&B4), and will be delivered in an accessible location that can support healthy lifestyles. Low growth option HG&B1 is ranked least positively overall as is less likely to deliver the strategic interventions that should be supported in this sustainable location; to maximise the health and wellbeing of residents.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs, and contributing towards sustaining sufficient land supply throughout the plan period.

It is considered that Option HG&B1 is the lowest growth option, followed by Option HG&B2, and HG&B3, with HG&B4 being the highest growth option. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups; including affordable housing. A key consideration in this respect is housing needs of older people i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes.

Additionally, high growth options could help meet the accommodation needs of any increase in demand for PBSA; recognising that this is being explored within sustainably located settlements along the Bristol to Bath corridor.

Higher levels of growth also increase opportunities for accessibility improvements and other community benefits associated with development (including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

Taking the above into consideration, Option HG&B4 performs most positively, followed by Option HG&B3, then HG&B2.

Communities

All options will likely support local communities, focusing growth in a sustainable location along the Bath to Bristol corridor, which is being heavily invested in through strategic sustainable transport interventions.

Large scale growth options are considered to be most positive in this respect, recognising for example that Option HG&B4 presents an opportunity to deliver a new Park & Ride interchange at Hicks Gate junction as part of the WECA BBCP. The favoured site for this is KS52 which falls within Options HG&B2, HG&B3 and HG&B4. While still at concept and evidence development stages, an interchange would provide improved bus services into the city centre, and could also include connectivity with Keynsham centre; alongside other services such as a café and shower, and provide bikes/ ebike collection/ drop off. Moving this interchange would improve connectivity for by sustainable transport modes and links to surrounding communities.

Interventions proposed through the BBCP will help ensure sustainable access to a broad range of community services and facilities, including leisure, and recreation within neighbouring centres. Notably Hicksgate benefits from being 2km from Keynsham town centre, and within 5 miles of Bristol City centre; all accessible via the A4/ A4174 corridor.

While all options perform positively in terms of supporting sustainable communities, large growth options present an increased opportunity to deliver essential infrastructure. This can include education, health services, green infrastructure, allotment space etc., although it is recognised infrastructure delivery will be dependent on site masterplanning and choices on developer contributions. Nonetheless it is likely that strategic growth will best support communities and a range of population groups; capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places.

In terms of supporting cohesive communities, sites K55 and K64 provide a very visible green gap between the edge of Keynsham and Bristol. These sites separate the settlements, contributing to the important identity of each community.

Overall, it is considered that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility to neighbouring services and facilities. In terms of ranking options, it is considered that as the level of growth increases so does the likelihood for positive effects of significance.

Option HG&B4 is therefore best performing, as would deliver the highest level of strategic growth, maximising opportunities for social engagement and active travel, thereby improving community cohesion and connectivity with the natural environment. Furthermore an increased level of supporting infrastructure would likely better ensure sustainable growth of existing and new communities, ensuring access to essential services without reliance on the private vehicle.

Options HG&B2 – 4 also perform well as would capitalise upon the potential relocation of the Park & Ride interchange (alongside other transport interventions to support sustainable travel), although this is at an early stage of development. However conversely these options could impact the visible green gap between the edge of Keynsham and Bristol; although it is likely that mitigation would reduce the significance of effects in accordance with higher level policy requirements.

Economy

All options perform positively in relation to the economy SA theme, as all will support development that enables access to economic opportunities. Hicksgate has good access via the A4 / A4174 to Bristol, Keynsham, and Bath for employment, along with South Gloucestershire to the north. Furthermore, the WECA BBCP will improve sustainable transport connectivity along the Bristol to Bath corridor, providing increased access for residents to employment, without relying on the private vehicle.

A key issue identified through SA Scoping is the need to enable increased local employment, with less overall commuting. This could be delivered through high growth Option HG&B4, supporting local economic growth of the village.

The area to the west of Hicksgate towards Bristol (Site K53 and K59) presents an opportunity for strategic growth (Options HG&B3 and HG&B4 - as include both sites) to encourage the improvement of existing sites and support sustainable access to increase footfall from (for example) Keynsham, Bristol and Bath.

Additionally, Keynsham town centre is only 2km east of Hicksgate, and makes an important contribution to local employment. Keynsham is invested in through the LPPU in terms of employment and office/ industrial floorspace, along with Bath. It is likely that over the new Local Plan period, new strategic employment locations will be brought forward in Keynsham to enable future local economic growth. This supports the sustainability of Hicksgate as a location for high housing growth, recognising that employment opportunities will likely be delivered nearby in the medium - longer term. Higher growth options are also likely to better address potential demographic imbalances with growth in key working age groups. This is through an increased mix of housing type and tenure, delivering homes for younger people, including higher levels of affordable housing.

Considering these benefits to the local economy and employment, significant long-term positive effects are anticipated under higher growth Options HG&B3 and HG&B4. Options HG&B1 and HG&B2 also perform positively, although are ranked lowest. While all options are sustainably located to capitalise upon accessible

employment nearby, these options would be less likely to provide a level of employment alongside housing or deliver significant infrastructure provision.

Transportation

Hicksgate is located at a prominent strategic network junction on the southeastern edge of Bristol, at a key point along the A4 Bath Road. Hicksgate connects well to surrounding locations via the A4 and the A4174, with Bristol City centre being within 4km, and Keynsham town centre within 2km.

Traffic congestion in the area, particularly along the A4, is high, and there is a perception that any level of growth would exacerbate this issue. However the A4 is also a public transport route, with sustainable improvements ongoing through the WECA BBCP. The project aims to improve travel between Bath and Bristol through better bus services and enabling more cycling and walking. Notably, the proposed route from Hicksgate to Bristol will be facilitated by diversion of traffic onto the Callington Road Link to enable relocation of road space from car to public transport within Bristol. In the short term, metrobus will provide mass transit across the Bristol to Bath corridor, with light rail planned in the longer term. Further scheme details include extensions to the metro bus, and changes to existing roundabout layout including a new link between the A4174 and A4 Keynsham Bypass.

Brislington Park & Ride connects the area with Bristol City Centre, supporting 1,300 car parking spaces. However the Park & Ride service has recently been reduced, and is considered less frequent and reliable as the service now extends out to Portway. The WECA project proposes a new Park & Ride interchange At Hicks Gate junction, to replace the existing Brislington site. This junction is a key pinch-point within the highway network, at the A4 and ring road which takes traffic north to M4, and experiences high levels of congestion. The favoured site for this is KS52 which falls within Options HG&B2, HG&B3 and HG&B4. While still at concept and evidence development stages, an interchange would provide improved bus services into the city centre, and could also include connectivity with Keynsham centre; alongside other services such as a café and shower, and provide bikes/ ebike collection/ drop off. This would create new and improved connections between the city and the countryside, incentivising road users away from the private vehicle.

There is a network of PRoW and cycleways around the area, connecting to neighbouring centres. These are being invested in through the WECA project, with interventions including a segregated cycle route along the A4. Interventions also include connections to wider active travel network, supporting modal shift and accessibility for existing and new residents under all options.

In conclusion, while there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth at Hicksgate is considered, at this stage, to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A4/ A4174 and throughout the village, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth along the A4/ A4174 (under all options) to capitalise upon sustainable transport interventions proposed through the WECA BBCP; and for a max growth option (KG&B4) to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA BBCP. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Landscape

All options fall within the Bristol and Bath Green Belt. This is a particularly sensitive part of the Green Belt as it forms part of the narrow gap between Bristol and Keynsham. This land parcel also protects the countryside from encroachment and assists urban regeneration in Bristol and Keynsham. A Green Belt study carried out for sites K53 (Option HG&B1, HG&B3 and HG&B4) and K59 (Option HG&B2, HG&B3, HG&B4) concluded Green Belt within these land parcels is of high importance on the basis that they prevent the merger of Bristol with Keynsham and ribbon development along the A4. Land in the north western and southern parts of the parcel are of particular importance for preventing the sprawl of Bristol into open land.

The assessment further highlights that land to the north of the A4 (Option HG&B1, HG&B3 and HG&B4) is relatively self-contained, it is bounded to the north by the Bristol to Bath main line railway and to the east by the A4174 Avon Ring Road. However to the south (Option HG&B2, HG&B3, HG&B4), road infrastructure is less prominent, and topography rises steeply towards the ridgeline of Stockwood Lane. Site K55 (Option HG&B2, HG&B3, and HG&B4), along with neighbouring site K64 provide a very visible green gap between the edge of Keynsham and Bristol. These sites separate the settlements, are rural in nature and prevent coalescence. The loss of greenfield site K55 to development through Options HG&B2, HG&B3 and HG&B4 could therefore lead to the merging of settlements, which would significantly alter landscape character and development pattern. It is considered that a green buffer would be required to reduce the significance of adverse effects at this location.

Bath and North East Somerset Council's Urban Extension Environmental Capacity Appraisal: Revision A (October 2006) looks at the capacity of the wider area to accommodate development while retaining existing character. The Appraisal similarly concluded that development of the study area was considered to involve the loss of rural character and loss of distinctive and attractive small scale undulating landform. Notably the south of the A4 (Option HG&B2, HG&B3, HG&B4), the eastern area (Option HG&B4) and the Hicks Gate Ridge are identified as being the most visually prominent parts of the study area.

It was considered that other areas south of the A4 (HG&B4), were relatively well contained. Furthermore, provided the A4 tree screen was maintained, development in this area could be accommodated without too much visual impact.

North of the A4, while the area is heavily influenced by the built up areas of Keynsham and Bristol and the A4 road, the assessment considered that development would nonetheless result in the loss of attractive open landform which could not effectively be mitigated.

All options extend development into the open landscape to the west, which would significantly reduce the gap between Hicksgate and Brislington. While Options HG&B2, HG&B3, and HG&B4 would also extend development east reducing the gap between Hicksgate and Keynsham. This is could lead to significant negative effects, recognising that a key purpose of Green Belt land is to 'prevent neighbouring towns merging into one another'.

Alongside the potential for negative effects, it is recognised that there is there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to create new linkages along the A4 corridor through improvements to

green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. It is recognised that the nature and significance of effects will ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.

Taking the above into consideration, it is concluded that all options have the potential to significantly affect the landscape with the potential for significant adverse effects. In terms of ranking the options, evidence suggests south of the A4 and junction, (Option HG&B2, HG&B3, and HG&B4) has a very different character to the north, disconnected by existing infrastructure. Therefore from a landscape perspective, growth to the north of the round-about (Option HG&B1) is preferred, reducing the potential to impact upon the more sensitive landscape to the south. Options HG&B2, HG&B3 and HG&B4 would require mitigation to reduce the extent of development to the south. Development in this area could have a strong visual impact and adverse effect on character.

Option HG&B4 is considered worst performing, given the larger extent of greenfield loss to the east, west and south; followed by Option HG&B3. Option HG&B1 is best performing as focuses growth to the less sensitive north of the A4.

Historic environment

Hicks Gate is relatively constrained in terms of designated historic assets, and it is considered that the settlement is sensitive to changes in the character of the built environment. Directing growth to the A4/ A4174 corridor at Hicks Gate therefore has the potential to negatively impact upon the setting of assets, particularly given the sensitivity of Hicks Gate's historic landscape and character (as identified above). Notably, parts of the Green Belt surrounding Hicks Gate is constrained by heritage assets, including historic parks and scheduled monuments; which may result in a greater potential for negative effects under higher growth options.

A key constraint for site K53 (Option HG&B1, HG&B3, and HG&B4) is Grade II* Listed Registered Park and Garden (The Park and Garden to Brislington House (known as Long Fox Manor)) adjacent to the site to the west. Development of site K53 will likely adversely impact upon the intrinsic qualities, character and setting of the Park and Garden, significantly altering the approach to the asset from the east. Consideration is however given to the major roads and junction present within the setting, which could reduce the significance of any adverse effects. However, development will nonetheless permanently change the character and setting surrounding the asset.

Other constraints include Grade II Listed Buildings, located adjacent to site K55 (Option HG&B2, HG&B3, and HG&B4) and K56 (Option HG&B4), and close to site K57 (also Option HG&B4). All sites with the exception of K62 (Option HG&B4) are also constrained by undesignated heritage assets present, overlapping wholly or partially with sites.

Considering the above, it is likely that high growth options may result in increased pressure to locate growth in areas which could negatively impact on the intrinsic qualities and/ or setting of assets, or increase the density of development, encroaching upon historic landscapes and/or changing character. However, it is also

recognised that lowest growth Option HG&B1 is arguably more constrained than Option HG&B2 when considering sites in isolation, delivering growth on greenfield land adjacent to a Grade II* listed asset. Option HG&B2 is therefore best performing at this stage; although all of the options are considered to have the potential to lead to significant negative effects without appropriate avoidance, mitigation, and enhancement measures.

That being said, it is recognised that development under any option could be supported by the use of high-quality and sensitive design, to help mitigate adverse effects on the historic environment to some degree. The NPPF (2023) notably advises that historic environment strategies should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Biodiversity

Hicks Gate is not constrained by internationally designated biodiversity sites, however sites K58 and K57 (Option HG&B4) to the north are located adjacent to Bickley Wood Site of Special Scientific Interest (SSSI) and Ancient Woodland. Site K53 (Option HG&B1, Option HG&B3 and HG&B4) is within 600m of Bickley Wood, while Site K57 (Option HG&B4) is also constrained by Cleeve Wood SSSI and Ancient Woodland, within 400m east of the site.

In terms of locally designated sites, site K57 (Option HG&B4) is a SNCI. Stockwood Open Space Local Nature Reserve (LNR) is located adjacent to site K59 (Option HG&B2, HG&B3 and HG&B4). National Forestry Inventory Woodland is also present within sites K58 (Option HG&B1, HG&B3, and HG&B4), and sites K57 and K56 (Option HG&B4).

It is also noted that sites K58 and K57 (Option HG&B4) fall within an area of Green Infrastructure designated as part of the district wide GI network through the LPPU Policy NE1. Green infrastructure is a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities. While this is a constraint to development in this location, large scale growth through Option HG&B4 also presents an opportunity to maximise the potential of these sites as a green infrastructure resource for the wider area; maximising ecological value and BNG. Green infrastructure is a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities.

Overall, while it is difficult to conclude on significance of effects without knowing the exact design and layout of new development, Option HG&B1 and HG&B2 are identified as best performing overall. These options are least constrained by designated sites, with the exception of a SSSI/ Ancient Woodland within 600m (Option HG&B1) and an LNR adjacent (Option HG&B2). Taking a precautionary approach, option HG&B4 is worst performing at this stage, followed by HG&B3, reflecting the cumulative constraints present and uncertainty regarding mitigation. However as set out above, it is recognised that strategic scale development can also correlate with higher planning contributions, which could be spent to mitigate any impacts of higher growth and enhance/ protect designated sites and / or areas identified for habitat creation / improvement schemes.

Natural resources

In terms of air quality, as above, it is considered that focusing additional growth adjacent to the strategic transport corridor where sustainable transport interventions

are being focused (Option HGB3 and HGB4) perform well in terms of reducing vehicular use, and facilitating modal shift. Further positive effects are anticipated through the potential delivery of larger-scale developments which could alleviate the risk of strategic growth leading to problematic air quality along the A4/A4174 road network.

However, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Option HG&B1 would be best performing, with Option HG&B4 performing least positively overall. It is therefore difficult to rank options in relation to air quality objectives at this stage.

All options lie adjacent to the A4 and A4174 which are heavily used roads and could have significant issues of noise and disturbance to development. All options therefore have the potential to lead to negative effects in this respect, however mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. All sites within the options have had recent (post 1988) classification undertaken, with high quality (Grade 3a) land only present within site K53 (Option HG&B1, HG&B3 and HG&B4). All other sites fall within lower quality ALC (Grade 3b – 5 and 'other'). However all options would result in the loss of greenfield land in the Green Belt, and therefore would lead to significant negative effects in terms of the district's land resource. It is considered that as the landtake increases, so does the significance of effects, with Option HG&B4 performing worst overall.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Climate change

All options involve increasing amounts of growth in Hicks Gate, which is identified as a sustainable development location; focused on the Bath to Bristol transport corridor, with good access to services and facilities in neighbouring settlements.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Broadly speaking, high growth options HG&B3 and HG&B4 offer greater potential to secure high levels of resource efficiency, to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than Options HG&B1 and HG&B2, higher growth has the potential to be

offset by opportunities for sustainable design, renewable energy and sequestration measures.

In terms of flood risk, there are considerable areas within Hicks Gate at high risk of flooding (falling with Flood Zone 3), much of which follows the River Avon to the north of the settlement. Site K53 (Option HG&B1, HG&B3 and HG&B4) is constrained by Flood Zone 3 in the south east corner of the site, along with site K56 (Option HG&B4) which is dissected east to west by Flood Zone 3. There is also an area of Flood Zone 3 in the northern extent of site K57 (Option HG&B4), and along the northern boundary of site K59 (Option HG&B2, HG&B3, and HG&B4).

While all options are constrained by flood risk to some extent, it is considered that Option HG&B2 is best performing, as is least constrained by areas of high flood risk. Option HG&B4 is worst performing, followed by Option HG&B3, reflecting the cumulative areas of flood risk within these options. Nonetheless, it is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems in accordance with National Planning Policy and Sustainable Drainage (SUDs) legislation.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in Keynsham. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Midsomer Norton & Radstock

The options for assessment are:

- **Option R1** - Growth to the north (Sites RAD16a, b, c, d, e, f, g & h, RAD19a, b & c)
- **Option R2** - Growth to the east (Sites RAD21a, RAD21b, RAD23, RAD24, RAD25, RAD26/ 26a, RAD40, MDP32, S2PS31)
- **Option R3** - Growth to the south (Sites RAD30, RAD31a, b & c, RAD32, RAD35)
- **Option R4** - Max growth (Option 1 – 3 combined)

Assessment findings:

SA theme		Option R1	Option R2	Option R3	Option R4
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive

SA theme		Option R1	Option R2	Option R3	Option R4
	Rank	2	3	4	1
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	3	4	1
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	3	4	1
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	2	1	3	4
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	3	2	1	4
Biodiversity	Significant effects?	No	No	Yes – negative	Yes – negative
	Rank	=1	=1	2	3
Natural resources	Significant effects?	No	No	No	No
	Rank	3	2	1	4
Climate change	Significant effects?	No	No	No	No
	Rank	=	=	=	=
Waste	Significant effects?	No	No	No	No
	Rank	=	=	=	=

Health and wellbeing

In terms of access to health facilities, there are three GP surgeries in Radstock and one in neighbouring Westfield. All of the options have good access to the GP surgeries in Radstock. Whilst there is a hospital in Paulton (Paulton Memorial Hospital), this is only a specialist facility. The nearest hospital with an A&E unit is the Royal United Hospital in Bath.

Whilst it is recognised that significant growth in Radstock could place considerable pressure on existing health facilities, it is noted that where options are looking to deliver strategic growth (particularly Option R1) or high growth (Option R4), this may trigger the need for a new GP surgery to be delivered alongside development.

Options delivering strategic growth (Option R1) and higher growth (Option R4) are likely to support health and wellbeing by delivering improved active travel infrastructure, encouraging active travel uptake and modal shift. As Option R4 delivers not only the highest level of growth but also growth across the widest area, it is most likely to deliver the greatest strategic sustainable transport improvements (noting the Local Plan objective to avoid the creation of any new roads).

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space,

and recreational facilities / areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under the highest growth options, delivering development that is landscape-led and underpin by holistic scale masterplanning that can extend across existing and new communities.

Finally, opportunities also exist to integrate Public Rights of Way (PRoW) and cycle networks, further supporting healthy lifestyles. Apart from site RAD31b (Option 3), which could be connected via site RAD31a or RAD31c (also Option 3) all of the options are connected to the PRoW network, either via the road network or dedicated PRoWs.

Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments, and community cohesion.

Overall, it is considered that all options provide a significant opportunity to deliver improvements to support health and wellbeing objectives, providing an opportunity to support active travel uptake, deliver new and improved areas of multi-functional green infrastructure alongside development; and promote access to the countryside. Given all the options are similarly located and would support sustainable, accessible, development, options are ranked in terms of level of growth. The level of infrastructure delivery is expected to be greatest under the high growth option (Option R4), with the benefits seen across a wide area. Lower growth options (Options R2 and R3) are ranked least positively overall as they are less likely to deliver strategic sustainable transport interventions.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs and contributing towards sustaining sufficient land supply throughout the plan period.

Option R3 is the lowest growth option, followed by Option R2 and then Option R1, with Option R4 being the highest growth option. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups, including affordable housing. A key consideration in this respect is housing needs of older people, i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes.

Higher levels of growth also increase opportunities for accessibility improvements and other community benefits associated with development (including new and improved services and facilities, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

Taking the above into consideration, Option R4 is ranked most favourably, followed by Options R1, R2 and R3 respectively.

Communities

The towns of Midsomer Norton and Radstock provide the majority of the retail and leisure facilities in the Somer Valley, as well as the secondary schools. Radstock has seven bus stops, however only three (Maple Drive, Bath College and Victoria Hall) are served by more than one bus route. These are the 172, 173, 174, 414, 424 (Victoria Hall only), and 522 buses. These provide connections to Bristol,

Keynsham, Wells, Paulton, Midsomer Norton, Bath, and Frome. All options will likely support local communities, focusing growth in a relatively sustainable location, which is well connected via public transport.

Interventions proposed through the WECA Somer Valley Links will help ensure sustainable access to a broad range of community services and facilities, including leisure, and recreation within neighbouring centres. This includes improvements to bus services and walking and cycling opportunities along the A37, A362 and A367 (the latter two run through Radstock). Notably, the project aims to deliver bus stop upgrades in ten locations, including the north of Radstock; this will benefit Option R1. This is in addition to a new mobility hub in the centre of Radstock, which will make switching between different types of transport easier.

Whilst all options perform positively in terms of supporting sustainable communities, high growth options present an increased opportunity to deliver essential infrastructure such as education, health services, green infrastructure, allotment space etc. However, it is recognised infrastructure delivery will be dependent on site masterplanning and choices on developer contributions. Nevertheless, it is likely that strategic growth will best support communities and groups, capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places. In this respect, Options R4 performs well.

It is recognised that farming land to the south of Radstock (Option R3) is a social / meeting point area. Therefore, preserving access to the river valley is important.

Overall, it is considered that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility to neighbouring services and facilities. However, it is considered that as the level of growth increases so does the likelihood for positive effects of significance. Option R4 would deliver growth across the entire of Radstock, maximising opportunities for social engagement and active travel, thereby improving community cohesion and exposure to the natural environment. Furthermore, a likely increased level of supporting infrastructure would better ensure sustainable growth of existing and new communities, providing access to essential services without reliance on the private vehicle. Whilst Option R1 would also deliver strategic growth, the benefits of this would be restricted to the north of Radstock.

Economy

Midsomer Norton, Radstock and Westfield, the largest towns in the area, are geographically close to each other and together form the heart of the Somer Valley. A lack of available commercial space in the Somer Valley has constrained business and employment growth for some time, with many residents having to commute to surrounding towns and cities for work. B&NES Council’s Economic Strategy Review recognises this issue, and the 'urgent need' to encourage new employment land use in this area.

The Somer Valley Enterprise Zone (SVEZ) was established in April 2017 to support existing local businesses and to attract new business 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. The SVEZ site is located at Old Mills, a greenfield area extending to 13.5ha on the north-western edge of Midsomer Norton. Due to this, no

employment uses are proposed for Radstock. Nevertheless, all options perform positively in relation to the economy SA theme, as they will support development that enables access to economic opportunities at the SVEZ and further afield.

In light of the above, significant long-term positive effects are anticipated under all options, which are ranked according to the quantum of growth they deliver. All options are sustainably located to capitalise upon accessible employment in the SVEZ, Bath and Bristol, with potential to deliver infrastructure improvements and support a range of housing to meet demographic imbalances.

Transportation

Radstock has the lowest level of car ownership (1.43 cars per household) in the Somer Valley. However, the number of residents owning two or more cars in Radstock is still higher than the B&NES average, at 44.2%, highlighting the high level of car ownership within the Somer Valley.

Whilst Radstock is within a rural setting, it is relatively well connected by public transport. It has seven bus stops, however only three (Maple Drive, Bath College and Victoria Hall) are served by more than one bus route. These are the 172, 173, 174, 414, 424 (Victoria Hall only), and 522 buses. These provide connections to Bristol, Keynsham, Wells, Paulton, Midsomer Norton, Bath, and Frome. However, it is noted with the exception of Peasedown St John, all the other areas in the Somer Valley, including Radstock, fall well below the B&NES bus use average (3.6%)

There is a network of Public Rights of Ways and cycleways around the area, connecting to neighbouring centres. Most notably, Colliers Way is a 16km pedestrian and cycle route between Dundas Aqueduct, Radstock and Frome, making use of disused railway lines and country lanes, with onward connectivity via the Two Tunnels cycle route (NCN 244) to Bath. In addition, Norton Radstock Greenway is an off-road 4km pedestrian and cycle route between Radstock and Midsomer Norton. Notably, cycling is highest within Midsomer Norton, Westfield and Radstock, however this also falls below the B&NES average.

It is recognised that the pedestrian and cycle movement within Radstock town centre is severed due to the busy A367, which cuts through the centre, and the highways layout is overly complex. Moreover, Congestion in Radstock town centre creates an unpleasant environment for pedestrians and cyclists. This is primarily caused by the double mini-roundabout junctions in the centre of the town which provide a confluence between multiple routes into and through the town. Bath Old Road, which intersects Option R1, is currently used as a rat run as speed is only limited in the built-up areas to the south. In addition, the existing five-way junction at Frome Road, Old Road and Manor Road, adjacent to Option R2, is heavily congested at peak times. Manor Road is also used as a rat run to access Peasedown St John.

In response to the above, sustainable transport improvements are ongoing through the WECA Somer Valley Links. This includes improvements to bus services and walking and cycling opportunities along the A37, A362 and A367 (the latter two run through Radstock). Notably, the project aims to deliver bus stop upgrades in ten locations, including the north of Radstock; this will benefit Option R1. This is in addition to a new mobility hub in the centre of Radstock, which will make switching between different types of transport easier.

In conclusion, whilst there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth at Radstock under all four

options is considered, at this stage, likely to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A362 and A367 and throughout the town, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth along the A362 and A367 (under all options) to provide greater critical mass to enable more significant infrastructure improvements, supplementing the WECA SVL. Ultimately, the high growth option (Option R4) has the greatest potential to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA SVL. Due to this, the options are ranked according to the quantum of growth they deliver. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Landscape

Radstock lies within the sunken valley of Wellow Brook, set within the surrounding topography, and was historically characterised by operational collieries. All options fall outside of the Bristol and Bath Green Belt, which is approximately 1.5km northeast of the edge of the built-up area of Radstock.

The West of England Landscape Sensitivity Assessment (2015) only covers the part of Radstock that is covered by Option R3, which has a high landscape sensitivity according to the assessment. Nevertheless, it is recognised that the land to the north of Radstock (Option R1) is important to the green setting of the village. Meanwhile, the land to the east of Radstock (Option R2) sits within the existing landscape framework of agricultural fields, enclosed by the Combe to the northeast, which forms part of the Wellow Brook valley to the north.

Alongside the potential for negative effects, it is recognised that there is there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to improve green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. It is recognised that the nature and significance of effects will ultimately be dependent on the exact location, design and layout of development, and the implementation of mitigation measures.

Taking the above into consideration, it is concluded that all options have the potential to significantly affect the landscape with the potential for significant adverse effects. However, Option R4 is ranked least favourably as it delivers growth across the widest area, followed by Option R3 which delivers growth in an area of known high landscape sensitivity. This is followed by Option R1 and then Option R2. It is noted that the impact of development on the local landscape across all four options is highly dependent on the design and layout of development, which is not known at this stage.

Historic environment

Radstock has been described as one of England’s best preserved coal mining towns, which is the principal reason for the designation of Radstock Conservation Area. It extends over most the settlement and its significance derives from its industrial past, encompassing the main coal-mining areas, buildings and associated features. The conservation area also incorporates areas of open landscape

reflecting the character of Radstock, whereby countryside comes close to the heart of the town. There is a small number of listed buildings located within the conservation area. These are historic religious buildings, buildings from the mining area or historic farm buildings.

All of the options are constrained by designated heritage assets to varying degrees, however Option R1 could be considered the most constrained. This is because site RAD16h is approximately 25m from scheduled monument 'Camerton Romano-British town and associated Prehistoric and early medieval monuments' to the northwest. In addition, site RAD16a is approximately 150m east of a grade II listed building. It is also in proximity to a cluster of grade II listed buildings to the south, in the centre of Radstock, however existing development provides a degree of screening. Nevertheless, Option R1 is at a higher elevation than the centre of Radstock, and therefore development in this location still has the potential to impact the setting of heritage assets. Sites RAD19b and RAD19c fall within the Radstock Conservation Area and it is recognised that the land to the north of Radstock, covered by Option R1, is important to the green setting of the conservation area. It is also noted that Option R1 is intersected by Bath Old Road, which is a historic route.

Option R2 is also relatively constrained. Site RAD25 contains grade II listed building 'Manor Farmhouse' and is adjacent to another grade II listed building. Site RAD24 to the north is also adjacent to two grade II listed buildings. Whilst site RAD21a is in proximity to a cluster of grade listed buildings to the west, in the centre of Radstock, existing development provides a degree of screening. Nevertheless, Option R2 is at a higher elevation than the centre of Radstock, and therefore development in this location still has the potential to impact the setting of heritage assets. Sites RAD26 and MDP32 (Option R2) are approximately 1km from grade II* registered park and garden 'Ammerdown House' to the south. Sites RAD21a, RAD21b, S2PS31, RAD23 and RAD40 fall within the Radstock Conservation Area.

Option R3 is also constrained, although slightly less so than the other options. Site RAD32 is adjacent to two grade II listed buildings, whilst site RAD25 is approximately 150m northwest of another two grade II listed buildings. Site RAD31a is in proximity to a cluster of grade listed buildings to the north, in the centre of Radstock, with the nearest approximately 75m from the site. However, it is noted that Option R3 is at a lower elevation than the other two options. Sites RAD31a and RAD30 fall within the Radstock Conservation Area.

Notably, the sites within Options R1, R2 and R3 which are constrained by designated heritage assets are also within Option R4.

Overall, it is considered that all options have the potential to lead to significant adverse effects on the historic environment. Option R4 is considered most likely to lead to significant adverse effects as it delivers the highest level of growth over the widest area. This is followed by Option R1 and then Options R2. Option R3 is considered the least constrained. It is noted that the impact of development on the historic environment across all four options is highly dependent on the design and layout of development, which is not known at this stage.

Biodiversity

As noted above, Radstock has been described as one of England's best preserved coal mining towns, and this is seen in some of the designated sites for biodiversity.

Option R3 is considered the most constrained from a biodiversity perspective. Sites RAD31a, RAD31b and RAD31c are adjacent to nationally designated Kilmersdon Road Quarry SSSI. In addition, Huish Colliery Quarry SSSI is approximately 350m east of site RAD30. Whilst all of the options overlap IRZs for SSSIs; only sites RAD31a, RAD31b and RAD31c cover IRZs that impact the types of development likely to come forward (i.e. residential or rural residential development). Site RAD35 is adjacent to an area of ancient woodland. Finally, Option R3 almost entirely falls within Network Expansion Zone 2 of the National Habitat Network. This is land connecting existing patches of primary and associated habitats which is less likely to be suitable for creation of the primary habitat.

With regards to Option R2, Writhlington SSSI is approximately 225m north of site RAD24, and Huish Colliery Quarry SSSI is approximately 425m south of site RAD21b. Therefore, there is potential for development to lead to the disturbance of these sites, particularly during construction. However, this will likely be mitigated.

With regards to Option R1, Writhlington SSSI is approximately 200m southeast of site RAD16h. As above, whilst there is potential for development to lead to the disturbance of these sites, this will likely be mitigated. Whilst all of the options contain sites which are adjacent to BAP priority habitats, only sites RAD19b and RAD19c contain BAP priority habitats (deciduous woodland). As this priority habitat only covers a portion of each site, it could be retained as part of development.

All options entirely overlap with a priority area for Countryside Stewardship (CS) measures addressing Lapwing habitat issues.

Overall, whilst it is difficult to conclude on significance of effects without knowing the exact design and layout of new development, it is considered that Options R1 and R2 are likely to perform well in terms of avoiding significant negative effects. Taking a precautionary approach, Options R3 and R4 are worst performing at this stage, reflecting the constraints present at Option R3 and uncertainty regarding mitigation. Due to the proximity of nationally designated sites, significant adverse effects are predicted. Nevertheless, it recognised that strategic scale development, which will be delivered through these options, can correlate with higher planning contributions, which could be spent to mitigate any impacts of higher growth and enhance / protect designated sites and/or areas identified for habitat creation / improvement schemes.

Natural resources

In terms of air quality, as above, it is considered that by focusing additional growth adjacent to the strategic transport corridor (A367), where strategic sustainable transport interventions are being focused, Option R1 performs well. However, it is also noted that high growth (Option R4) is more likely to deliver strategic transport improvements, which could include new bus stops or improved walking and cycling infrastructure. This will have positive implications for air quality if appropriately delivered.

However, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Options R2 and R3 would be best performing, with Option R4 performing least positively overall. It is therefore difficult to rank options in relation to air quality objectives at this stage.

The site options lie adjacent to / near the A367, which is a busy road which could lead to noise pollution to nearby sites, which is particularly relevant to Options R1 and R4. However, this is not considered likely to be significant, and mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. According to data from the provisional ALC, all of the sites that make up each option are underlain by Grade 3 agricultural land, with the exception of part of RAD16h (Option R1) which is underlain by Grade 4 (poorer quality) agricultural land. With regards to the Grade 3 agricultural land, it is not possible to determine whether this is Grade 3a (BMV land) or 3b (poorer quality) land at this stage.

Despite the above, it is considered that as the scale of growth increases, as does the loss of land (whether that be BMV land or not). Therefore, the options are ranked accordingly.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Climate change

All options involve growth at Radstock, which is a relatively sustainable development located in the Somer Valley, with good access to the services and facilities locally.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Despite the above, the high growth option (Option R4) offers greater potential to secure high levels of resource efficiency; to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than through the other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy and sequestration measures. Strategic option (Option R1) also performs well by delivering substantial growth.

In terms of flood risk, Radstock is primarily within Flood Zone 1. However, there are isolated areas at medium-high risk of surface water flooding. These areas are not found within any of the sites that make up the options.

In light of the above, it is difficult to differentiate the options and therefore they are ranked equally. It is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example

through the delivery of sustainable drainage systems in accordance with National Planning Policy and sustainable drainage systems (SuDS) legislation.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in Radstock. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Peasedown St John

The options for assessment are:

- **Option P1** - Growth to the east (Sites PEA09, A367PS1)
- **Option P2** - Growth to the south (Sites PEA10, PEA15)
- **Option P3** - Larger-scale growth to the south (Sites PEA10, PEA15, S2PS30)
- **Option P4** - Growth to the west (Sites PEA11)
- **Option P5** - Larger-scale growth to the west (Sites PEA11, PEA12, PEA13, S2PS29)

Assessment findings:

SA theme		Option P1	Option P2	Option P3	Option P4	Option P5
Health and wellbeing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Economy	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	1	3	=2
Transportation	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	=2	=2	1	3	=2
Landscape	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	5	3	4	1	2
Historic environment	Significant effects?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	=2	=2	=3	=3
Biodiversity	Significant effects?	Uncertain	Uncertain	Yes – negative	Uncertain	Yes – negative

SA theme		Option P1	Option P2	Option P3	Option P4	Option P5
	Rank	2	=1	=3	=1	=3
Natural resources	Significant effects?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	=2	=2	3	1	=2
Climate change	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=
Waste	Significant effects?	No	No	No	No	No
	Rank	=	=	=	=	=

Health and wellbeing

In terms of access to health facilities, there are three GP surgeries in Peasedown St John. All of the options have good access to the GP surgeries, particularly options P1, P2 and P3. Whilst there is a hospital in Peasedown St John (Sulis Hospital Bath), this is a private facility. The nearest hospital with an A&E unit is the Royal United Hospital in Bath.

Whilst it is recognised that significant growth in Peasedown St John could place considerable pressure on existing health facilities, it is noted that where options are looking to deliver strategic growth (Option P1, P2, P3 and P5), this may trigger the need for a new GP surgery to be delivered alongside development.

Options delivering strategic growth (Option P1, P2, P3 and P5) are also likely to support health and wellbeing by delivering improved active travel infrastructure, encouraging active travel uptake and modal shift. As Option P3 is considered likely to deliver the highest level of growth, it is most likely to deliver the greatest strategic sustainable transport improvements (noting the Local Plan objective to avoid the creation of any new roads).

All options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities / areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under the highest growth options, delivering development that is landscape-led and underpin by holistic scale masterplanning that can extend across existing and new communities.

Finally, opportunities also exist to integrate Public Rights of Way (PRoW) and cycle networks, further supporting healthy lifestyles. All of the options are connected to the PRoW network, either via the road network or dedicated PRoWs.

Positive effects are therefore anticipated in terms of improving physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments, and community cohesion.

Overall, it is considered that all options provide a significant opportunity to deliver improvements to support health and wellbeing objectives, providing an opportunity to support active travel uptake, deliver new and improved areas of multi-functional green infrastructure alongside development; and promote access to the countryside. Given all the options are similarly located and would support sustainable, accessible, development, options are ranked in terms of level of growth. The level of

infrastructure delivery is expected to be greatest under the highest growth option (Option P3). Option P4, which is the lowest growth option, is ranked least positively overall as it is less likely to deliver strategic sustainable transport interventions.

Housing

All options have the potential to lead to significant positive effects, delivering new housing to meet local needs and contributing towards sustaining sufficient land supply throughout the plan period.

It is considered that Option P4 is the lowest growth option, followed by Options P1, P2 and P5, which are likely to deliver similar levels of growth, with Option P3 being the highest growth option. It is therefore assumed at this stage that as the level of growth increases, so does the ability to help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups, including affordable housing. A key consideration in this respect is housing needs of older people, i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes.

Higher levels of growth also increase opportunities for accessibility improvements and other community benefits associated with development (including new and improved services and facilities, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

Taking the above into consideration, Option P3 is ranked most favourably as the highest growth option. This is followed by Options P1, P2 and P5, which are ranked equally, and finally Option P4 is ranked last as the lowest growth option.

Communities

Peasedown St John provides some retail and community facilities for local residents. There is a notional centre to the settlement on Bath Road, as evidenced by the location of several village retail amenities, footways and a bus route. Elsewhere, there is a doctor's surgery, post office, preschool / nurseries and one primary school. The towns of Midsomer Norton and Radstock provide the majority of the retail and leisure facilities in the Somer Valley, as well as the secondary schools.

Peasedown St John is popular as a commuter village with access to Bath (7km) and Bristol (20km). Peasedown St John has five bus stops, which are served by the 172, 173, 174 and 522 buses. These provide connections to Bristol, Keynsham, Wells, Paulton, Midsomer Norton, and Bath. All options will likely support local communities, focusing growth in a relatively sustainable location, which is well connected via public transport.

Interventions proposed through the WECA Somer Valley Links will help ensure sustainable access to a broad range of community services and facilities, including leisure, and recreation within neighbouring centres. This includes improvements to bus services and walking and cycling opportunities along the A37, A362 and A367 (which runs through Peasedown St John). Notably, the project aims to deliver bus stop upgrades in ten locations, including in the southwest of Peasedown St John; this will benefit Option P2, P3, P4 and P5 in particular. This is in addition to a new mobility hub in the centre of Peasedown St John, which will make switching between different types of transport easier. Walking, wheeling and cycling routes will also be delivered to the south and southeast of Peasedown St John, connecting it to the countryside and wider Somer Valley.

Whilst all options perform positively in terms of supporting sustainable communities, high growth options present an increased opportunity to deliver essential infrastructure such as education, health services, green infrastructure, allotment space etc. However, it is recognised infrastructure delivery will be dependent on site masterplanning and choices on developer contributions. Nevertheless, it is likely that strategic growth will best support communities and groups, capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places. In this respect, Options P3 performs well.

It is recognised that development south of the bypass (A367) (Options P1, P2 and P3) could feel like a new settlement, rather than an extension of Peasedown St John, due to the severance caused by the bypass. Conversely, development to the southwest (Option P4 and part of P5) would blend into the existing settlement, and residents would benefit from existing transport infrastructure. Development to the west (Option P5) would also likely blend into the existing settlement.

Overall, it is considered that all options will support stronger and more vibrant, cohesive communities, delivering growth in sustainable locations supported by strategic sustainable transport interventions to improve accessibility to neighbouring services and facilities. However, it is considered that as the level of growth increases, so does the likelihood for positive effects of significance. Option P3 would deliver the highest level of growth, maximising opportunities for social engagement and active travel, thereby improving community cohesion and exposure to the natural environment. Furthermore, a likely increased level of supporting infrastructure would better ensure sustainable growth of existing and new communities, providing access to essential services without reliance on the private vehicle. Conversely, Option P4 is least likely to deliver new community infrastructure and its associated benefits.

Economy

Peasedown St John is popular as a commuter village with access to Bath (7km) and Bristol (20km). A lack of available commercial space in the Somer Valley has constrained business and employment growth for some time, with many residents having to commute to surrounding towns and cities for work. B&NES Council's Economic Strategy Review recognises this issue, and the 'urgent need' to encourage new employment land use in this area.

The Somer Valley Enterprise Zone (SVEZ) was established in April 2017 to support existing local businesses and to attract new business 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. The SVEZ site is located at Old Mills, a greenfield area extending to 13.5ha on the north-western edge of Midsomer Norton. Due to this, no employment uses are proposed for Peasedown St John. Nevertheless, all options perform positively in relation to the economy SA theme, as they will support development that enables access to economic opportunities at the SVEZ and further afield.

It is recognised that development across the bypass (A367) (Options P1, P2 and P3) could cause severance issues. However, there is a well-defined commercial area (Bath Business Park) in this location. which Options P1, P2 and P3 would be well connected to and could increase employment opportunities here.

In light of the above, significant long-term positive effects are anticipated under all options, which are ranked according to the quantum of growth they deliver. All options are sustainably located to capitalise upon accessible employment in the SVEZ, Bath and Bristol, with potential to deliver infrastructure improvements and support a range of housing to meet demographic imbalances.

Transportation

The Somer Valley has a high proportion of residents travelling between 10-20km (25%) compared to B&NES (13.8%), the South West (11.7%) or GB (12.3%), representing a significant proportion of residents travelling to Bath and Bristol. Most of the journeys to work are made by car (highest Paulton 60.2%, lowest Peasedown St John 51.4%), which is significantly higher than for B&NES (+20.7% for Paulton and +12.0% for Peasedown St John).

Whilst Peasedown St John is within a rural setting, it is relatively well connected by public transport. Peasedown St John is popular as a commuter village with access to Bath (7km) and Bristol (20km). Peasedown St John has five bus stops, which are served by the 172, 173, 174 and 522 buses. These provide connections to Bristol, Keynsham, Wells, Paulton, Midsomer Norton, and Bath. All options will likely support local communities, focusing growth in a relatively sustainable location, which is well connected via public transport. Notably, Peasedown St John is the only area in the Somer Valley that falls above (5.2%) the B&NES bus use average (3.6%).

There is a network of PRoWs and cycleways around the area, connecting to neighbouring centres. Most notably, the area to the south of Peasedown St John has several PRoWs leading out into the countryside.

It is recognised that development south of the bypass (A367) (Options P1, P2 and P3) could cause severance issues. The scale of any development south of the bypass would essentially create a new bypass.

In response to the above, sustainable transport improvements are ongoing through the WECA Somer Valley Links. This includes improvements to bus services and walking and cycling opportunities along the A37, A362 and A367 (which runs through Peasedown St John). Notably, the project aims to deliver bus stop upgrades in ten locations, including in the southwest of Peasedown St John; this will benefit Option P2, P3, P4 and P5 in particular. This is in addition to a new mobility hub in the centre of Peasedown St John, which will make switching between different types of transport easier. Walking, wheeling and cycling routes will also be delivered to the south and southeast of Peasedown St John, connecting it to the countryside and wider Somer Valley.

In conclusion, whilst there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth at Peasedown St John under all five options is considered, at this stage, likely to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A367 and throughout the village, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth along the A367 (under all options) to provide greater critical mass to enable more significant infrastructure improvements, supplementing the WECA SVL. Ultimately, the high growth option (Option P3) has the greatest potential to provide increased critical mass to enable more significant infrastructure improvements, supplementing the WECA SVL. Due to

this, the options are ranked according to the quantum of growth they deliver. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Landscape

Peasedown St John development expands mainly south of the Bath Road up to the Green Belt boundary. There is little structure to the townscape in the north, beyond areas fronting Bath Road / Ashgrove. In the far south, below the A367, a well-defined commercial area exists (Bath Business Park), which is accessed via the Wellow Lane roundabout.

Option P1 is approximately 1.7km west of the Cotswolds National Landscape (previously referred to as Area of Outstanding Natural Beauty (AONB)). Therefore, this option has the potential to impact the setting and significance of the AONB, especially as Peasedown St John (including parts of Option P1) sits at a high elevation. In addition, Option P1 is entirely within the B&NES Green Belt, and therefore development in this location would result in the loss of Green Belt land.

The eastern parts of Options P2 and P3 also fall within the Green Belt, and therefore development in these locations would result in the loss of Green Belt land. Notably, Option P3 would lead to the coalescence of Peasedown St John and Shoscombe, which would significantly alter settlement pattern and identity.

Similarly, Option P5 would lead to the coalescence of Peasedown St John and Carlingcott, which would also significantly alter settlement pattern and identity.

The West of England Landscape Sensitivity Assessment (2015) only covers the western part of Peasedown St John. The assessment concludes that the majority of the land surrounding the existing settlement boundary in this location (Options P2, P3 and P5) has a high landscape sensitivity. The exception to this is the land covered by site PEA11 (Option P4 and part of Option P5), which has a medium landscape sensitivity. It is described as visually contained area of three fields adjacent to a tree-lined main road and with a backdrop of woodland.

Alongside the potential for negative effects, it is recognised that there is there is also the opportunity for growth to deliver landscape enhancements; maximising opportunities to improve green infrastructure and ecological connectivity, and to secure and/or improve public open space and recreation provision through planning gain. Opportunities to deliver positive effects in this respect are considered to increase as the level of growth increases, but likely to be minor overall when considered in the context of greenfield development. It is recognised that the nature and significance of effects will ultimately be dependent on the exact location, design and layout of development, and the implementation of mitigation measures.

Taking the above into consideration, it is concluded that all options have the potential to significantly affect the landscape with the potential for significant adverse effects. However, Option P1 is ranked least favourably as it delivers growth in the most sensitive area, within the Green Belt and near a National Landscape. This is followed by Options P2 and P3 which partially fall within the Green Belt. Option P3 is ranked less favourably than Option P2 as it would lead to the coalescence of Peasedown St John and Shoscombe. Options P4 and P5 are considered the least sensitive from a landscape perspective, with Option P4 ranked most favourably as it covers the only parcel of land with a medium landscape sensitivity and will not lead to the coalescence of any settlements. It is noted that the impact of development on

the local landscape across all four options is highly dependent on the design and layout of development, which is not known at this stage.

Historic environment

All of the options are constrained by designated heritage assets to varying degrees; however, Option P5 could be considered the most constrained. Site PEA11 is approximately 50m northeast of scheduled monument 'Camerton Romano-British town and associated Prehistoric and early medieval monuments'. Site S2PS29 also falls within the setting of this scheduled monument. In addition, site S2PS29 is within 1km of 20 listed buildings, including one grade I listed building (Church of St Peter), which is approximately 225m west of the site. Site PEA11 is also in proximity to several listed buildings; however, it is only considered to be within the setting of three grade II listed buildings. One is located approximately 350m west of the site, and the other two are located approximately 225m east of the site.

Due to the above, Option P4 (which covers site PEA11) is also considered one of the most constrained options.

Option P3 is slightly less constrained than the above options; however, it is still considered relatively constrained. Sites PEA10 and S2PS30 fall within the setting of scheduled monument 'Camerton Romano-British town and associated Prehistoric and early medieval monuments'. In addition, site PEA15 is approximately 275m northwest of a grade II listed building in Shoscombe. The largest of the three sites within this option, site S2PS30, is adjacent to grade II listed building 'Shoscombe Farmhouse' and approximately 75m from another grade II listed building, also in Shoscombe. It also has the potential to impact the setting of a cluster of six listed buildings in and around Foxcote to the southeast. This includes grade II* listed building 'Church of St James The Less', which is approximately 800m from the site.

Due to the above, Option P2 (which covers sites PEA10 and PEA15) is also considered a relatively constrained option.

Whilst Option P1 is considered the least constrained of all the options, it is still in proximity to several designated heritage assets. Site A367PS1 is approximately 175m west of a grade II listed building in Double Hill. It also has the potential to impact the setting of a cluster of four grade II listed buildings in White Ox Mead to the northeast of the site. Moreover, site A367PS1 is approximately 1.1km west of scheduled monument 'Roman villa at Upper Hayes'.

Overall, it is considered that all options have the potential to lead to significant adverse effects on the historic environment. Options P4 and P5 is considered most likely to lead to significant adverse effects as it is very near a large scheduled monument and several listed buildings. This is followed by Options P2 and P3 and then Option P1, which is considered the least constrained. It is noted that the impact of development on the historic environment across all four options is highly dependent on the design and layout of development, which is not known at this stage.

Biodiversity

Option P3 is considered the most constrained from a biodiversity perspective, as it is in closest proximity to a nationally designated site for biodiversity. Specifically, site S2PS30 is approximately 675m north of Writhlington SSSI. It also contains a relatively large area of woodpasture and parkland and smaller areas of deciduous

woodland and good quality semi-improved grassland (BAP priority habitats). A small part of site S2PS30 falls within the Network Expansion Zone of the National Habitat Network. This is land beyond the Network Enhancement Zones with potential for expanding, linking / joining networks across the landscape.

Option P5 is considered the second most constrained option. Site S2PS29 is approximately 700m southeast of Camerton Batch Heritage Site LNR. It also contains three areas of deciduous woodland and a relatively large area of woodpasture and parkland (BAP priority habitats). In addition, there is a large area of deciduous / ancient woodland sandwiched between sites S2PS29 and PEA11. Site PEA12 is covered entirely be deciduous woodland.

This is followed by Option P1, which falls entirely within the Network Expansion Zone of the National Habitat Network. This is land beyond the Network Enhancement Zones with potential for expanding, linking / joining networks across the landscape.

Options P2 and P4 are considered the least constrained, although it is recognised that they still have the potential to impact biodiversity locally.

Whilst all of the options overlap IRZs for SSSIs; none of these concern the types of development likely to come forward (i.e. residential or rural residential development).

All options entirely overlap with a priority area for Countryside Stewardship (CS) measures addressing Lapwing habitat issues.

Overall, whilst it is difficult to conclude on significance of effects without knowing the exact design and layout of new development, it is considered that Option P3, followed by Option P5, are the most likely to lead to significant adverse effects on biodiversity. Nevertheless, it recognised that strategic scale development, which will be delivered through these options, can correlate with higher planning contributions, which could be spent to mitigate any impacts of higher growth and enhance / protect designated sites and/or areas identified for habitat creation / improvement schemes. Options P2 and P4 are considered to perform most favourably.

Natural resources

In terms of air quality, as above, it is considered that by focusing additional growth adjacent to the strategic transport corridor (A367), where strategic sustainable transport interventions are being focused, Options P1, P2, P3 and P4 performs well. However, it is also noted that high growth (Option P3) is more likely to deliver strategic transport improvements, which could include new bus stops or improved walking and cycling infrastructure. This will have positive implications for air quality if appropriately delivered.

However, it can also be assumed that the level of air pollution generated from specific site allocations will correspond to the scale of development, as it can broadly be assumed that there are likely to be more private cars on the road under the highest growth options. Under this assumption, Option P4 would be best performing, with Option P3 performing least positively overall. It is therefore difficult to rank options in relation to air quality objectives at this stage.

Options P1, P2, P3 and P4 lie adjacent to / near the A367, which is a busy road which could lead to noise pollution to nearby sites. However, this is not considered likely to be significant, and mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. According to data from the provisional ALC, almost all of the sites that make up each option are underlain by Grade 3 agricultural land, with the exception of sites S2PS30 (Option P3) and PEA10 (Options P2 and P3), which are also partially underlain by Grade 4 (poorer quality) agricultural land. With regards to the Grade 3 agricultural land, it is not possible to determine whether this is Grade 3a (BMV land) or 3b (poorer quality) land at this stage.

Despite the above, it is considered that as the scale of growth increases, as does the loss of land (whether that be BMV land or not). Therefore, the options are ranked accordingly. Nevertheless, uncertainty is noted with regard to whether the Grade 3 agricultural land is Grade 3a (BMV land) or 3b (poorer quality).

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Climate change

All options involve growth at Peasedown St John, which is a relatively sustainable development located in the Somer Valley, with good access to services and facilities locally.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Despite the above, the high growth option (Option P3) offers greater potential to secure high levels of resource efficiency; to plan for sequestration and for development-wide solutions to energy provision. As such, though the climate impact is greater than through the other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy and sequestration measures. Strategic options (Options P1, P2 and P5) also performs well by delivering substantial growth.

In terms of flood risk, Peasedown St John is entirely within Flood Zone 1. However, there are isolated areas at medium-high risk of surface water flooding. However, these areas are confined to small channels and are not considered likely to significantly affect development at any of the options.

In light of the above, it is difficult to differentiate the options and therefore they are ranked equally. It is assumed that susceptible development proposed under all options would be directed to areas of lower flood risk as per the requirements of sequential testing. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example

through the delivery of sustainable drainage systems in accordance with National Planning Policy and sustainable drainage systems (SuDS) legislation.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in nearby Radstock. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Farrington Gurney

The options for assessment are:

- **Option FG1** - Growth to the north-east (Sites A37PS14, A37PS15 (in part))
- **Option FG2** - Growth to the north-west (Site A37PS12)
- **Option FG3** - Growth to the south (Sites FAR16, A37PS13, A37PS15 (in part))
- **Option FG 4** - Max growth (Options 1 – 3 combined)

Assessment findings:

SA theme		Option FG1	Option FG2	Option FG3	Option FG4
Health and wellbeing	Significant effects?	No	No	No	Yes – positive
	Rank	=2	=2	3	1
Housing	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	1
Communities	Significant effects?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	=2	=2	=2	1
Economy	Significant effects?	No	No	No	Yes – positive
	Rank	2	4	3	1
Transportation	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	4	3	2	1
Landscape	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	3	2	1	4
Historic environment	Significant effects?	Yes - negative	No	No	Yes - negative

	Rank	**3**	**2**	**1**	**4**
Biodiversity	**Significant effects?**	**Uncertain**	**Uncertain**	**Uncertain**	**Uncertain**
	Rank	**2**	**3**	**4**	**1**
Natural resources	**Significant effects?**	**Yes - negative**	**Yes - negative**	**Yes - negative**	**Yes - negative**
	Rank	**2**	**3**	**1**	**4**
Climate change	**Significant effects?**	**No**	**No**	**No**	**Uncertain**
	Rank	**2**	**1**	**3**	**4**
Waste	**Significant effects?**	**No**	**No**	**No**	**No**
	Rank	**=**	**=**	**=**	**=**

Health and wellbeing

In terms of access to health facilities, the nearest GP surgery to Farrington Gurney is Paulton Pharmacy, 1.6 miles from the village, in Bristol; or Midsomer Pharmacy 2.3 miles away in Midsomer Norton. There is a hospital 1.6 miles away in Paulton, however this does not provide full services (such as an A&E department). The nearest hospital with an A&E department is the Royal United Hospital in Bath, 8.8 miles from Farrington Gurney.

When considering options for growth in Farrington Gurney, it is considered that the max growth option (Option FG4) would perform more positively than all other options as a result of the potential to deliver significant new infrastructure (such as health facilities). However, all other options are also considered to be of a size to deliver a level of health infrastructure, recognising that recent housing growth in the area has been delivered on a piecemeal basis without supporting infrastructure to meet local needs. All options therefore have the potential to contribute towards addressing existing health accessibility issues, in addition to ensuring no further pressure is placed on the capacity of those health services in nearby settlements.

Strategic development will also contribute positively towards addressing wider accessibility issues in the area, notably capitalising upon the Somer Valley links project. Relevant interventions proposed through the project include bus stop, lane and junction upgrades, improved cycle and walking routes between Farrington Gurney and Harletrow and Cluton to the west, and Midsomer Norton to the east, and a new transport hub at Farrington Gurney. Interventions proposed extend throughout the Somer Valley, and will improve accessibility between settlements and support active travel uptake.

While all options would benefit from the Somer Valley links project, large growth option FG4 is favoured as would likely better facilitate strategic interventions, with a focus on opportunities to improve sustainable transport connections (noting the Local Plan objective to avoid the creation of any new roads). However it is recognised that all options are strategic in scale, and have the potential to utilise new

and updated routes and facilities, leading to positive effects for health and wellbeing objectives.

Furthermore, being strategic in nature, all options have the potential to increase opportunities for healthy living by protecting and enhancing provision of multi-functional green infrastructure, public open space, and recreational facilities/ areas. It is likely that, as above, strategic opportunities for a network of green infrastructure will be greatest under highest growth option FG4, delivering development that is landscape-led and underpin by holistic scale masterplanning that can extend across existing and new communities.

Opportunities also exist to integrate Public Rights of Way (PRoW) and cycle networks; further supporting healthy lifestyles. The majority of sites within options are connected to the PRoW network, with the exception of sites A37PS15 (Option FG1 and FG4) and A37PS13 (eastern parcel), which would need to connect through neighbouring sites. The PRoW network east and west of the A37 is well connected to neighbouring villages; and capitalising on these connections is a key objective of the Somer Valleys project. This will support active travel uptake in the long term, with all options performing well.

Finally it is worth noting that adjacent to Option FG1 and FG2 is 'The Recreational Ground' designated Local Green Space, designated as a safeguarded sport and recreation facility. Residents within Option FG1, FG2 and FG4 will benefit from access to this facility, further supporting active, healthy lifestyles.

Overall, it is considered that all options have the potential to lead to positive effects against health and wellbeing objectives. All options are connected to the existing settlement, and have significant opportunity to support accessibility and improve green links throughout residential areas, providing a high-quality public realm and direct access to the countryside. Large growth option FG4 is preferred, reflective of the holistic infrastructure opportunities that accompany development of this scale; and how these opportunities could benefit a relatively sustainable village such as Farrington Gurney. It is difficult to differentiate Options FG1 – 3 at this stage, given all propose a similar level of growth in similarly sustainable locations, with good access to facilities in the village, the countryside, and the PRoW network. For the purposes of ranking the options, Option FG1 and FG2 are ranked higher than Option FG3 given the adjacent recreational ground, and that direct access to this facility will likely support healthy lifestyles.

Housing

All options have the potential to lead to significant positive effects against housing objectives, delivering new homes to meet local needs, and contributing towards sustaining sufficient land supply throughout the plan period.

It is recognised that recent housing growth within Farrington Gurney has been delivered on a piecemeal basis, without the necessary supporting infrastructure keeping pace. It is therefore considered that there are opportunities for a good size residential and landscape-led development within the area; of which all options could deliver. Strategic growth would help significantly boost the supply of housing, delivering a greater mix of housing types and tenure to cater for all population groups; including affordable housing.

A key objective for Farrington Gurney is the delivery of a greater proportion of family housing, and all options are considered to be beneficial in terms of contributing towards market and affordable housing delivery. Of the options, there is clearly merit for high growth option FG4, as it is considered that as the scale of growth increases so does the potential to deliver an increased mix of homes including affordable housing; to increase the working age population. Furthermore, there is a greater opportunity for development to be landscape led and holistic in nature, delivering strategic green links and high quality housing. This is also likely to be supported by an increased level of infrastructure ((including new and improved service and facility provision, extended green infrastructure, transport and infrastructure upgrades, new open spaces, and an improved public realm).

Taking the above into consideration, Option FG4 performs most positively, with Options FG1-3 ranked equally at this stage, recognising that all options will deliver a similar level of growth in reasonably sustainable locations around the existing settlement.

Communities

Farrington Gurney forms part of the Somer Valley area, which focuses on the six closely connected settlements of Midsomer Norton, Radstock, Westfield, Peasedown, Paulton and Farrington Gurney.

The Somer Valley has a rich mining and industrial heritage and a locally distinctive character. It is important that the character of each settlement is respected, and therefore all options, being relatively strategic in size, has the potential to extend the settlement and change the overall settlement pattern - which is historic in nature, and valued by the community. Option FG4 as a max growth option would significantly alter the size of the settlement, which could adversely impact upon settlement identity with the potential for negative effects.

However, it is recognised that recent housing growth in the area has been delivered on a piecemeal basis, without the necessary supporting infrastructure keeping pace. As such, strategic growth presents an opportunity to deliver essential infrastructure alongside housing; to address local needs. While the village already supports a variety of facilities including a school, pub, restaurant and a community facility; an example of services at capacity is the existing primary school, alongside limited local health facilities (discussed above), which strategic growth under any option could help deliver.

Options further benefit from their central location, surrounding the existing village to the east west and south. As such, existing residents will be able to benefit from any facilities/ infrastructure provided alongside housing, and will ensure integration between new and existing residents; supporting community cohesion and inclusion for all.

Consideration is also given to the accessibility of the village, and how strategic growth around the village would be able to capitalise upon the sustainable transport links along the A37/ A362 / A367. While traffic is currently a key issue along these roads (see ‘transportation’ discussion below), options will benefit from the Somer Valley links project and proposed interventions. As discussed above, interventions include improving the bus network (routes, stops, and crossing improvements), specifically at Farrington Gurney to better connect with neighbouring settlements and

support a modal shift. Similar interventions are also proposed for the active travel network, and should encourage healthier, better connected communities in the long-term. These improvements present an opportunity for strategic growth to buy into, supporting safe active travel routes along the key road corridors.

It is also considered that a new mobility hub could come forward on the A37, and strategic growth would strengthen the case for this, while capitalising upon accessibility benefits that will be delivered through this scheme in the medium to long term.

Green infrastructure provision is limited in the village, and a strategic scale scheme provides an opportunity to deliver high quality green spaces, including parks, open spaces, greenways, etc.; and linkages between them, to support healthy communities. The PRoW network could further be utilised through strategic masterplanning to improve connectivity with the countryside and surrounding settlements. A key opportunity in this respect is site A37PS13 (Option FG3 and FG4), where a PRoW extends east to west connecting into a network of PRoWs; providing a link to the Chewton Woods and Hollow Marsh Meadows Nature Reserve to the west. Option FG2 (and FG4) also has good access the countryside via several PRoWs.

Overall, it is considered that under all options, the location of development is central to the existing village thereby existing residents will be able to benefit from any facilities/ infrastructure provided alongside housing. This will support integration between new and existing residents; increasing footfall in the village, improving community cohesion, and maximising inclusion for all. All options would support a stronger and more vibrant community, delivering new homes supported by necessary infrastructure to meet local needs, and support the sustainable growth of the village.

All options will also capitalise upon strategic sustainable transport interventions being delivered through the Somer Valleys project, alongside likely delivering a level of transport infrastructure to meet the needs of new homes; which together will improve accessibility within the village and with neighbouring services and facilities.

Option FG4 clearly presents an opportunity to deliver strategic growth at a much larger scale than other options, which could unlock further infrastructure such as a mobility hub and/or other transport interventions. This will best support communities and specialist groups; capitalising upon links between settlements and utilising new / upgraded infrastructure to strengthen local places. Therefore, positive effects are most significant under this option. However as discussed above, strategic growth of this scale could undermine the identity of the community, significantly changing the settlement pattern which is of value to residents. Nonetheless, Option FG4 performs most positively overall, and it is considered that any development would be appropriately designed and masterplanned to maximise green infrastructure and accessibility.

It is difficult to differentiate Options FG1 – 3 at this stage, given all propose a similar level of growth in similarly sustainable locations, with good access to facilities in the village, the countryside and the PRoW network.

Economy

Out-commuting from the area to work is relatively high and has increased in recent decades due to economic restructuring within the area. Farrington Gurney, and the

wider Somer Valley, is connected to Bath and Bristol by two major transport corridors (A367 and A37) and is relatively well served by public transport, although not as accessible to both cities as settlements in the Bath to Bristol corridor discussed above. Nonetheless all options perform positively in relation to the economy SA theme, as all will support development that enables access to these economic opportunities.

Furthermore, it is recognised that investment is being made to improve public transport through the Somer Valley links project, which will better connect settlements within the Somer Valley, alongside provide improved sustainable travel to Bristol and Bath. Economies of scale achieved through Option FG4 notably could include further improvements/ upgrades to the local transport network, maximising accessibility for the high proportion of commuters present. Options FG1-3 could also deliver transport improvements, recognising that growth proposed would be of strategic scale, however this is unlikely to be as significant as opportunities presented through Option FG4.

In terms of the local employment offer, Farrington Gurney is not an established employment location, with the exception of industrial land at Farrington Fields. However it will be important for growth in the area to support new and improved employment opportunities, including capitalising upon the Somer Valley Enterprise Zone. The planned enhancements across the transport corridor (A37 and A362) will support improved access to employment, and facilitate investment in the Enterprise Zone, located to the east of Farrington Gurney. There is an opportunity for strategic growth in Farrington Gurney to be mixed use in nature, balancing jobs and homes through delivering a level of employment provision. This would support the sustainable development of the village as a recognised employment location, reducing levels of out-commuting and increasing modal shift. Opportunities in this respect are greatest under Option FG4 given the significant level of growth proposed under this option.

While Option FG4 is best performing with the potential for significant positive effects, Options FG1 – 3 also perform well overall, being of a scale to potentially deliver a level of employment to support housing growth. More broadly, these options will deliver a strategic level of growth which will support sustainable economic growth of the village, increasing footfall in the village, growing the local market and high street offer. Options will also capitalise upon sustainable access to employment within Farrington Gurney and at the Enterprise Zone, recognising that this is a focus of investment. Furthermore, options will benefit from improved access to neighbouring centres for employment, as well as utilising the transport corridor for access to Bristol and Bath (recognising that sustainable access to these larger cities will be improved in the longer-term).

In terms of ranking Options FG1 – FG3, while options are of similar size and all relatively sustainably located, Options FG1 and FG3 rank better than Option FG2, as these options are located extremely close to the Somer Valley Enterprise Zone (to the east on the edge of Midsomer Norton). Option FG1 would also deliver new housing to the east and west of Farrington Fields industrial estate, leading to increased access to local employment. Option FG1 therefore performs second most positively after FG4, followed by Option FG3; reflecting increased opportunity to support higher levels of self-containment, reduced reliance on the private vehicle, and growth of the local economy.

Transportation

Farrington Gurney sits on the junction of the A37 and A362 with good access to surrounding villages, towns and cities. For a small village, the area has good transport links, connecting to Bath and Bristol by two major transport corridors, and is relatively well served by public transport; including bus services along the A37 linking Bristol, Wells, Midsomer Norton and Bath.

Despite this, further significant investment is needed to improve public transport across the Somer Valley, recognising that car dependence is high, and congestion is a key issue along the A37. Transport connections between Midsomer Norton and Farrington Gurney is specifically identified in the options document as a key issue, and any new development will therefore need to consider impact on the existing highways network.

In this respect, it is recognised that sustainable transport improvement measures are committed to be delivered as part of the Somer Valley Links Project, extending along the A37/ A362/A367. Improvements proposed include bus stop and service upgrades, new bus lanes and junction upgrades, active travel network investment, and new mobility hubs throughout the wider area.

It is considered that opportunities for larger scale growth through the east of the A37 (Option FG2 and FG4) could capitalise upon a new bus route along the A362 connecting with existing services in the A37 corridor, via a new Mobility Hub located at the junction of the A362/ A37. This has the potential to improve future levels of connectivity, and reduce reliance on the private vehicle. Option FG2 and FG4 would also benefit from PRoW parallel to the A37 and A362. This would provide increased connectivity for active modes, and increased connectivity to key destinations for everyday needs such as retail, education, etc., further supporting modal shift.

Option FG3 also performs positively through extending the village south of the A362. This could support improved accessibility to Midsomer Norton to the east via the A37, although this may exacerbate local congestion without intervention/ road upgrades. In this respect, the option could capitalise upon the forthcoming mobility hub on the A37 (if delivered), improving service frequency along the A37 corridor, and delivering bus priority measures as part of the Somer Valley Links Project.

Option FG1 also benefits from existing and proposed services along the A37, with similar potential adverse effects for congestion at peak time. However assuming interventions proposed are to be delivered, new housing that is sustainably located and supported by active travel opportunities, could work to increase modal shift.

There will clearly be opportunity for strategic development at all sites to improve permeability throughout the village, with focus placed on road upgrades and improving the existing pedestrian and cycle routes. Opportunities have been identified to improve walking and cycling connections between Midsomer Norton and Farrington Gurney, for example supporting sustainable access to the Enterprise Zone.

In conclusion, while there are opportunities to deliver sustainable transport infrastructure to support a modal shift; strategic growth at Farrington Gurney is considered, at this stage, to lead to significant negative effects on transport objectives. This reflects the existing significant capacity issues along the A37/ A362 and throughout the village, and high reliance on the private vehicle for travel.

There is clearly an opportunity for strategic growth (under all options) around the A37/ A362 corridor to provide greater critical mass to enable more significant

infrastructure improvements, supplementing the Somer Valleys Project. Option FG4 is likely to be best performing in this respect, as a max growth option. However, mitigation and interventions to be delivered are currently unknown, and will be considered at a later stage of SA.

Landscape

The Somer Valley has a rich mining and industrial heritage and a locally distinctive character. Farrington Gurney is surrounded by rolling, relatively flat countryside, while the gentle escarpment to the south creates a boundary for any proposed development. South of the A362 (Option FG3 and FG4) is considered more sensitive from a landscape perspective than the north (Option FG1, FG2 and FG4), being much more sloping in nature when compared to the north.

Option FG3 (FAR16, A37PS13 and A37PS15) sits at the foot of Rush Hill ridgeline, and although steep to the south, the sites are relatively flat with open views. Development at this location would extend the settlement boundary to the south of the A362, changing the linear form of the existing settlement, impacting views and setting of existing residential development along the A362. There are areas of dense hedgerows within the sites which could be utilised to reduce the significance of any effects, and Rush Hill to the south would help to enclose any new development.

Option FG2 (site A3PS12 east and west of the A37), would extend the settlement boundary to the northwest away from the core of village and into the open arable landscape, likely impacting on landscape character, setting and views. This would change the settlement pattern, leading to the loss of the intermittent ribbon development seen along the A37 north to south. However, development along and to the east and west of the A37 would maintain a direct link with the core of the village.

Option FG1 (site A27PS14 and A37PS15) would extend the settlement boundary to the east, along the A362 and away from the village core into the open landscape. Site A37PS15 would enclose Farrington Fields industrial estate and residential development further along the A362, adversely impacting upon setting, character and views. Furthermore, development of Option FG1 would reduce the green gap between Farrington Gurney and Midsomer Norton, with the potential for coalescence of these settlements in the longer term. While there may be opportunities for masterplanning to include a green buffer, alongside planting to reduce the significance of effects; development of the option would alter the landscape character in this location. This could lead to the loss of settlement identity in the longer term if not appropriately designed and masterplanned, with the potential for significant adverse effects.

Overall, it is concluded that all options could lead to a change in the landscape with the potential for significant adverse effects. In terms of ranking the options, high growth Option FG4 is worst performing due to the cumulative effects of all options, and significant loss of open greenfield land.

Option FG1 is the next worst performing option, reflecting the potential coalescence between Farrington Gurney and Midsomer Norton, loss of open greenfield parcels north of the A362, and the impact on existing development along the A362 (i.e. at Old Mills Lane). Option FG3 is least constrained, extending development north along the A37 where the landscape is less sensitive; although the option would significantly change the size of the settlement, encompassing the ribbon development seen along the A37. Option FG2 focuses growth south of the A362

which is more sensitive from a landscape perspective, although the sites are noted as being less sensitive in isolation.

Historic environment

As set out above, the Somer Valley has a rich mining and industrial heritage and a locally distinctive character. Farrington Gurney specifically is constrained by designated heritage assets, notably the Grade II St John's Church is a key asset for the village.

Option FG1 (site A37PS14) surrounds St John's Church, and would significantly change the setting of the asset, recognising that the isolated nature of the Church to the east of the village contributes significantly to its intrinsic qualities and provides a distinctive setting.

Option FG2 (site A37PS12 west of A37) is also constrained by St John's Church, although not immediately adjacent, the site falls within the setting and would likely impact upon views towards the asset from the village. Site A37PS12 west of the A37 is also constrained by Grade II Listed Buildings along Church Lane, while site A37PS12 east of the A37 is in close proximity to Grade II Listed Buildings along Bristol Road and Pitway Lane. Consideration is also given to the setting of Grade II* building 'The Old Parsonage' just off Main Street. These buildings are already located within the built settlement, and therefore any effects are unlikely to be significant if development is sensitively designed and masterplanned. Residential development should seek to preserve the setting of the listed structures in any future proposals.

Option FG3 is the least constrained of the options, with no listed structures close to the sites forming the option, although there may be views towards or from listed structures, particularly Grade II* and Grade II Listed Buildings north off Main Street.

Overall, it is considered that a max growth option is worst performing, as may result in increased pressure to locate growth in areas which could negatively impact on the intrinsic qualities and/ or setting of assets; recognising that a number of the sites within options are constrained by Grade II Listed St John's Church. Furthermore, a max growth option could see an increase in the density of development, encroaching upon historic landscapes and/or changing character. As such, Option FG4 is worst performing of the options with the potential to lead to significant negative effects.

Option FG1 is the next worst performing option, and also has the potential to lead to significant negative effects; particularly relating to Grade II Listed St John's Church. Option FG2 is also identified as having the potential to lead to adverse effects on nearby assets, however is further from the assets and therefore less constrained in this respect. Option FG3 is best performing as is least constrained of the options in terms of designated heritage assets.

While adverse effects are identified at this stage, it is recognised that development under any option could be supported by the use of high-quality and sensitive design, to help mitigate adverse effects on the historic environment to some degree. The NPPF (2023) notably advises that historic environment strategies should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Biodiversity

Farrington Gurney is not constrained by internationally or nationally designated biodiversity sites, the nearest being Long Dole Wood and Meadow SSSI, 1.5km west of the village. There is however Ancient Woodland present, notably Rush Hill Wood is located adjacent (to the south) of Option FG3 (site A37PS13), and Easton Wood is located to the west of Option FG2 (site A37PS12). While this is a constraint to development, the proximity of the sites to Ancient Woodland also presents opportunities to develop the Strategic Nature Recovery Network, for example through planting, etc. to improve green linkages.

This reflects the inclusion of options (entirety of Option FG3, majority of site A37PS14 within Option FG1, and eastern half of site A37PS12 within Option FG2) within LPPU Policy NE1 'Green Infrastructure', forming part of the district wide green infrastructure network identified through the LPPU. Green infrastructure is a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities. While this is a constraint to development in this location, large scale growth proposed through all options also provides an opportunity to increase the potential of sites as a green infrastructure resource for the wider area; maximising ecological value and BNG. Max growth option FG4 is likely to perform most positively in this respect through delivering coordinated, strategic scale development underpin by green infrastructure and connectivity. Green infrastructure is a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities.

In terms of locally designated sites, Marsh Lane Coal Tip Sit of Important Nature Conservation (SNIC) falls within Option FG3 (site A37PS13), and Hollow Marsh Meadows Local Nature Reserve (LNR) is to the west of Option FG2 (site A37PS12). Option FG3 (FAR16 and A37PS13) is also constrained by mature hedgerows and trees which enclose and cross the sites, forming a vegetated network which extends into the wider countryside. While a constraint to development, it is recognised that there is an opportunity for development to capitalise upon green links throughout residential areas. This can enhance local biodiversity and provide a high-quality public realm and direct access to the countryside.

Overall, it is considered that effects are uncertain in relation to biodiversity for all options, as effects are dependent on the design and layout of development. In terms of ranking the options, Option FG3 is ranked least favourable due to being constrained by a SNIC within the site, and Rush Hill Ancient Woodland adjacent to the site, however as set out above this does also present an opportunity to support connectivity and nature recovery. Option FG2 also performs less well as is also constrained by local designations and Ancient Woodland. Option FG4 is best performing as presents a significant opportunity to deliver strategic scale connectivity for biodiversity.

Natural resources

There is an AQMA within Farrington Gurney at the junction of the A37 and A362, designated for levels of Nitrogen Dioxide exceeding the national annual average of 40 micrograms per cubic metre (µg/m3). While it is recognised that the area is expected to become compliant in 2023, an increase in development to the village may impact on air quality and any new development many need to deliver financial contributions to manage air quality. While option FG3 does focus growth adjacent to the AQMA, this option connects well to the village core and provides sustainable access to the services and facilities in the village. As such, focussing growth adjacent to the AQMA may better meet air quality objectives than other options

looking to direct strategic growth further north of the village (Option FG2) which is less well connected to the village centre and may increase private car use in the AQMA. Option FG1 benefits from being close to the village centre and the AQMA to the west, however extends further east along the A362 which is likely to increase congestion in the village and adversely impact air quality.

Max growth option FG4 has the potential to lead to negative effects of greatest significance through delivering extremely high growth in close proximity to the AQMA. However, the scale of growth will allow for strategic interventions, which as well as sustainable transport upgrades, could include road improvements, for example a new junction could provide suitable mitigation to address any potential congestion increases.

The site options lie adjacent to the A37 and A362 which are heavily used roads and could have significant issues of noise and disturbance to development. It is considered that all options have the potential to lead to negative effects in this respect, however mitigation could reduce the significance; for example through sensitive masterplanning and design.

The key considerations in terms of supporting the efficient use of land in the district is the need to avoid unnecessary loss of the highest quality 'Best and Most Versatile' (BMV) agricultural land. In relation to this, the Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being BMV land and Grades 3b to 5 are of poorer quality. Sites within Farrington Gurney have not had recent (post 1988) land classification undertaken, and therefore there is a need to rely on provisional (pre 1988 data).

Provisional data indicates that all options are wholly overlain by Grade 1 and Grade 2 BMV agricultural land. All options are considered equally constrained at this stage without further detailed land classification, with the potential to lead to significant negative effects. Option FG4 is considered worst performing as would result in a higher level of land take and subsequent loss of high quality greenfield land.

In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.

Climate change

All options involve increasing amounts of growth in Farrington Gurney, which for a small village, the area has good transport links, and is relatively well served by public transport; including bus services along the A37 linking Bristol, Wells, Midsomer Norton and Bath.

Whilst there are some opportunities to deliver highly sustainable development on greenfield land, there will likely be higher embodied carbon in developments and a need to consider the mitigation / offsetting of carbon sequestration opportunities that may be 'sterilised' by development. An overall higher scale of growth is also likely to have a greater carbon impact.

Broadly speaking, max growth option FG4 offers greater potential to secure high levels of resource efficiency, to plan for sequestration and for development-wide

solutions to energy provision. As such, though the climate impact is greater than all other options, higher growth has the potential to be offset by opportunities for sustainable design, renewable energy, and sequestration measures. An example of this is the potential for a new mobility hub along the A37, which would help to achieve a net zero carbon development, and will likely only be deliverable alongside a max growth option (Option FG4).

It is however recognised that options FG1-3 are also of a strategic nature and will likely have the potential to deliver positive effects in this respect, albeit to a lesser extent.

Finally in terms of flood risk, none of the options are constrained, falling wholly within Flood Zone 1 which is of low risk of flooding.

Waste

It is considered that all options will promote waste management in accordance with the waste hierarchy, and all options will have access to recycling facilities in Keynsham. Options therefore cannot be differentiated between at this stage in relation to meeting waste objectives.

Appendix E - Policy options appraisals

Linking to Chapter 5, this appendix presents detailed appraisal findings in relation to the policy options that have been established for PBSA growth, renewable energy policy directions, and biodiversity net gain requirements.

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in the text. Where appropriate neutral effects, or uncertainty will also be noted.

However, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '**1**' being the highest ranking. '**=**' has been used to highlight where options perform equally, and cannot be differentiated between.

PBSA policy options

Two sets of options have been established for PBSA policy approaches which relate to both the level and the location of growth. The options for assessment are:

Level of growth:

- **Option PBSA1** - Growth as projected for UoB and Bath Spa up to 2030, but no growth for either university post 2030 (2,026 PBSA bedspaces or 506 equivalent homes)
- **Option PBSA2** - Growth as projected for UoB and Bath Spa up to 2030, with 1% increase for both universities post 2030 (4,863 PBSA bedspaces or 1,215 equivalent homes)
- **Option PBSA3** - Growth as projected for UoB and Bath Spa up to 2030, with 4.1% increase for UoB post 2030 (13,445 PBSA bedspaces or 3,361 equivalent homes)

Location of growth:

- **Option PBSA4** - Rely on existing policy (LPPU) approach giving educational establishments flexibility to use nomination agreements to bring forward PBSA.
- **Option PBSA5** - Amend LPPU Policy H2A to only allow PBSA to be developed on sites specifically allocated for that purpose, including a review of potential locations outside Bath (Keynsham and Hicks Gate).
- **Option PBSA6** - Amend LPPU Policy H2A to restrict PBSA across the district, other than on-campus (alongside discussions with universities about provision of growth outside B&NES).

SA theme		Option PBSA1	Option PBSA2	Option PBSA3
Health and wellbeing	Significant effect?	No	No	Uncertain
	Rank	3	2	1
Housing	Significant effect?	No	No	Yes - positive
	Rank	3	2	1
Communities	Significant effect?	No	No	Yes - positive
	Rank	3	2	1
Economy	Significant effect?	No	No	No
	Rank	3	2	1
Transportation	Significant effect?	No	No	No
	Rank	2	1	3
Landscape	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
Historic environment	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
Biodiversity	Significant effect?	No	No	No
	Rank	1	2	3
Natural resources	Significant effect?	No	No	No
	Rank	2	1	2
Climate change	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	1	2
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Health and wellbeing

Access to the right type of housing has a significant bearing on health and wellbeing, and with the Local Housing Needs Assessment (LHNA) forecasting a significant proportion of the projected population growth is in the student population, it will be important to boost the supply of PBSA to meet these needs. Importantly, PBSA needs to be developed in connected areas that provide sustainable transport links to the university, as well as supporting community uses and recreational opportunities. Therefore, ensuring the level of forecasted growth can be underpinned by sustainable sites for development will be key to supporting health and wellbeing.

Option PBSA3 is the only option that would deliver against the identified needs in the LHNA in full, and accordingly this option ranks first. However, it is recognised that land supply in Bath (where the universities are located) is severely limited with competing land uses, so this strategy would likely need to identify suitable alternative locations for PBSA development outside of Bath. Options PBSA1 and PBSA2 are not likely to meet the forecasted needs in full over the plan period but have better potential of being delivered within Bath. Overall, given all options seek to deliver new PBSA development in at least the period up to 2030, minor long-term positive effects are concluded as most likely. Whilst Option PBSA3 has the potential for

positive effects of significance, this is uncertain until precise development locations have been identified that can accommodate this level of growth.

Housing and communities

The LHNA has undertaken an assessment of housing needs based on population and household projections and this analysis shows that a significant proportion of projected population growth is in the student population (those aged between 18 and 23). Student housing needs are typically provided for by PBSA development, although Houses of Multiple Occupation (HMOs) also tend to cater for students in later years (as well as other groups such as young professionals).

The LHNA indicates that, based on population projections, an increase of around 7,300 students is expected over the plan period, which equates to need for around 365 student bedspaces per year. Evidence provided by the universities has projected student growth figures up to 2030 which indicate a need for 2,026 new student bedspaces and the options explore whether to boost this supply in line with the findings of the LHNA post 2030.

All options seek to deliver new PBSA development that will support residents with these identified housing needs, and minor positive effects are anticipated in this respect. However, Option PBSA3 is the only option that is considered likely to meet the needs forecasted by the LHNA (7,300 new bedspaces) in their entirety (and potentially exceed them). On this basis, Option PBSA3 is ranked first (with an identified potential for significant positive effects).

Option PBSA1 would only deliver against around a quarter of the forecasted needs, which could result in unmet needs and increasing pressures on other housing types (e.g., HMOs) to house future students. This has implications for communities, for example, by affecting the availability and affordability of family housing and contributing to the creation of 'imbalanced' communities. Unmet needs may also arise under Option PBSA2 but not the extent as predicted under Option PBSA1. Unmet needs could be a particular problem for Bath (where the universities are located) given a significant lack of available land for development and the competing uses for such land as it arises. Whilst a concentration cap on HMO development in any given area could avoid 'imbalanced' communities, it could also compound the issue of unmet needs in relation to student housing. On this basis, Option PBSA1 and to a lesser extent Option PBSA2 could also lead to minor negative effects in the long-term. Accordingly, Option PBSA1 is ranked last.

Economy

The universities in Bath are intrinsically linked to the local economy, and the options will support the universities in developing new bedspaces to accommodate a growth in the student population and thus the capacity of the university. The higher the level of growth, the more positive effects are likely to be, given this will support the universities to grow, attract more people to the city, create more jobs, and lead in certain sectors. Minor positive effects are considered likely under all options, but the options are ranked according to the level of growth, with Option PBSA3 ranked first.

Transportation

The growth in the student population is expected to occur whether PBSA is built to accommodate this or not, making it important to plan for PBSA in the most accessible locations that can reduce the need to travel.

With regards to trip generation, it would serve to allocate PBSA development in connected and accessible locations and of a scale that meets needs but does not significantly exceed them, given that locating higher levels of PBSA within Bath (where the universities are located) may be difficult to achieve with a constrained land supply and competing land uses for available land. Higher levels of PBSA growth could potentially need to be located outside of Bath (presumably in connected areas nearby). It is therefore assumed that exceeding identified PBSA needs could result in less connected development and higher trip generation levels. Whilst no significant negative effects are considered likely (given the potential to still link development with sustainable transport connections), Option PBSA3 (significantly exceeding the forecasted PBSA need) is ranked last on this basis.

Ultimately the lower level of growth (Option PBSA1) could be accommodated more easily within Bath or its surrounding areas, but there is then uncertainty around the alternative forms of housing that are likely to accommodate unmet needs, which could increase trip generation. On this basis, Option PBSA2 which more closely aligns with the forecasted PBSA needs, without exceeding them, is considered to rank first, as it is assumed that the most sustainable and accessible sites would be identified to meet this need. No significant effects are considered likely under any option.

Landscape

All options are considered likely to affect the landscape to some degree through the development of new PBSA and it is recognised that the increasing levels of PBSA development under the options have increasing potential for negative effects. Recognising the existing location of the universities within Bath, the settlement is surrounded by some of the most sensitive designated landscapes in the district as well as the historic townscape of Bath.

Accommodating the PBSA development proposed under any option has the potential to negatively affect the landscape, but effects are uncertain until the precise location of development is known. The options are ranked according to the level of development, with the lowest level of development (Option PBSA1) ranked first and the highest level of development (Option PBSA3) ranked last.

Historic environment

Whilst the options relate to a particular housing type, it is recognised that increasing levels of PBSA development are expected under the options, which equate to increasing risks for potential effects in relation to the historic environment. Most notably, the district's two universities are located within Bath, which is a particularly sensitive location in terms of the historic environment (considering the World Heritage Site inscriptions). Higher levels of PBSA development within Bath therefore have greater potential to affect the Outstanding Universal Values (OUVs) associated with the inscriptions. It is recognised that higher levels of development could be located in areas outside of Bath, but the settlements in vicinity of the universities also contain designated and non-designated assets that could be affected by such development.

Accommodating the PBSA development proposed under any option has the potential to negatively affect the historic environment, but effects are uncertain until the precise location of development is known. The options are ranked according to the

level of development, with the lowest level of development (Option PBSA1) ranked first and the highest level of development (Option PBSA3) ranked last.

Biodiversity

It is expected that PBSA development under any of the options could avoid areas with significant biodiversity features, by being located either within the Bath urban area or in one of the key connected settlements (likely along the Bath-Bristol corridor). Significant negative effects are therefore considered unlikely, especially when considered alongside the premise for biodiversity net gain in development. However, the overall effects are uncertain in the absence of precise locations which will inform effects in relation to local habitats and ecological networks.

In terms of ranking the options, ultimately higher levels of growth have greater implications for biodiversity and ecological networks, particularly within Bath where land supply is constrained with competing land uses. On this basis, the options are ranked according to the level of development, with the lowest level of development (Option PBSA1) ranked first and the highest level of development (Option PBSA3) ranked last.

Natural resources

The forecasted increase in the student population is expected as part of the baseline whether PBSA development is built to accommodate these students or not. Thus, in the absence of PBSA development there will likely be increased pressures on housing development, particularly HMOs (as a more affordable option for students) and continued pressures on land and water resources. The benefit of PBSA development is ultimately a reduced footprint when accommodating these needs (e.g., flats, shared communal areas, tall buildings) that minimises impacts on natural resources. It will also be important to locate PBSA development in accessible locations that reduce trip generation and thus minimise impacts for air quality. On this basis, Option PBSA2 is ranked first, as it is the closest option to align with the forecasted needs, which assuming can be developed in accessible areas, can reduce trip generation when compared to the other options (which either leave unmet needs or significantly exceed the forecasted need). No significant effects are considered likely.

Climate change

As a vulnerable land use, it is assumed that any option would avoid locating PBSA development within a high flood risk area. It is also assumed that development under any of the options could incorporate sustainable drainage and measures to improve resilience to the effects of climate change.

It will be important to ensure that PBSA development is well connected to the universities minimising the need to travel and promoting more sustainable transport options. On this basis, PBSA development would be best located within Bath, as close to the existing universities as possible. Recognising the land supply constraints within Bath, and the competing land uses, higher levels of growth (Option PBSA3) may be difficult to accommodate, and lower growth levels (Option PBSA1) leave uncertainty around the alternative forms of housing that are likely to accommodate unmet needs, both of which could lead to students being housed in less accessible areas. On this basis, Option PBSA2, which more closely aligns with forecasted needs, but doesn't exceed them, is considered to rank best. However, the overall effects are uncertain until the precise location of development is known.

Waste

Whilst the options propose increasing levels of PBSA development, this is to meet forecasted needs for the predicted increase in the student population over the plan period. This growth in the student population is expected under any development scenario, the options relate to the type of development that could accommodate these needs. Thus, the waste generated by the increase in the student population is expected to be the same under any scenario. It is also expected that development under any option could promote the waste hierarchy in line with the developing policy framework. Broadly neutral effects are therefore considered most likely under the options which are ranked on par.

SA theme		Option PBSA4	Option PBSA5	Option PBSA6
Health and wellbeing	Significant effect?	No	No	No
	Rank	2	2	1
Housing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	2	1
Communities	Significant effect?	No	No	No
	Rank	2	2	1
Economy	Significant effect?	No	No	No
	Rank	2	2	1
Transportation	Significant effect?	No	No	Yes - positive
	Rank	2	2	1
Landscape	Significant effect?	Uncertain	Uncertain	No
	Rank	2	2	1
Historic environment	Significant effect?	Yes - negative	Yes - negative	Yes - negative
	Rank	1	1	2
Biodiversity	Significant effect?	No	No	No
	Rank	3	1	2
Natural resources	Significant effect?	No	No	No
	Rank	3	2	1
Climate change	Significant effect?	No	No	No
	Rank	3	2	1
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Health and wellbeing

The proposed PBSA development under any option is considered likely to support health and wellbeing by providing against specialist housing needs and accommodating a growing student population. All options are therefore considered likely to lead to minor positive effects. A minor drawback to Options PBSA4 and PBSA5 is the potential for off-campus sites in Bath (either allocated or identified through nomination agreements) to be given over to alternative uses such as new healthcare facilities or open spaces if PBSA development could be delivered on-

campus (reflecting the constrained land supply and competing land uses that contribute to sustainable and healthy communities). Option PBSA6 is therefore considered to rank marginally better than Options PBSA4 and PBSA5 given its potential to support wider land uses at alternative locations in Bath.

Housing

By delivering the required PBSA development to meet the needs of the student population, all options are considered likely to support long-term significant positive effects in relation to housing. Most notably, Options PBSA5 and PBSA6 provide greater certainty around delivery (by identifying precise locations). However, a drawback to Options PBSA4 and PBSA5 is the potential for off-campus sites in Bath (either allocated or identified through nomination agreements) to be given over to alternative uses such as new housing development land if PBSA development could be delivered on-campus (reflecting the constrained land supply and acute housing needs in Bath – for affordable homes for example). Option PBSA6 is therefore considered to rank marginally better than Options PBSA4 and PBSA5 given its potential to support wider housing needs at alternative locations in Bath.

Communities

The proposed PBSA development under any option is considered likely to support communities by providing against specialist housing needs and avoiding unmet PBSA needs being accommodated in other forms of housing (such as HMOs) and creating 'imbalanced' communities in this respect. All options are therefore considered likely to lead to minor positive effects. As with the housing objective, it is recognised that a drawback to Options PBSA4 and PBSA5 is the potential for off-campus sites in Bath (either allocated or identified through nomination agreements) to be given over to alternative uses such as new housing or employment development land if PBSA development could be delivered on-campus (reflecting the constrained land supply and competing land uses that contribute to sustainable and healthy communities). Option PBSA6 is therefore considered to rank marginally better than Options PBSA4 and PBSA5 given its potential to support wider supporting land uses at alternative locations in Bath.

Economy

The locations of PBSA development are not considered likely to significantly affect this SA objective, as all options will contribute to accommodating student growth and therefore growth in the Universities. Given the links between the economy and educational establishments, minor positive effects can be inferred. The only notable drawback to Options PBSA4 and PBSA5 is the potential for off-campus sites in Bath (either allocated or identified through nomination agreements) to be given over to alternative uses such as employment development land if PBSA development could be delivered on-campus. Option PBSA6 is therefore considered to rank marginally better than Options PBSA4 and PBSA5.

Transportation

By focusing PBSA development to onsite campus locations, Option PBSA6 provides good potential to reduce the need to travel and minimise trip generation for students accessing the Universities daily. Given the centrality of the Universities in the City of Bath, students are also well connected to key services, facilities, recreational and leisure/ entertainment facilities.

In identifying sites within Bath or nearby settlements (Option PBSA5) it is likely that new PBSA development could be connected by sustainable transport modes and supported by local services and facilities, but the trip generation is expected to be higher than under Option PBSA6. The same case is stated for Option PBSA4 where sites are identified through nomination agreements. On this basis, Option PBSA6 is recognised for a greater potential for positive effects of significance and is considered to rank better than the alternatives. No significant negative effects are considered likely under the remaining options, given only connected sites are likely to be progressed in any case.

Landscape

By focusing PBSA development within on-site campus locations, Option PBSA6 is considered most likely to avoid significant negative effects with regards to the landscape, as it would be in-keeping with the campus setting and minimise the effects of PBSA expansion in wider areas of the city or nearby settlements.

Without precise development locations underpinning the alternatives and considering the sensitive townscape setting of Bath and the National Landscapes that surround it, the effects in relation to Options PBSA4 and PBSA5 are uncertain at this stage. Despite this, it is assumed that any site progressed as an allocation in the plan (Option PBSA5) or through a nomination agreement (Option PBSA4) could avoid areas of high sensitivity and mitigate landscape impacts appropriately to avoid significant effects arising.

In line with these findings, Option PBSA6 is ranked marginally better than Options PBSA4 and PBSA5.

Historic environment

Recognising that both Universities are located within the City of Bath, which is a highly sensitive heritage area, all options are considered for their potential to impact upon the historic environment significantly and negatively. Most notably, Options PBSA4 and PBSA5 provide greater flexibility to direct development away from the most sensitive heritage areas (including outside of the city), potentially in locations where any impacts could be more readily mitigated. On this basis, Options PBSA4 and PBSA5 are considered to rank marginally better than Option PBSA6. Despite this, effects remain relatively uncertain in the absence of precise development locations.

Biodiversity

Allocating sites for PBSA anywhere has the potential to impact on biodiversity through changes to the biodiversity network (and potentially to wider connectivity), and the potential loss of important features or habitats. As such, it will be important to focus growth in areas that already have a level of development.

Option PBSA6 ensures growth comes forward in areas of existing development by focusing new development within the campus environment. This will focus growth in an area that already has existing development and thus a lower associated biodiversity value. This reduces the potential for significant negative effects. Option PBSA4 would allow the university to negotiate with the council as to where to build PBSA – whilst this is seen to be slightly more risky (given it assumes the university would avoid more biodiverse areas, but is not certain), it will likely avoid significant effects. This is due to the university being likely to allocate sites closer to campus in

already developed areas with a lower biodiversity value. Option PBSA5 would allow the council to allocate sites for PBSA development. This is considered to be the best option, as potential development would not be as restricted in terms of location, and the council would be able to allocate sites that meet the required need whilst focusing growth away from areas with greater biodiversity potential.

Overall, no significant effects are anticipated for biodiversity under any option. Option PBSA5 is considered to be the most favourable given it allows the council to allocate sites for PBSA development, and is more likely to meet the required need and be focused in areas of lower biodiversity value. This is followed by Option PBSA6, which focuses development within the campus environment – thus limiting effects due to bringing growth forward in an area of generally lower biodiversity value. Option PBSA4 is found the least favourable.

Natural resources

Option PBSA6 would likely have a reduced impact on natural resources. This is due to bringing forward PBSA development within the campus environment – an already developed area. As such, there would be a reduced loss of natural resources, for example through a limited loss of potentially productive, agricultural quality land through bringing forward development away from greenfield areas. Additionally, there would likely be a reduced impact on air quality due to reducing the need to engage with transport infrastructure to travel to campus and access other services / facilities. Option PBSA5 is ranked second most favourably, as allowing the council to allocate sites for development will likely ensure growth is focused in areas with limited natural resources that could be impacted upon (like land that could be used for productive agricultural activity). Additionally, the council are more likely to ensure there is a good level of connection to the local sustainable transport network – which will reduce impacts on air quality by encouraging the use of public transport. Option PBSA4 is ranked least favourably, given that the council would not have as much control over where development comes forward and therefore the options to mitigate effects on natural resources may reduce. No significant effects are anticipated through any option, though it is noted PBSA4 could bring forward negative effects through inconsiderate site allocations.

Climate change (contained emissions)

All options are looking at increasing the built environment footprint by introducing a greater level of development. As such, it is likely carbon emissions and greenhouse gas releases will increase as a result of allocating sites for PBSA development.

Of the three options, option PBSA6 is most likely to have reduced impacts in comparison to the other two. This is due to allocating PBSA development within the campus environment. This level of containment would reduce the need to travel to the campus from other areas, which will reduce carbon and greenhouse gas emissions linked to transport into and out of the university. Option PBSA5 is the second most favourable option; allowing the council to allocate sites for development will likely ensure it is located in accessible locations with a good link to sustainable transport networks. This will reduce emissions linked to transport and travel to the university campus and additional services and facilities. Finally, option PBSA4 is ranked least favourably – given that the sites coming forward could be located in less sustainable areas, with connectivity not fully considered. No significant effects are considered likely through any option, though negative effects could come forward through PBSA4.

Waste

Waste associated with new PBSA development will come forward through either of the three options, no matter the location of development. Whilst it is possible that waste could more effectively dealt with through Option PBSA6, given development would be within the campus environment and could integrate into the existing waste network, this is unlikely to be a significant factor that differentiates between the options.

No significant effects are concluded likely through the adoption of either option, and no differentiation has been made. As such, the options are ranked equally.

Renewable energy policy options

The options for assessment are:

- **Option REN1** - Rely on existing policy (LLPU) approach i.e., set criteria for all types of renewable energy, landscape led approach for wind energy and PV (guiding development to the best locations), provide support for community led projects.
- **Option REN2** - Safeguard the best sites for wind.
- **Option REN3** - Allocation of sites (for wind and solar arrays)

Assessment findings:

SA theme		Option REN1	Option REN2	Option REN3
Health and wellbeing	Significant effect?	No	No	No
	Rank	=	=	=
Housing	Significant effect?	No	No	No
	Rank	2	1	1
Communities	Significant effect?	No	No	No
	Rank	1	2	2
Economy	Significant effect?	No	No	No
	Rank	3	2	1
Transportation	Significant effect?	No	No	No
	Rank	=	=	=
Landscape	Significant effect?	No	Yes - negative	No
	Rank	1	2	1
Historic environment	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	3	1
Biodiversity	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	2	3	1
Natural resources	Significant effect?	No	No	No
	Rank	=	=	=
Climate change	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	=	=	=
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Health and wellbeing

It is not possible to differentiate between the options in relation to this SA theme given impacts would depend to some degree on location, scale, and design of energy schemes. For example, options could impact positively on health and wellbeing through increased climate resilience, reduced fuel poverty, and the incorporation of and access to green infrastructure; or adversely impact upon health

and wellbeing through noise disturbance, loss of green infrastructure, and visual impact for nearby residents. However, it is considered that such impacts on health and wellbeing would be a key consideration under all options and can be mitigated: whether criteria-led (Option REN1), through the identification of 'best sites' (Option REN2), or as specific site allocations (Option REN3).

Overall, it is considered that the safeguarding/ allocations approaches of Options REN2 and REN3 will help provide certainty to communities as to the design and location of wind energy. Option REN1 provides additional flexibility in how wind energy can come forward across B&NES and could be combined with a community-led approach which could deliver a range of health and wellbeing benefits. It is therefore difficult to rank options at this stage, which perform broadly on par and are all expected to deliver residual minor positive effects.

Housing

The options will not directly affect housing delivery; noting for example that many of the best sites for wind are located in prominent landscape areas that are unlikely to be subject to strategic housing development. None of the options are considered likely to impact settlement growth, but Options REN2 and REN3 do provide greater certainty by strategically planning for housing growth alongside infrastructure development, ensuring the necessary connectivity whilst avoiding impacts in relation to housing delivery and the quality of housing and the living environment. No significant effects are anticipated under any Option, but Options REN2 and REN3 rank marginally higher than Option REN1 given the potential for integrated development planning at the district level.

Communities

It is considered that all options could bring benefits for communities, although allocating sites and identifying suitable sites for wind development (Options REN2 and REN3) should improve certainty for applicants and therefore their willingness for local communities to make/ support applications. Of these two options, the approach outlined in Option REN2 may provide less certainty on individual sites, but it does provide greater flexibility and offers the potential for a higher proportion of the total wind resource across the district to be utilised.

In terms of Option REN1, the existing LPPU policy enables community-led projects to identify suitable areas for wind energy development, which presents opportunities relating to community buy-in. Notably, this provides opportunity for local residents to take control of the process, delivering early stakeholder engagement to minimise conflict and increase public acceptance. Community-led development may, however, be difficult to deliver where residents are not supportive of certain energy developments, for example through concerns relating to property values, or a potential drop in tourism. Certainly, in the case of neighbourhood planning, the requirement for a referendum ensures development can only come forward where there is an appropriate level of community support.

Option REN3, through allocating specific sites through the Local Plan, will help provide additional certainty as to the delivery and location of energy developments. If combined with a community-led approach, this has the potential to maximise benefits.

Whilst it is considered that the safeguarding/ allocations approaches of Options REN2 and REN3 will help provide certainty to communities as to the design and

location of wind energy, Option REN1 provides additional flexibility in how wind energy can come forward across B&NES and allows for more community buy-in. Option REN1 is therefore ranked marginally higher at this stage, though minor positive effects are expected overall under all options.

Economy

All options are expected to lead to minor positive effects in relation to jobs and the local economy due to the investment and employment opportunities that are likely to arise from renewable energy development and positive impacts relating to fuel economy. Option REN3 is ranked highest, as allocating sites will likely speed up the delivery of the infrastructure, and associated economic benefits (and can ultimately include key sites that would otherwise be safeguarded). Option REN2 is ranked next, as safeguarding key sites will ensure delivery in the longer-term, of some of the best performing sites in relation to energy generation potential. Option REN1 ranks last as the option does not secure development locations.

Transportation

All options are likely to bring forward renewable energy schemes which are considered most likely to lead to short-term impacts related to construction/ decommissioning phases. Such impacts are likely to minor and managed through policy mitigation under all options. No meaningful differences between the options can be drawn which are all considered to perform broadly on par.

Landscape

It is recognised that solar development and the installation of wind turbines could potentially result in adverse effects on the landscape. Much of the district is considered suitable for solar development including land in areas which are more sensitive to development. It is also considered that to access the best wind resource, turbines need to be higher than the nearest surrounding structures. This means that some visual impact is unavoidable, whether in open countryside or a populated area. Of key concern is the location of the best sites for wind power (which would be safeguarded under Option REN2), which are mostly dominant areas with nationally designated landscapes.

However, under all options, consideration will be given to the impacts of energy development on landscape character. The current LLPU approach (which would be continued under Option REN1) to take a landscape sensitivity-based approach to identifying suitable areas for energy development is supported by the NPPG and Natural England guidance. This option also provides greater flexibility for the delivery of such infrastructure development more widely across the district and through more potential delivery vehicles.

Option REN3 provides the opportunity to plan for infrastructure development in the most suitable locations across the district (which do not necessary equate to the best performing sites) and ensure that significant landscape impacts are avoided where possible and minimised where not.

Considering the above, the potential for negative effects of significance is identified under Option REN2, which ranks last accordingly. Options REN1 and REN3 provide different benefits that are difficult to weight (in terms of ranking the options) so both options are considered to perform on par with each other at this stage. Options REN1 and REN3 are also considered likely to avoid significant landscape impacts.

Historic environment

It is recognised that solar development and the installation of wind turbines could potentially result in adverse effects on the historic environment. Furthermore, much of the district is considered suitable for solar development and given the constrained nature of the district, this includes some land in areas which are more sensitive to development. It is also considered that to access the best wind resource, turbines need to be higher than the nearest surrounding structures. This means that some visual impact on setting of important heritage features could be unavoidable, dependant on the exact location of turbines.

However, under all options, consideration will be given to the impacts of wind energy on the historic environment, in line with NPPG, and Historic England's guidance. Depending on their scale, design, and prominence, a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset As such, while the LPPU policy framework provides a level of protection to heritage assets, a 'safeguarding' approach of the best sites for wind (Option REN2) may not suitably mitigate against potential adverse effects. This reflects, for example, the extent of the WHS and Conservation Areas, which extend throughout the district.

In terms of Option REN3, it is considered that allocating specific sites provides greater opportunity to weight the relative merits and constraints of multiple sites and may restrict the likelihood for adverse effects through setting tighter development parameters.

In the absence of precise development locations, it is difficult to predict the likely significance of effects at this stage, and uncertainty is noted. However, the narrative identifies greater concerns for heritage settings under Option REN2, which is considered to rank last. Option REN3 is considered to rank marginally better than Option REN1 given it provides greater opportunity for strategic planning and mitigation.

Biodiversity

Under all options, solar development and the construction of wind turbines has the potential to result in habitat and species disturbance and loss. Notably, wind turbine operation and maintenance can disturb sensitive species, and there is a risk of bird and bat collision with moving blades and any additional overhead wires. The RSPB (Royal Society for the Protection of Birds) has stated that it supports a significant growth in offshore and onshore wind power generation in the UK, provided that it is located and designed to minimise impacts on bird populations. This means avoiding locating turbines close to major migration pathways and important habitats.

Effects from each option on features and areas of biodiversity interest will therefore largely depend on the detailed location, scale, and nature of development and the incorporation of avoidance, mitigation, and enhancement measures.

LPPU Policy CP3 notably highlights that opportunities for ground functional solar arrays should be sited on land "*which is not functionally linked to nationally protected sites (SACs, SPAs and SSSIs)*". However, while local planning policy provisions provide a level of protection to biodiversity, it is considered that a 'safeguarding of the best sites' approach to onshore wind development (Option REN2) may not appropriately prioritise avoidance measures. For example, some of the best areas to generate wind power are within nationally designated landscapes and may include

protected and priority BAP habitats and species that are susceptible to the effects of wind turbines.

In terms of Option REN3, it is considered that defining specific sites may restrict the likelihood for adverse effects through strategic planning (considering the merits and constraints of multiple locations across the district) and setting tighter development parameters. Option REN1 provides flexibility in location following a criteria-based development approach, and supports community-led schemes, where impacts on the natural environment would likely be a key consideration for residents when considering specific sites for allocation. Furthermore, in line with Natural England's Technical Information Note, some form of ecological assessment is likely to be required for any proposed wind farm, although very small developments away from vulnerable bird species may only require a limited desk study to confirm the low likelihood of an impact.

In the absence of precise development locations, it is difficult to predict the likely significance of effects at this stage, and uncertainty is noted. However, greater concerns are identified for biodiversity under Option REN2, which is considered to rank last. Option REN3 is considered to rank marginally better than Option REN1 given it provides greater opportunity for strategic planning and avoidance and mitigation measures.

Natural resources

If managed appropriately, wind energy has the potential to reduce the use of fossil fuels for generating electricity, which in turn has the potential to reduce air pollution in other locations. However, the air quality benefits of onshore wind will vary by location, depending on the mix of existing energy sources. As such it is difficult to differentiate between the options in this respect.

When considering high quality agricultural land, uncertain effects are expected for all options, as it is possible that wind energy development could result in loss of this resource (until the site is restored to its previous use at the end of its lifecycle). However, it is recognised that larger wind turbines can increase the value obtained from land use, by providing some income to the owners of the land they are built on, while allowing other activities such as farming to continue around the base of the turbines.

This is less of an issue for solar, recognising that the LPPU Policy CP3 states that "*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 arrays should be sited on land of lower agricultural quality*." This premise is likely to be applied to all options.

Overall, whilst uncertainty is noted, effects are not considered likely to be significant overall under any option, recognising the potential to restore sites after decommissioning, and the longer-term benefits to climate change and natural resources. Given all options will lead to renewable energy development, they cannot be meaningful differentiated at this stage (in the absence of precise locations) and as such are ranked on par with each other.

Climate change

Option REN3 has the potential to provide additional certainty as to the delivery of solar and wind energy in the district through allocating such provision. Option REN2

will also provide a degree of certainty as to the broad location of such provision and safeguard the best performing sites. In this respect, these options have increased potential to support climate change mitigation, contributing to a reduction of greenhouse gas emissions from all sources. Option REN1 provides greater flexibility in terms of development locations across the district, and thus greater potential for more schemes to emerge over the plan period. All options are therefore considered likely to lead to significant positive effects against climate change objectives, helping to facilitate the aim of carbon neutrality by 2030 but they are difficult to meaningfully rank (and are thus considered to perform broadly on par). Ultimately a combined scheme that maximises the benefits of all options could further enhance the significance of the likely effects (i.e., safeguarding the best sites, alongside allocating sites and setting criteria for schemes to come forward outside of allocated sites).

It is not possible to differentiate between the options with regards to climate change adaptation, given this depends on the location of renewable energy provision. However, the delivery of solar development and wind turbines are not likely to have a significant influence on climate change adaptation, including resilience to extreme weather events and flood risk.

Waste

It is assumed that all options have the potential to support the waste hierarchy with appropriate policy and mitigation requirements. No significant effects are considered likely in relation to waste, and the options cannot be meaningfully differentiated (and are therefore ranked on par with each other).

Biodiversity net gain policy options

The options for assessment are:

- **Option BNG1** - Rely on existing policy (LPPU) approach i.e., requiring a Biodiversity Net Gain (BNG) of a minimum of 10% be demonstrated and secured in perpetuity (at least 30 years) subject to meeting the criteria listed within the policy.
- **Option BNG2** - Require a minimum 20% biodiversity net gain on select schemes: previously developed land, (major) strategic allocated sites, major schemes in protected landscapes, ground solar array schemes, and council developments.
- **Option BNG3** - A staggered approach to BNG requirements for different schemes i.e., require a minimum 20% BNG on all major developments, down to 10% on minor applications.

Assessment findings:

SA theme		Option BNG1	Option BNG2	Option BNG3
Health and wellbeing	Significant effect?	No	No	No
	Rank	2	1	1
Housing	Significant effect?	No	No	No
	Rank	2	1	1
Communities	Significant effect?	No	No	No
	Rank	2	1	1
Economy	Significant effect?	No	No	No
	Rank	2	1	1
Transportation	Significant effect?	No	No	No
	Rank	=	=	=
Landscape	Significant effect?	No	No	No
	Rank	2	1	1
Historic environment	Significant effect?	No	No	No
	Rank	2	1	1
Biodiversity	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	1	1
Natural resources	Significant effect?	No	No	No
	Rank	2	1	1
Climate change	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	2	1	1
Waste	Significant effect?	No	No	No
	Rank	=	=	=

Health and wellbeing

Under all options benefits are expected in relation to health and wellbeing recognising that access to nature and healthy ecosystems support healthy lifestyles, and onsite delivery of biodiversity net gain should ensure equitable access in new developments. Ultimately a net gain approach seeks to mitigate any habitat and species loss in development and support a halt in biodiversity decline that will in turn support climate resilience (and the health of residents and their environments). Options BNG2 and BNG3 (with higher net gain requirements) provides greater opportunity to facilitate the wider wellbeing benefits that healthy ecosystems offer. Natural solutions promoting multiple benefits should be considered at every opportunity, including in drainage and flood risk solutions, urban design, and water and energy harvesting schemes. On the assumption that none of the options will significantly affect the viability of development (as evidence suggests), Options BNG2 and BNG3 are ranked higher than Option BNG1, despite minor positive effects being concluded as most likely under all options.

Housing

Effects in relation to housing are expected to be positive (albeit minor) given the potential for biodiversity net gain to lead to improved residential environments and supporting public spaces, that are attractive to residents and encourage inward investment. Notably, evidence suggests that access to green space can markedly increase property values.

Whilst placing greater infrastructure requirements on developers can affect viability, given the range of net gain solutions available, it is not considered likely that the higher 20% requirement under Options BNG2 and BNG3 would lead to significant impacts on housing delivery. This is supported by evidence[16] that suggest that 20% net gain will not materially affect viability in most cases, and the costs associated with this increase above 10% are often negligible. The evidence demonstrates that biodiversity net gain costs are low compared to other policy costs and suggests that in no cases are they likely to be what renders a development unviable. On this basis, Options BNG2 and BNG3 rank marginally higher than Option BNG1, given the higher net gain requirements.

Communities

It is recognised that attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. ‘Green’ neighbourhoods are also more desirable places to live, with evidence indicating that access to green space can markedly increase property values. Under all options minor positive effects are expected in relation to communities, recognising that access to nature and healthy ecosystems support community resilience. Furthermore, the onsite delivery of biodiversity net gains should ensure equitable access in new developments. With higher requirements, Options BNG2 and BNG3 provide greater opportunity to facilitate the wider social and community benefits that healthy ecosystems offer and this is reflected in the ranking of the options. However, this is on the assumption that neither option (Option BNG2 or BNG3) will significantly affect the viability of development (as evidence suggests).

Economy

[16] CIEEM, 2022 KNP Assesses 20% Biodiversity Net Gain Requirement

Effects in relation to the economy are predominantly indirect and relate to built environment settings. Biodiverse spaces support the quality of neighbourhoods, and spaces where people congregate. High-quality spaces, where people enjoy working and visiting attract continued inward investment and productive economies and 'green' neighbourhoods are also more desirable places to live and work, with access to green space found to markedly increase property values. Increases in biodiversity also indirectly support food production and agriculture.[17]

All options under consideration are likely to support such indirect minor benefits for the economy, and Options BNG2 and BNG3 are ranked marginally higher than Option BNG1 given the enhanced level of (green) infrastructure development.

Transportation

With regards to sustainable transport, none of the options are considered likely to lead to significant effects and there is little to differentiate between the options. Biodiversity enhancements can benefit active travel uptake and connections, but these effects are considered limited to onsite measures under these options and negligible in this respect.

Landscape

Delivering net gains in biodiversity has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. For example, habitats such as trees, hedgerows, grass, shrubs, etc., can form important parts of the landscape and provide a role in buffering development and screening less desirable views. They can also play a role in contributing towards local distinctiveness and a sense of place, particularly important when considering the national importance of the some of the district's landscapes. While minor positive effects are anticipated under all options, Options BNG2 and BNG3 rank higher given the enhanced (green) infrastructure requirements.

However, is recognised that BNG needs to be appropriately designed to reinforce the special qualities of a landscape. The design of BNG will therefore need to be sensitive to the surrounding landscape, and exercises in habitat restoration and creation should be carefully selected to complement existing character and setting.

Historic environment

With regards to the historic environment minor indirect benefits are associated with biodiversity and green infrastructure enhancements, that improve built environment settings and by extension benefit the settings of designated and non-designated heritage assets. A higher net gain (Options BNG2 and BNG3) is ultimately ranked higher in this respect, but the differences between the options are negligible in terms of effects. This is under the assumption that all options will seek to avoid impacts in relation to archaeology when delivering habitat restoration or new habitat creation schemes. It is also recommended that such schemes are informed by historic landscape character assessments and Conservation Area Appraisals as appropriate.

Biodiversity

BNG is ultimately targeted at reversing biodiversity decline and all options are considered likely to lead to significant positive effects as a result. Given Options

[17] Ecological Expertise, Evolved Building Biodiversity Net Gain into Housing

BNG2 and BNG3 seeks to push existing policy requirements further to deliver higher net gains, these options are ranked higher than Option BNG1.

Natural resources

Biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil, and water resources. These include soil formation; flood and erosion protection; and water quality regulation. All options are likely to support minor positive effects in this respect and Options BNG2 and BNG3 are ranked marginally higher than Option BNG1 given the enhanced level of (green) infrastructure development.

With respect to air quality, whilst all options will provide minor benefits, Option BNG2 and BNG3 are likely to perform more favourably given the enhanced level of (green) infrastructure development (and this is reflected in the ranking of options). Green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution (particulate matter, sulphur dioxide, nitrogen dioxide and ozone).

Climate change

There are numerous climate considerations but in the context of BNG effects are likely to be highly positive in nature. As highlighted by the NPPF (2023), well planned green infrastructure can help an area adapt to and manage the risks of climate change; playing an important role in carbon sequestration linked to climate mitigation, and addressing flood risk. Ultimately, nature-based solutions should be promoted at development sites wherever possible. Whilst all options are considered likely to support significant positive effects, Options BNG2 and BNG3 are ranked higher given the increased (green) infrastructure requirement.

Waste

The policy directions for BNG are unlikely to lead to significant effects in relation to waste and it is difficult to meaningfully differentiate between the options, which are considered to perform broadly on par with each other.