
Bath & North East Somerset Council

Improving People's Lives

**Bath and North East Somerset
Draft Local Plan Partial (LPPU) Update**

Draft Sustainability Appraisal Report including the appraisals of Main Modifications

**Date
September 2022**



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Explanation

The Draft Local Plan Partial Update (LPPU) was submitted to the Secretary of State to be examined by an independent Planning Inspector in December 2021. The Examination hearings took place in June/July 2022. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation on the Main Modifications.

The Inspector is inviting comments on the appraisals of the Main Modifications to the LPPU. The screening process has identified amendments which are considered to make a difference to the SA of the LPPU (i.e. that the previous assessment of the submitted LPPU requires corresponding amendments).

Appendix I shows the screening of the Main Modifications to the submitted LPPU. Where further appraisals or updates are required, Appendix D (Policy appraisals) of the SA report has been updated.

This report is published for consultation alongside the Main Modifications to the submitted LPPU. Representations can only be made on the appraisals of the Main Modifications at this stage. This is not an opportunity to make comments on any other part of the SA report. In order to show the results of the Main Modifications appraisals clearly, new text is shown as underlined and deleted text is shown with strike through to the previously published SA Report that accompanied the submitted LPPU.

The amended text of the draft SA report subject to consultation is:

Draft SA report

Appendix D Draft LPPU Appraisal Matrices

Appendix I Screening of Main Modifications

In conclusion, the appraisals show that the Main Modifications do not significantly alter the previously recorded sustainability effects of the submitted plan, resulting in no significant changes in considering the cumulative effects of the Plan as a whole or in combination with other Plans. Therefore, other Appendices are not republished for the Main Modifications consultation. However, they are available from the Examination Library below.

Draft Sustainability Appraisals for the submitted LPPU ([Link](#))

How to comment on this Report

The draft SA Report is being published for consultation alongside the Main Modification to the Draft LPPU from 21st September to 2nd November. The purpose of this consultation is to provide the statutory environmental bodies and other interested parties the opportunity to express their opinion on the draft SA Report. It also enables the reader to use the information within the SA Report to guide their deliberations on the draft LPPU. Please send your comments on this report by 2nd November to the address below.

Planning_policy@bathnes.gov.uk
[01225-394041](tel:01225-394041)

Following the consultation, the Inspector's report on the plan will be issued once the Inspector has had the opportunity to consider the representations received through the consultation.

1. Introduction

Background

- 1.1. The preparation of the Bath & North East Somerset (B&NES) LPPU has been subject to a fully integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of:
- the SEA Regulations (*Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004*) which requires an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment;
 - The Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework which requires sustainability appraisal (SA) of all emerging Development Plan Documents and Supplementary Planning Documents;
 - Applicable Government guidance including *A Practical Guide to the Strategic Environmental Assessment Directive* (Office of the Deputy Prime Minister, 2005) and Sustainability Appraisal section of the Plan Making Manual (<http://www.pas.gov.uk/pas/>).
- 1.2. The integrated process is therefore termed Sustainability Appraisal (SA) and it incorporates the requirements of the SEA Regulations. This report is the main output of the SA and records the results of the whole SA so far. This report has been produced alongside the production of the draft LPPU (pre-submission version) and is published for consultation. Following the submission to the Secretary of State to be examined by an independent Planning Inspector in December 2021 the Examination hearings took place in June/July 2022. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation on the Main Modifications. The draft SA report incorporates all amendments made as result of the Main Modifications to the submitted LPPU.

Structure of this Report

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

Table 1: Contents of the SA report

SEA Regulations – requirement for an environmental report	Where covered in the SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	The contents and main objectives of the plan are presented in Section 2. The plan's relationships to other plans and programmes are addressed in Appendix A.

b)The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and	Section 5 and Appendix B
c)The environmental characteristics of areas likely to be significantly affected.	Section 5 and Appendix B
d)Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 and Appendix B
e)The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4 and Appendix A
f)The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Section 6 and 7 and Appendixes C, D, E, F, G and I (the definition of significance is addressed in Section 3).
g)The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 6 and Appendix C, D and F.
h)An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 6 and 7. Appendix C, D and E. Difficulties are addressed in Section 3.
i)A description of measures envisaged concerning monitoring in accordance with regulation 17.	Section 10 and Appendix G.
j)A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	The whole report does this.
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies. (Regulation 12(3))	Scoping Report for 5 weeks from 28th April to 3rd June 2020 Interim SA Report 7 th January to 18 th February 2021
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).	Interim SA Report 7 th January to 18 th February 2021

Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	The Local Plan Review is not expected to have significant effects on other EU Member States.
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
Provision of information on the decision: - When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed: - The plan or programme as adopted; - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and - The measures decided concerning monitoring	The next stage
Monitoring	
The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	Section 10 and Appendix G describes the measures that should be taken to monitoring the likely significant effects of the Partial Update.

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

Habitats Regulations Assessment

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

How to comment on this Report

- 1.7. The draft SA Report is being published for consultation alongside the Main Modifications to the Draft LPPU from 21st September to 2nd November. The purpose of this consultation is to provide the statutory environmental bodies and other interested parties the opportunity to express their opinion on the draft SA Report. It also enables the reader to use the information within the SA Report to guide their deliberations on the draft LPPU. Please send your comments on this report by 2nd November to the address below.

Planning_policy@bathnes.gov.uk
[01225-394041](tel:01225-394041)

- 1.8. Following the consultation, the Inspector's report on the plan will be issued once the Inspector has had the opportunity to consider the representations received through the consultation.

2. B&NES Development Plan – Planning Framework

- 2.1. The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029. Together these documents form the Local Plan for B&NES. The Council is required to review the Local Plan every five years in order to determine whether it remains fit for purpose or whether all or part of it needs to be updated.
- 2.2. On 9th May 2022 the West of England Combined Authority (WECA) Mayor wrote to the Secretary of State for Levelling Up, Housing and Communities to advise him that he had halted work on the WECA Spatial Development Strategy (SDS).
- 2.3. A full review of the Local Plan will be undertaken alongside the West of England Combined Authority Spatial Development Strategy (SDS) which is scheduled for publication in 2023. The Council is committed to progressing preparation of a full replacement Local Plan as swiftly as possible. In the absence of a response from the Secretary of State and the lack of any indication from the WECA Mayor that work will be re-started on the SDS, the three WECA UAs are of the view that the Local Plans for B&NES, Bristol and South Gloucestershire will now provide the strategic planning framework for the West of England Combined Authority area. Work on the full replacement Local Plan for B&NES has been formally launched in September 2022. It is now anticipated the Local Plan will be adopted by summer 2025. (Please see the Examination Document EXAM 22.) Therefore, in the interim, B&NES is undertaking a Partial Update of the Local Plan to address a number of urgent issues. The scope of the review will be set out below.
- 2.4. A full SA has been carried out on the B&NES Core Strategy and Placemaking Plan in line with the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment Directive) and the UK Environmental Assessment of Plans and Programmes Regulations (2004). The final report can be accessed from:
- The SA report for the Core Strategy ([Link](#))
 - The SA report for the Placemaking Plan ([link](#))

Purpose and scope of the partial update

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

Table 2 Core Strategy and Placemaking Plan Objectives

Objective 1		SCS Driver: Climate Change
<p><i>Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate</i></p> <ul style="list-style-type: none"> • reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services • ensuring the location and layout of new development enables and encourages people to make the fullest 		

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

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

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

Table 3 Key policy changes

Policies	Summary
Updating policies to better address the climate and ecological emergency	

Police CP1 Retrofitting existing buildings	Amend the policy to require new houses in multiple occupation to achieve an Energy Performance Certificate 'C' rating.
Policy CP3 Renewable Energy	Maintain the overall targets for renewable electricity and heat generation and provide further guidance and requirements for renewable energy technology to facilitate more renewable energy schemes.
Policy SCR6(residential) and SCR7(non-residential) Sustainable Construction	Facilitate zero carbon development by: <ul style="list-style-type: none"> • reducing space heating demand • reducing total energy use • requiring renewable energy to match total energy use • considering district heating networks • requiring a financial offset contribution for residual carbon emissions
Policy SCR8 Embodied Carbon	Introduce a requirement to submit an Embodied Carbon Assessment and set a standard to be achieved by large scale new development.
Policy CP4 District Heating	Amend Keynsham Hight Street policy to an opportunity area rather than a district heating priority area as the majority of land allocated for development in Keynsham Town Centre has been completed.
Policy SCR9 EV charging	Require electric vehicle charging infrastructure for both residential and non-residential development. Further guidance will be provided by the Transport and Development Supplementary Planning Document.
Policy NE2 Conserving and Enhancing the Landscape And Landscape Character	Add new criterion to allow great weight to be afforded to conserving and enhancing landscape and scenic beauty within nationally designated Areas of Outstanding Natural Beauty (AONBs) and their setting, and with particular reference to their special qualities.
Policy NE3 Sites Species and Habitats	Strengthen the protection of protected sites, National Network Sites (SPAs and SACs) and internationally protected species and habitats as well as nationally important sites and species and their habitats.
Policy NE3a Biodiversity Net Gain	Require a Biodiversity Net Gain of a minimum 10% from major developments and secure in perpetuity (at least 30 years)
Policy NE5 Ecological Networks and Nature Recovery	Facilitate enhancement of Nature Recovery Networks and local ecological networks.
Policy NE6 Trees and woodland conservation	Strengthen the protection of veteran trees.
Policy CP7 Green Infrastructure	Facilitate nature recovery and introduction of the Bath River Line, a strategic green infrastructure project.
Policy NE1 Development and GI	Promote maximising opportunities for effective and functional Green Infrastructure (GI) within the desing of developments, focussing on the use of nature based solutions and linking to active travel routes.
Policy D8 Lighting	Require lighting to be designed to protect wildlife habitats best practice as set out in current guidance (inc. B&NES Waterspace Design Guidance and Bats and Lighting in the UK (ILP 2018)
Policy ST1 – ST7 Transport policies in general	Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency, linking with the Climate and Ecological Emergency Declarations and 2030 Carbon Neutrality
Policy ST1 Promoting Sustainable Travel	Increased recognition of the importance of location and design in the sustainability of development. Ensure that development transport choices e.g. access strategy and mitigation, are required to place sustainable modes first.
Policy ST2 Safeguarded Sustainable Transport Routes	Widen the scope to include other land to be safeguarded through the Policies Map.
ST2A Active Travel Recreational Routes	Require developments to enhance active travel routes, rather than just maintaining them or avoiding harm. Onus placed on developer to provide, rather than Council to negotiate additional linkages.
ST3: Transport Infrastructure	Require infrastructure to be planned and designed to promote mode shift to sustainable transport as a priority over traffic capacity. Schemes which

	increase traffic capacity must demonstrate that opportunities to achieve mode shift as an alternative solution have been exhausted.																								
ST5: Traffic Management Proposals	Include additional requirements and detail reflecting Liveable Neighbourhoods Strategy																								
ST6: Park and Ride	Updated to expand its scope to include a new multi-modal interchange model.																								
ST7 Transport Requirements for Managing Development	Include strengthened requirement for development to offer genuine travel choice through opportunities to travel sustainably. include requirement for transport improvements and/or mitigation to maximise sustainable travel opportunities. Remove parking standards from the PMP (parking standards to be included in the new Transport and Development SPD)																								
Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land maintained																									
DW1	Amend the policy to incorporate allocation of land previously safeguarded for development in Keynsham <u>and the Transport Interchanges at the Park and Ride sites.</u>																								
Spatial distribution of the Housing Requirement	<p>Monitoring (March 2021) shows that there is a housing supply shortfall of about 1,100 dwellings against the Core Strategy housing target (around 13,000 dwellings). This takes into account the annual requirement to deliver 722 dwellings for the rest of the plan period. In order to meet this shortfall, the LPPU allocates sites for housing in accordance with the spatial strategy set out in the Core Strategy.</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Capacity (homes)</th> </tr> </thead> <tbody> <tr> <td>Policy SB8 Bath Riverside</td> <td>250 additional (total 1,750)</td> </tr> <tr> <td>Policy SB18 RUH</td> <td>50 additional (total 100)</td> </tr> <tr> <td>Policy SB24 Sion Hill</td> <td>100</td> </tr> <tr> <td>Policy SB14 Twerton Park</td> <td>80</td> </tr> <tr> <td>Policy SB25 St Martin's Hospital</td> <td>50</td> </tr> <tr> <td>Policy KE2b Keynsham Fire Station</td> <td>20</td> </tr> <tr> <td>Policy KE5 Keynsham Treetops</td> <td>35</td> </tr> <tr> <td>Policies KE3C and KE3D Keynsham safeguard land (2 sites)</td> <td>280</td> </tr> <tr> <td>Policy SSV21 Midsomer Norton, Silver Street</td> <td>10</td> </tr> <tr> <td>SSV22Paulton (former printworks)</td> <td>80</td> </tr> <tr> <td>Total (allocations)</td> <td>955</td> </tr> </tbody> </table> <p>Taking into account sites in the Development Management process, it is expected to increase the housing supply by 1,205 homes.</p>	Site	Capacity (homes)	Policy SB8 Bath Riverside	250 additional (total 1,750)	Policy SB18 RUH	50 additional (total 100)	Policy SB24 Sion Hill	100	Policy SB14 Twerton Park	80	Policy SB25 St Martin's Hospital	50	Policy KE2b Keynsham Fire Station	20	Policy KE5 Keynsham Treetops	35	Policies KE3C and KE3D Keynsham safeguard land (2 sites)	280	Policy SSV21 Midsomer Norton, Silver Street	10	SSV22Paulton (former printworks)	80	Total (allocations)	955
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SB1 The Milsom Quarter including the Cattlemarket site	Seeking to create a more vibrant and diverse part of the city centre with a greater balance in the mix of uses																								
SB22 Locksbrook Creative Industry Hub	To provide a mixed use development comprised of employment space including incubator units and 'grow-on' space and teaching space.																								
SB26 Bath Park & Ride sites	To ensure their efficient and effective use acting as a transport interchange rather than a traditional park & ride, plus potentially meeting objectives of providing waste recycling facilities, solar energy generation and nature recovery.																								

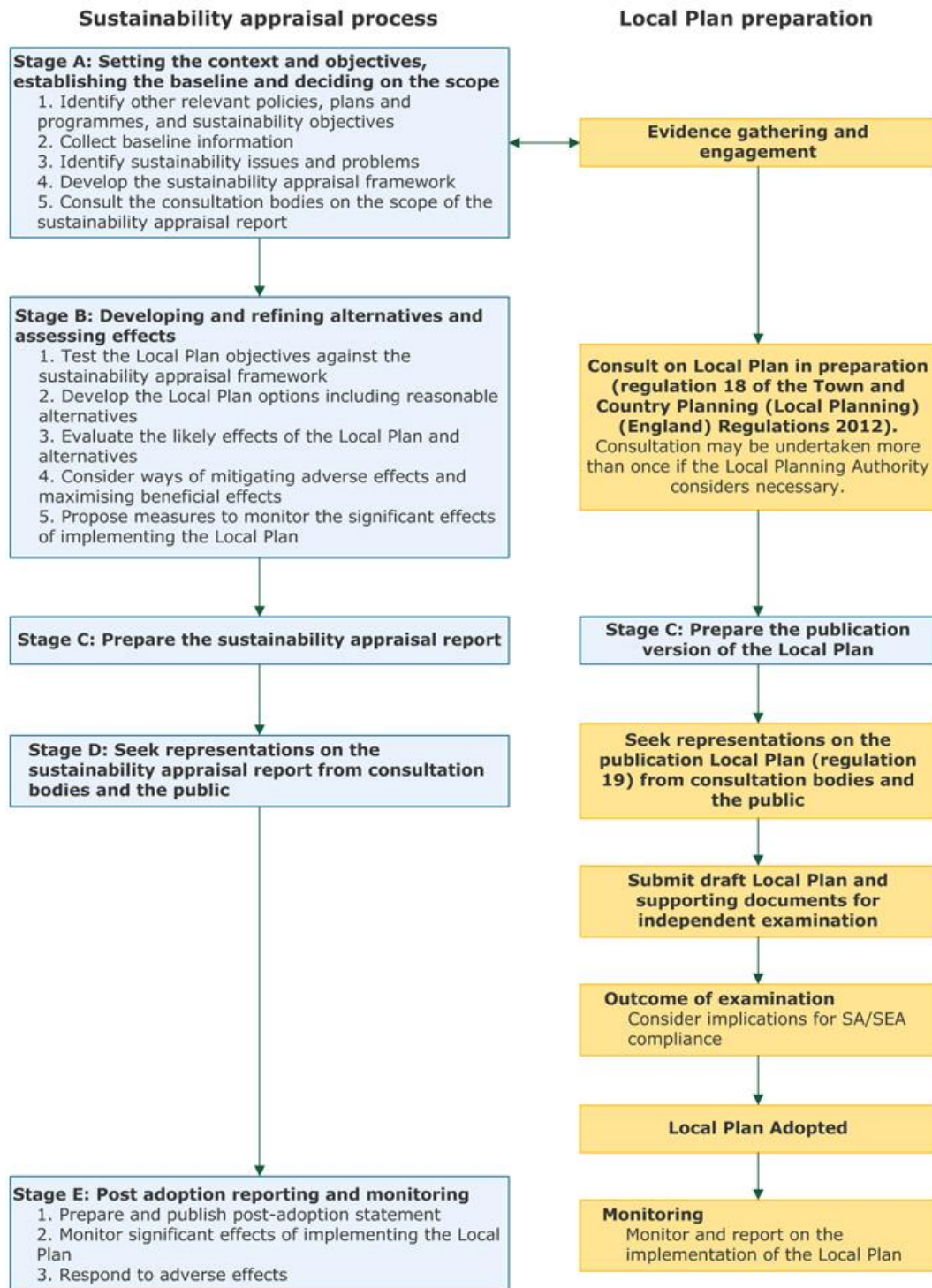
SB23 Western Island	To be redeveloped for industrial uses including requirements such as enhancing the ecological value of the river edge, ensuring lighting avoids harming ecological interest.
SSV9 Somer Valley Enterprise Zone	To amend the site boundary and broaden the mix of uses appropriate to be developed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

3. Sustainability Appraisal Methodology

Approach adopted for this Sustainability Appraisal

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

Table 4



Stage A: Scoping

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

How the sustainability objectives have been identified'

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

Table 5: Placemaking Plan Revised SA Framework		
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<ul style="list-style-type: none"> • Provision of adequate supporting health services and improved access to healthcare including through sustainable transport means? • Provision of communal spaces that are safe and appealing, to support social cohesion e.g communal allotments, play areas, neighbourhood centres? 	Population; Human Health and Material Assets

Table 5: Placemaking Plan Revised SA Framework		
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
	<ul style="list-style-type: none"> • Make it easy to reach everyday destinations (e.g. schools, workplaces, homes, shops, community facilities) by “active” travel e.g. through high quality cycling and walking infrastructure? • Streets and the public realm are safe, attractive and accessible for all ages and levels of disabilities? • Range of sports, leisure facilities and pitches designed and maintained for use by the whole community? • Support local sustainable food production, including the provision of allotments and community gardening? • What actions are being taken to mitigate against the differential impact of COVID-19 on health inequalities? • Maintaining or increasing access to existing open/natural/green space, the provision of new open/natural/green space? • Planned network of high-quality green and blue spaces that can also be used for walking and cycling? • Inclusive design which supports social interaction for all ages, including the needs of those with sensory and mobility impairments? 	
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<ul style="list-style-type: none"> • Provide viable and deliverable good quality housing and affordable housing to meet the full objectively assessed housing needs? • Help boost significantly the supply of housing? • Deliver a suitable mix of housing types and tenures that cater for all population groups? • Address housing needs of older people i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes? 	Population; Human Health; and Material Assets
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<ul style="list-style-type: none"> • Connection with existing communities? Prevention of community severance e.g. new road or development dividing a community in two? • Provision of a range of appropriate and accessible community, social and cultural facilities-e.g. neighbourhood centres, play areas, green & blue spaces? 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? 	Population; and Human Health

Table 5: Placemaking Plan Revised SA Framework		
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<ul style="list-style-type: none"> • Provide an adequate supply of land and diverse range of employment opportunities to meet the requirements of growth sectors? • Address imbalances between residential and employment development to help reduce travel distances to work • Contribute to the regions' ambition to be a driving force for clean and inclusive growth? • Access to local training, work experience and apprenticeship opportunities for local people? 	Population; Material Assets
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<ul style="list-style-type: none"> • Prioritising access to good public transport and safe walking and cycling infrastructure (including segregated cycle lanes, secure bike storage and parking), over facilities for private cars? • New cycle and pedestrian paths are linked with existing / wider networks to ensure connectivity? • Traffic management and calming measures to help people feel safe & confident to walk and cycle, whilst helping to reduce and minimise road injuries? • Incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted? • Access to major employment areas? 	Population; Material Assets
Objective 6 (landscape): Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<ul style="list-style-type: none"> • Protection of areas of valued landscape and townscape? • Avoidance of harmful impacts of development on all landscapes including AONB landscape character and its statutory purpose? • Development which values and protects diversity and local distinctiveness including rural ways of life? 	Biodiversity; Flora; Fauna; and Landscape
Objective 7 (heritage): Conserve and enhance the historic environment, heritage/cultural assets and their settings	<ul style="list-style-type: none"> • Development that affects cultural and historic assets and their settings? • Well-designed development that is well related and provides physical connection to the surrounding townscape/landscape? 	Cultural Heritage, including architectural and archaeological heritage
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<ul style="list-style-type: none"> • Has the mitigation hierarchy been used to avoid and minimise impacts • Development delivers biodiversity net gain. • Avoidance of potential impacts of development on designated sites (international, national, local)? • Avoidance of potential impacts or loss of ancient woodland and aged or veteran trees • Avoidance of net loss, damage to, or fragmentation and positive enhancement of designated and undesignated wildlife sites protected species and priority species? 	Air; Climatic Factors; and Human Health

Table 5: Placemaking Plan Revised SA Framework		
SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
	<ul style="list-style-type: none"> • Conservation, restoration and re-creation of priority habitats? • Development which incorporates biodiversity into the design e.g. 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. 	
Objective 9: Reduce land, water, air, light, noise pollution	<ul style="list-style-type: none"> • Minimise increase in traffic congestion? • Development that minimises exposure to poor air quality and noise pollution? • measure to encourage the use of public transport, cycling and walking? • The remediation of contaminated sites? • Avoidance of location of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity? • Development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available? • Minimise increase in light and water pollution? • Protect the natural thermal spring under County of Avon Act 1982? 	Biodiversity; Flora; Fauna; and Landscape Air; Climatic Factors; and Human Health
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<ul style="list-style-type: none"> • Development which supports and corresponds with appropriate flood risk management guidance including applying natural solitons and a sequential approach and policies for any form of flooding including surface water flooding? • Development which incorporates SUDS? 	Air; Climatic Factors; and Human Health
Objective 11 Reduce negative contributions to and Increase resilience to climate change	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions? • Development designed to be resilient to future climate of increased extremes of heat, cold and rainfall in line with latest guidance, e.g. use of green infrastructure to include cooling measures such as deciduous trees, green space and blue? • Facilitate the supply of local food and increase provision of food growing space. i.e. allotments, community farms and farmers markets? 	Air; Climatic Factors; and Human Health Water; Soil; Climatic F
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and	<ul style="list-style-type: none"> • Encourage the effective use of brownfield land, provided that it is not of high environmental value? • Water efficient design and reduction in water consumption? • Development that demonstrates sustainable design and construction including efficient use of materials? 	Air; Climatic Factors; and Human Health

SA Objectives	Appraisal questions/prompts (would the policy/option lead to...)	Relevant SEA Topics
promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<ul style="list-style-type: none"> • Facilitates low carbon community infrastructure such as district heating? • Development that increases renewable energy generation? • Development that maximises energy efficiency? • Protection of grades 1- 3a agricultural land from development? • Adequate provision of waste management facilities and where possible include measure to help to reduce the amount of waste generated by development? 	

Stage B: Developing and refining options and assessing effects

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

Assessment techniques

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

Score	Description	Symbol
Major positive impact/effect	The option / plan achieves the majority of the applicable SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	++
Minor positive impact/effect	The option / plan achieves some of the SA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	+

Neutral	The option / plan does not have an effect on the achievement of the SA Objective or SA questions	0
Minor negative impact/effect	The option / plan conflicts with some of the SA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors	-
Major negative impact /effect	The option / plan conflicts with the majority of the applicable SA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors. In addition the future baseline indicates a worsening trend in the absence of intervention	--
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective	?
n/a	The option / plan is not relevant to these objectives	n/a

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

Table 7: Development Management Policies relevant to SA objectives

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<ul style="list-style-type: none"> Policy D1 and D3 require development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and ease to move around. Policy D5 requires developments to provide for appropriate levels of amenity, including provision of adequate and usable private or communal amenity space, which relates to maintaining or increasing access to open space. Policy D8 provides guidance on lighting.

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<ul style="list-style-type: none"> • Policy LCR5 requires development involving the loss of open space, land and buildings used for sport and recreation to demonstrate no longer a demand or evidence of future use; or that development only affects land that is incapable of being used for sport; or suitable replacement facilities are provided in accessible locations. • Policy LCR9 requires all major developments to incorporate opportunities for informal food growing wherever possible which relates to supporting local sustainable food production, including the provision of allotments and community gardening. • Policies ST1, ST2 and ST2A require well-connected places accessible by sustainable means of transport; relates to making it easy to reach everyday destinations by active travel • Policy SCR9 requires all dwellings to demonstrate secure and accessible cycle storage facilities, which relates to making it easy to reach everyday destinations by active travel measures • Policy SU1 requires SuDS. Good quality SuDS can also provide recreational areas which relates to providing opportunities to engage in informal recreation • Policies H2 requires and CP1 encourage retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and require HMOs to achieve an Energy Performance certificate 'C' rating • Policy H7 sets the requirements for housing accessibility. • Policies PCS1-PCS 5 manage pollution, contamination and safety.
<p>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</p>	<ul style="list-style-type: none"> • Policy DW1 sets the spatial strategy and housing requirements • Policies RA1 and RA2: facilitate development in the rural villages. • Policy CP9 and 10 sets out affordable housing requirements and housing mix. • Policy RA4 allows residential development of 100% affordable housing in rural area. • Policy CP11 provides guidance on Gypsies, Travellers and Travelling showpeople. • Policies CP1, SCR6, SCR7, SCR8 and SCR9 improve the sustainability of the existing and new development • Policies D1, D3, D5, D6 and D7 require development to be designed for people, and to be safe and attractive. The requirement for attractiveness relates to the delivery of good quality housing. • Policy D3 requires development to be designed with appropriate frontages, including active frontages and continuity of street frontage. This relates to the delivery of good quality housing. • Policy D5: requires developments to be well detailed which relates to the delivery of good quality housing. • Policy D6: requires development to provide for appropriate levels of amenity. • Policy D7: guides infill and backland development • Policy H1: facilities housing and facilities for the elderly, people with other supported housing or care needs. • Policy H2 allows a change of use from residential to a large HMO providing that it meets the requirements. • Policy H2a provides guidance on new Purpose Built Student Accommodation. • Policy H7 provides guidance on moorings. • Policy H8 sets housing accessibility.
<p>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</p>	<ul style="list-style-type: none"> • Policy CP13 requires new development to be supported by the timely delivery of the required infrastructure • Policy D1 requires development to be designed for people, and to be safe and attractive. The requirement for safety relates to designing out crime and promoting a feeling of security through better design. • Policy D2 requires development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and easy to move around. This relates to designing public realm which maximises opportunities for social interaction and connections within and between neighbourhoods. • Policy D3 requires development to be designed for ease of walking and cycling and provide safe and quality routes; be permeable, connected with the existing street

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<p>network, making new connections and avoiding severance; and designed not to prejudice existing/future development on adjoining sites.</p> <ul style="list-style-type: none"> • Policy D4 requires development with open spaces to be defined positively, with clear definition of public and private, appropriate enclosure and no ambiguous left over space. • Policy D5: requires developments to provide for appropriate levels of amenity, including provision of defensible space, which relates to designing out crime and promoting a feeling of security through better design. • Policies LCR1, LCR1A, LCR2 and LCR6 protect community, social and cultural facilities. • Policy LCR3 safeguards land for primary school use. • Policy LCR5 protects open spaces. • Policy LCR6 protects the local green space. • Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also enhance the public realm which relates to the design of public realm which maximises opportunities for social interaction • Policy ST7 requires development to provide if appropriate a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; facilities for public transport; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking.
<p>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</p>	<ul style="list-style-type: none"> • Policy DW1 Strategic Framework for new employment provision • Policy CP12 sets out the hierarchy of shopping centres • Policy D1 requires places to be mixed use and respond to context, which will contribute to providing an adequate supply of land to meet a diverse range of employment opportunities and to correct imbalances between residential and employment development to help reduce travel distances to work. • Policy D3 requires development to be mixed use where possible, particularly at public transport nodes and at local, district, city and town centres, which will contribute to providing an adequate supply of land to meet a diverse range of employment opportunities and to correct imbalances between residential and employment development to help reduce travel distances to work. • Policy ED.1A supports proposals for office development within city and town centre boundaries. • Policy ED.1B provides guidance on change of use and redevelopment of B1 office to residential use. • Policy ED.1C provides guidance on change of use and redevelopment of B1 office to other town centre use • Policy ED.2A protects strategic and other primary industrial estates and identifies the Locksbrook Creative Industry Hub. • Policy ED2B protects non-strategic industrial land • Policy RE1 facilitates employment development in RA1 and RA2 villages. • Policies RE2, RE3, RE4, RE5, RE6 and RE7 provide guidance on development in the rural area. • Policies CR1, CR2, CR3 and CR4 ensure the vitality and viability of the city and town centres. • Policies 1-7: Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency.
<p>Objective 5: Ensure everyone has access to high quality and affordable public</p>	<ul style="list-style-type: none"> • Policies D1 and D3 require development to make connections by foot, cycle, public transport and by car (in that order), with streets legible and easy to move around. This relates to prioritising access to good public transport and safe walking and cycling infrastructure, over facilities for private cars.

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
transport, cycling and walking infrastructure	<ul style="list-style-type: none"> • Policies 1-7 Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency. • Policy ST1, ST2 and ST2A require well-connected places accessible by sustainable means of transport; relates to prioritising access to good public transport and safe walking and cycling infrastructure over facilities for private cars • Policy ST6 allows transport interchange. • Policy ST7 requires development to provide if appropriate a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; facilities for public transport; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking. • Policy SCR9 requires all dwellings to demonstrate secure and accessible cycle storage facilities which relates to prioritising access to cycling infrastructure
<p>Objective 6 (landscape): Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	<ul style="list-style-type: none"> • Policy CP6: requires high quality design, protect and enhance historic environment, landscape and nature conservation. • Policies GB1, GB2 and GB3 provide guidance on development in the Green Belt. • Policy D1 requires development to enrich the character and qualities of places and contribute positively to local distinctiveness. • Policy D2 prevents development that harms local character and distinctiveness. • Policy D3 requires development to be of an appropriately fine urban fabric. • Policy D4 requires development to be well connected respecting streets and spaces. • Policy D5 provides guidance on building scale design and materials • Policy D8 provides guidance on lighting. • Policies NE2, NE2A and NE2B require development to protect and enhance local landscape character and distinctiveness, incorporating green space to enhance the sense of place, and preserve and enhance important views. • Policy CP3 guides new renewable energy development.
<p>Objective 7 (heritage): Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<ul style="list-style-type: none"> • Policy GB1 only allows development within or visible from the Green Belt to proceed if it is not visually detrimental to the Green Belt by reason of siting, design or materials used. This ensures development that is well related to the surrounding landscape. • Policy D1 requires development to enrich the character and qualities of places and contribute positively to local distinctiveness. • Policy D2 prevents development that harms local character and distinctiveness; requiring development to positively respond to the site context and local character, locally characteristic architectural styles, patterns, rhythms and themes, and reflects materials, colours, textures and boundary treatments appropriate to the area. • Policy D3 requires development to be of an appropriately fine urban grain. • Policy D4 requires signage, lighting and street furniture associated with new development to respond to the local context which leads to development that is well related to the surrounding townscape. • Policy NE6 requires development to include the appropriate retention and new planting of trees and woodlands, and not have an adverse impact on a veteran tree. • Policy HE1 requires development to enhance or better reveal any heritage assets' significance and setting and avoid substantial harm to any heritage assets. • Policy HE2 protects remains and/or historic routs of the Wansdyke or Somersetshire Coal Canal.
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<ul style="list-style-type: none"> • Policy CP7 protects, enhances and manages the strategic Green Infrastructure network and introduces the Bath River Line project. • Policy D2 prevents development that harms local character and distinctiveness; • Policy D8 supports a variety of techniques to facilitate development that will minimise and/or compensate for light spill, including providing functional dark routes and provision of roosting opportunities on site. • Policy NE1 requires development to make provision for green infrastructure, ensuring suitable links to existing networks are provided and maintained; does not adversely affect the integrity and value of green infrastructure assets; and that major

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
	<p>developments are accompanied by an audit of existing green infrastructure and how green infrastructure has been incorporated into the scheme.</p> <ul style="list-style-type: none"> • Policy NE3 prevents development that would adversely affect internationally or nationally protected species and/or their habitats. • Policy NE3a requires a Biodiversity Net Gain. • Policy NE4 protects and enhance ecosystem services • Policy NE5 requires development to make a positive contribution to the creation, protection, enhancement, restoration and management of robust ecological networks. This relates to avoiding potential impacts on designated sites; avoidance of damage to and positive enhancement of wildlife sites; conservation, restoration and re-creation of priority habitats; development which enhances the ecological services of the wider area; and development which incorporates biodiversity into the design. • Policy NE6 protects trees and woodland. • Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also create new habitats leading to an increase in the biodiversity of the area, which relates to enhancing the ecological services of the wider area and incorporating biodiversity into the design.
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<ul style="list-style-type: none"> • Policy D1 requires development to make connections by foot, cycle, public transport and by car (in that order), • Policy D8 requires external lighting to not give rise to an unacceptable level of illumination into the sky, open countryside or in villages, which relates to the objective of reducing light pollution. • Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Natural processes break down pollutants leading to an improvement in the quality of the water discharge, which relates to the reduction in water pollution • Policy PCS1 only allows development if there is no unacceptable risk from existing or potential sources of pollution or nuisance on development, and no unacceptable risks of pollution to other existing or proposed land uses. • Policy PCS2 only allows development where it does not give rise to unacceptable increases in levels of noise that has an adverse impact on health and quality of life, which relates to development that minimises exposure to noise pollution and avoidance of locating potentially noisy activities in areas that are sensitive to noise. • Policy PCS3 only allows development which does not give rise to polluting emissions which have an adverse impact on air quality and health; is not located where it would be at unacceptable risk from existing sources of odour/dust/other forms of air pollutant; and is consistent with the local air quality action plan if applicable. • Policy PCS5 only allows development on contaminated land provided the proposal will not cause significant harm to health or environment, and that remediation measures are put in place as appropriate. This relates to the remediation of contaminated sites • Policy PCS6 does not allow development on the land may be unstable. • Policies PCS7 and PCS7A do not allow development that would adversely affect the quality or quantity of water resources by means of pollution which relates to reducing water pollution • Policy PCS does not allow development that would have an adverse impact on the quality or yield of the Bath Hot Springs which relates to reducing water pollution. • Policy LCR6 requires a management plan for new artificial pitches.
<p>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<ul style="list-style-type: none"> • Policy CP5 requires a sequential approach to flood risk management and sustainable drainage. • Policy NE4 allows development which considers ecosystems services and addresses flood prevention. This relates to reducing the vulnerability to and managing of flood risk. • Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. This relates to reducing the vulnerability to and managing of flood risk.

SA Objectives	Key relevant Development Management Policies considered in appraising the sites
<p>Objective 11 Reduce negative contributions to and Increase resilience to climate change</p>	<ul style="list-style-type: none"> • Policies CP1 and H2 encourages retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and requires HMOs to achieve an Energy Performance certificate 'C' rating. • Policy NE1 requires development to make provision for green infrastructure, ensuring suitable links to existing networks are provided and maintained; does not adversely affect the integrity and value of green infrastructure assets; and that major developments are accompanied by an audit of existing green infrastructure and how green infrastructure has been incorporated into the scheme. • Policy NE3a requires a Biodiversity Net Gain. • Policy NE4 protects and enhance ecosystem services • Policy NE5 requires development to make a positive contribution to the creation, protection, enhancement, restoration and management of robust ecological networks. • Policy NE6 protects trees and woodland. • Policy SU1 requires all planning applications to be accompanied by a SuDS proof of concept whereby the drainage strategy is based on sustainable drainage principles which do not increase flood risk. Good quality SuDS can also create new habitats leading to an increase in the biodiversity of the area, which relates to enhancing the ecological services of the wider area and incorporating biodiversity into the design. Policy D1: requires buildings and spaces to be energy efficient which leads to development designed to be resilient to future climate of increased extremes of heat, cold and rainfall. • Policy D3 requires development to provide natural light, passive solar gain and passive ventilation, and avoid pockets of cold, areas of overheating, dazzle, wind or shade which leads to development designed to be resilient to future climate of increased extremes of heat, cold and rainfall. • Policy SCR2 requires all major non-domestic development to achieve BREEAM Excellent or DEC Level 'A'; relates to development being resilient to future climate change • Policy SCR3 allows implementation of allowable solutions in order to meet the national zero carbon requirements for dwellings from 2016; this relates to development designed to be resilient for future climate change • Policies ST1-7 Strengthen focus on sustainable travel, providing genuine travel choice and reducing car dependency, linking with the Climate and Ecological Emergency Declarations and 2030 Carbon Neutrality. • Sustainability Policies CP1, CP3, SCR1, SCR2, SCR4 SCR6, SCR7, SCR8, SCR9 and CP4 contribute reduce carbon emission.
<p>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>	<ul style="list-style-type: none"> • Policy CP4 encourages district heating • Policy D1 requires buildings and spaces to be energy efficient which relates to development that demonstrates sustainable design and construction and maximises energy efficiency. • Policy D3 requires development to provide natural light, passive solar gain and passive ventilation, and avoid pockets of cold, areas of overheating, dazzle, wind or shade which relates to development that demonstrates sustainable design and construction and maximises energy efficiency. • Policies SCR6 and 7 require on-site renewable energy • Policy CP3 sets the renewable energy targets and provide guidance on renewable energy development • Policy SCR3: sets the requirements for ground mounted solar arrays • Policy SCR4 supports community renewable energy schemes • Policy SCR5 encourages water efficiency • Policy SCR8 requires applicants to meet local water efficiency requirements which relates to water efficient design and reduction in water consumption • Policy PCS8 protects the quality or yield of the Bath Hot Springs. • Policies M1 – M5 provide guidance on facilitating the sustainable use of minerals. • Joint Waste Core Strategy requires waste prevention and promote the waste hierarchy.

Stage C: Preparing the SA Report

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

Stage D: consulting on the SA Report

- 3.18. Consultation on the Scoping Report for 5 weeks from 28th April to 3rd June 2020 and the Interim SA Report was undertaken for 5 weeks from 7th January to 18th February 2021 and comments received are published in Appendix H alongside the council's responses to these.
- 3.19. The SA Report ~~has been produced for consultation~~ alongside the Draft LPPU was consulted on from 27th August to 8th October before submitted the Secretary of State.
- 3.20. The draft SA Report is published for consultation alongside the Main Modification to the Draft LPPU from 21st September to 2nd November. All comments need to be sent to: planning_policy@bathnes.gov.uk
- 3.21. ~~The consultation period for the draft Plan and the SA Report is from 27th August to 8th October. All comments need to be: planning_policy@bathnes.gov.uk.~~
- 3.22. ~~The next stages of the production of the Placemaking Plan are:
December 2021 : Submission
Spring : Examination in Public; and
Summer: : Adoption~~

Stage E: Monitoring and implementation of the LPPU

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

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

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

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

Relationship with other Plans and Programmes and Baseline

What the SEA Regulations say...

Information for Environmental Reports:

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

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

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

Table 8: Sustainable Development Messages Identified in the Review of Plans, Policies and Programmes	
Topic	Sustainable Development messages which have informed the SA objectives
Air quality and noise	<ul style="list-style-type: none"> • The National Planning Policy Framework (NPPF) requires that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. • The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect our environment. • There are 5 Air Quality Management Areas (AQMAs) in Bath and North East Somerset (B&NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre (µg/m³) • NPPF requires “Planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.” <p>Met through the inclusion of SA Objective 9: Reduce land, water, air, light, noise pollution</p>
Biodiversity	<ul style="list-style-type: none"> • Avoid impacts on key habitats, species and sites, especially designated sites; irreplaceable habitats; priority habitats and species; greenspace networks and habitat connectivity, including river and stream corridors by employing the avoidance-mitigate-compensate hierarchy. Provide a Biodiversity Net Gain • Facilitate maximum on-site delivery of BNG and compliance with the BNG Good Practice Principles. • Contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services. <p>Met through the inclusion of SA Objective 8 Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>
Climate change and flood risk	<ul style="list-style-type: none"> • Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change; • Minimise dependence on cars and reduce congestion • Maximise access by sustainable transport means, through the provision of safe and attractive walking and cycling routes that are well connected to services and amenities • Facilitate more renewable energy development • Promote best practice for SuDs and minimise impact on drainage and water supply infrastructure. <p>Met through the inclusion of SA Objective 10 Reduce vulnerability to, and manage flood risk (taking account of climate change) and Objective 11 Reduce negative contributions to and Increase resilience to climate change</p>

<p>Community, health and well-being</p>	<p>Improve peoples' health and reduce health inequalities; Improve access to health and well-being facilities Protect and provide access to appropriate levels of open space and community facilities; Create mixed, safe communities and promote social inclusion; Maximise access to local facilities and access to the natural environment for all population groups. Ensure adequate provision of community services and facilities, and maximise access by sustainable modes of transport. Provide accessible healthcare services and other social infrastructure to support population growth.</p> <p>Met through the inclusion of SA Objective 1: Improve the health and well-being of all communities, and reduce health inequalities and SA Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</p>
<p>Employment</p>	<ul style="list-style-type: none"> • Promote high quality and sustainable tourism • Ensure a resilient and economically sustainable food system • Facilitate building competitive economy and improve access to employment and training opportunities • Maximise access to existing employment and create more jobs • Correct imbalances between residential and employment development to reduce in / out commuting. • Contribute to green recovery <p>Met through the inclusion of SA Objective 4: Build a strong, competitive economy and enable local businesses to prosper</p>
<p>Energy and carbon emissions</p>	<ul style="list-style-type: none"> • Support low carbon economies • Achieve successful and competitive businesses both urban and rural; • Promote energy efficiency; • Promote and provide for renewable energy and energy storage • Encourage the use of electric car and facilitate such infrastructure <p>Met through the inclusion of SA Objective 11 Reduce negative contributions to and Increase resilience to climate change and Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>
<p>Historic environment</p>	<ul style="list-style-type: none"> • Protect and enhance heritage assets including their setting • Make a positive contribution to, or better reveal the significance of, the heritage assets, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area • Reduce impacts on the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, registered Historic Parks and gardens, registered battlefields, listed buildings and conservation areas or their settings • Avoid harmful impacts on protected landscapes (Cotswolds and Mendip Hills AONBs) • Sustain the Outstanding Universal Value of the City of Bath WHS. • Reduce impacts on the quality, character and local distinctiveness of the landscape and townscape, and the features within it <p>Met through the inclusion of SA Objective 7 (heritage): Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>
<p>Housing</p>	<ul style="list-style-type: none"> • Plan for objectively assessed need for all types of housing, including market housing and affordable housing. • Provide affordable housing to meet identified need • Improve the accessibility standards. • Promote good design and sustainable construction • Incorporate the principles of sustainable development

	<ul style="list-style-type: none"> • Ensure the sustainable location of development sites • Maximise access to existing services and plan for provision of new services where required • Manage future growth in HMOs and student accommodation <p>Met through the inclusion of SA Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</p>
Natural resources	<ul style="list-style-type: none"> • Make the best use of previously developed land; • Promote higher densities of development in accessible locations; • Protect soil resources including high quality agricultural land; • Promote water efficiency; • Promote local food production • Promote waste management hierarchy <p>Met through the inclusion of SA Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>
Landscape	<ul style="list-style-type: none"> • Protect and enhance heritage assets including their setting • Make a positive contribution to, or better reveal the significance of, the heritage assets, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area • Reduce impacts on the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, registered Historic Parks and gardens, registered battlefields, listed buildings and conservation areas or their settings • Avoid harmful impacts on protected landscapes (Cotswolds and Mendip Hills AONBs) • Sustain the Outstanding Universal Value of the City of Bath WHS. • Reduce impacts on the quality, character and local distinctiveness of the landscape and townscape, and the features within it • Follow the Government Tree Strategy and the Tree Action Plan to enhance the treescape in the district <p>Met through the inclusion of SA Objective 6 (landscape): Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>
Transport	<ul style="list-style-type: none"> • Reduce the need to travel • address impacts of car dependency and deliver a transformational rebalancing of our transport network to address the Climate Emergency, support sustainable travel and healthier lifestyle • Encourage walking and cycling and public transport • Support sustainable and inclusive economic growth; • Enable equality and improve promote accessibility • support measures that enhance the liveability of our neighbourhoods by reducing traffic volumes and speeds, making walking and cycling the mode of choice for local trips, and offering a range of choices for longer distance trips. • Improve air quality especially the area identified as the Air Quality management Area • Facilitate an affordable, low carbon, accessible, integrated, efficient and reliable transport network through which we can achieve a more competitive economy and better connected, more active and healthy communities. <p>Met through the inclusion of SA Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</p>

5. The Sustainability Baseline

What the SEA Regulations say...

Information for Environmental Reports...

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

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

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
Air quality	
<p>There are currently 5 Air Quality Management Areas (AQMAs) in Bath and North East Somerset (B&NES) where levels of nitrogen dioxide exceed the national annual average objective of 40 micrograms per cubic metre ($\mu\text{g}/\text{m}^3$)</p> <p>The Clean Air Zone scheme was introduced in Bath in March 2021.</p> <p>There are no AQMAs in Midsomer Norton, Radstock or elsewhere in the district.</p> <p>41% of Bath & North East Somerset’s carbon emissions come from domestic properties, 34% from commercial premises and the rest from transport.</p>	<p>Improving air quality is continuing to be challenging.</p> <p>The LPPU was undertaken specifically to respond to the climate and ecological emergency and facilitate the carbon neutrality by 2030. The LPPU offers an opportunity to mitigate poor air quality by promoting sustainable development locations and active transport.</p> <p>The LPPU policies, particularly new sustainability policies such as zero carbon development and updated transport policies focusing on sustainable travel, providing genuine travel choice and reducing car dependence would present the opportunities to reduce carbon emissions and improve air quality.</p> <p>The Placemaking Plan Policy PCS3 continue to apply to manage air quality even without the LPPU.</p>

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
Noise	
There is a gap in the baseline data regarding noise levels within the District.	<p>Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.</p> <p>However electric vehicles are quieter than petrol or diesel vehicles and the LPPU Policy SCR8 facilitates electric vehicles charging infrastructure from new development which indirectly contributes to addressing noise associated with traffic.</p> <p>The Placemaking Plan Policies D6 (residential amenity), PCS2 (noise pollution), and LCR6 (sports facilities) and ST3 (transport) continue to apply to manage noise levels and pollution even without the LPPU.</p>
Biodiversity	
<p>The following sites are designated for nature conservation:</p> <p>SPA: Chew Valley Lake</p> <p>SAC: Combe Down and Bathampton Mines, part of the 'Bath & Bradford-on-Avon Bats SAC'.</p> <p>SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC.</p> <p>There are 59 SSSIs in B&NES and 300 locally designated sites. 71% of SSSI units are in favourable condition.</p> <p>There are 300 locally designated sites.</p> <p>A BAP priority habitat is mapped in the Scoping Report.</p>	<p>The Council declared a nature emergency. The district's biodiversity is at threat from development; human activities such as pollution, roads, disturbance, farming practices; loss of habitat; loss of food sources and a changing climate and pressures on the natural environment are likely to continue regardless of the LPPU.</p> <p>Prior to the mandatory Biodiversity Net Gain (BNG) requirements coming into effect the LPPU BNG policy (Policy NE3a) will reflect the proposed mandatory measures, including use of the DEFRA metrics and emerging national guidance. The LPPU updated policies would present opportunities to guide new development to protect and enhance biodiversity and to minimise the impact where necessary.</p> <p>The Placemaking Plan already includes policies (inc. Policy NE3 Sites, Species and Habitats) seeking to address these issues and these would continue to apply even without the LPPU.</p>
Climate change and flood risk	
<p>The areas prone to flooding tend to follow the main rivers. The areas most at risk of flooding are:</p> <p>Bath - at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Level 2 SFRA has shown that large proportions of the central area and areas closest to the River Avon are in Flood Zone 3a and 3b (the highest risk). The Black and Veatch Bath Flood Risk Management Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It</p>	<p>Climate change is likely to have on-going effects regardless of the LPPU. The Core Strategy Policy CP5 to manage flood risk and Policy SU1 to facilitate sustainable drainage are retained, and these would continue to apply even without the LPPU.</p> <p>One of the purposes of the LPPU is to replenish housing supply in order to meet the Core Strategy housing requirement and the necessary supply of housing land maintained. The sequential approach is taken to select new</p>

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

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
<p>Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards.</p> <p>There is a requirement to address health inequalities as well as specific health problems such as obesity in the District</p>	<p>development approach which may result in inappropriate uses take up key regeneration sites in Bath, thereby undermining the objective to create balanced community. These allocation sites were retained and continue to apply. The LPPU allocations further ensure to direct appropriate uses in the right locations.</p> <p>Opportunities to consider access to healthcare, open spaces and other recreational were taken into account during identification and allocation of development sites through the Core Strategy and Placemaking Plan.</p> <p>The Local Plan Review presents further opportunities to allocate new housing development sites at locations which are in close proximity to existing healthcare facilities, open spaces and other facilities which might encourage healthier lifestyle choices including increased levels of physical activity. The identification of the Bath River Line as a key green infrastructure project in Bath would encourage more walking and cycling.</p>
Economy and employment	
<p>There is an uneven spatial distribution of skills levels in Bath and North East Somerset with particular skills issues in Midsomer Norton and Radstock (the Somer Valley area).</p> <p>The percentage of the economically active population of B&NES which are unemployed is lower than the UK and regional percentages.</p> <p>Wage rates are lower than the UK average and there are many low skill/wage jobs.</p> <p>There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation.</p> <p>There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 30% of local jobs are accounted for in manufacturing, a declining sector.</p> <p>In 2019, 5 areas are within the most deprived 20% of the country (Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West). No areas in B&NES are within the most deprived 10% nationally.</p> <p>The rural areas generally feature in the least deprived areas in England. However, Bathavon North, Englishcombe, Corston, Hinton Blewet and Chew Valley are within 10% of most deprived areas with barriers to obtaining suitable housing and in accessing key local services. Whitchurch is within the 10% most deprived areas for Crime and Disorder.</p>	<p>The updated Policies ED2A (including Creative Hub) and ED2B strengthen the protection of industrial land to ensure a balanced economy to continue to provide more employment in Bath and the wider area.</p> <p>Policy SSV9 The Old Mills Industrial Estate was allocated through the Placemaking Plan to provide a long term supply of new employment land and to boost jobs in the Somer Valley area. The northern area was designated as an Enterprise Zone in 2018 and the Local Development Order is in preparation, therefore it is likely that the site would come forward for development without the LPPU, however the LPPU updates Policy SSV9 to improve development viability to support its delivery.</p> <p>The Placemaking Plan includes allocations for key employment sites in the district and these allocations are retained and Policies continue to apply, however the LPPU updates some of the key sites such as the Royal United Hospital(SB18) and University of Bath (SB19) which helps increase the provision of employment.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>The Placemaking Plan Policy RE1 to facilitate employment uses in the countryside is retained and continue to apply.</p>

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
<p>The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space.</p> <p>There are a number of Local Food Suppliers in the District and the North East Somerset & Bath Local Food Partnership was set up in 2007 to encourage the production, sale, purchase and consumption of quality foods produced in the local area. The Partnership commissioned a survey in to local food production in the B&NES area. Key findings included a need for the planning system to support barriers to expansion of local food producers.</p>	<p>There are some uncertainties about how the new use class E and MA will affect the provision of office floorspace in the district. However Bath is excluded from permitted development class MA as a World Heritage Site. They are governed nationally and will apply even without the LPPU.</p> <p>Local food producers may continue to experience barriers to expansion.</p>
Historic environment	
<p>Bath was designated a World Heritage site in 1987 and European Spa Town in 2021.</p> <p>There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&NES (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register.</p> <p>The area which was formerly part of the Somerset coalfield retains a rich industrial heritage.</p> <p>There is a requirement to protect and enhance the district's historic, environmental and cultural assets.</p>	<p>The Core Strategy and Placemaking Plan already have a number of policies to protect and enhance the historic environment especially Policy HE1. They are retained and will continue to apply even without the LPPU.</p>
Housing	
<p>The Core Strategy sets the housing requirements, and the latest monitoring shows some shortfall (around 1,100 homes)</p> <p>High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers.</p> <p>Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the overall need for affordable housing in B&NES is concentrated in Bath City.</p> <p>Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. Achieving an appropriate mix of</p>	<p>One of the purposes of the LPPU is to replenish housing supply in order to meet the Core Strategy housing requirement and the necessary supply of housing land maintained (and continue to meet the 5 year land supply). By allocating more sites through the Partial Update, it could avoid development in unsustainable locations.</p> <p>The LPPU additional allocation sites also provide some affordable housing.</p> <p>Without the pro-active planning represented by the LPPU, it is unlikely that B&NES will be able to provide enough affordable housing to satisfy future requirements.</p> <p>Without the LPPU, the market led development approach may result in inappropriate uses taking up key regeneration</p>

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
<p>decent, affordable homes will need to be a priority in any new development proposals.</p> <p>Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials.</p> <p>Houses in Multiple Occupation (HMO) are HMOs are an important part of the local housing market, particularly within Bath, providing affordable accommodation for student, professionals and migrant workers among others. HMOs have traditionally been more concentrated in certain areas of the city, particularly in the wards of Oldfield, Westmoreland and Widcombe.</p> <p>There is a need to create more balanced communities.</p> <p>Recently more purpose built student accommodations were built on former industrial land resulting a shortage of industrial land in Bath.</p>	<p>sites in Bath resulting in not meeting the Council's housing objectives.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve.</p> <p>The Placemaking Plan Policy H2 provides guidance on a change of use from residential (use class C3) to HMO (use class C4 and Sui Generis) and it will continue to apply without the LPPU. However the LPPU presents an opportunity to update Policy H2 to expand the remit to cover a change of use from other uses such as office and intensification from small to large HMOs.</p> <p>The LPPU also presents a new policy to manage new purpose built student accommodation and update the policy for Claverton Campus. Without the LPPU it is likely to lead to further loss of industrial land.</p>
Land	
<p>B&NES has prepared a Remediation Statement relating to contaminated land located in Keynsham. This land has been remediated, including the removal of all material, contaminated and uncontaminated, from the site and, therefore, permanently removing the pollutant linkage.</p> <p>No further land is registered as contaminated under Part 2A of the Environmental Protection Act 1990.</p> <p>82% of now or converted dwellings in the District completed during 2008/09 were built on previously developed land.</p>	<p>As developments occur on contaminated land they will be remediated. Therefore, the amount of contaminated land will decrease over the next 5-10 years.</p> <p>The amount of development that is built on brownfield land should remain high in the district.</p> <p>Without the LPPU, the market led development approach may result in inappropriate uses taking up key regeneration sites in Bath resulting in not making efficient use of brownfield land within the settlement boundaries.</p>
Landscape	
<p>There are 2 AONBs in the District – Mendip and Cotswolds AONBs.</p> <p>The district has a varied landscape represented by 18 LCAs. Large areas of B&NES are Green Belt (61%).</p> <p>Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views.</p> <p>The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas.</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.</p> <p>Without the LPPU, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.</p> <p>The LPPU indicates the areas potentially suitable for renewable energy linking with the land sensitivities. It also provides further guidance to avoid, minimise and mitigate the impact on landscape.</p>

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
Large areas of Radstock are covered by a Conservation Area.	
Transport	
<p>Over 50% of residents travel out of the area to work. The average journey to work is 13.23km (comparatively high). JLTP 2020 states: 2 of 3 commutes by car, 25% increase in trips by 2036, Over 300 premature deaths a year linked to NO2 and 2 in 5 commutes are less than 2km.</p> <p>There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-region's poor internal transport links. Major link roads, A4, A36 and A46 pass through the centre of Bath, therefore Bath has a very high level of through traffic. This includes large numbers of HGVs en route to or from the Channel ports.</p> <p>Bath has low level of cycling due mainly to heavy traffic volumes, the lack of cycle networks and steep hills, but a relatively higher proportion of movements by foot despite gradients and busy roads.</p> <p>The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City.</p> <p>High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.</p> <p>Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303.</p> <p>Problems with congestion are experienced in Bath, Keynsham and Radstock.</p> <p>Any proposals for the further development of the area will need to address this by bringing relief from current congestion, and promoting more sustainable forms of transport.</p> <p>Across the West of England, Joint Local Transport Plans over ten years have seen the number of cycling trips more double, and bus passenger trips increase by more than one third, in the context of a national 1% fall</p>	<p>The high proportion of the district's population recorded in 2001 who travel to work by car will continue unless alternative and more attractive modes of transport are provided.</p> <p>Increased traffic would exacerbate all of the existing problems outlined in the baseline data.</p> <p>The Plan facilitates the implementation of the Transport Strategy. Without the Plan, traffic congestion and air quality are likely to remain the same or will be worsen.</p>
Waste	
<p>B&NES is one of the top recycling authorities within the country, recycling 41% of household waste in 2009/10.</p> <p>Waste infrastructure: 2 x waste transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling</p>	

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
<p>Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots.</p> <p>Every day B&NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset.</p> <p>In 2018-19 over 48,000 tonnes of Bath & North East Somerset residents waste was reused and recycled.</p> <p>In total B&NES exported just over 14% of the 66,906 tonnes diverted away from landfill. The majority of this exported waste has been removed from residents' weekly bin waste at different facilities within the region.</p> <p>In B&NES 19,705 tonnes of black bag waste was sent to these facilities in 2018-19</p>	<p>Levels of recycling have been increasing and there is no reason to believe that this trend will change.</p> <p>However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.</p>
Energy and carbon emissions	
<p>indicating that the main sources of greenhouse-gas emissions across the district are energy use in buildings (66%), and transport (29%)</p> <p>Energy use in buildings: 66% and 507,808t/CO2e/yr, consisting of emissions from</p> <ul style="list-style-type: none"> - Homes: 38% of the total and 293,585t/CO2e/yr - Non-domestic buildings: 28% of the total and 214,223t/CO2e/yr. <p>Transport: 29% and 216,110t/CO2e/yr.</p> <p>There is no record of any major renewable energy schemes within the district. There are a few small scale schemes undertaken on an individual basis but no comprehensive survey of existing installations has been undertaken and this may be a gap in baseline information.</p> <p>The Core Strategy Policy CP3 sets renewable energy targets (Electricity 110MWe and Heat 165MWth) by 2029. The latest monitoring in the district shows that only 21.7 MW electricity and 7.4 MW heat are available as of 2019. A renewable energy research study has been undertaken.</p>	<p>The LPPU policies, particularly new sustainability policies such as zero carbon development and updated transport policies focusing on sustainable travel, providing genuine travel choice and reducing car dependence would present opportunities to reduce carbon emissions.</p> <p>The Core Strategy and Placemaking Plan already have policies aiming to reduce carbon emissions, however the LPPU presents the opportunity to build on this policy approach and provide stronger requirements.</p> <p>The Core Strategy and Placemaking Plan already have policies aiming to facilitate renewable energy projects (CP3 renewable, SCR1 on-site renewable, SCR2 Roof-mounted solar, SCR3 Ground-mounted Solar and SCR4 Community Renewable), these will continue to apply without the LPPU. However the LPPU present the opportunity to build on this policy approach and provide further guidance. The NPPF states that '<i>A proposed wind energy development involving one or more wind turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan.</i>' The LPPU revised CP3 identifies the suitable areas for wind energy development. Therefore it is unlikely that wind energy development come forward without the LPPU.</p> <p>The LPPU policies, particularly new sustainability policies such as zero carbon development policy encourage energy efficiency and uptake of renewable energy.</p> <p>Historic buildings may be difficult to make more energy efficient. The Energy Efficiency, Retrofit and Sustainable Construction Supplementary Planning Document provides further guidance in relation to historic buildings.</p>

Table 9: Summary of the Sustainability Baseline Data	
Sustainability baseline, issues and the environmental characteristics of those areas likely to be significantly affected	Likely evolution without the LPPU (LPPU)
Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings.	With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years.
Water/Soil	
<p>The river chemical and biological quality is generally Very Good to Fairly Good.</p> <p>Nitrate is regularly found in groundwater in some areas.</p> <p>The far east and far west of the district is covered by Ground Source Protection Zones (including a part of Bath).</p> <p>There are some concerns regarding impact on people's health resulting from exposure to contaminated granular material used for artificial pitches and through the contamination of soil and water.</p>	<p>The Core Strategy and Placemaking Plan already have policies aiming to protect water quality such as Policy PCS7 (Water Source Protection Zones). They continue to apply without the LPPU.</p> <p>With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.</p> <p>The Core Strategy and Placemaking Plan Policies LCR6 (new and replacement sports and recreational facility) and PCS5 (contamination) already provide guidance to avoid such contamination, however the LPPU presents the opportunity to strengthen the policies, particularly revised LCR6 requires a management plan to be submitted with new artificial pitches applications.</p>

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

What the SEA Regulations say...

Information for Environmental Reports:

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

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

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

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

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

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

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

Options document reference	Key results of sustainability appraisal of alternative options	How this informed the preparation the draft LPPU and other reasons for selection and discounting the option to be taken forward in the draft LPPU (Reg19)
<p>DM1 Net Zero Carbon Policy</p> <p>Option 1: Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new buildings.</p> <p>Option 2 Amend policies with a new zero carbon construction policy reflecting the energy hierarchy for all new major development.</p> <p>Option 3 Retain current policies SCR1, CP2 and CP1</p>	<p>Option 1 will help to secure more sustainable methods of construction using the energy hierarchy for all new buildings whereas option 2 will only apply to major developments. For objective 1(health) the proposed policy will result in warmer, more fuel efficient homes. For objective 2(housing) an energy efficient home is more affordable to live in and financial contributions can help to alleviate fuel poverty. For objective 4 the proposed policy will encourage investment in sustainable construction and renewable energy industry. For objective 5(transport) development will be sited close to public transport and local amenities. For objectives 6 and 7 the provision of renewable energy will impact on the landscape and heritage assets.</p> <p>However, development will also be subject to development management policies NE.2 and HE.1 which seek to protect the historic and natural environment. For objective 9 a reduction in CO₂ emissions will improve air quality. For objective 10 the reduction in carbon emissions will help slow climate change, which would reduce the vulnerability to flood risk. For objectives 11 and 12 a fabric first approach and renewable energy provision will reduce emissions and help contribute to tackle climate change.</p>	<p>Option 3 retaining the current policies is rejected as the overriding priority for the LPPU is to align the planning policies with the Council's declaration of Climate Emergency and reduce carbon emissions.</p> <p>Option 1 requiring all new development to be zero carbon reflecting the energy hierarchy would have major (significant) positive effects on a number of objectives. The LPPU Options document considered how the policy could be amended to work alongside the Future Home Standards (the update on Part L of the Building Regulations). The government has stated their intention to bring in the Future Homes Standards in 2025 but the exact method of how carbon reduction will be enacted is still subject to future consultation. Due to the uncertainty of the Future Homes Standard, the plan will continue to pursue a zero carbon construction standard but to change the metric from carbon</p>

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

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

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

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

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

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

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

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

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

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

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

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

7. Results of the Appraisal of the draft LPPU

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

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

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

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

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

Policy	Key findings significant effects
CP1 Retrofitting Existing Buildings	The policy will encourage the retrofitting of existing buildings and supplemented by the Energy Efficiency, Retrofitting and Sustainable Construction SPD. Energy efficient buildings and

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

<p>Supersede CP2 and SCR1 Residential and non Residential Development</p>	<p>residential and non-residential developments that cannot meet their energy needs on site, off setting payments will be secured through a section 106 agreement. This will result in a major positive effect on Objective 11(climate) and Objective 12(resources). <u>The supporting text encourages all new development to undertake a CIBSE TM59 overheating assessment to evaluate how overheating can be mitigated. Even though this is not a policy requirement, it encourages exemplary development.</u></p> <p>A minor negative and uncertainty effect are identified for Objective 6 (landscape)(landscape) and 7(heritage) as the provision of on-site renewable energy generation would have potential to increase negative impacts on areas of valued landscape and townscape and the setting of heritage assets. However, any development will be subject to development management policies in particular HE.1, NE.3, NE.4 and NE.5 which seek to protect the landscape, historic and natural environments and therefore negative impacts could be mitigated. The Energy Efficiency Retrofitting and Sustainable Construction SPD will also provide guidance with regards to the design of renewable energy and sustainable construction on historic buildings.</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including zero carbon requirements. It concludes that the affordable housing requirements can be met across all areas of the District but the existing use value of sites is a critical factor in determining the outcome. It identifies that large high density flatted schemes are less viable in lower value areas, due to their higher build costs, but these types of schemes generally only come forward where values are higher (i.e. Bath City Centre).</p> <p>Mitigation There may be some possible negative impacts for viability and affordability of setting additional requirements of house builders. In these circumstances, CIL exceptional circumstances relief could be applied, or the tenure mix or overall level of affordable housing could be changed to improve viability and deliverability.</p>
<p>Policy SCR8 Embodied Energy</p>	<p>Embodied carbon emissions are the carbon emissions resulting from the materials, production, demolition and disposal. An embodied carbon assessment provides details of a building's materials used in the substructure, superstructure and finishes. This provides a true picture of a building's carbon impact on the environment. Reducing embodied carbon helps reduce resource use and associated costs also alleviating longer term risks around resource availability. Therefore a major positive effect on Objective 12 (resource).</p>
<p>Policy CP4 District heating</p>	<p><u>The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions which has positive effects on Objective 1 (health), 9 (pollution) and 11(climate change)</u></p>
<p>Policy SCR9 Electric Vehicle Charging Infrastructure</p>	<p>The provision of electric vehicle infrastructure will increase the uptake in EV use and helps design new development to be resilient to future climate changes contributing to a zero carbon development, provide access to sustainable transport options and reduce emissions from car exhaust which will reduce greenhouse gas emissions. Electric vehicles also result in a reduction in traffic noise.</p> <p>The proposed policy will have significant positive effects on objective 5 (promoting sustainable transport), objective 9 (air pollution) and objective 11(climate change).</p> <p>Mitigation On street parking infrastructure could have some impact on the design and layout of the development. The Policy requires any special characteristics of the area, the public realm or the mobility of other users are not compromised. New development is also subject to other Development Management policies. The Transport and Development SPD will set the standards for electric vehicle charging in development.</p>
<p>Policy NE2 CONSERVING AND ENHANCING THE LANDSCAPE AND LANDSCAPE CHARACTER</p>	<p>The original policy NE2 aims to conserve and enhance the landscape and landscape character. The proposed change to give great weight to conservation and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities, has a major positive effect on this objective.</p>

	<p>The original policy NE2 requires to incorporate green space within the scheme that positively contributes to creating a high quality environment by providing enhanced landscape features which could include some heritage and ecological destinations/assets. The proposed change to give great weight to conservation and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs) has a neutral effect on Objective 1(health), Objective 2(communities), Objective 7 (heritage)(heritage) and Objective 8(biodiversity) however they have minor positive effects on these objectives as a revised policy.</p>
<p>Policy NE3, NE3a and NE5 Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery</p>	<p>An Ecological Emergency has been declared by B&NES Council in response to ongoing threats to wildlife and ecosystems. Policy NE3 provides policy as relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs) <u>and other protected species</u>. Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitates to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. <u>The amendments through the Main Modifications help avoid adverse impacts on European, UK protected species, UK Priority and locally important species.</u></p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. The proposed policy amendments and new biodiversity net gain policy seek to strengthen policies as relates to biodiversity requirements, thereby supporting the climate and ecological emergency. The policies will have a major positive effect on Objective 8(Biodiversity) and 11(climate change).</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including BNG requirements. It concludes that the main impact of a requirement for a net gain on residual land values through this option is relatively modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p>Mitigation Minor negative effects are identified for Objective 2(housing) and Objective 4(economy) as the requirement on developers to provide 10% Biodiversity Net Gain in residential and non-residential developments could increase build costs and potentially reduce developable areas on sites. However, some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>
<p>Policy CP7 and Policy NE1 Amendment to Policy CP7: Green Infrastructure Amendment to Policy NE 1: Development and Green Infrastructure</p>	<p>Proposed amendments to Green Infrastructure policy will support the delivery of GI as a key delivery mechanism for nature recovery and an integral part of creating healthy and sustainable communities. Strategic GI projects, such as the Bath River Line project, will support opportunities for connection to wider GI networks further supporting the health and well-being of communities and providing active travel routes within GI. GI offering nature-based solutions such as natural flood management, reducing air and noise pollution and increasing the sustainability of food production will also offer increased resilience to climate change. Therefore, there are major positive effects on Objective 1(health) and Objective 5(sustainable transport – walking).</p>
<p>Policy GB2 Policy GB3 Policy GB2 and amend reference to Housing Development</p>	<p>Defining infill boundaries and removing reference to HDB's will align policy GB2 more fully with national policy. The policy will reference that residential development is acceptable where it is limited to infilling within the defined infill boundary, replacement dwellings or redevelopment of previously developed land. The boundaries will give a clear indication of where infill development would be considered acceptable in principle within Green Belt (GB)</p>

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

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

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

<p>Policy DW1 (Spatial Strategy)</p>	<p>Policy DW1 sets out the overarching spatial strategy for the district and is largely retained. The key amendment to the policy is to increase the development capacity at East Keynsham i.e. releasing the previously safeguarded sites for development through LPPU Policy KE3c and KE3d. The new site allocations prioritise previously developed land and follow the spatial sequential approach directing new development to existing urban settlements, Bath, Keynsham and Somer Valley. This helps encourage walking and cycling by locating new housing close to existing workforces, facilities and services. Therefore major positive effects on objective 1(health) and 2(housing). There is a minor negative effect on objective 12 as three of the sites are currently greenfield land, however the two sites at Keynsham were justified and safeguarded for development through the Core Strategy</p>
<p>Policy B2 (Bath Central Area Strategic Policy)</p>	<p>The amendments to Policy B2 include the Milsom Quarter as a key development opportunity area.</p> <p>The Milsom Quarter is located within the Bath Central Area. The overarching ambition is to transform and re-imagine the future of the Milsom Quarter, creating a more viable, vibrant and diverse part of the city with a greater balance of mix of uses, activity and increased residential development, all combining to redefine the sense of community and increased local purpose. This includes redeveloping underused upper floors to residential use. In general this will have positive effects on a number of Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12(natural resources).</p> <p>However, there are some uncertain effects on Objectives 6(landscape), 7(heritage) and 8(biodiversity) as this is not a site allocation with detailed development requirements, it is therefore not clear how this designation directly responds to the natural and built environment.</p> <p>Mitigation and enhancement</p> <p>The comprehensive masterplan will review and respond to the natural and built environment and will inform future development. Also any development proposals will be subject to other Development Management policies.</p> <p>Increasing the commercial offer and footfall and usage of the Milsom Quarter area could increase traffic congestion and impact on air quality, however this area has good access to sustainable modes of transport including public transport, walking and cycling. It is also intended to bring more residential uses which assists in reducing car usage. Therefore, mixed effects are identified for Objective 9(pollution)</p> <p>The evidence-based Vision and Masterplan for Milsom Quarter is in preparation alongside the Top of the City Access and Movement Strategy. This will inform future development connections to the existing and new cycle and walking infrastructure.</p>
<p>Policy SB1 Walcot Street /Cattlemarket</p>	<p>The site is located in a highly sustainable location with potential for day to day trips (including health and well-being facilities) to be made locally and on foot or by bicycle, encouraging active lifestyles. The site has good access to employment sites/opportunities in Bath. The amendments would encourage meanwhile and temporary uses responding to the history and complexity of the site which helps increase employment opportunities. Therefore, there are major positive effects on Objective 4(economy) and 5(sustainable transport).</p> <p>Providing new development including retail, workspace, food and drink uses could increase traffic congestion and impact on air quality, however this area has a good access to sustainable modes of transport including public transport, walking and cycling. It is also intended to bring more residential uses which helps reduce car usage. Therefore, mixed effects are identified for this objective.</p> <p>Mitigation and enhancement</p> <p>This site is part of the Masterplan for Milsom Quarter which will be informed by the Access and Movement Strategy. This will inform future development connections to the existing and new cycle and walking infrastructure. New development will be subject to other Development Management policies.</p>
<p>Policy SB8 Bath Riverside</p>	<p>The updated site allocation for Bath Riverside will have a major positive effect in terms of Objective 2(housing) boosting the supply of housing (including affordable housing), and</p>

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

	<p>Mitigation New development is subject to other Development Management policies and the need to respond the restrictions on light spill from development set out in the Waterspace Design Guidance.</p>
Policy SB14 Twerton Park	<p>The policy facilitates a mixed use development that supports the retention and regeneration of the Football club and further promotes its existing role as a community hub in Twerton. Development is to comprise a mix of residential accommodation, active 'Class E' uses on the ground floor fronting onto Twerton High and a new community hub which offers communal facilities to promote healthy lifestyles, community cohesion and employment spaces, including co-working options. The site is in an accessible, well-connected location with the A36 Lower Bristol Road close to the north of the site accessed via either end of Twerton High Street. Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities) and 4(economy).</p>
Policy SB18 RUH	<p>The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&NES. Various projects to improve the facilities have been completed in accordance with their Estate Strategy (2014) and now the RUH is planning for further improvements tapping into the funding under the government's 'New Hospital Programme'. The updated policy would facilitate the improvement of essential healthcare facilities. The Trust is also the largest employer in Bath & North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to 1,000). The policy supports the improvement to their facilities helping to create more employment opportunities to meet the requirements of this growth sector. <u>The amended Policy refers to the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal.</u> The site is a sustainable location accessible by public transport and brownfield land. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12 (natural resources)</p> <p>The policy requires a sustainable transport masterplan for the whole of the RUH site, examine the pedestrian and cycle routes between the site and key local facilities, and making appropriate enhancements to ensure that the walking and cycling are the natural choice for local trips.</p> <p><u>The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate necessary enhancements to ensure that walking and cycling are the natural choices for local trips. Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate</u></p> <p><u>New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</u></p> <p>Mitigation New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>
Policy SB24 Sion Hill	<p>The site is brownfield land and expected to provide approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1 and 2 bed flats) are based on emerging housing needs set out in WECA's draft housing needs assessment. Development of the site for residential use includes provisions to encourage active lifestyles for residents and surrounding communities. Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped gardens, for use by both residents and surrounding local community. <u>The amendments through the Main Modifications links to the objectives of the Liveable</u></p>

	<p><u>Neighbourhood Project.</u> Any new development will be subject to new zero carbon development requirements. The Policy requires demolition and rebuild of the existing buildings at the site should only be proposed where conversion is not considered feasible. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities) and 12 (natural resources)</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary planting within the site is substantial, and screens the site well from views across the city. Therefore, potential minor negative effect on Objective 6 (landscape)(landscape)</p> <p>Mitigation New development will be subject to other Development Management Policies particularly Policy NE2 with a requirement for a Landscape and Visual Impact Assessment and SPDs including Transport and Development SPD for parking standards.</p>
<p>Policy SB25 St Martins Hospital</p>	<p>The new site allocation for St Martins Hospital will have a major positive impact on Objective 2(housing) in terms of boosting the supply of housing (including affordable housing). Other positive impacts will arise through potential enhancement of the existing network of pedestrian footways throughout the site, delivery of measures to improve permeability and legibility for pedestrians and cyclists in the local area and access improvements to Odd Down playing fields.</p> <p>Potential negative impacts on Objective 4(economy) relating to the loss of surplus clinical floorspace will be mitigated by policy wording requiring evidence that clinical floorspace is surplus to the needs of the NHS. Other potential minor negative impacts relating to impact on heritage and biodiversity will be mitigated through development requirements set out within the policy wording. <u>However, the amendment made to clause 8 will help conserve the heritage significance of the Chapel of St Martin.</u></p> <p>Mitigation New development will be subject to other Development Management policies and SPDs.</p>
<p>Policy SB19 University of Bath Claverton Campus</p>	<p>The revised Policy SB19 proposes further improvements to university related development including spaces for teaching, research and business incubation and provides more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. It also facilitates the further provision for sports and recreation and 3rd generation pitches which help facilitate longer play especially in winter. Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits. The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between accommodation and university facilities. <u>The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</u></p> <p>The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires <u>a campus wide approach including implementing</u> an up to date Travel Plan. As the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. Policy Framework proposes an improved green corridor and encourages walking and cycling routes.</p> <p>Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities), 4(economy) and 5(sustainable transport).</p> <p>The campus is surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area. The Verified Views Appraisal has informed the siting, building heights and required buffers to minimise the impact. The Policy also requires the University Park area to remain undeveloped as it has an important landscape setting and green infrastructure function to the many developed parts of the campus.</p>

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

	<p>and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew. Therefore, there are major positive effects on objective 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 6 (natural resources)</p> <p>New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.</p>
Policy KE3C and Policy KE3d Safeguarded land	<p>The sites are allocated for residential development of around 210 units (KE3c) and 70 units (KE3d) including affordable housing in the plan period. The provision of a replacement sports pitch in the north-west corner of the KE3c site will facilitate the expanded primary school located within the Hygge Park development. The policies prioritise pedestrians and cyclists with comprehensive networks of pedestrian and cycle routes including a new link between new development through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. Therefore, there are major positive effects on objective 1 (health), 2(housing), 3(communities), 5(sustainable transport) and 11(climate).</p> <p><u>The amendments through the Main Modifications require that Travel Plan and Transport Assessment assesses the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</u></p> <p><u>There is a minor positive effect on objective 8 (biodiversity) as the policy requires a minimum of 10% biodiversity net gain. The amendments through the Main Modifications provide some flexibility with regards to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</u></p> <p>There is a minor negative effect on objective 12 as the sites are currently greenfield land, however they were justified and safeguarded for development through the Core Strategy</p> <p>Mitigation New development will also be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>
Policy KE5 Treetops	<p>The policy requires to provide residential development (30 units) including affordable housing which helps boost the housing supply, therefore a major positive effect on objective 2(housing). Minor positive effects have been identified on a number of objectives as the policy requires to maximise sustainable transport opportunities for future residents, particularly in terms of capitalising on the active travel potential of its location and facilitates crossing points over St Clements Road and Albert Road along with a proportionate contribution to improvements to Keynsham Route 3 in the WoE LCWIP.</p> <p>Mitigation New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.</p>
Policy SV2 and SSV2 Deletion of South Road Car Park Retail Allocation and retention of South Road car park as a car park	<p>The revised plan will remove the allocation for a retail store at South Road car park and remove policy SSV2 from the plan. The evidence has demonstrated that the car park is important to support the vitality and viability of the existing town centre. The site is located close to public transport and revised policies, ST.1, ST2A, ST3 and ST7 will support and encourage the use of sustainable travel options. Policy SSV4 will be revised to allow for a medium scale retail store to be sited at the former Welton Manufacturing Site. This will allow for linked trips to the High Street which will support the viability of the High Street.</p> <p>As the site is already in use as a car park there will not be an increase in traffic to and from the site. In particular, the proposal will support the local economy and the aims of objective 3(community) and 4(economy).</p>

<p>Policy SSV4 Former Welton Manufacturing Site</p>	<p>The change to the allocation will allow for a medium scale retail store to be constructed on the site. The site sits to the north of the existing High Street and the proposed change is intended to support the High Street. The provision of a retail store at this site will allow for linked trips from the new site and the High Street, so that the change to the allocation will support the vitality of the High Street. The policy will include a requirement for a pedestrian connection from the development site to the High Street. The proposed changes will retain the existing allocation which will provide housing and economic uses. The allocation requires connection to existing walking and cycling networks. The site is located adjacent to the existing public transport network. Therefore, the amendments to the policy have a major positive effect on objective 4(economy)</p> <p>The amendments include medium scale retail up to around 1,300 sqm. This may lead to increase in traffic congestion and contributing to poor air quality and noise pollution, however the site is close to the existing public transport network.</p> <p>Mitigation The amendments to the policy require that new development be well connected to existing walking and cycling routes. The policy will require pedestrian connection to the High Street. Any development will be subject to other development management policies.</p>
<p>Policy SSV21 Silver Street</p>	<p>The allocation of the site at Silver Street will increase housing supply and provide affordable housing. The site is close to pavement access into the town centre and is close to a local bus route. The policy requires to provide pedestrian/cycle connection to the recently delivered and committed active travel routes on Silver Street to allow for active travel access to existing shops, services, and facilities as well as making a financial contribution to the delivery of LCWIP walking and cycling routes between Norton Hill Primary School and Charlton Road. This will help make it easy to reach everyday destinations by active travel. The proposed concept diagram will retain the existing boundary planting and tree protection orders. Therefore, major positive effects on objectives 1(health) and 2(housing)</p> <p>Any development will be subject to other development management policies</p>
<p>Policy SSV9 Old Mills Industrial Estate</p>	<p>The Old Mills employment site was allocated in the B&NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses such as retail, food & drink and a hotel to enable delivery and investment in the site. This would also benefit to bring a greater mixed of uses to facilitate a more diverse range of employment opportunities. Therefore, a major positive effect on objective 4(economy). However, the retail development should be of a scale, type and format that does not harm the town centre (although policy requirements seek to ensure that retail development complements, rather than harms, the town centre).</p> <p>The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development. This has a major positive effect on objective 5(sustainable transport).</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies and Local Development Order.</p>

Policy	SA1 :Health	SA2:Housing	SA3:Communities	SA4:Economy	SA5:Transport	SA6:Landscape	SA7:Heritage	SA8:Ecology	SA9:Pollution	SA10Flood Risk	SA11:Climate Change	SA12: Natural resources
Policy CP1 Retrofitting Existing Buildings	++	++	+	+	n/a	0	0	+/0	+	0	+	+
Policy CP3 Renewable Energy	+	n/a	0/+	++	n/a	-/0	-/+	-/?	?/+	n/a	+	+
Policy SCR6 and Policy SCR7 Zero Carbon	0	+	0	+	n/a	-/?	-/?	+	+	n/a	++	++
Policy CP4 District Heating	0/+	n/a	n/a	0	n/a	n/a	n/a	0	0/+	n/a	0/+	0
Policy SCR8 Embodied Energy	n/a	n/a	n/a	0	n/a	n/a	0/+	n/a	+	n/a	+	++
Policy SCR9 Electric Vehicle Charging Infrastructure	0	0	+	+	++	-/0	-/0	0	++	n/a	++	+
Policy NE2 CONSERVING AND ENHANCING THE LANDSCAPE AND LANDSCAPE CHARACTER	0	n/a	0	0	n/a	++	0	0	0	n/a	0	-0
Policy NE3, NE3a and NE5 Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3afor Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery	+	-	+	+/-	n/a	+	n/a	++	n/a	+	++	n/a
Policy CP7 and Policy NE1 Amendment to Policy CP7: Green Infrastructure Amendment to Policy NE 1: Development and Green Infrastructure	++	n/a	+	+	++	+	n/a	+	+	+	+	n/a
Policy GB2 Policy GB3 Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB	n/a	+	+0	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Policy PCS5 Contamination Policy LCR6 New and replacement sports and recreational facilities	++	n/a	++	0	0	0	n/a	0	++	n/a	-/0	+
Policy H2 Houses in Multiple Occupation (HMO) amendments to Policy H2	0	+	+	0	-	0	0	0	0	0	+	0
New Policy H2A Purpose Built Student Accommodation	+	+	0	+	0	0	0	0	0	0	0	0
Policy H7 Accessibility Standards	++	++	++	n/a	n/a	n/a	0	n/a	n/a	0	0	0
ED1B Change of use & redevelopment of office to residential use ED1C Change of use and redevelopment of office use to other town centre use (not within use class E)	n/a	0	+	+	+	n/a	0	n/a	n/a	n/a	n/a	n/a
Policy ED2A Strategic Industrial Estate / Other Primary Industrial Estate Policy ED2B Non-Strategic Industrial Estate	n/a	0/-	+	++	+	n/a	n/a	n/a	0	n/a	n/a	n/a
Policy RE1 Employment uses in the Countryside	n/a	n/a	n/a	++	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a
Policies CR1 Sequential Test (retail and other main town centre uses),CR2 Impact Assessments and CR3 Primary Shopping areas and primary shopping frontages	n/a	n/a	0	0	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Policy	SA1:Health	SA2:Housing	SA3:Communities	SA4:Economy	SA5:Transport	SA6:Landscape	SA7:Heritage	SA8:Ecology	SA9:Pollution	SA10:Flood Risk	SA11:Climate Change	SA12: Natural resources
Policies ST1, ST2, ST3, ST4, ST5, ST6 and ST7 Transport	++	n/a	++	+	++	0/?	0/?	0/?	++/+	0	+	0
Spatial Policies												
Policy DW1 (Spatial Strategy)	++	++	0	+	+/0	0	0	0	0	0	0	+/-
Policy B2 (Bath Central Area Strategic Policy)	+	+	+	+	+	0/?	0/?	0/?	+/-	0	n/a	+
Policy SB1 Walcot Street /Cattlemarket	+	0	+	++	++	0	0	0	+/-	0	0	+
Policy SB8 Bath Riverside	+	++/+	+	+	++	0	0	0/+	0	0	+	+
Policies B3 Strategic Policy for Twerton and Newbridge Riverside and SB22 Creative Industry Hub	+	+	+	++	++	0	0	0	+	0	+	0
Policy SB23 Weston Island	++	0	+/-	++	++	0/+	0	0/+	0/+	0	+	+
Policy SB14 Twerton Park	++	++	++	++	+	0	0	0	0	0	0/+	+
Policy SB18 RUH	++	++	++	++	++	0/-	0	+	0	0	+	+
Policy SB24 Sion Hill	++	++	++	+	+	0/-	0	+	0	0	+	+
Policy SB25 St Martins Hospital	+/0	++	+	-/0	+	0	0	+	0	0	+	+
Policy SB19 University of Bath Claverton Campus	++	++	++	++	++/+	-/0	-/0	+/-	0	0	0	+
Policy ST6 and Policy SB26 Park and Ride Site Allocations	++	n/a	+	+	++	0	0	+/0	0	0	+	+
Kingswood School playing field												
*This site is not allocated through the LPPU but will be reviewed through the new Local Plan.	++/+	++	+	0	+	-	-	--	0	0	+	0
Policy KE2B Riverside and Fire Station Site	++	++/+	++	++/+	++	0	0	+	0	0	+	+
Policy KE3C and Policy KE3d Safeguarded land	++	++	++	0	++/+/0	0	0	0/+	0	0	++	+/-
Policy KE5 Treetops	+	++	0	0	+	0	0	+/0	0	0	+	+
Policy SV2 and SSV2 Deletion of South Road Car Park Retail Allocation and retention of South Road car park as a car park	-/0	n/a	+	+/0	0	n/a	n/a	n/a	0	0	0	n/a
Policy SSV4 Former Welton Manufacturing Site	+	0	+	++	+	0	0	0	0/-	0	0	+
Policy SSV21 Silver Street	++	++	+	n/a	+	0	0	0/+	0	0	+	+/-
Policy SSV9 Old Mills Industrial Estate	+	n/a	+/0	++/0	++	0	0/+	0	0	0	+	+/-
Policy SSV22 Former Paulton Printworks	+	++	+	-	+	0	0	0/+	0	0	+	+

8. Cumulative effects of LPPU policy

- 8.1. Table 12 below presents a summary of all the potential sustainability effects identified for the Local Plan (Core Strategy, Placemaking Plan with Partial Update). From this summary it is possible to assess the likely significant effects of the Pre-submission Draft Local Plan and the appraisals of the Main Modifications as a whole (including the site allocations) in relation to each of the SA objectives. This enables a description of the likely cumulative effects of the plan as required by the SEA Regulations. On the basis of the criteria set out within Table 6, significant effects have been considered to be major positive, major and minor negative effects, plus uncertain effects. Uncertain effects are considered to be significant because they could potentially result in major positive or major negative effects.
- 8.2 It is worth noting that the appraisals show that the Main Modifications do not significantly alter the previously recorded sustainability effects of the submitted plan.

Table 12 Summary of cumulative effects of LPPU

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

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Strategy/Placemaking Plan) and site allocations in the Partial Update will also help to maintain the provision of 5 year housing land supply. Through the consultation, some further greenfield sites were promoted, however since there is sufficient land available to meet the Core Strategy requirements, additional greenfield land is not considered as alternative options in the SA.</p> <p>The revised Policy H7 with accessibility standards helps to address housing needs of older people.</p> <p>The pressure to manage new student accommodation continues to increase. Policy B5 prioritises the delivery of office space and general housing development. The revised Policy SB19 sets out further guidance and requirements for Claverton Campus and new Policy H2a (PBSA) will help manage new PBSA.</p> <p>Through the revised Policy H2 new build HMOs, the change of use to HMOs from other uses, and intensification of existing HMOs shall provide opportunity to facilitate further HMOs in the areas with lower HMO concentration and provide good quality homes catering for population groups unable to afford other forms of private accommodation.</p> <p>RA1 and RA2 would continue to guide new development in the rural villages.</p> <p>The retained policies (Policies D1-D10, CP9, RA4, H1-H8, CP10 and CP11) help achieve the delivery of good quality housing and affordable housing to meet the fully objectively assessed housing needs.</p> <p>The viability assessments were undertaken taking into account various exiting and new policy requirements. It indicated that the affordable housing requirements can be met across all areas of the District, but the existing use value of sites is a critical factor in determining the outcome. Where existing use values are high, the ability of residential schemes to meet the policy requirement will be more constrained and the level of achievable residential sales values becomes a more critical factor. In these circumstances, the policy contains sufficient flexibility, to enable schemes to come forward with a viable package of affordable housing.</p> <p>The Partial Update does not extend the Plan period, therefore it has only a minor positive effect in the long term.</p> <p>Mitigation and enhancement</p> <p>Continue to monitor new PBSA promoted outside the allocated sites.</p> <p>Continue to monitor the number of C3 dwellings converted to C4 Houses in multiple occupation.</p> <p>The longer term housing requirements need to be <u>established set through the WECA Spatial Development Strategy and addressed through the new (full replacement) Local Plan.</u></p>
<p>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</p>	++	++	++	<p>The site allocations direct most new housing development to the main urban areas in Bath, Keynsham and Somer Valley, which have the majority of higher order services and facilities, including social, cultural and community facilities. This helps to promote stronger more vibrant and cohesive communities.</p> <p>The revised Policy CP3 supports a community benefit in terms of either profit sharing or proportion of community ownership or delivering local social and community benefits from renewable energy.</p> <p>The original NE2 requires development to incorporate green space within the scheme that positively contributes to creating a high-quality environment by providing sustainable public access and other landscape benefits. The revised Policy NE3, new Policy</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>NE3A and Policy NE5 strengthens the protection of biodiversity. The provision of new habitats to achieve BNG might be delivered as multi-functioning publicly accessible open/natural/green space.</p> <p>The revised transport policies further encourage development accessible to community, social and cultural facilities by sustainable transport modes, including supporting disabled people and others with restricted mobility.</p> <p>The retained policies (Policy LCR1-LCR9, RA3) help provide or manage a range of appropriate and accessible community, social and cultural facilities.</p> <p>The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p>
<p>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</p>	++	++	+	<p>The site allocations included in the Partial Update with the development requirements help achieve the economic vision and objectives set by the Core Strategy.</p> <p>The Milsom Quarter area is currently in decline, shown by falling footfall and increasing vacancy rates, greater than other areas of the City Centre. Many upper floors are also currently underutilised or empty. Redeveloping this area will provide more attractive and diverse range of employment opportunities.</p> <p>The revised Policy ED2A with The Locksbrook Creative Industry Hub and amended Policy ED2B strengthen the protection of industrial land and encourage the delivery of new opportunities. The new allocation of Weston Island will enable the relocation and retention of employment uses from elsewhere within the city, particularly from the Enterprise Zone and continue to provide employment provision.</p> <p>The revised Policy SB19 create more employment opportunities in growth sectors as the policy defines university-related uses to include research and allied business incubation. This will help improve access to local training, work experience and apprenticeships. The UoB is the second biggest employer in the District therefore facilitating meeting long-term requirements for the university on campus (48,000 sqm) would have a major positive effect .</p> <p>Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions ambition to be a driving force for clean and inclusive growth.</p> <p>The amendments to the Policy SSV9 include a limited amount of higher value uses to enable delivery and investment in the site. This would also benefit to bring a greater mix of uses to facilitate a more diverse range of employment opportunities.</p> <p>Revised Policy RE1 allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities.</p> <p>Revised transport policies encourage developments which reduce travel distances from homes to workplaces, with sustainable transport options available, including for first occupiers of new development. Proposed amendments include detail regarding travel plans, which need to be tailored to the specific development and the location context in order to ensure that an optimal package of measures is provided to enable future users of the development to travel sustainably, thus supporting clean and inclusive growth.</p> <p>Other retained and revised employment policies would help build a strong, competitive economy and enable local businesses to prosper.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Mitigation and enhancement A masterplan is in preparation, but no details are available at this stage. The masterplan will inform the future applications and new Local Plan. Subject to an assessment of the capacity of the site, there are also opportunities for more public facing uses such as creative, arts-based activities. The Local Development Order for the Somer Valley Enterprise Zone is in preparing. There are limited opportunity sites available to facilitate new industrial uses therefore this need to be reviewed through the new Local Plan. The Transport and Development SPD provides further guidance to promote sustainable travel.</p>
<p>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</p>	<p>++/0</p>	<p>++/0</p>	<p>++/0</p>	<p>By locating the majority of new housing and employment development close to the existing main settlements in the district, the Partial Update allocations should help promote accessibility by public transport and cycling and walking. However, the potential development sites allocated in the Core Strategy and draft Placemaking Plan will have a cumulative impact on traffic congestion (although the impact on the highway network is shown not to be severe and is mitigated). The Transport Strategy makes some recommendations taking into account these development sites. The amendments to Policies ST1-ST7 strengthen existing policies in relation to access to public transport, safe walking and cycling routes, reducing dependence on the private car and discouraging short car journeys. Proposed amendments to Policy ST2A include reference to Active Travel Routes and requires <i>'Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible.'</i> New Policy SCR9 requires electric vehicle charging infrastructure. To support high quality and affordable public transport and cycling and walking infrastructure, Policy ST1 proposes <i>'Access to high quality public transport facilities is achieved by improving existing and providing new public transport facilities which would increase the proportion of journeys made by public transport.'</i> ST6 proposes new and expansion of existing Transport Interchange sites. Proposed amendments to Policy ST7 ensure that <i>'Walking and cycling assessment and facilities are provided in line with the Transport and Development SPD, including safe, convenient and inclusive access to and within the site for pedestrians and cyclists.'</i> The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p> <p>Mitigation and enhancement</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Policy ST2A requires that the provision and enhancement of strategic connections between, and within, urban areas and other key origins/destinations, utilising the Active Travel routes, should be investigated and implemented wherever feasible. Policy 6 requires a Transport Assessment demonstrating transport effects of the proposed development are comprehensively and robustly identified. The Transport and Development SPD provides further guidance to promote sustainable travel including travel plans, parking standards and electric charging infrastructure.</p>
<p>Objective 6 : Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	+0/-	+0/-	+0/-	<p>New housing development sites were chosen taking into account the consideration of this objective (site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>Policy CP3 sets out the suitable areas for renewable energy development. The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with a 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in the area with 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants demonstrate that adverse impacts on the landscape can be satisfactorily mitigated.</p> <p>The revised Policy NE2 requires great weight to be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities. Proposed amendments to Policy CP7(Green Infrastructure) and NE1 (Development and Green Infrastructure) support effective and functional GI design focussing on nature-based solutions which include protecting, managing, and enhancing landscape character.</p> <p>The provision of new transport related infrastructure would have the potential to increase negative impacts on areas of valued landscape and townscape. The park and ride sites will be removed from the green belt and allocated for use as multi-modal transport interchanges (Policy SB26). The sites are all very sensitive in terms of landscape, due to their locations on the edge of the city. This sensitivity is decreased due to the sites already being developed for park and ride uses. Removal of the sites from the green belt has been informed by a Green Belt harm assessment and consideration of exceptional circumstances.</p> <p>Policy wording ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impact on AONBs and other sensitive landscape features.</p> <p>The Claverton Campus (University of Bath) is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. The Visual Impact Assessment was prepared and informed the key development areas with minimum buffer distances and maximum height restrictions.</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Policy KE3c and KE3d (East of Keynsham) Building heights generally limited to 2/2.5 storeys, ensuring that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB. The retained urban design policies (D1-D10) also contribute to achieve higher quality townscape.</p> <p>Mitigation and enhancement The revised Policy CP3 avoids significant adverse impact on the local environment that cannot be satisfactorily mitigated including protected landscape and visual impacts (inc. cumulative effects) and the special qualities of all nationally important landscapes. Policy NE2 requires proposals with potential to impact on the landscape/townscape character of an area or on views to be accompanied by a Landscape and Visual Impact Assessment undertaken by a qualified practitioner to inform the design and location of any new development. B&NES Council has adopted the West of England Joint Green Infrastructure Strategy 2020-2030 (JGIS). The original Policy ST3 (7) requires that proposals have no unacceptable impact on heritage and environmental assets and amenity including the WHS and its setting, AONBs and Natura 200 sites (SACs/SPAs). New development is also subject to other Development Management policies. Policy (SB26) wording also requires development to be contained within the areas of the sites already developed for Park and Ride use, i.e. no encroachment into the surrounding landscape will occur. Any new development will be subject to other Development Management policies. Even though policy requirements including the heights of buildings are informed by various evidence, individual applications for new buildings should be informed by more detailed specific studies and evidence.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	+	+	+	<p>New development sites were chosen taking into account the consideration of this objective (site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The heights of buildings are an important aspect of the visual homogeneity of Bath city, and new developments need to respond creatively and sensitively to their exceptional context. The Building Heights Strategy (2010) provides an overall context for considering building heights and informed the Placemaking Plan site specific requirements.</p> <p>The revised Policy CP1 Retrofitting Existing Buildings would apply to historic buildings. Given the quality of the historic environment in the District and the high number of listed buildings, Conservation Areas and the World Heritage Site designation for Bath, an SPD on energy efficiency, retrofitting and sustainable construction has been prepared to provide guidance on sensitively retrofitting the historic building stock.</p> <p>The retained Policies, particularly HE1, help achieve this objective.</p>

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

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	<p>The revised Policies PCS5 and LCR6 requires to avoid development that may result in the contamination of land. Also, Policy LCR6 requires a management plan submitted with applications for new artificial pitches setting out the materials used and potential sources of pollution from the installation phase through to end of life.</p> <p>The revised suitability policies such as CP1 (Retrofit) CP3(Renewable Energy), SCR6/7(Zero Carbon), SCR8(Embodied Carbon) and SCR9(EV charging) would help reduce the production of harmful emissions and contribute improving air quality. Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels.</p> <p>The revised transport policies encourage provision of sustainable transport options and to reduce reliance on car-use, thereby improving traffic congestion and air quality issues. Further, proposed amendments to Policy ST1 require proposals to support and promote measures which reduce the levels of traffic pollution in the interests of improving health and quality of life and reducing harmful impacts on the built and natural environment. Proposed amendment to Policy ST3 requires that the environmental impact of the scheme, such as from noise and other forms of pollution, is minimised and of an acceptable level in accordance with relevant topic-specific environmental guidance and standards. Thus, proposed amendments to transport policy support the reduction of pollution.</p> <p>Policy SCR9 requires provision of EV infrastructure to increase the uptake in the use of electric vehicles. This contributes to reducing pollution from vehicles and improve air quality, particularly within AQMAs. Electric vehicles also result in a reduction in traffic noise.</p> <p>New development sites were chosen taking into account the consideration of light pollution, particularly the site along the bat corridor or close to open countryside. (See site specific appraisals Appendix C and Appendix D). The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.</p> <p>The allocation sites within Bath, Keynsham and Somer Valley in the Local Plan (including the Core Strategy, Placemaking Plan and Partial Update) will have cumulative impacts on traffic congestion. The cumulative impacts were considered through the process of identifying the new development sites.</p> <p>The retained policies such as PCS1-PCS8(Pollution), D8 (Lighting), NE4(Ecosystem Services), SU1(Sustainable Drainage) also contribute to achieve higher quality townscape would help achieve this objective.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	<p>Sustainable Drainage Systems (SuDS) offer opportunities to reduce vulnerability to and manage flood risk. The retained Policy SU1 facilitates SuDS to be employed for the management of runoff.</p> <p>The revised Policy NE1 requires development design to maximise opportunities for effective and functional Green Infrastructure (GI), focussing on the use of nature-based solutions including the use of natural flood management and SuDS.</p> <p>The new site allocations through the Partial Update were directed to the existing main settlements in the district. They are mainly in Flood Zone 1 and were subject to the flood risk sequential test. Some parts of the Bath Riverside (SB9) are located adjacent to the river, in flood zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy. Therefore, the location of the general growth areas was justified through the Core</p>

SA Objectives	Short Term	Medium Term	Long Term	Potential cumulative effects
				<p>Strategy high level Sequential Test. Policy SB23 (Westeo Island) - As the site lies within a flood risk zone it is not suitable for residential development and is allocated for employment use.</p> <p>Some retained brownfield allocation sites, particularly in Bath, may be in areas at risk of flooding. However, the sequential approach was taken to identify these development sites and site-specific requirements ensure that vulnerable uses will not be developed within high risk flood zones.</p> <p>Other Development Management policies and Guidance such as The West of England Sustainable Drainage Developer Guide would help guide development to reduce the vulnerability to and manage flood risk.</p>
<p>Objective 11 Reduce negative contributions to and Increase resilience to climate change</p>	+	+	+	<p>Policy CP1 facilitates the retrofitting of existing buildings allowing them to be more resistant to future climate change such as extreme heat and cold. Policy CP3 facilitates renewable energy developments which reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses. Policies SCR6 and SCR7 require a sustainable method of construction, reducing heat and energy demand by encouraging a fabric first approach then supplying all energy demand through onsite renewable. This will help reduce the production of greenhouse gas emissions and helps to increase resilience to climate change.</p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. Policy NE1 promotes effective and functional Green Infrastructure, focussing on the use of nature based solutions to deliver community benefits.</p> <p>The retained policies such as SCR5(water efficiency), CP5 (flood risk management) and design policies help guide new development to be resilient to climate change.</p>
<p>Objective 12 Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>	++/0	++/0	++/0	<p>The Core Strategy Policy DW1 sets out housing targets and broad distribution of new housing development. In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley. The safeguarded land in Keynsham is greenfield land but they are already removed from the Green Belt and safeguarded for development.</p> <p>The new Policy SCR6 and 7 will help new development to be zero carbon by reducing the heat and energy uses. In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation. Policy CP2 requires applicants to demonstrate that waste and recycling during construction and in operation have been addressed as well as the type, lifecycle and source of materials to be used.</p> <p>The site allocation policies require specific measures where identified.</p>

9. In combination effects with other plans

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

Table 13

Plan	Progress	Development proposed with potential for in-combination effects with development within B&NES
<p>West of England Combined Authority Spatial Development Strategy(SDS)</p>	<p>The West of England Combined Authority is was currently progressing its Spatial Development Strategy which sets a vision for the West of England over the next 20 years and delivery commitment to reaching carbon neutrality by 2030. The review process reached an informal consultation stage in November 2020 consisting of the Future of the Region survey in its first steps to developing the SDS. The draft consultation is planned for Spring 2022, followed by the Submission in Autumn 2022. The Publication is scheduled for Autumn 2023. However, in May 2022, the WECA Mayor has decided to halt work on the preparation of the Spatial Development Strategy (SDS).</p>	<p><u>Following the decision of the WECA Mayor to halt all work on the SDS, the Local Plans for Bath & North East Somerset, Bristol and South Gloucestershire will now provide the strategic planning framework for the WECA area. The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan. Therefore no significant in-combination effects with the new Local Plan. the SDS. The new Local Plan will be prepared in conformity with the SDS.</u></p>
<p>Bristol CC Local Plan</p>	<p>Bristol City Council is currently in the process of updating their local plan for delivery in 2023 which will set out Bristol's development plan for the next 20 years. The plan will replace the Core Strategy (2011), Site Allocations and Development Management Policies Local Plan (2014) and the Bristol Central Area Plan (2015). Progress to date has seen the completion of consultation on the draft proposals (regulation 18) which took place in February 2018 and March 2019. An additional consultation on issues and options for development is due to take place in Spring 2022. Following the submission of the SDS to the Secretary of State, a formal consultation will take place in the summer of 2022 (regulation 19). Spring/Summer 2023 will see the examination period.</p>	<p>The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.</p> <p>Therefore no significant in-combination effects with the current Bristol Local Plan.</p> <p><u>However, the B&NES Council and Bristol Council are working closely together through the working arrangements associated with the WECA Spatial Development Strategy and continue to actively engage as new evidence emerges relating to proposed development and transport infrastructure improvements along the A4 corridor. However, the Councils will continue their longstanding history of joint working and cooperate with each other and with other key bodies on strategic, cross boundary matters as they prepare their Local Plans.</u></p>
<p>South Gloucestershire Council Local Plan</p>	<p>Current adopted plans for South Gloucestershire Council consist of the Core Strategy (2006-2017), the Policies, Sites and Places Plan (2017) and the</p>	<p>The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan</p>

	<p>Joint Waste Core Strategy. A new local plan is currently developing which will include new strategies and policies to guide development for the next 15 years. Phase 1 of the consultation ran from November 2020 to March 2021 and consultation of SPD's ran from May 2021- June 2021. Phase 2 is planned for late 2021 on potential options for growth, protection, site proposals and place discussions with the publication version available for consultation in 2022. The submission and examination are planned for 2023 along with adoption.</p>	<p>i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.</p> <p>Development in the East Keynsham area (Policy KE3c and KE3d) is very close to and may impact on South Gloucestershire communities. B&NES Council and South Gloucestershire Councils are working closely together particularly through the working arrangements associated with the WECA Spatial Development Strategy and continue to engage on our respective Local Plans as new evidence emerges relating to proposed development and transport infrastructure improvements in Keynsham to understand how proposals may affect communities within South Gloucestershire.</p>
<p>Wiltshire Council Local Plan (Wiltshire Housing Site Allocations Plan adopted Feb 2020, Chippenham Site Allocations Plan adopted May 2017, Wiltshire Core Strategy adopted Jan 2015) (see the Statement of Common Ground)</p>	<p>The Wiltshire Core Strategy, adopted in 2015, and saves polices from district local plans which form a substantive part of the development plan are under review. The Wiltshire Local Plan Review DPD will provide the strategic context for development up to 2036 and determine the level and direction for future growth. It will include the allocation of a range of sites to meet the identified need for homes and jobs, a review of existing development management policies, and strategic guidance for the preparation of neighbourhood plans</p>	<p>The scope of the changes proposed through the LPPU is confined within those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.</p> <p>Proposed policy amendments focus on sustainable travel, providing genuine travel choice and reducing car dependence, all supporting a reduction in carbon emissions. B&NES Council and Wiltshire Council transport officers met to discuss the transport technical evidence base to the LPPU including how B&NES is supporting growth in sustainable travel demand, primarily with consideration to demand within and to / from Bath.</p> <p>Therefore no significant in-combination effects with the current Wiltshire Council Local Plans. However discussion of cross boundary issues will continue to inform further development of the local authorities Development Plans.</p>
<p>Mendip District Council Part 1 and Part 2 (see the Statement of Common Ground)</p>	<p>The Mendip District Council Local Plan Part 1 was adopted in December 2014 for the period to 2029. Mendip District Council's Local Plan Part II is currently awaiting the Inspectors Examination Report and Adoption. The Mendip Plan Review 2020-2040 proposes to review strategy and policies in the Local Plan Part 1, incorporate the adopted Local Plan Part II and review strategic policies for Mendip. The direction of the Plan Review and its timetable will be affected by the outcome of the unitary proposals for Somerset.</p>	<p>The scope of the changes proposed through the LPPU is confined within those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan. Some specific issues have been raised such as:</p> <p>1) Policy SSV9 Somer Valley Enterprise Zone: This will be further discussed through the Local Development Order prepared by the B&NES Council.</p>

		<p>2)Renewable energy and landscape sensitivity: Mendip DC is embarking on a comprehensive assessment of renewable energy generation potential. Strategic cross boundary engagement will take place in preparing the B&NES new Local Plan and Mendip Plan Review.</p> <p>3)Highway matters: A Statement of Common Ground has been prepared between B&NES Council and Somerset County Council relating to highways matters and it has been agreed that in terms of highways considerations, there is no severe cumulative impact that arises from the B&NES LPPU on the Mendip administrative area.</p> <p>Therefore no significant in-combination effects with the Mendip Local Plan Part 1 and Part 2.</p>
West of England Joint Waste Core Strategy (2011) JWCS	The Joint Waste Core Strategy sets out the authorities' aspirations for all levels of waste management until 2026: prevention; reuse; recycling; recovery; and disposal.	The JWCS was produced jointly with B&NES Council, Bristol City Council, South Gloucestershire Council and North Somerset Council. It provides the strategic framework for the waste management and it compliment the draft LPPU. Therefore no significant in-combination effects with the JWCS.
Travel West The Joint Local Transport Plan 4 (JLTP4) March 2020	The Joint Local Transport Plan 4 (JLTP4) – led by the West of England Combined Authority, working with Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire councils – sets out the vision for transport up to 2036. It sets out how we aim to achieve a well-connected sustainable transport network that works for residents, businesses and visitors across the region; a network that offers greater, realistic travel choices and makes walking, cycling and public transport the natural way to travel.	<p>The scope of the changes proposed through the LPPU is confined to those areas that can be addressed without significantly changing the strategic policy framework of the adopted Plan i.e. the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the Core Strategy & Placemaking Plan.</p> <p>5 authorities are working closely together and particularly through the working arrangements associated with the WECA Spatial Development Strategy and continue to engage on their respective Local Plans as new evidence emerges relating to proposed development and transport infrastructure improvements.</p>

10. Monitoring

What the SEA Regulations say...

Information for Environmental Reports...

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

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

Table 14 Monitoring

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

SA Objectives	Monitoring
	<ul style="list-style-type: none"> • A range of indicators to monitor implementation of the actions identified in the World Heritage Site Management Plan
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<ul style="list-style-type: none"> • Change in priority habitats (in hectares) • % of SSSI in “favourable condition” • Number of nature conservation sites that are enhanced annually • Change in areas designated for intrinsic environmental value • Implementation of Biodiversity Net Gain
<p>Objective 9: Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<ul style="list-style-type: none"> • Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1.3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm10), sulphur dioxide) • Bathing water quality • River water quality (chemical, physical and ecological status of water bodies) • Ground water quality
<p>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<ul style="list-style-type: none"> • Number of planning permissions granted contrary to Environment Agency advice. • Numbers of properties affected by fluvial flood events in the last year • Condition of flood defences
<p>Objective 11 Reduce negative contributions to and Increase resilience to climate change</p>	<ul style="list-style-type: none"> • Implementation of Green Infrastructure • Number of properties achieving “very good”and “excellent” BREEAM levels • Monitor Embodied Carbon assessments
<p>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>	<ul style="list-style-type: none"> • Proportion and number of renewable energy schemes granted planning permission annually • Amount of renewable energy generated by installed capacity, for electricity (MWe) and heat (MWth) • Number of heat priority areas where policy district heating schemes have started to be implemented • Proportion and number of Combined Heat and Power schemes granted planning permission annually . • Energy generated from renewable energy sources annually • Percentage of new homes provided on previously developed land annually and since 2006 in B&NES • Amount of floorspace by on previously developed land by type (sqm) • Waste- Monitoring though the Joint Waste Core Strategy

11. Conclusion

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

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

12. Next Steps

- 12.1. If any significant issues arise through consultation leading to amendments to the draft document, then further consultation would be required. If the changes made to the Plan are significant, they would also need to be subject to SA.
- 12.2. A Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.
- 12.3. The SEA Regulations set out the particulars that should be covered by the statement as follows:
- How environmental (sustainability) considerations have been integrated into the Placemaking Plan;
 - How the Environmental (SA) Report has been taken into account;
 - How opinions expressed in response to consultation have been taken into account;
 - The reasons for choosing the Placemaking Plan as adopted, in the light of the other reasonable alternatives dealt with; and
 - The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the Placemaking Plan.
- 12.4. For further information on the timetable for the next steps in the production of the LPPU please contact the Planning Policy team on 01225 394041.

Bath & North East Somerset Local Plan
Partial Update

Sustainability Appraisal

Appendix D:

Draft Appraisals include the Main Modification

Date: September 2022

**Bath & North East
Somerset Council**

Improving People's Lives

Please note that amendments to the SA matrices resulting from the Main Modifications are shown as underlined / ~~struck through~~ text.

Ref CP3	Title Renewable Energy <i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i>
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<p>+</p> <p>Facilitating renewable energy development and seeking to reduce developments that burn fossil fuels will result a reduction in CO2 emissions. This has an indirect positive effect on this objective.</p> <p>The potential for provision of multi-function green infrastructure within proposals Clause 1) de) would also contribute to a minor positive effect. <u>Clause 2) d) seeks to protect residential amenity as result of noise, shadow flicker and visual intrusion which helps to achieve this objective.</u></p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p><u>0/+</u></p> <p>The revised Policy supports a community benefit in terms of either profit sharing or proportion of community ownership or delivering local social and community benefits. Also commercial led energy schemes with a capacity over 5MW shall provide an option to communities to own at least 5% of the scheme. The Policy supports community led energy schemes where evidence of community support can be demonstrated.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>++</p> <p>Providing a positive policy context for renewable energy development will help provide a diverse range of employment opportunities and contribute to the region's ambition to be a driving force for clean and inclusive growth.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	n/a
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>-/0</p> <p>The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with the 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for</p>

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

Ref CP3	<p>Title Renewable Energy</p> <p><i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i></p>
SA Objectives	
Biodiversity in the district and geodiversity (taking account of climate change)	<p>The policy seeks to guide development to the best locations, along with criteria to bring the consideration of cumulative effects and allows for mitigation and enhancement measures. Development will be subject to the 10% Biodiversity Net Gain. The revised policy for wind energy requires that Flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected.</p> <p>The policy promotes a shift from burning fossil fuels to reduce emissions of CO₂, particulates and oxides of nitrogen. This would have positive impacts on ecology.</p> <p>Mitigation</p> <p>Any new development will be subject to other Development Management policy, particularly Policy NE3 (Sites, Species and Habitats).</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>+/?</p> <p>Projects will need to be carefully sited so as not to cause harm to amenity, e.g. potential shadow flicker and unwanted noise from wind turbines. The policy promotes a shift from burning fossil fuels to reduce emissions of CO₂, particulates and oxides of nitrogen. This would have a positive effect on this objective.</p> <p>The policy also seeks to ensure that the land is returned to it's former use at the end of the project's life.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and increase resilience to climate change	<p>+</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses. This has a positive effect on this objective.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>+</p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. This has a positive effect on this objective.</p> <p>As the most common renewable energy sources are intermittent there is a greater need for power reserves that can "balance" the grid by releasing power onto the grid at times when demand exceeds supply. Balancing plant can be gas turbines or gas engines that can be turned on at short notice to meet temporary demand. Alternatively, energy storage plants can be used to balance the grid.</p> <p>The policy does not encourage the effective use of brownfield land as sites are likely to be greenfield. However the policy aims to protect grades 1 – 3a agricultural land.</p>

Ref CP3	<p>Title Renewable Energy</p> <p><i>The renewable electricity and heat targets were set by the Core Strategy. The revised Policy CP3 supersedes the original CP3 and replaces SCR 3 and sets out the criteria for all stand alone renewable energy projects as well as specific criteria for wind energy and ground mounted solar.</i></p>
SA Objectives	
General Summary	
<p>Providing a positive policy context for renewable energy development will help provide a diverse range of employment opportunities and contribute to the regions' ambition to be a driving force for clean and inclusive growth. Therefore, there is a major positive effect on objective 4(economy). <u>The potential for provision of multi-function green infrastructure within proposals Clause 1)de) would also contribute to a minor positive effect. Clause 2) d) seeks to protect residential amenity as result of noise, shadow flicker and visual intrusion which helps to achieve Objective 1.</u></p> <p>Facilitating renewable energy developments will reduce dependence on the burning of fossil fuels. In turn this will reduce the emissions of particulates that change atmospheric concentrations and contribute to greenhouse gasses which helps achieve a number of objectives.</p> <p>Some negative or uncertain effects have been identified on objectives 6(landscape), 7(heritage), 8(ecology) and (pollution). The significance of the negative impact will depend on the size and type of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with the 'high' landscape impact (indicated as the low potential area in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy does not avoid ground mounted solar development in areas with the 'high' landscape impact (indicated as low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants to demonstrate that adverse impacts on the landscape can be satisfactorily mitigated. <u>The amended supporting text through the Main Modifications provides further explanation of the landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations based on the landscape Sensitivity Assessment (LSA: LUC 2021). The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District Including information from the LSA in the Plan help clarify and make the policy more effective. This results in achieving better outcome for objective 6.</u></p> <p>The revised Policy requires an assessment of the impact the development might have on the significance of heritage assets and their settings, including the outstanding universal value of Bath WHS. Any harmful impact on the significance of a designated heritage asset requires a clear and convincing justification, detailing the benefits of the proposal and enabling them to be weighed against any harm that would be caused.</p> <p>The revised Policy for wind energy requires that Flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs), are not adversely affected.</p> <p>The policy seeks to provide a positive approach for determining applications for renewable energy projects, guiding solar and wind energy development to the right locations in terms of landscape capacity. Site specific mitigation and enhancement measures are included in the policies.</p>	
Mitigation and enhancement	
Any new development will be subject to other Development Management policies.	

Policy SCR6 and SCR7	Net Zero Carbon Policy for Residential and Non residential Buildings. The revised policies replace CP2 and SCR1 Residential and non Residential Development
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	0 Having more energy efficient and warmer buildings means lower energy bills. Improving the energy efficiency of homes can help to alleviate fuel poverty contributing to improve the general health and well-being. A reduction in harmful emissions will result in an improvement to air quality. For non-residential properties the policy will seek a fabric first approach to carbon reduction with renewable energy and carbon offsetting. Even though there are some indirect positive effects, it is considered to have a neutral effect on this objective.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	+ The policy approach to residential will reduce the amount of energy required to operate and heat a home. The policy will seek to meet the energy need of the building through the provision of on site renewable energy. The policy approach will help to achieve the aim of delivering a zero carbon development through a fabric first approach and on-site renewable energy. An energy efficient home will be more affordable to live in. Financial contributions from major developments that cannot meet their energy requirements can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings. The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including zero carbon requirements. It concludes that the affordable housing requirements can be met across all areas of the District but the existing use value of sites is a critical factor in determining the outcome. It identifies that high density flatted schemes are less viable in lower value areas, due to their higher build costs, but these types of schemes generally only come forward where values are higher (i.e. Bath City Centre). Mitigation There maybe some possible negative impacts for viability and affordability of setting additional requirements of house builders. In these circumstances, CIL exceptional circumstances relief could be applied, or the tenure mix or overall level of affordable housing could be changed to improve viability and deliverability.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0 In the case of major developments which cannot meet the policy requirements onsite, offsetting payments will be required through a section 106 agreement. Financial contributions can also be used to help alleviate fuel poverty, provide renewable energy schemes or improve the efficiency of existing buildings potentially including some community facilities. Even though there are some indirect positive effects, it is considered to have a neutral effect on this objective.
Objective 4:	+

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

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

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

Policy CP4	District Heating CP4 District heating
SA Objectives	
Objective 11 Reduce negative contributions to and Increase resilience to climate change	<u>0/+</u> <u>The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions. Therefore, it helps achieve this objective.</u>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0
General Summary <u>The reference to an alternative zero carbon heat source allows the Policy to follow the overall objective of reducing carbon emissions which has positive effects on Objective 1 (health), 9(pollution) and 11(climate change)</u>	

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

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
	<p>a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p>Mitigation Some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>+</p> <p>The revised Policy NE3, new Policy NE3 and Policy NE5 strengthen the protection of biodiversity. The provision of new habitats to achieve BNG might be delivered as multi-functioning publicly accessible open/natural/green space. Therefore, there is a minor positive effect on this objective.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+/-</p> <p>The proposed amendments to the biodiversity policy and new biodiversity net gain policy support the ecological and climate emergency, supporting clean and inclusive growth. The policy requirements may encourage green recovery and growth, jobs and opportunities.</p> <p>The requirement on developers to provide 10% Biodiversity Net Gain in non-residential developments will increase development costs and potentially reduce the developable area of sites; this could have negative impacts.</p> <p>Mitigation Some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>n/a</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>+</p> <p>It is proposed through amendments to the biodiversity policy to support biodiversity net gain and management opportunities. The new policy for Biodiversity net gain (BNG) proposes <u>at least a minimum of</u> 10% biodiversity net gain from development. BNG is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development. Biodiversity policy amendments and new policy has the potential to not only protect local biodiversity, but also protect and enhance the local environmental distinctiveness through habitat creation, protection, enhancement, restoration and management. Local nature recovery networks have the opportunity to link to wider nature recovery networks within the Cotswold and Mendip Hills</p>

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
	AONBs which protect the special qualities of the landscape.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	++ Policy NE3 provides policy and relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs). Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitate to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. <u>The amendments through the Main Modification help avoid adverse impacts on European, UK protected species, UK Priority and locally important species.</u> It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. Policy NE6 protects veteran trees. Therefore, there is a major positive effect on this objective.
Objective 9: Reduce land, water, air, light, noise pollution	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	+ Sustainable Drainage Systems (SuDS) offer opportunities to reduce vulnerability to and manage flood risk. SuDS include opportunities to support biodiversity net gains within a development. These SuDS can further support ecosystem services such as filtering dirty water along with providing a habitat for wildlife.
Objective 11 Reduce negative contributions to and Increase resilience to climate change	++ It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably

Policies NE3, NE3a, NE5 and NE6	Amendments to Policy NE3: Sites, Habitats and Species New Policy NE3a for Biodiversity Net Gain Amendments to Policy NE5: Ecological Networks and Nature Recovery Amendments to Policy NE6: Trees and woodland conservation
SA Objectives	
	managing biodiversity is critical to addressing climate change. The proposed amendments to biodiversity policy and new biodiversity net gain policy will support biodiversity gains from development, supporting resilience to climate change.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	n/a
<p>General Summary</p> <p>An Ecological Emergency has been declared by B&NES Council in response to ongoing threats to wildlife and ecosystems. Policy NE3 provides policy as relates to potential impacts of development on designated sites (such as RAMSA) and sites within the National Sites Network (including new and existing SACs and SPAs) <u>and other protected species</u>. Proposed biodiversity net gain policy (NE3a) will ensure that development delivers biodiversity net gain, secured for at least 30 years. Policy proposes that any off-site habitats created are well located to maximise opportunities for local nature recovery. Policy NE5: Ecological Networks and Nature Recovery will support the local nature recovery networks through habitat creation, protection, enhancement, restoration and management. Policy NE3 also facilitates to avoid net loss and to protect and enhance irreplaceable habitats including ancient woodland, ancient and veteran trees, priority grasslands. <u>The amendments through the Main Modification help avoid adverse impacts on European, UK protected species, UK Priority and locally important species.</u></p> <p>It is widely recognised that climate change and biodiversity are interconnected. Biodiversity is affected by climate change, with negative consequences for human wellbeing, but biodiversity, through the ecosystem services it supports, also makes an important contribution to both climate-change mitigation and adaptation. Consequently, conserving and sustainably managing biodiversity is critical to addressing climate change. The proposed policy amendments and new biodiversity net gain policy seek to strengthen policies as relates to biodiversity requirements, thereby supporting the climate and ecological emergency. The policies will have a major positive effect on Objective 8 (Biodiversity) and 11 (climate change).</p> <p>The viability test was undertaken taking into account the cumulative impact of the Council's planning requirements including BNG requirements. It concludes that the main impact of a requirement for a net gain on residual land values through this option is relatively modest, with a typical 1.5% reduction. As biodiversity net gain becomes more engrained in development, research and innovation are likely to result in lower cost solutions becoming available.</p> <p>Mitigation</p> <p>Minor negative effects are identified for Objective 2 (housing) and Objective 4 (economy) as the requirement on developers to provide 10% Biodiversity Net Gain in residential and non-residential developments could increase build costs and potentially reduce developable areas on sites. However some type of development will be exempt from the BNG requirements through the Environment Bill. Policy NE3a needs to be applied in the context of the Environment Act once enacted.</p>	

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

Policy GB2 Policy GB3	Title Green Belt policy – infill boundaries
SA Objectives	Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB
	now includes proposals to alter a building. This should result in a neutral impact on this SA Objective. Mitigation and enhancement Infill boundaries will be defined tightly around village edge to prevent encroachment into open countryside.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a
Objective 9: Reduce land, water, air, light, noise pollution	n/a
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	n/a
<p>General Summary</p> <p>Defining infill boundaries and removing reference to HDB's will align policy GB2 more fully with national policy. The policy will reference that residential development is acceptable where it is limited to infilling within the defined infill boundary, replacement dwellings or redevelopment of previously developed land. The boundaries will give a clear indication of where infill development would be considered acceptable in principle within GB villages. This policy approach will avoid proposals for new housing outside of the boundary which could be severed from the village and community and will only allow development in line with national GB policy. <u>The amendments through the Main Modifications amendments clarify and steer limited infilling in villages within the GB. This has a positive</u></p>	

Policy GB2 Policy GB3	Title Green Belt policy – infill boundaries
SA Objectives	Policy GB2 and amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries, which are not determinative, but do provide a strong indication. Policy GB3 minor amendment to include proposals to alter a building in the GB
<p>effect on this objective by facilitating appropriate limited infill development in rural areas. Therefore, positive effects are identified on Objective 2(housing), Objective 4(economy) and Objective6 (landscape)</p> <p>Mitigation</p> <p>Infill boundaries were defined using the existing HDB's as an indication. Some small amendments are made to better reflect infill opportunities. For villages without existing HDB's, opportunities for infill development were considered and several villages are proposed to have newly defined infill boundaries. These new boundaries are tightly defined around the village boundary to avoid possibility of encroachment (mitigating the impact on landscape). All proposals for infill development within the boundary will be considered on a case-by-case basis and will need to meet criteria for infill development.</p>	

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

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

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

Policy H2	Houses in Multiple Occupation (HMO) amendments to Policy H2
SA Objectives	Increase scope of policy H2 to refer to new build HMOs, change of use to HMO from other uses, and intensification changes of use from C4 (small HMO) to sui generis (large HMO). Additional criteria, including the requirement for all new HMOs to achieve energy performance certificate C.
	<p>Mitigation and enhancement</p> <p>Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including designing new development to be resilient to future climate. It is also expected that all new HMOs and intensification of existing HMOs achieve an Energy Performance Certificate 'C'.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>0</p> <p>New build HMOs should consider efficient use of natural resources.</p> <p>Mitigation and enhancement</p> <p>Proposals for new build HMOs required by updated policy H2 to be consistent with other relevant Local Plan policies relating to new build residential accommodation, including sustainable construction methods and site-specific waste management.</p>
<p>General Summary</p> <p>The revised policy would fill the current policy gap relating to new build HMOs, change of use from other uses such as shops, and the intensification of existing HMOs. Where intensification of existing HMO is proposed, it has potential for overcrowding contributing to poor living environment for occupiers. However amended wording requires applications relating to intensification to be assessed against criteria relating to provision of a good standard of accommodation for occupants, and must also achieve an Energy Performance Certificate rating of C. Therefore, there is a minor positive effect on Objective 2(housing), Objective 3(community) and Objective 11(climate).</p> <p>The policy aims to manage potential issues arising in areas with higher concentrations of HMOs by requiring new HMOs and intensification applications to be assessed against threshold tests set out in the HMO SPD. The intensification of HMOs to an extent further than assessable at planning stage will be restricted by policy wording allowing conditions to be attached to relevant permissions, controlling the number of occupiers.</p> <p><u>The exemptions were set out in the HMO Supplementary Planning Document, but the amendments through the Main Modifications bring these exemptions to Policy H2. This helps improve the effectiveness of the Policy, especially as they help avoid potential negative impact on fabric or structure (clause c) and unacceptable harm to the heritage significance of a heritage asset (clause d).</u></p> <p>A minor negative impact remains in relation cycle storage for HMOs, as current cycle parking standards do not provide adequate requirements for larger properties. Future updates to the HMO SPD and new Transport and Development SPD will provide cycle storage standards for HMOs.</p>	

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
Objective 1:	+

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	New policy H2A requires the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect to improve the health and well-being of occupiers.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>+</p> <p>Provision of PBSA shall increase the existing supply of housing for students to meet future demand, providing good quality, managed homes, linked directly to an educational facility.</p> <p>Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, either but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment. <u>The amendments through the Main Modifications provide clarification in regard to need for further student accommodation, particularly to meet the needs of second and third year students.</u> This avoids and oversupply of PBSA in Bath outside allocated sites.</p> <p>Where follow on students (including 2nd or 3rd year students) decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and complete with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes.</p> <p><u>B5 sets out the overall strategy to manage student accommodation. In accordance with the strategy set out by Policy B5, Policy H2A facilitates PBSA on-campus as a first priority, and sets out that it will only be allowed on other sites where a need can be demonstrated. Policy H2A sets out the policy requirements for all new, extensions to and conversions to PBSA.</u></p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>0</p> <p>Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of anti-social behaviour. However, Policy H2A requires the submission of a Management Plan, in order to manage associated issues such as anti-social behaviour.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+</p> <p>Many recently built PBSAs are on sites previously used for employment uses. The new policy, with a more strategic approach towards location of PBSAs, would provide clarity and help maintain employment sites, unless a need could be demonstrated for PBSA in association with an education provider.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>0</p> <p>PBSA developments will be directed to sites allocated for that purpose, which are accessible by public transport. Proposals for PBSA shall be required by policy H2A to provide adequate cycle storage in line with current standards for student accommodation.</p> <p>Mitigation and enhancement</p> <p>The new Transport and Development SPD includes updated cycle standards for student accommodation.</p>
Objective 6:	0

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
Protect and enhance local environmental distinctiveness and the character and appearance of landscape	Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on landscape.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on heritage assets.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including impact on biodiversity.
Objective 9: Reduce land, water, air, light, noise pollution	0 Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance. Policy H2A requires the submission of a Management Plan, in order to manage associated issues such as noise disturbance. The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 Proposals for new build PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including flood risk and drainage.
Objective 11 Reduce negative contributions to and Increase resilience to climate change	0 Proposals for PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including those relating to resilience to changing climate.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0 Proposals for PBSA required by policy H2A to be consistent with other relevant Local Plan policies, including renewable energy, sustainable construction, and waste management.
General Summary	
Provision of PBSA shall increase the existing supply of housing for students to meet future demand, providing good quality, managed homes, linked directly to an educational facility. Future PBSA provision will be directed to sites allocated for that purpose. Any additional demand will be met elsewhere in the district, but only where need is demonstrated and evidenced by a formal agreement between the developer and an educational establishment or <u>meeting the needs of second and third year students</u> . This avoids an oversupply of PBSA in Bath outside allocated sites.	

New Policy H2A	New Policy H2A Purpose Built Student Accommodation
SA Objectives	
<p>Where follow on students (including 2nd or 3rd year students) decide to live in PBSA, demand for HMOs amongst the student population could decrease (only where PBSA is comparable and competitive with HMO), opening up the HMO market further to the non-student population. This could also encourage the change of use of some HMOs back into family homes. Therefore, new policy H2A will have a positive effect on Objective 2(housing). New policy H2A requires the internal design, layout and size of accommodation and facilities to be an appropriate standard and adequate level of outdoor amenity space is provided. This will have a positive effect on objective 1(health). Also the new policy, with a more strategic approach towards location of PBSAs, would provide clarity and help maintain employment sites, unless a need could be demonstrated for PBSA in association with an education provider resulting in a positive effect on Objective 3(economy).</p> <p>Perception that higher concentrations of PBSA bed spaces in an area might cause more frequent incidences of noise disturbance. Policy H2A requires submission of a Management Plan, in order to manage associated issues such as noise disturbance. The policy also restricts PBSA development to allocated sites, except for where demand to meet need is evidenced. However these negative effects are minimised by requiring a Management Plan to be submitted through the planning application process.</p>	

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

Policy RE1	Policy RE1 Employment uses in the Countryside
SA Objectives	
public transport, cycling and walking infrastructure	
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	n/a
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	n/a
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	n/a 0 <u>The amendments through the Main Modification only allow redevelopment of previously developed land where it is not habitat functionally linked to a European site. This helps avoid harm to European sites.</u>
Objective 9: Reduce land, water, air, light, noise pollution	0
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	n/a
Objective 11 Reduce negative contributions to and Increase resilience to climate change	n/a
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	n/a
The revised Policy allows the limited expansion, intensification or redevelopment of previously developed land in the rural area which helps to increase the supply of employment land and provide a diverse range of employment opportunities. Therefore, a major positive effect is identified on Objective 4(economy).	

Policy RE1	Policy RE1 Employment uses in the Countryside
SA Objectives	
<p>The amendments through the Main Modification only allow redevelopment of previously developed land where it is not habitat functionally linked to a European site. This helps avoid harm to European sites.(Objective 8).</p>	

DW1	Title District wide spatial strategy
SA Objectives	No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. <u>The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</u>
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<p>++</p> <p>Policy DW1 sets of the district wide spatial strategy first adopted through the Core Strategy. The original SA identified a major positive effect as it directs housing growth to existing settlements which contain services and facilities including health and well-being facilities. By directing new development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services. The new allocation sites were selected following the sequential approach established through the Core Strategy.</p> <p>Through the Partial Update, the sites safeguarded for development (Core Strategy Policy KE3b) are released for housing (new allocation Policy KE 3c and KE3d). In general these sites have a good access services and facilities including health and well-being facilities in Keynsham, Bath and Bristol.</p> <p><u>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. (Please see the site allocation SB22 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</u></p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>++</p> <p>The monitoring identified about 1,300 homes shortfall to achieve the Core Strategy target. The LPPU allocates or re-allocates 10 sites (including the sites previously safeguarded for development Policy KE3 c and KE3d) to meet this shortfall. This helps boost significantly the supply of housing. The new housing allocations are subject to the affordable housing policy CP9 which helps achieve this objective. Therefore, a major positive effect on this objective.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>0</p> <p>By locating the majority of new housing and employment development close to the existing main settlements in the district, the spatial strategy should help to support strong, vibrant and cohesive communities. The site specific appraisals (Appendix C) helped to identify the sites most accessible to existing communities to contribute to this objective.</p> <p>The spatial strategy itself will have a limited effect on crime and anti-social behaviour, however, the direction of growth to Keynsham and Bath may help to regenerate areas identified in the baseline as experiencing the highest levels of recorded priority crime. However, overall, a neutral</p>

DW1	Title District wide spatial strategy
SA Objectives	No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. <u>The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</u>
	performance is recorded for this spatial strategy against this SA Objective.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+</p> <p>The spatial strategy refers to improving the quality of jobs as well as delivering growth in jobs numbers, without the need for expansion of settlements. The spatial strategy proposes the delivery of 10,300 new jobs by 2029. The site specific appraisal (Appendix C) helped to identify the sites most accessible to employment areas.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>+/0</p> <p>The LPPU site allocations direct housing growth to existing settlements which contain services and facilities as well as employment opportunities. By directing new development to existing main settlements, the strategy should encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services. The new allocation sites were selected following the sequential approach established through the Core Strategy.</p> <p>The 2017 Placemaking Plan analysed the highways capacity in Keynsham and concluded that mitigation would need to be delivered in order to release the safeguarded land. Mitigation opportunities have been reviewed to ensure that they meet the Council's requirements to maximise sustainable transport improvements. This has included identifying measures which will also shift some existing car trips to sustainable modes in order to release capacity for additional housing growth in advance of major strategic interventions such as metrobus and Mass Transit. The content of the mitigation package has been updated to enable the safeguarded land to be allocated for much needed housing. Site specific mitigation requirements are included in Policy KE3c and KE3d.</p> <p><u>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. The aim of multi-modal transport interchanges is to co-locate sustainable transport opportunities to create choice and opportunities for lower emission and sustainable travel, including into and out of key urban areas. (Please see the site allocation SB22 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</u></p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core Strategy Policy KE3b). The policy stresses the importance of protecting, conserving and enhancing the district's nationally and locally important cultural and historic assets.</p> <p>Mitigation and enhancement</p> <p>Policy KE3c and KE3d Placemaking Principles generally limit building heights to ensure that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.</p>
Objective 7: Conserve and enhance the	<p>0</p> <p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core</p>

DW1	Title District wide spatial strategy
SA Objectives	No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. <u>The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</u>
historic environment, heritage/cultural assets and their settings	<p>Strategy Policy KE3b). The site assessments identified the importance of the skyline views from Queen Charlton Conversation Area and Cotswolds AONB.</p> <p>Mitigation and enhancement</p> <p>Policies KE3c and KE3d Placemaking Principles generally limit building heights to ensure that development does not interrupt the skyline views from Queen Charlton Conversation Area and Cotswolds AONB.</p>
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>0</p> <p>The revised Policy DW1 allocates the sites previously safeguarded for development (Core Strategy Policy KE3b).</p> <p>Mitigation and enhancement</p> <p>Policies KE3c and KE3d require retention and enhancement of internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas, and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees.</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>0</p> <p>Mature trees and hedgerows and along northern edge of the stie to act as buffer from A4 road. Additional development in Keysham potentially lead worsening the air quality particularly taking into account the Keynsham Air Quality Management area. There are a number of transport related mitigation measures including preparing a Travel Plan and Transport Impact Assessment are identified and included in Policies KE3c and KE3d.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<p>0</p> <p>These sites are located within Flood Zone 1.</p> <p>Mitigation</p> <p>New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
Objective 11 Reduce negative contributions to and increase resilience to climate change	<p>0</p> <p>The amendments have no direct effect on this objective. However development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>+/-</p> <p>The sites are greenfield land, however they were justified and safeguarded for development through the Core Strategy. Any new development will be subject to new zero carbon policies.</p> <p>Therefore, mixed effects have been identified for this objective.</p>
General Summary	

DW1	Title District wide spatial strategy
SA Objectives	No change in the spatial strategy but the sites removed from the Green Belt and safeguarded for development in East Keynsham are now allocated for housing through the LPPU. <u>The policy also reflect that the Park and Ride sites are also removed from the GB to facilitate transport interchange hubs.</u>
<p>Policy DW1 sets out the overarching spatial strategy for the district and is largely retained. The key amendment to the policy is to increase the development capacity at East Keynsham i.e. releasing the previously safeguarded sites for development through LPPU Policy KE3c and KE3d. The new site allocations prioritise previously developed land and follow the spatial sequential approach directing new development to existing urban settlements, Bath, Keynsham and Somer Valley. This helps encourage walking and cycling by locating new housing close to existing workforces, facilities and services. Therefore, major positive effects on objective 1(health) and 2(housing). There is a minor negative effect on objective 12 as three of the sites are currently greenfield land, however the two sites at Keynsham were justified and safeguarded for development through the Core Strategy.</p> <p><u>Through the Partial Update three Park and Ride sites were removed from the Green Belt to facilitate the expansion of their scope to provide facilities relating to a multi-modal interchange. The aim of multi-modal transport interchanges is to co-locate sustainable transport opportunities to create choice and opportunities for lower emission and sustainable travel, including into and out of key urban areas. (Please see the site allocation SB22 appraisals for detail) The amendments proposed through the Main Modifications list these site allocations within DW1 policy. This helps improve its effectiveness.</u></p>	

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

Policy SB8	Updated policy: Bath Riverside
SA Objectives	
	<p>Policy wording also requires streets and spaces to be provided in accordance with the relevant typology set out in the Bath Pattern Book.</p>
<p>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</p>	<p>+</p> <p>Development of the site will provide a mix of uses, some of which will provide local job opportunities, including a primary school, an early years facility and a new community hub.</p>
<p>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</p>	<p>++</p> <p>The site is located in a sustainable location, with residential development able to capitalise on the location's potential for day to day trips to be made locally and on foot or by bicycle, with public transport being an attractive option for trips to/from the city centre.</p> <p>Policy wording requires development to facilitate improvements to pedestrian and cycle routes, including provision of a new Sustainable Transport Route across part of the site, from east to west, and delivery of an upgrade to the disused former railway bridge over the river to allow use by pedestrians and cyclists. <u>It requires investigating specific infrastructure elements, such as integrating with emerging Metrobus/Mass Transit proposals and ensuring options for crossing Windsor Bridge Road, are feasible solutions for the provision of sustainable transport.</u> The wording also requires provision of clear hierarchy of pedestrian and cycling routes throughout the site, providing good permeability across the site as a whole, and linking individual sites with the surrounding context.</p>
<p>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	<p>0</p> <p>The site is visible from multiple key views around the city, including longer sweeping views from important viewpoints.</p> <p>Policy wording requires development to provide high quality public realm, designed to provide green infrastructure with a focus on nature recovery and nature-based solutions. A strong tree infrastructure is required throughout the site using large growing species to provide both Green Infrastructure (GI) nature-based solutions and structural landscaping to break up extensive massing of buildings.</p> <p>Policy wording also requires that development is informed by a comprehensive understanding of the sensitive landscape context in which the area sits. Any development should not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints as set out in the WHS Setting SPD; and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response and to influence the height, massing and design of buildings. The Bath Building Heights Strategy (BBHS) should be used as part of the evidence base and the starting point for this analysis which must also include a detailed Landscape and Visual Impact Assessment (LVIA).</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies.</p>
<p>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<p>0</p> <p>The site is historically sensitive. It is located within the World Heritage Site (WHS), Bath Conservation Area and is surrounded by various listed buildings and structures. The site is visible from multiple key views around the city, including longer sweeping views towards the Georgian City and views from historically important viewpoints.</p> <p>Enhancement and mitigation Policy wording requires that development is informed by a comprehensive understanding of the sensitive heritage context in which the area sits, including undertaking a detailed historic environment assessment to include assessment of the effects of development proposals on the wider City of Bath WHS, Outstanding Universal Values (OUVs) and Attributes and other heritage assets including the</p>

Policy SB8	Updated policy: Bath Riverside
SA Objectives	
	<p>Georgian city, Bath CA, listed buildings, Royal Victoria Park, undesignated heritage assets and archaeology, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation. A heritage-led and contextual approach is strongly encouraged.</p> <p>Policy wording also requires that development does not detract from important views over the site including, but not limited to, longer, sweeping views towards the Georgian City and views from historically important viewpoints.</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies.</p>
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<p>+/0</p> <p>The River Avon runs through the site, and creates a river boundary for a number of the land parcels which make up the allocation. These areas are particularly sensitive in terms of biodiversity and habitats.</p> <p>Policy wording requires development to retain and enhance green infrastructure and habitats along the riverside edge providing a biodiversity led approach towards the treatment of this area. <u>Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated.</u> Built form is required to be set back from the existing riverside habitat infrastructure by a buffer of at least 10 metres <u>where feasible</u>. Development blocks should seek to retain and enhance the existing hedgerows throughout the site wherever possible, providing a 10m protective buffer of new grassland habitat for all retained hedgerows, and the provision of additional hedgerows is encouraged.</p> <p>Mitigation</p> <p>New development will be subject to other Development Management policies including the requirements for biodiversity net gain of <u>at least a minimum of 10%</u>, and provide one nest or roost site per residential dwelling.</p>
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<p>0</p> <p>Potential for harmful light spill onto river corridor.</p> <p>Policy wording requires lighting to be designed to safeguard the important ecological function of the river corridor, including the retention of a dark corridor for bats.</p> <p>Mitigation New development will be subject to other Development Management policies and latest environmental standards.</p>
<p>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<p>0</p> <p>Some parts of the site are located adjacent to the river, in Flood Zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy, therefore the location of the general growth areas was justified through the Core Strategy high level Sequential Test.</p> <p>Policy wording requires development proposals to be informed by a site specific Flood Risk Assessment (FRA), with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.</p>
<p>Objective 11 Reduce negative contributions to and Increase resilience to climate change</p>	<p>+</p> <p>Policy wording requires development to optimise sustainability innovations, including district heating infrastructure, on-site renewable energy generation, and demonstrate that all reasonable opportunities to reduce the embodied carbon emissions associated with development have been explored. It also requires development to optimise the solar energy potential of development by careful design and orientation.</p>

Policy SB8	Updated policy: Bath Riverside
SA Objectives	
	Mitigation and enhancement New development will be subject to other Development Management policies.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	+ As per objective 11.
<p>General Summary</p> <p>The updated site allocation for Bath Riverside will have a major positive effect in terms of Objective 2(housing) boosting the supply of housing (including affordable housing), and Objective 5(sustainable transport) through the provision of improved walking and cycling infrastructure and routes within the local area.</p> <p>A positive impact will arise relating to the promotion of healthy lifestyles through the provision of a health related community facility, and through provision of improved walking and cycling infrastructure in the local area.</p> <p>Other positive impacts will arise through provision of local jobs relating to the provision of a primary school, an early years facility and a community hub, the protection and enhancement of existing habitats along the river line and within existing hedgerows, provision of 10% biodiversity net gain, and through the optimisation of sustainability innovations at the site.</p> <p>Potential negative impacts relating to heritage impact, landscape, views of the site, light spill and flooding will be mitigated through development requirements set out within the policy wording.</p> <p><u>Policy wording requires development to retain or reinstate riverside habitat infrastructure to retain and enhance green infrastructure where possible. Where vegetation clearance is necessitated for site preparation the vegetation shall be reinstated. Built form is required to be set back from the existing riverside habitat infrastructure by a buffer of at least 10 metres where feasible. This helps mitigate potential negative effects on objective 8 (ecology).</u></p> <p>Some parts of the site are located adjacent to the river, in Flood Zones 2 and 3. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy, therefore the location of the general growth areas was justified through the Core Strategy high level Sequential Test</p> <p>Policy wording requires development proposals to be informed by a site specific FRA, with site layouts designed using a sequential approach. As a minimum, floor levels must be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.</p>	

Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce	+ Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. The site is located in a highly sustainable location with potential for day to day trips to be made locally and on foot or by bicycle, encouraging active lifestyles. This helps contribute to this objective.

Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
health inequalities	
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	+ The policy facilitates more student accommodation close to teaching facilities. The policy also allows the consolidation of the University estate and release the Sion Hill campus for housing. Therefore, a minor positive effect on this objective.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+ The Creative Industrial Hub in partnership with Bath Spa University offers mixed use development with employment space including incubator units and 'grow on' space and teaching. It also provides opportunities to share the university's specialist equipment and facilities and become a focal point where universities and businesses work together. This will have a major positive effect on this objective contributing to the wider community benefits.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++ The policy facilitates mixed use development comprising flexible teaching and employment space. The space will also provide incubator units and grow on space space associated with Bath Spa University which can also be used as studio space with access to specialist equipment and facilities for start-up businesses and workspaces for local people, academics and students, resulting in an increase in the supply and diversity of employment opportunities; contribute to inclusive growth by making units available to students and SMEs; and increasing local training, work experience and apprenticeships. The site is located in a sustainable location with good access to public transport. This mixed use development could increase the potential for reducing travel distances to work. The previous SA stated that 'the Locksbrook campus is located within the Newbridge Strategic Industrial Estate. If the potential new site for Bath Spa University is only used for academic space it has a negative effect on this objective. The site selection and potential uses need to be carefully considered to ensure they contribute to the wider economic benefits.' Responding to this, the policy states that teaching space will be supported subject to a)providing workspace that can be offered to small and medium enterprises and b) the demonstration of economic benefits to the city in particular for industrial uses. This has a major positive effect on this objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++ Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. In addition Lockbrook Campus is in a sustainable location well connected to Bath Spa Station, the city centre and Newbridge Campus by public transport. Mitigation and enhancement Any new development will be subject to Development Management Policies.
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	0 The new Policy SB22 requires a positive relationship with Station Road and Locksbrook Road and respond positively to short and long distance views having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. It also requires provide an architectural response that helps to reinforce the identity of this area as a Creative Hub, whilst responding to its sensitive context. Mitigation and enhancement Any new development will be subject to Development Management Policies.

Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	0 The Locksbrook Area has an industrial heritage (the current Locksbrook campus is based on the former Herman Millar building which is a Great II listed building). The mixed use development would help maintain the industrial and creative legacy of the Locksbrook Area. The new Policy SB22 requires to respond positively to short and long distance views having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. It also requires provide an architectural response that helps to reinforce the identity of this area as a Creative Hub, whilst responding to its sensitive context. Mitigation and enhancement Any new development is subject to Development Management Policies.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0 The new Policy NE3a (biodiversity net gain) will apply to this allocation. The SB22 requires to consider opportunities to deliver 10% biodiversity net gain within the site curtilage before any off-site measures are proposed. <u>New clause 10 requires to retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</u> Mitigation and enhancement Any new development is subject to Development Management Policies
Objective 9: Reduce land, water, air, light, noise pollution	+ Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel' and help reduce traffic congestion contributing to reduce air and noise pollution. Also concentrating Bath Spa University on two main campuses helps reduce travel/movements between the key campuses and satellite campuses. This helps reduce the need to travel contributing to reduced air pollution. Mitigation Need to ensure that the living conditions at the upper floors will be maintained at an acceptable level in terms of noise from the ground floor teaching/industrial activities. New development will be subject to other Development Management policies and latest environmental standards.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 Part of the Locksbrook Campus is located in Flood Zone 1 and 2. The policy allows some student accommodation. The policy reflects the extant planning permission under which the sequential test was carried out and justified. Mitigation Any new development is subject to Development Management Policies, in particular Policy CP5 Flood Risk and SU1 Sustainable Drainage.
Objective 11 Reduce negative contributions to and Increase resilience to	+ The Locksbrook Campus is walkable from may Purpose Built Student Accommodation where students live. Also concentrating Bath Spa University on two main campuses helps reduce traveling/movement between key campuses and satellite campuses. This helps reduce travel movements contributing to

Policy B3 and SB22	B3 Strategic policy for Twerton ad Newbridge SB22 Creative Industry Hub
SA Objectives	
climate change	reduced carbon emission. Mitigation Any new development will be subject to Development Management Policies including in particular zero carbon and biodiversity net gain polices introduced through the Partial Update.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0 The new allocation encourages the use of brownfield land. The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies. Mitigation Any new development is subject to Development Management Policies particularly zero carbon and biodiversity net gain polices introduced through the Partial Update.
General Summary The Creative Industry Hub in partnership with Bath Spa University offers mixed use development with employment space including incubator units and 'grow on' space and teaching. It also provides opportunities to share the university's specialist equipment and facilities and become a focal point where universities and businesses work together. This will have a major positive effect on objective 3(communities) and 4(economy). Creating a walkable campus close to where students live makes it easy to reach everyday destinations (campus/homes) by 'active' travel'. Also the Locksbrook Campus is well connected to Bath Spa Station, the city centre and Newbridge Campus by public transport. This helps reduce travel/movements between key campuses and satellite campuses limiting air pollution and reducing carbon emission. This results in a major positive effect on objective 5(sustainable transport). The policy SB22 sets out site specific requirements addressing Objective 6 (landscape), 7(heritage) and 8 (biodiversity). The nature of the mixed-use development, in terms of character, scale, external appearance and intensity of use, will need to reflect existing development in the surrounding area. However any new development will be subject to other Development Management policies including in particular new zero carbon and biodiversity net gain polices. <u>New clause 10 requires to retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.</u>	

Policy SB18	Royal United Hospital
SA Objectives	Amendments to the policy
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	++ The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&NES. Various projects to improve their facilities have been completed in accordance with their Estate Strategy (2014) and now planning for further improvement tapping into the funding under the government's 'New Hospital Programme'. The modified Policy refers to <u>the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal.</u> The updated policy would facilitate the improvement of these essential healthcare facilities. Therefore, the policy has a major positive effect on this objective.
Objective 2: Meet identified needs for	++ The policy facilitates the provision of use class C3 flats, with a range of sizes and types for use by

Policy SB18	Royal United Hospital
SA Objectives	Amendments to the policy
sufficient, high quality housing including affordable housing	key workers associated with the RUH. This will help contribute to boosting the housing supply.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	++ The RUH is an essential health, social and well-being facility and improving its facilities will help promote stronger more vibrant and cohesive communities.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++ As well as being the main provider of healthcare services the Trust is also the largest employer in Bath & North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to 1,000). The policy supports the improvement to facilities helping to create more employment opportunities to meet the requirements of this growth sector.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++ Site located in a sustainable location well connected by public transport. The policy requires a sustainable transport masterplan for the whole of the RUH site, examining the pedestrian and cycle routes between the site and key local facilities, and making appropriate enhancements to ensure that the walking and cycling are the natural choices for local trips. Some specific opportunities for investigation and delivery are included in the Policy requirements, such as pedestrian improvements to at the Weston Lane/Crown Road/High Street junction. The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate enhancements to ensure that walking and cycling are the natural choices for local trips. <u>Site located in a sustainable location well connected by public transport. The policy requires a sustainable transport masterplan for the whole of the RUH site, examining the pedestrian and cycle routes between the site and key local facilities, and making appropriate enhancements to ensure that the walking and cycling are the natural choices for local trips. Some specific opportunities for investigation and delivery are included in the Policy requirements, such as pedestrian improvements to at the Weston Lane/Crown Road/High Street junction. The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate enhancements to ensure that walking and cycling are the natural choices for local trips.</u> <u>Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate</u> Mitigation New development will be subject to other Development Management policies – which sets out the parking standards. Contributions to a Residents Parking Zone (RPZ) may be required as part of parking solutions for the site. <u>New development will be subject to other Development Management policies</u>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	-/0 The Policy requires development to be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area. Mitigation New development will be subject to other Development Management policies
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	0 The Policy requires development to be informed by a detailed heritage assessment and heritage impact assessment (to include listed buildings, undesignated heritage assets, archaeology, and landscape), both in terms of the specific site and the wider area. The Grade II* Manor House and its setting will require an especially sensitive approach to ensure that its significance is taken into account and both enhanced and better revealed. A heritage-led and contextual approach is therefore required. <u>New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</u> Mitigation New development will be subject to other Development Management policies
Objective 8: Conserve, enhance and	+ Development of part of the site for residential use provides opportunity to enhance opportunities for

Policy SB18	Royal United Hospital
SA Objectives	Amendments to the policy
restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>biodiversity net gain across the site including the former kitchen garden to the north of the Manor House. It also requires to consider a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.</p> <p>Mitigation New development will be subject to other Development Management policies</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>0</p> <p>Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill. The policy requires parking for bicycles and cars in line with the parking standards in the Transport and Developments SPD, for both residential and clinical uses. Improved integrated parking solutions and car park management across the site should be investigated to maximise efficient use of land and reduce the need to travel by car. Contributions to a Residents Parking Zone (RPZ) may be required as part of parking solutions for the site.</p> <p>Mitigation New development will be subject to other Development Management policies and latest environmental standards.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<p>0</p> <p>The site is located in flood zone 1.</p> <p>Mitigation New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
Objective 11 Reduce negative contributions to and increase resilience to climate change	<p>+</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>+</p> <p>The site is brownfield land. The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies.</p>
<p>General Summary</p> <p>The RUH is a major sub-regional healthcare facility serving over 500,000 people within B&NES. Various projects to improve the facilities have been completed in accordance with their Estate Strategy (2014) and now the RUH is planning for further improvements tapping into the funding under the government's 'New Hospital Programme'. The updated policy would facilitate the improvement of essential healthcare facilities. The Trust is also the largest employer in Bath & North East Somerset with around 5,500 staff and over 400 volunteers (predicted to rise to 1,000). The policy supports the improvement to their facilities helping to create more employment opportunities to meet the requirements of this growth sector. <u>The amended Policy refers to the Council's commitment to work collaboratively and support the Trust in developing the updated Estate Strategy, and its associated Sustainable Transport Strategy, in delivering the District's healthcare clinical needs and estate renewal.</u> The site is a sustainable location accessible by public transport and brownfield land. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities), 4(economy), 5(sustainable transport) and 12 (natural resources)</p> <p>The policy requires a sustainable transport master plan for the whole of the RUH site, examine the pedestrian and cycle routes between</p>	

Policy SB18	Royal United Hospital
SA Objectives	Amendments to the policy
<p>the site and key local facilities, and making appropriate enhancements to ensure that the walking and cycling are the natural choice for local trips.</p> <p><u>The Policy requires to examine the pedestrian and cycle routes between the site and key local facilities, and make appropriate necessary enhancements to ensure that walking and cycling are the natural choices for local trips. Development proposals will be required to have regard to the Sustainable Transport Strategy, once completed to the satisfaction of both the Trust and B&NES, and introduce, as necessary, measures that improve safe and suitable active travel routes, provide supporting infrastructure such as parking, wayfinding, hire facilities, showers and changing spaces, and manage car parking appropriate</u></p> <p><u>New clause 5a requires development proposals in the vicinity of the Manor House to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill.</u></p> <p>New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>	

Policy SB24	New Policy: Sion Hill
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<p>++</p> <p>Development of the site for residential use to include provisions to encourage active lifestyles for residents and surrounding communities.</p> <p>Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped gardens, for use by both residents and surrounding local community.</p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>++</p> <p>Provision of approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1 and 2 bed flats) are based on emerging housing needs set out in the WECA draft housing needs assessment.</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies including the revised Policy H7 which sets out revised accessibility requirements.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>++</p> <p>The site is located close to community facilities in Bath. The Policy requirements include to make the landscaped gardens available for both residents and the surrounding local community.</p> <p><u>The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project. This helps contribute to this objective.</u></p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+</p> <p>The University's strategy is to focus development into two campuses: Newton Park and a new campus area around Locksbrook Road. This will free up land at Sion Hill campus for use as residential.</p> <p>The loss of this university facility on this site could have a neutral effect. Providing more homes in Bath which is the district's major employment centre has a positive effect as it helps reduce travel distances to work.</p>
Objective 5: Ensure everyone has access	<p>+</p> <p>Site located in a sustainable location, within walking distance to the city centre, and close to bus</p>

Policy SB24	New Policy: Sion Hill
SA Objectives	
<p>to high quality and affordable public transport, cycling and walking infrastructure</p>	<p>stops with services to the city centre. Development of the site for residential use to include requirements to improve the walking / cycling infrastructure through the site, as well as in the local area.</p> <p>Policy wording requires development to provide a comprehensive network of walking and cycling public access routes through the landscaped gardens, plus appropriate connections to the wider walking and cycling network, including safe crossings where necessary.</p> <p>Policy wording also requires development proposals to ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road.</p> <p>A requirement for the development to provide measures to improve conditions on Winifred's Lane to the east of the site, to make the route safe and suitable for pedestrians and cyclists is also included.</p> <p><u>The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project.</u></p> <p>Mitigation New development will be subject to other Development Management policies as well as Transport and Development SPD which sets out the parking standards.</p>
<p>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	<p>0/-</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary planting within the site is substantial, and screens the site well from views across the city.</p> <p>Policy wording requires development to protect and enhance existing landscape infrastructure within the site and to retain and enhance substantial boundary planting to protect both short and long views of the site from across Bath.</p> <p>Policy wording also requires development to deliver a high quality, contemporary and sustainable built form and architectural design, informed by the site's sensitive landscape context. Development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.</p> <p>Mitigation New development will be subject to other Development Management policies particularly NE2 requiring a Landscape and Visual Impact Assessment.</p>
<p>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<p>0</p> <p>The site is located in a highly sensitive hillside location, within the World Heritage Site and Bath Conservation Area. The site has many layers of history prior to its development by Bath Spa University. There are known archaeological deposits in the area including Romano-British burials, an Iron Age site and the former site of St Winifred's Chapel and Well, the exact locations of which are not known. The site is the former ornamental landscaped garden of St Winifred's, a 19th century house built in 1803. There may be below ground remains of the property on site, and historic walls and railings survive in places around its perimeter. Various listed buildings are located in the immediate area surrounding the site, including Grade I listed buildings Somerset Place to the east, and Sion Hill Place to the north.</p> <p>Policy wording requires development to deliver high quality, contemporary and sustainable built form and architectural design, informed by the opportunities presented by the site's sensitive historic and landscape context. In seeking to preserve or enhance this part of the Conservation Area and WHS, it is anticipated that development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.</p>

Policy SB24	New Policy: Sion Hill
SA Objectives	
	<p>Policy wording also requires applications to undertake a detailed historic environment assessment, and where necessary evaluation, to identify and implement appropriate mitigation.</p> <p>Mitigation New development will be subject to other Development Management policies.</p>
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<p>+</p> <p>Development of the site for residential use provides opportunity to enhance opportunities for biodiversity across the site.</p> <p>Policy wording requires development to protect and enhance existing habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. The development will also be required to deliver biodiversity net gain of at least 10%. Other ecological interventions required include integrated swift boxes and garden boundaries permeable for hedgehogs.</p> <p>Mitigation New development will be subject to other Development Management policies.</p>
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<p>0</p> <p>Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill.</p> <p>Mitigation New development will be subject to other Development Management policies and latest environmental standards.</p>
<p>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<p>0</p> <p>The site is located in Flood Zone 1.</p> <p>Mitigation New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
<p>Objective 11 Reduce negative contributions to and increase resilience to climate change</p>	<p>+</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.</p>
<p>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>	<p>+</p> <p>The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a positive effect on this objective.</p> <p>The Policy requires demolition and rebuild of existing building at the site should only be proposed where conversion is not considered feasible.</p>
<p>General Summary</p> <p>The site is in brownfield land and expected to provide approximately 100 new apartments, including, 40% affordable housing. Mix of sizes specified in policy requirements (market 2+ bed flats and affordable 1 and 2 bed flats) are based on emerging housing needs set out in WECA's draft housing needs assessment. Development of the site for residential use includes provisions to encourage active lifestyles for residents and surrounding communities. Policy requirements to include provision of new walking and cycling routes throughout the site and connecting to existing routes (see objective 5 below) and provision of public open space within the landscaped</p>	

Policy SB24	New Policy: Sion Hill
SA Objectives	
<p>gardens, for use by both residents and surrounding local community. The amendments through the Main Modifications links to the objectives of the Liveable Neighbourhood Project. Any new development will be subject to new zero carbon development requirements. The Policy requires demolition and rebuild of the existing buildings at the site should only be proposed where conversion is not considered feasible. Therefore, major positive effects on Objectives 1(health), 2(housing), 3(communities) and 12 (natural resources)</p> <p>The site is highly sensitive in terms of landscape and setting. The existing university building is set within a former ornamental landscaped garden of a 19th century house. Boundary planting within the site is substantial, and screens the site well from views across the city. Therefore, potential minor negative effect on objective 6(landscape).</p> <p>Mitigation New development will be subject to other Development Management Policies particularly Policy NE2 with a requirement for a Landscape and Visual Impact Assessment and SPDs including Transport and Development SPD for parking standards.</p>	

Policy SB25	New Policy: St Martins Hospital
SA Objectives	
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<p>+/0</p> <p>The site is currently owned by NHS Property Services. Some areas of the site, namely the clinical buildings to the south-east, continue to play an important role in the NHS's clinical facilities requirement. However, some buildings within the site are expected to soon be declared surplus to the operational healthcare requirements of the NHS by local health commissioners, and are therefore being released for use as housing. The policy requires that the continued use of the south-eastern section of the site for clinical health services is facilitated.</p> <p>The site is located in a sustainable location with potential for day to day trips to be made locally and on foot or by bicycle, encouraging active lifestyles.</p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>++</p> <p>The allocation provides approximately 50 new homes, including policy compliant affordable housing, which will help boost housing supply.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>+</p> <p>The policy also requires that the continued use of the south-eastern section of the site for clinical health services is facilitated. Retention / enhancement of safe walking routes through the site in order to ensure permeability, for use by surrounding communities.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>-/0</p> <p>Loss of surplus clinical floorspace.</p> <p>Mitigation and enhancement Policy wording only allows for loss of clinical floorspace where supported by evidence to show that it has been formally declared as surplus to the operational healthcare requirements of the NHS by local health commissioners.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and	<p>+</p> <p>Site located in a sustainable location. There is potential for future residents to make day to day trips locally and on foot or by bicycle, and there is good public transport links for trips to/from the city centre.</p>

Policy SB25	New Policy: St Martins Hospital
SA Objectives	
walking infrastructure	<p>Mitigation and enhancement Policy wording requires development to retain and enhance the existing network of pedestrian footways throughout the site and deliver measures to improve permeability and legibility for pedestrians and cyclists. Policy also requires the examination of pedestrian and cycle routes between the site and key local facilities and to make appropriate <u>necessary</u> enhancements to ensure that the walking and cycling are the natural choice for local trips. The requirements also include “Improve access to Odd Down Sports Ground for pedestrians and cyclists through off-site contributions towards crossing improvements across Wellsway, and a new access to the Sports Ground.”</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>Attractive landscaped areas throughout the site are considered important visually and potentially important in terms of biodiversity. There are many trees throughout the site which require retention and protection, some of which are located very close to the footprint of the buildings.</p> <p>Mitigation and enhancement Policy wording requires development to protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, planting, and landscaped areas. Any extension or redevelopment of existing buildings will be designed to ensure minimal to no encroachment into landscaped areas.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>0</p> <p>The site is historically sensitive. It is located within the World Heritage Site and has many layers of history prior to its development by the NHS. Records show that it may have once been used as a military barracks, before becoming a workhouse, and then a hospital. The main building within the complex, a former workhouse building, which has now been converted to apartments, is Grade II listed, as is the Chapel of St Martin, located to the north of the site. A nineteenth century paupers burial ground is also located within the site, and there are known archaeological deposits in the surrounding area. <u>The amendments through the Main Modifications will help conserve the heritage significance of the Chapel of St Martin.</u></p> <p>Mitigation and enhancement Policy wording requires development to be informed by a detailed, site-wide heritage assessment, which considers each of the individual buildings within the site, their context and relationship to each other, as well as other heritage assets, including the World Heritage Site, adjacent listed buildings, and undesignated heritage assets. The redevelopment of Kempthorne House, Midford House and Ash House will not be supported, unless an objective and comprehensive heritage assessment is provided to justify such a proposal, with a clear evidence base to demonstrate that conversion would not be feasible and / or viable.</p>
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>+</p> <p>Landscaped areas throughout the site are considered potentially important in terms of biodiversity.</p> <p>Mitigation and enhancement Policy wording requires development to protect and enhance existing habitats within the site. The development will also be required to deliver biodiversity net gain of at least 10%. Other ecological interventions required include integrated swift boxes and garden boundaries permeable for hedgehogs.</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>0</p> <p>Residential development could potentially increase light spill into ecologically sensitive habitats in landscaped gardens. Policy to require development to protect all habitats from increased light spill.</p> <p>Mitigation New development will be subject to other Development Management policies and latest environmental standards.</p>
Objective 10: Reduce	0

Policy SB25	New Policy: St Martins Hospital
SA Objectives	
vulnerability to, and manage flood risk (taking account of climate change)	The site is located in Flood Zone 1. Mitigation New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.
Objective 11 Reduce negative contributions to and increase resilience to climate change	+ Development will be required to meet policy compliant reduction in carbon emissions through renewable energy interventions on-site. Opportunity to increase sustainability of uses on site.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	+ In terms of sustainable construction, policy wording states that other than the demolition of Frome House, all other buildings within the site should be retained and converted, subject to feasibility and viability.
General Summary The new site allocation for St Martins Hospital will have a major positive impact on Objective 2(housing) in terms of boosting the supply of housing (including affordable housing). Other positive impacts will arise through potential enhancement of the existing network of pedestrian footways throughout the site, delivery of measures to improve permeability and legibility for pedestrians and cyclists in the local area and access improvements to Odd Down playing fields. Potential negative impacts on Objective 4(economy) relating to the loss of surplus clinical floorspace will be mitigated by policy wording requiring evidence that clinical floorspace is surplus to the needs of the NHS. Other potential minor negative impacts relating to impact on heritage and biodiversity will be mitigated through development requirements set out within the policy wording. <u>However, the amendment made to clause 8 will help conserve the heritage significance of the Chapel of St Martin.</u>	
Mitigation New development will be subject to other Development Management policies and SPDs.	

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	++ The revised Policy facilitates further improvements to teaching facilities and provides for more purpose built student accommodation. There are good health and leisure facilities available on the Claverton Down Campus. Policy SB19 enables the further provision of facilities for sports and recreation and the masterplan proposes 3 rd generation pitches which help facilitate longer play, especially in winter. Responding to some concerns raised in terms of potential risk to health and soil/water contamination associated with old tyres, revised Policy requires 100 % recyclable pitch materials with natural filling crumbs <u>unless it is demonstrated not to be feasible</u> . Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
	with nature and bring mental and physical health/well-being benefits. It also requires a campus-wide approach to sustainable travel including the active implementation of the Travel Plan.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	++ The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation on campus could contribute to bringing existing HMOs back to non-student use (subject to achieving the right types and rental levels). Therefore, it has a major positive effect on this objective.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	++ The site can accommodate university related uses including a variety of spaces for education, business, conference, IT, sport, health, arts and social, catering and retail which helps promote stronger more vibrant and cohesive communities on campus. The new Development Framework Plan identifies new or improved public spaces such as open space, Focal Lake and new Focal Spaces. This helps Promote public spaces that support civic, cultural, recreational and community functions. <u>The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</u>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++ The current policy framework is to prioritise general housing and jobs in the city and the Council's preferred approach is to facilitate necessary student accommodation on campuses. Facilitating further student accommodation has a major positive effect on this objective as it helps, along with the new policies for PBSA, maintain existing employment sites in the centre of Bath, especially as many of the recently built PBSAs have been on previously employment land. The revised policy creates more employment opportunities in growth sectors as the policy defines university-related uses to include research and allied business incubation. This will help improve access to local training, work experience and apprenticeships. The UoB is the second biggest employer in the District the the policy facilitates the long term requirements of the university on campus (48,000 sqm). This would have a major positive effect through the short to long terms.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++/+ The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between their accommodation and university facilities. The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires <u>a campus-wide approach including the implementation of an up to date Travel Plan</u> . Based on the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. The Policy Framework proposes an improved green corridor and encourages walking and cycling routes. Mitigation and enhancement The new Travel and Development Supplementary Planning Document (SPD) will set the parking standards as well as the requirements for electric vehicle charging spaces. Any future

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
	applications will be subject to other Development Management policies as well as the SPD.
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>-/0</p> <p>The campus is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. A Visual Impact Assessment was prepared and informed the key development areas. The maximum heights and various buffers were set through the Policy. (eg minimum 15 metres buffer for the multi storey car park at the existing West Car Park area). Therefore, the impact on the landscape can be minimised. The Policy also requires careful design of the eastern-most block (at the current East Car Park) to ensure minimising the impact on views from Bushey Norwood (AONB). The University Park has an important landscape setting and green infrastructure function to the many developed parts of the campus. It should remain as an undeveloped yet enhanced open space as the remainder of the campus intensifies.</p> <p>Mitigation and enhancement</p> <p>The original SB19 d) is maintained and carried over to the new SB19. 'In all circumstances where development would be visible to views from within the Cotswolds AONB (at Bushey Norwood, Bathampton Down, and Claverton Down, or from within the Limpley Stoke Valley at places such as Warleigh and Conkwell), it should respond to this context and its visual impact must be moderated with a suitable design response including suitable (immediate and longer term) mitigation measures, including any opportunities to enhance the AONB. Impacts on the AONB will need to be evidenced in an LVIA, the scope of which should be set out in consultation with the LPA, Natural England and the Cotswold Conservation Board.'</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>-/0</p> <p>The main Claverton Down campus is within the City of Bath World Heritage Site (WHS). The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p> <p>The redevelopment of the decked car park at the West Car Park could be visible from the city (Bath WHS). The Verified Views Appraisal has informed the need for a tree belt (approx. 15 meters) on the western/north western side of the new decked car park. This will provide additional screening for the buildings in views from the city to the west. Also the facades and rooftop plant of both the car park and building will be required to be carefully designed so that they can be assimilated into views from the west and to ensure that light spill is minimised.</p> <p>Mitigation and enhancement</p> <p>The original SB19 c) is maintained and carried over to the new Policy SB19. 'In all circumstances development will be assessed to determine the degree to which it affects the significance of the Bath World Heritage Site (by reference to the Bath World Heritage Setting SPD), the Bath Conservation Area, the Claverton Conservation Area, the Claverton Manor Historic Garden and the Bathampton Down Scheduled Ancient Monument (including by affecting their settings) and great weight will be given to their conservation and enhancement.</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence required by the other Development Management policies.</p>

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<p>+/-</p> <p>The mitigation hierarchy is used to avoid and minimise impacts, and various area specific measures are included in the Policy such as:</p> <ul style="list-style-type: none"> • Set back to reduce light spill and provide space for additional tree planting to bolster the existing perimeter vegetation • Careful design of the buildings to ensure that the impact on the adjacent bat corridors (in terms of light spill) is minimised. <p>The revised policy requires biodiversity to be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds. It also requires a minimum of a swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required.</p> <p>Wider green buffer was proposed around the new 3G pitch.</p> <p>Mitigation and enhancement</p> <p>The original SB19 f) and j) below is maintained and carried over to the new SB19.</p> <p>f)'In all circumstances the design response should be evidenced as contributing positively to a campus wide strategy for green infrastructure, landscape and ecology (particularly in respect of protected species of Bats) such as the Landscape and Ecological Management Plan. These matters should be intrinsic to development, which should enable the creation, protection, enhancement and management of networks affecting the campus. If it is necessary to cause harm to a network, this should be minimised and suitable compensatory measures must be made within the campus.'</p> <p>j) In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).</p> <p>Even though policy requirements including the heights of buildings are informed by various evidence documents, individual applications for new buildings should be informed by more detailed specific studies and evidence required by the other Development Management policies. The new development will be subject to the requirement for 10% biodiversity net gain.</p>
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<p>0</p> <p>There is potential for increased light spill by illuminating areas of the campus that are dark at present. The general intensification other parts of the campus also has the potential to increase light spill. The development requirements set out some area specific measures including:</p> <ul style="list-style-type: none"> • Careful design of the buildings to ensure that the impact on the adjacent bat corridors (in terms of light spill) • Roofs over the decked car parks to reduce light spill. • The green corridors around the perimeter of the campus will be retained as a continuous green ribbon around the campus which includes public rights of way and links to the wider network of public footpaths and bridleways. • The 3G pitch is located in the AONB and the opportunity will be explored to use the required earthworks and additional planting to screen / filter views of the pitch and related infrastructure.. <p>The revised policy would facilitate more new university related development (including on the</p>

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
	<p>land currently used as a car park), however the Policy requires to maintain or reduce the total number of parking spaces. This contributes to minimising increase in traffic congestion and encouraging the use of public transport, cycling and walking.</p> <p>The revised policy requires enhancing pedestrian and cycling infrastructure to promote active travel modes over private cars.</p> <p>The revised policy requires 3G pitches to be recyclable and use natural crumb.</p> <p>Mitigation and enhancement The original SB19 j) is maintained and carried over to the new SB19 j)'In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).'</p> <p>New development will be subject to other Development Management policies and latest environmental standards.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<p>0</p> <p>The site is within Flood Zone 1.</p> <p>Mitigation and enhancement Any new development will be subject to Development Management Policies, particularly Policy CP5 Flood Risk and Policy SU1 Sustainable Drainage.</p>
Objective 11 Reduce negative contributions to and increase resilience to climate change	<p>0</p> <p>The policy framework encourages and enables the delivery of the site in accordance with the Council's climate and ecological emergency declaration and sustainable construction policies and in addition the University has adopted a Climate Action Framework. The University has committed to the targets of being net zero carbon in Scope 1 and 2 emissions by 2030, and Scope 3 emissions by 2040.</p> <p>The revised policy requires no increase in car parking provision which help not increase greenhouse gas emissions.</p> <p>The revised policy requirements include to enhance the green corridor and green infrastructure, which helps increase resilience to future climate change with increased extremes of heat.</p> <p>Mitigation and enhancement New development will be subject to zero carbon policies proposed through this Partial Update.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>+</p> <p>The revised Policy encourages the effective use of brownfield land.</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies including zero carbon policies proposed through this Partial Update and University's own Climate Action Framework.</p>
<p>General Summary The revised Policy SB19 proposes further improvements to university related development including spaces for teaching, research and business incubation and provides more purpose built student accommodation. There are good health and leisure facilities available on</p>	

Policy SB19	University of Bath
SA Objectives	The revised development requirements are informed by more detailed and up to date evidence base.
<p>the Claverton Down Campus. It also facilitates the further provision for sports and recreation and 3rd generation pitches which help facilitate longer play especially in winter. Policy SB19 also requires the wider University Park to be enhanced by improving the connectivity between its different parts, improving legibility and way-marking, and encouraging a more dispersed pattern of use. Enhanced access to the park will help to provide a connection with nature and bring mental and physical health/well-being benefits. The site is served by regular buses and is accessible to/from the city centre. It is also accessible to a number of footpaths and open countryside. Facilitating more student accommodation on campus will help reduce the level of traffic by reducing travel distances for students between accommodation and university facilities. <u>The revised Clause 8 ensures that the loss of playing fields is considered in line with the NPPF requirements.</u></p> <p>The revised Policy proposes two decked multi storey car parks but requires the overall level of parking (about 2,200 spaces) to be retained or reduced. It also requires <u>a campus wide approach including implementing</u> an up to date Travel Plan. As the commitment made through the University's Climate Action Framework, future growth will be accommodated without increasing car trips and facilitate the use of sustainable modes of travel. Policy Framework proposes an improved green corridor and encourages walking and cycling routes.</p> <p>Therefore, there are major positive effects on Objective 1(health), 2(housing), 3(communities), 4(economy) and 5(sustainable transport).</p> <p>The campus is surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area. The Verified Views Appraisal has informed the siting, building heights and required buffers to minimise the impact. The Policy also requires the University Park area to remain undeveloped as it has an important landscape setting and green infrastructure function to the many developed parts of the campus.</p> <p>The main Claverton Down campus is within the City of Bath World Heritage Site. The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.</p> <p>Various area specific measures are included in the Policy such as buildings to be set back to reduce light spill and provision of space for additional tree planting to bolster the existing perimeter vegetation. The revised policy requires biodiversity to be improved through the strategies set out in the Landscape and Ecology Management Plan, including the introduction of a more varied grassland management regime, introduction of wildflower species, installation of invertebrate refuges and nest boxes, and exploring opportunities for introducing small wildlife ponds. It also requires a minimum of a swift brick per 6 sqm of wall, mounted near the roof, in clusters of three or more, within new buildings. Also a wider green buffer was proposed around the new 3G pitch.</p> <p>Therefore, there are some negative effects on Objective 6(landscape), 7(heritage) and 8(biodiversity).</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies particularly HE1 Historic Environment, NE2 /NE2A (Landscape), NE3-NE6 (ecology) and new Biodiversity Net Gain policy. The site-specific policy requirements SB19 c), d), f) and j) are maintained and carried over to the new SB19. This helps ensure individual proposals address negative effects identified through the appraisal at this stage.</p>	

Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
Objective 1:	++

Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	Allocation of the park and ride sites for use as transport interchanges will provide a range of opportunities relating to health and well-being, including provision of safe walking and cycling routes through the sites, with connections to the surrounding countryside and into the City, plus provision of bikes for hire. <u>The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. The policy has a major positive effect on this objective.</u>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+ Use of park and ride sites as transport interchanges seeks to provide people accessing the city to use sustainable forms of transport, with one of the likely results being reduced car use and congestion, which will help to create more vibrant communities in Bath through less congestion and potentially improved air quality.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+ Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions' ambition to be a driving force for clean and inclusive growth. Continued use of the sites as park and ride facilities will be ensured through policy wording.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++ Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel, including into and out of key urban areas. By providing affordable, convenient and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in the existing public transport network. Interchanges do not need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place. All 3 sites help access to major employment areas in Bath. This is likely to result in reduced greenhouse gas emissions, opportunities for improved health and well-being, reduced car dependency and congestion. <u>The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness. The policy has a major positive effect on this objective.</u> Mitigation and enhancement Continued use of the sites as park and ride facilities will be ensured through policy wording. Any new development will be subject to other Development Management policies.
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	0 The park and ride sites will be removed from the green belt and allocated for use as multi-model transport interchanges. The sites are all very sensitive in terms of landscape, due to their locations on three edges of the city. This sensitivity is decreased a little due to the sites already being developed for park and ride uses. Removal of the sites from the green belt has been informed by a green belt harm assessment and consideration of exceptional circumstances. Policy wording ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be

Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
	<p>informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impacts on Areas of Outstanding Natural Beauty and other sensitive landscape features. <u>The amendments through the Main Modification include the allocation site boundary which helps improve its effectiveness in protecting environmental distinctives/landscape.</u></p> <p>Mitigation Policy wording also requires development to be contained within the areas of the sites already developed for Park and Ride use, i.e. no encroachment into the surrounding landscape will occur. Any new development will be subject to other Development Management policies.</p>
<p>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<p>0</p> <p>Odd Down and Lansdown Park and Ride sites both lie outside of the Bath World Heritage Site boundary but within the indicative extent of its setting (as defined in the City of Bath World Heritage Site SPD). Tree screening around the sites means that they are not visible from the City, and the extent of their development means that they make only a very limited contribution to preserving Bath's setting and special character.</p> <p>Newbridge Park and Ride lies within of the Bath World Heritage Site boundary, which in this area follows the River Avon, but the extent to which the site itself can be considered to contribute to preserving the setting and special character is limited by its developed form for park and ride purposes.</p> <p>Policy wording requires development to be contained within the areas of the sites already developed for Park and Ride use. Any new development will be subject to other Development Management policies.</p>
<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<p>+/0</p> <p>Odd Down P&R site meets the criteria for designation as an SNCI and will be designated through the LPPU. Odd Down P&R is particularly sensitive in terms of biodiversity interest.</p> <p>Policy wording ensures the protection of biodiversity interest by requiring development proposals to be informed by an ecological survey of each site to ensure key habitats and features of ecological value are retained and enhanced. This is an absolute requirement for the Odd Down site which is known to support a colony of Small Blue butterflies. The areas of calcareous grassland shown on the site allocations policies map must be retained and enhanced, and where feasible buffered with supporting habitat.</p> <p>Policy wording also requires development to protect and enhance existing green infrastructure and habitats within the sites, including trees, hedgerows, and grassland habitats. <u>And new clause 11 through the Main Modification requires exploring and delivering measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats.</u></p> <p>Development is also required to be contained within the areas of the sites already developed for Park and Ride use, i.e. the hardstanding areas, as specified on the Site Allocations Policies Map.</p> <p>Development of the sites will need to achieve 10% biodiversity net gain. Any new development will be subject to other Development Management policies.</p>
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<p>0</p> <p>Potential for development to introduce additional light spill to the sites.</p> <p>Mitigation and enhancement Policy wording requires flight lines and foraging routes to be protected from light spill. Any development will be subject to other Development Management policies and the latest environmental standards.</p>

Policy ST6 and Policy SB26	New Policy: Park and Ride Site Allocations
SA Objectives	Park and Ride sites: Odd Down, Newbridge and Lansdown
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 Odd Down and Lansdown Park and Rides are located in Flood Zone 1. The majority of Newbridge Park and Ride is located in flood zone 1, with some space to the south of the site located in Flood Zone 2. Mitigation and enhancement Any development proposed in Flood Zone 2 will need to be supported by a Flood Risk Assessment in line with Core Strategy policy CP5 and SU1 (sustainable drainage).
Objective 11 Reduce negative contributions to and increase resilience to climate change	+ Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel. This is likely to result in reduced greenhouse gas emissions, reduced car dependency and reduced congestion.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	+ Opportunity to provide renewable energy infrastructure (solar panels) on the top of new buildings relating to the interchange. Mitigation and enhancement Policy wording requires development to incorporate renewable energy provision that is compatible with the primary function of the sites as multi-modal transport interchanges.
<p>General Summary</p> <p>Policy seeks to allocate sites for use as multi-modal transport interchanges, with the aim to co-locate sustainable transport opportunities to create choice and opportunities for lower emission travel, including into and out of key urban areas. By providing affordable, convenient and comfortable travel options across various modes from a single location, transport interchanges aim to enhance the integration of the transport network across the region and address gaps in the existing public transport network. Interchanges do not need to be limited to large scale, edge of city expanses, but can also include smaller, more local, mobility hubs. Such hubs can be tailored to meet the need of the locality and include a mix of transport opportunities relevant to the travel demand of the place. <u>The amendments proposed through the Main Modifications list the appropriate transport interchange uses within the policy. This helps improve its effectiveness.</u> All 3 sites help access to major employment areas in Bath. This is likely to result in reduced greenhouse gas emissions, opportunities for improved health and well-being, reduced car dependency and congestion. The new site allocations for the three Park and Ride sites and the revised Policy ST6 will have a major positive impact in terms of improvements to health (objective 1), and access to high quality and affordable public transport, cycling and walking infrastructure (objective 5). <u>New clause 11 requires exploring and delivering measures to improve the environmental quality of Green Belt land adjoining the sites, with a focus on improvement and / or the expansion of existing habitats. The amendments through the Main Modification include the allocation site boundary which help improve its effectiveness in protecting environmental distinctives/landscape.</u></p> <p>Potential negative impacts relating to landscape, heritage, light spill and flood risk will each be mitigated by requirements set out in policy wording and any new development will be subject to other Development Management policies.</p>	

Policy KE2B	Riverside and Fire Station Site
SA Objectives	Amendments to Policy KE2B
Objective 1:	++

Policy KE2B	Riverside and Fire Station Site
SA Objectives	Amendments to Policy KE2B
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	<p>Development of the site for residential use to include provisions to encourage active lifestyles for residents and surrounding communities. The site is located with good access to community and social facilities which make it easy to reach everyday destinations in Keynsham.</p> <p>The policy requires: to provide a high quality public realm along Temple Street and throughout the public spaces of the development, constructed from an appropriate palette of materials referenced from the local context. The suitability for tree planting along Temple Street should be investigated. The Policy requires to improve the links through the site to the Memorial Park and River Chew.</p>
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	<p>++ / +</p> <p>The policy requires to provide residential development including affordable housing which helps boost the housing supply.</p> <p>Mitigation and enhancement New development will be subject to other Development Management policies including the revised Policy H7 which sets the new accessibility requirements.</p>
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	<p>++</p> <p>The site is located close to community facilities in Keynsham. The policy requires to provide residential development (C3 use class) and around 2,500sqm of B4 office Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre with an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level. It also requires to respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it and deliver the 'Market Walk' through the site. This helps contribute to design out crime and promote a feeling of security.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>+ / ++</p> <p>The policy requires to provide around 2,500sqm of B4 office Use Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre. This contributes to the supply of employment land and to the regions' ambition to be a driving force for clean and inclusive growth. Therefore, this has a major positive effect on this objective.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>++</p> <p>The site is located in the centre of Keynsham accessible to local services and jobs. It is also within walking distance of Keynsham Railway Station and has good access to public transport to key employment areas (Bath and Bristol), and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew.</p> <p>Mitigation New development will be subject to other Development Management policies as well as the Transport and Development SPD which sets out parking standards.</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>The policy requires to deliver the 'Market Walk' through the site. Whilst its alignment may be slightly deflected to enable practical development parcels to come forward, there must be a direct visual connection along its route from the Civic Centre to the Riverside development.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>0</p> <p>Achieve high quality design that enhances the Conservation Area and its setting and which complements the transition between the Civic Centre and Library and the Riverside development. This may require some variation in roof heights, and the design of buildings must provide articulation and relief to their elevations. Construct external facades in an appropriate palette of materials referenced from the local context and vernacular. This should include materials identified as central</p>

Policy KE2B	Riverside and Fire Station Site
SA Objectives	Amendments to Policy KE2B
	to the character of Keynsham set out in the Conservation Area Appraisal.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	+ The Policy requires to ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill within and into the River Chew corridor.
Objective 9: Reduce land, water, air, light, noise pollution	0 The policy requires development to protect all habitats from increased light spill. Mitigation New development will be subject to other Development Management policies and latest environmental standards.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 The site is located in Flood Zone 1. Mitigation New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.
Objective 11 Reduce negative contributions to and increase resilience to climate change	+ Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site. It also requires to enhance the Memorial Park and provide links with Temple Street to include planting in order to improve links, views and green infrastructure. Opportunities for providing terraced public open space overlooking the park will be encouraged, as will reinstatement of the orchard. The provision of SUDS (excluding infiltration techniques) is required.
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	+ The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a major positive effect on this objective.
General Summary The site is located close to community facilities and jobs in Keynsham. The policy requires to provide residential development (C3 use class) and around 2,500sqm of B1 office Use Class Eg(i) floorspace to provide a mix of uses that contribute to the vitality and viability of the town centre with an active frontage to Temple Street and a positive frontage with all other publicly accessible routes, particularly at ground floor level. It also requires to respond appropriately to the Memorial Park, in the views to and from it, and in the relationship of development to it, and deliver the 'Market Walk' through the site. This helps contribute to design out crime and promote a feeling of security. The site also is within walking distance to Keynsham Station and has good access to public transport to key employment areas (Bath and Bristol) and walking and cycling routes. The policy requires to ensure the general alignment of the existing public rights of way that run through the site are retained, enhanced and incorporated into and through the scheme. This includes the links through the site to the Memorial Park and River Chew. Therefore, there are major positive effects on objective 1(health), 2(housing), 3(communities), 4 (economy), 5(sustainable transport) and 6 (natural resources) New development will be subject to other Development Management Policies and SPDs including Transport and Development SPD for parking standards.	

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
SA Objectives	
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	++ The provision of a replacement sports pitch in the north-west corner of the KE3c site to facilitate the expanded primary school located within the Hygge Park development. The policy priorities pedestrians and cyclists with a comprehensive network of pedestrian and cycle routes including new link between KE3c and KE3d through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel'. Therefore, there is a major positive effects on this objective.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	++ The sites are allocated for residential development of around 210 units(KE3c) and 70 units (KE3d)b including affordable housing in the plan period. This will help boost the housing supply.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	++ The policies require to provide a new pedestrian and cycle link between new development and the Manor Road Community Woodland. It requires permeable, well-connected, well-lit development designed to optimise potential natural surveillance of public space and the incorporation of green infrastructure, including on-site provision of well-integrated formal and natural green space and play provision, and off-site enhancements to allotments.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	0 The site allocations do not include any employment provision; however Keynsham is well located between major employment areas in Bath and Bristol. The policy requires improving frequency for public transport service along the A4 and an opportunity to interchange with metrobus and Mass Transit Services. This helps improve access to employment opportunities.
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	++/+/0 The policies require an appropriate access to the development from the A4 Bath Road and the creation of a public footpath with KE3d connecting at Manor Road Community Woodland. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. The layout will be pedestrian and cycle dominant. A 'shared space' ethos for streets and spaces should prevail throughout the site. Mitigation The policies require a Travel Plan and Transport Assessment setting out mitigation requirements of an individual site. <u>The amendments through the Main Modifications require Travel Plan and Transport Assessment to assess the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</u> Any new development will be subject to other Development Management policies.
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	0 There will be continuation of the housing style, character and density of the adjacent Hygge Park development – incorporating an element of traditional materials including natural lias limestone. Building heights generally limited to 2/2.5 storeys, ensuring that development will not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB. The policies require development to face outwards towards the open countryside, adopting a perimeter block layout, with a clear distinction between the fronts and backs of properties.

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
SA Objectives	
	Mitigation Any new development will be subject to other Development Management policies.
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	0 The policies require building heights generally limited to 2/2.5 storeys, ensuring that development does not interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB. Mitigation Any new development will be subject to other Development Management policies.
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	0/+ The policies require retention and enhancement of internal hedgerows including hedgerow specimen trees, enabling the subdivision of the site into a number of development areas, and providing a strong landscape and green infrastructure framework. Sufficient setback of development should allow for growth of trees. <u>The amendments through the Main Modifications provide some flexibility with regard to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</u> Mitigation Any new development will be subject to other Development Management policies including the requirement for the biodiversity net gain.
Objective 9: Reduce land, water, air, light, noise pollution	0 Mature trees and hedgerows and along northern edge of the site to act as buffer from A4 road. Mitigation New development will be subject to other Development Management policies and latest environmental standards.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0 The sites are within Flood Zone 1. Green corridors will be utilised throughout the development to provide shared pedestrian and cycle routes. Public space and footpaths should incorporate species-rich verges and grassland habitat. Development to fully incorporate SuDs as part of the green infrastructure strategy to provide betterment to the existing surface water flood issues. Mitigation Any new development will be subject to other Development Management policies.
Objective 11 Reduce negative contributions to and increase resilience to climate change	++ The policies require the layout to be pedestrian and cycle dominant and encourages improved access to, and frequency of, public transport which helps reduce greenhouse gas emissions. They also require new development to provide sufficient setback allowing for growth of trees and incorporate green infrastructure, including on-site provision of well-integrated formal and natural green space and play provision, and on or off-site provision of allotments. Development will be required to meet policy compliant reduction in carbon emissions through reducing energy use and renewable energy interventions on-site. Opportunity to increase sustainability of use on site.
Objective 12: Encourage careful, efficient use of natural resources including energy and	-/+ The sites are greenfield land, however they were justified and safeguarded for development through the Core Strategy. Any new development will be subject to new zero carbon policies. Therefore, mixed effects have been identified for this objective.

Policy KE3C and Policy KE3d	KE3c and KE3d East of Keynsham – safeguarded land
SA Objectives	
encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	
<p>General Summary</p> <p>The sites are allocated for residential development of around 210 units (KE3c) and 70 units (KE3d) including affordable housing in the plan period. The provision of a replacement sports pitch in the north-west corner of the KE3c site will facilitate the expanded primary school located within the Hygge Park development. The policies prioritise pedestrians and cyclists with comprehensive networks of pedestrian and cycle routes including a new link between new development through to Manor Road Community Woodland. This will make it easy to reach everyday destinations by 'active travel'. It also requires utilising green corridors through the development to provide shared pedestrian and cycle routes, public space and footpaths should incorporate species-rich verges and grassland habitat and direct highway access to be formed to Charlton Road with a through link to KE2a sufficient to enable bus service provision to pass through the sites without turning. Therefore, there are major positive effects on objective 1 (health), 2(housing), 3(communities), 5(sustainable transport) and 11(climate).</p> <p><u>The amendments through the Main Modifications require that Travel Plan and Transport Assessment assesses the mitigation requirements of an individual site in order that sufficient headroom capacity is created on the highway network through mode shift such that development does not result in a severe impact. This helps further clarify what the Travel Plan and Transport Assessment needs to consider.</u></p> <p><u>There is minor positive effect on objective 8 (biodiversity) as the policy requires a minimum of 10% biodiversity net gain. The amendments through the Main Modifications provide some flexibility with regards to a potentially reduced buffer where the applicant can demonstrate that a reduced buffer would adequately protect the woodland.</u></p> <p>There is a minor negative effect on objective 12 as the sites are currently greenfield land, however they were justified and safeguarded for development through the Core Strategy</p> <p>Mitigation</p> <p>New development will be subject to other Development Management Policies and SPDs including the Transport and Development SPD for parking standards.</p>	

Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
Objective 1: Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	+ The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. This helps encourage /makes it easy to reach everyday destinations (workplace) from where people live, by 'active' travel.
Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing	n/a
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+/0 The amendments to the policy include development of some retail, food & drink units (use classes E(a), (b) and a hotel (use class C1) <u>food & drink units (use class E(b)), ancillary retail (use classes E(a)) and a hotel (use class C1)</u> however new development has to be of a scale, type and format that does not harm, but complements, nearby town centres; and that benefits the attractiveness and operation of the Enterprise Zone.

Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
	<p>Mitigation and enhancement Any new development will be subject to other Development Management policies including retail impact assessment.</p>
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	<p>++/0</p> <p>The Old Mills employment site was allocated in the B&NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses to enable delivery and investment in the site. It would also benefit to bring a greater mix of uses to facilitate a more diverse range of employment opportunities.</p> <p>Therefore, a major positive effect is identified. however the retail development should be a scale, type and format that does not harm the town centre.</p> <p>Mitigation and enhancement Local Development Order : Any new development will be subject to other Development Management policies including retail impact assessment. The northern area comprises around 11ha of agricultural land located to the north of the A362 which was designated as an Enterprise Zone in 2018. A Local Development Order (LDO) is being prepared in order to help facilitate investment in the Somer Valley Enterprise Zone (SVEZ). The LDO once approved is effectively a granting of planning permission for development that meets specified parameters, it significantly reduces uncertainty and planning risks for investors and developers.</p>
Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	<p>++</p> <p>The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development.</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies including retail impact assessment.</p>
Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape	<p>0</p> <p>The amendments have a neutral effect however the original policy requirements include major landscaping to mitigate the impact on the surrounding countryside and nearby residential properties.</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies.</p>
Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings	<p>0</p> <p>The amendments have a neutral effect on this objective. However the original development requirements include to undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.</p>
Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)	<p>0/+</p> <p>The amendments to the policy require substantive retention of internal and boundary hedgerows. Where hedgerow sections will be lost or breached, replacement hedgerows are to be provided within or at the periphery of the site to enhance habitat connectivity for mobile species. Provision of 10m habitat buffers is expected for retained and created hedgerows. A protective and complementary habitat buffer of at least 20m is expected adjacent to the SNCI. A 15m habitat buffer to the River Somer/ Wellow Brook for the southern section of the site is also required. The policy requires bat surveys.</p>

Policy SSV9	Old Mills Industrial Estate
SA Objectives	Amendments to the site boundary and proposed uses.
	<p>Mitigation and enhancement Any new development will be subject to other Development Management policies.</p>
Objective 9: Reduce land, water, air, light, noise pollution	<p>0</p> <p>Policy requires to ensure sensitive lighting solutions are provided for the buildings and the public realm to minimise light spill to retained habitats and protective buffers in accordance with latest best practice guidance. It requires bat surveys.</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies.</p>
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<p>0</p> <p>The site is located in Flood Zone 1.</p> <p>Mitigation New development will be subject to other Development Management policies including the requirement for a sustainable drainage system.</p>
Objective 11 Reduce negative contributions to and Increase resilience to climate change	<p>+</p> <p>Development will be required to meet policy compliant reduction in carbon emissions through by reducing energy use and renewable energy interventions on-site.</p>
Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	<p>+/-</p> <p>The site is brownfield land and new development will be subject to new zero carbon development requirements therefore there is a major positive effect on this objective.</p>
<p>General Summary The Old Mills employment site was allocated in the B&NES Local Plan (2007) and reallocated in the Placemaking Plan. The land is allocated primarily in order to provide a long term supply of new employment land and to boost jobs in the area in light of the high levels of out-commuting. However, no development has been brought forward to date. The amendments to the policy include a limited amount of higher value uses such as retail, food & drink and a hotel to enable delivery and investment in the site. This would also benefit to bring a greater mixed of uses to facilitate a more diverse range of employment opportunities. Therefore, a major positive effect on objective 4(economy). However the retail development should be of a scale, type and format that does not harm the town centre.</p> <p>The amendments to the policy require to provide new and enhanced walking and cycling routes linking the Enterprise Zone to Midsomer Norton and Paulton. It also requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development. This has a major positive effect on objective 5(sustainable transport).</p> <p>Mitigation and enhancement Any new development will be subject to other Development Management policies and Local Development Order.</p>	

**Bath & North East
Somerset Council**

Appendix I

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

September 2022

1. Introduction

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

Adopted Plan: Plain text

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

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

Main Modifications

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

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

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

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

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

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

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

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

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

MM3

Para 88

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

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

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

	<p>Para 99g</p>	<p><u>requirement to identify suitable areas for development and the contribution that it can make to help meeting our targets. Policy CP3 takes a landscape sensitivity-based approach to identifying suitable areas for wind energy development (see paragraphs 99r below).</u></p>	
	<p>Para 99h</p>	<p><u>99g. An evidence base study has been undertaken to assess the Landscape Potential for wind energy of different scales of wind turbine within the district. The output of this study has been used to identify suitable areas of search for development, recognising that other considerations need to be addressed and are set out in the policy criteria below. The Landscape evidence also provides guidance for wind energy development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals</u></p> <p><u>99h. 99g.</u> In the NPPF, and outlined above, developments for wind energy need to be able to demonstrate that, through consultation, the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. <u>Whether the proposal has the backing of the affected local community is a planning judgement for the decision maker.</u> It is recognised that any development may not be able to achieve 100% of the support from the community, particularly in relation to renewable wind energy development in rural areas, however examples of community support could be <u>(but not limited to):</u></p> <ul style="list-style-type: none"> - Community Renewable Energy Schemes (as set out in SCR4) - Support from representative organisations, such as Parish Councils <p><i>Renumbering of subsequent paragraphs within policy explanatory text. 99i to 99h and 99j to 99i</i></p>	
	<p>Para 99k</p>	<p><u>99k. 99j.</u> Given the rural nature of the district, and the opportunities for ground mounted solar arrays as part of the renewable energy mix, it is anticipated that such Ground Mounted Solar A arrays, to which should be sited on land of lower agricultural quality and which is not functionally linked to nationally protected sites (SACs, SPAs and SSSIs), will continue to contribute significantly towards the district wide renewable energy target. in CP3, and to</p>	

	<p>Para 99m</p>	<p>facilitate Green Infrastructure and biodiversity gains this policy is considered necessary (e.g. provisions for wildlife Placemaking Plan as proposed to be adopted July 2017 66 and inclusion of permissive paths).</p> <p><u>99m. An evidence base study has been undertaken to assess the Landscape Potential for solar energy of different scales of solar farm within the district. The Council particularly encourages ground mounted Solar energy development proposals in the high, moderate high and moderate potential areas set out in the Solar Assessment Report and on land which is not functionally linked to nationally protected sites (SACs, SPAs, SSSIs). However proposals can be submitted in other landscape areas, provided that applicants clearly demonstrate that adverse impacts on the landscape can be satisfactorily mitigated and recognising that other considerations need to be addressed and as set out in the policy criteria below. The Landscape evidence also provides guidance for solar development in each of the landscape character types identified within the study, which can help applicants in designing or mitigating the landscape impact of their proposals.</u></p> <p><i>Renumbering of subsequent paragraphs within policy explanatory text. <u>99l to 99k</u></i></p> <p><u>Identifying Suitable Areas for Renewable Energy Development</u></p> <p><u>99l. The Policies Map illustrates geographically the assessed landscape potential for renewable energy development in the District. Through the LPPU the Council has set out a landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations which is based on the Landscape Sensitivity Assessment (LSA) for Renewable Energy Development (LUC, 2021). Through Policy CP3:</u></p> <ul style="list-style-type: none"> <u>Wind energy development proposals will be supported where they lie within a landscape area identified as being potentially suitable for this type of development (high, moderate-high, moderate and low-moderate potential areas) and will be normally refused in areas of low landscape potential.</u> 	
	<p>New para 99l</p>		

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

New 99p

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

• **Band A ≤5ha**

• **Band B >5 to 10ha**

• **Band C >10 to 15ha**

• **Band D >15 to 30ha**

Wind Energy Development Banding Turbine Height (to blade tip)

• **Band A 18 – 25m**

• **Band B 26 – 60m**

• **Band C 61 – 99m**

• **Band D 100 – 120m**

• **Band E 121 – 150m**

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

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

New 99q

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

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

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

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

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

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

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

Policy CP3

Renewable Energy Targets

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

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

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

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

Proposals for All Standalone Renewable Energy Types

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

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

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

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

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

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

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

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

~~;~~ and

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

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

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

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

Wind energy

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

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

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

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

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

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

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

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

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

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

Ground Mounted Solar Energy

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

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

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

- a. Are not sited on the best and most versatile agricultural land (Grades 1, 2, and 3a) unless significant sustainability benefits are demonstrated to outweigh any loss_{zi}
- b. Maintain grazing regimes within SAC bat sustenance zones_{zi}
- c. Avoid the loss of hedgerow & woodland connectivity₇; ~~and~~
- d. Avoid the loss and deterioration of UK priority habitats (as shown on the Policies Map)_{zi}; and
- e. Meet current best practice guidelines and standards on protection and enhancement of biodiversity.

Energy balancing plants

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

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

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

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

MM5	<p>Para 107a</p> <p>Para 107b</p> <p>Para 107e</p> <p>Para 107f</p>	<p>Through the Local Plan Partial Update there is an opportunity to revise the sustainable construction policies with an aim to achieve net zero construction. Therefore, policy CP2 of the Core Strategy and SCR1 of the Placemaking Plan will be <u>has been</u> replaced with a new sustainable construction policy.</p> <p>The government is proposing to update part L of the Building Regulations to achieve more energy efficient homes. The new Part L <u>will be called the Future Homes Standard and is planned to be implemented from 2025.</u> In January 2021 the government released their response to the Future Homes Standards Consultation. The results of the consultation have confirmed that local authorities will still be able to set their own standards. The government has stated their intention to bring in the Future Homes Standards in 2025 but the exact method of how carbon reduction will be enacted is still subject to future consultation. As an interim measure the government are now proposing an uplift of 31% above current Building Regulations requirements. This is due to be published in December 2021 and come into effect June 2022. As an interim measure from June 2022, a 31% CO₂ reduction above Part L 2013 must be achieved to comply with Building Regulations requirements.</p> <p>In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation. <u>Development proposals where offsetting is relied upon to comply with Policies SCR6 and SCR7 should have regard to the Sustainable Construction Checklist SPD and the Planning Obligations SPD. The Sustainable Construction Checklist SPD includes information which may guide the calculation of the residual on-site renewable energy generation (SCR6) and residual carbon (SCR7). The Planning Obligations SPD includes a formula which may be used to calculate the subsequent financial contribution value. The scale of offsetting required must also meet the statutory tests for planning obligations.</u></p> <p>107f The compliance tools for Building Regulations are not intended to accurately evaluate overheating, so large-scale proposals are <u>encouraged</u> to use the more sophisticated CIBSE (Chartered Institute of Building Service Engineers) standards TM52 for non-residential</p>	<p>The amendments clarify how carbon off-setting (only where necessary should a development scheme be unable to achieve zero carbon on-site) will be calculated and delivered via the Sustainable Construction Checklist and Planning Obligations SPD.</p> <p>The amendments include the removal of the overheating assessment and standards. This needs to be reflected in the SA.</p>
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		<p>development and TM59 for residential development. The CIBSE methodologies use the criteria below:</p> <ul style="list-style-type: none"> • TM59 & TM52: “Hours of Exceedance”, a measure of how often the temperature exceeds a threshold comfort temperature during a typical warm season and sets a limit of 3% of occupied hours • TM52: “Daily Weighted Exceedance”; the severity of overheating within any one day. The limit is no more than 6 hours a day above the thermal comfort threshold. • TM52: “Upper Limit Temperature” which sets an absolute maximum temperature for a room beyond which the level of overheating is unacceptable <p><u>The Council recommends and encourages all developments to undertake a CIBSE TM59 overheating assessment to evaluate how overheating can be mitigated. This is not a policy requirement but exemplary developments will address climate adaptation through the submission of an overheating strategy in the Sustainable Construction Checklist SPD.</u></p> <p><u>The government is consulting on Buildings Regulations Part L for non-domestic buildings. This is called the Future Buildings Standard. The outcome of this consultation is not yet known. As it is currently uncertain what the new non-domestic Part L will be it is proposed to require non-residential buildings to demonstrate BREEAM excellent plus net zero carbon.</u></p> <p><u>BREEAM (Building Research Establishment Environmental Assessment Method) is a tool for assessing the environmental sustainability of a development. The BREEAM standards will be applied to major non-residential developments</u></p> <p><u>107g. Policy SCR6 applies to all types of residential development. This includes dwellings and purpose-built accommodation, such as PBSA and care homes. Policy SCR6 does not apply to existing buildings that propose applications for extensions, conversions and other changes of use.</u></p>	
	Para 107g and i		
	Para 107g		

<p>Para 107h</p> <p>Policy SCR6 Sustainable Construction</p>	<p><u>107h.Applicants must adhere to the energy hierarchy of improving fabric first, then adding renewables and finally offsetting emissions that can't be mitigated onsite, but with no fixed targets at each stage due to the difficulty of setting targets when Part L (the baseline) is changing. Please refer to paragraph 107e for information on offsetting.</u></p> <p>Policy SCR6 Sustainable Construction Policy for New Build Residential Development</p> <p>New build residential development will be required to meet the standards set out below.</p> <p>New build residential development will aim to achieve zero operational emissions by reducing heat and power demand then supplying all energy demand through onsite renewables. Through the submission of <u>an appropriate energy assessment, having regard to the Sustainable Construction Checklist SPD</u> a sustainable construction checklist, proposed new <u>dwellings residential development</u> will demonstrate the following:</p> <ul style="list-style-type: none"> • Space heating demand less than 30kWh/m²/annum; • Total energy use less than 40kWh/m²/annum; and • On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV • Connection to a <u>low- or zero-carbon</u> district heating network where available <p>Major residential development</p> <p>In the case of major developments where the use of on site renewables to match total energy consumption is demonstrated to be not technically feasible (for example with apartments) or economically viable, renewable energy generation should be maximised and the residual <u>on site renewable energy generation (calculated as the equivalent carbon emissions using the carbon factor)</u> must be offset by a financial contribution paid into the Council's carbon offset fund where the legal tests set out in the Community Infrastructure Regulations are met.</p>	
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		Applications for 50 dwellings or more are required to demonstrate that the CIBSE TM59 overheating target has been met in the current climate, and a strategy submitted to show how overheating can be mitigated in the future climate	
MM6	Policy SCR7 Sustainable Construction Policy for new Build Non-Residential Buildings	<p>Policy SCR7 Sustainable Construction Policy for new Build Non-Residential Buildings</p> <p>New build non-residential major development will maximise carbon reduction through sustainable construction measures. Through the submission of an <u>appropriate energy assessment having regard to the Sustainable Construction Checklist SPD</u> a sustainable construction checklist all planning applications will provide evidence that the standards below are met.</p> <p>Major development is to achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2013 (or future equivalent legislation), following the hierarchy set out below.</p> <ul style="list-style-type: none"> • Minimise energy use through the use of energy efficient fabric and services • Residual energy use should be met through connection to a <u>low- or zero-carbon</u> heat network if available. • Maximise opportunities for renewable energy to mitigate all regulated operational emissions. • Residual carbon emissions that cannot be mitigated on site should be offset through a financial contribution to the Council’s carbon offset fund 	The amendments include the removal of the overheating assessment and standards. This needs to be reflected in the SA.
MM7	Para 107i	<p>107i.107h. Embodied carbon emissions are the carbon emissions resulting from the materials, production, demolition and disposal. An embodied carbon assessment <u>in the context of the LPPU</u> provides details of a building’s materials used in the substructure, superstructure and finishes. This provides a true picture of a buildings carbon impact on the environment.</p> <p>Policy SCR8 Embodied Carbon</p>	

	Policy SCR8 Embodied Carbon	Large scale new-build developments (a minimum of 50 dwellings or a minimum of 5000m² of commercial floor space) are required to submit an Embodied Carbon <u>Assessment having regard to the Sustainable Construction Checklist SPD that demonstrates a score of less than 900kgCO₂e/m² 900kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.</u>	
MM8	CP4 District heating	POLICY CP4 DISTRICT HEATING The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the two three "district heating priority areas", indicated on Diagram 19 (Bath Central, and Bath Riverside and Keynsham High Street), and shown in detail in the associated evidence base, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable, <u>or if an alternative zero carbon heat source is proposed.</u>	The amendments ensure the policy is in line with the overall objective to reduce carbon emissions. This needs to be reflected in the SA report.
MM9	Para 132b SCR 9 EV charging	Electric Vehicle Infrastructure is best provided at the construction stage. This policy seeks to provide electric vehicle infrastructure within new residential and non-residential development where parking is provided. <u>There are grid connection cost exemptions that apply to providing vehicle charging infrastructure which are set out in Building Regulations and outlined in the Transport and Development SPD. Where costs for grid connections of 7kW minimum active and passive charging can be evidenced to exceed £3,600 (per dwelling), an exemption to a supply of slow charge, 16 amp 3.7 kW, single phase power supply active and passive charging may be applicable. Further exemptions may also apply for grid connections for 3.7 kW active and passive charging costing more than £3,600 (per dwelling). The policy will complement the aims set out in the councils On Street Electric Vehicle Charging Strategy.</u> New Policy SCR9 Electric vehicles charging infrastructure New Build Residential Development: All dwellings with one or more dedicated parking space or garage must provide access to electric vehicle charging infrastructure. Further guidance will be set out in the Transport and Development Supplementary Planning Document. Where off street parking is not provided and	The amendments reflect the Building Regulations and provide further explanation on exemptions. The amendments do not affect the findings of the SA report.

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

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

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

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

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

		<p>vi. <u>The HMO property does not achieve an Energy Performance Certificate “C” rating (unless one or more of the exemptions set out in the HMO SPD applies), unless one or more of the following exemptions applies:</u></p> <ul style="list-style-type: none"> a) <u>The cost of making the cheapest recommended improvement would exceed £10,000 (including VAT).</u> b) <u>Where all relevant energy efficiency improvements for the property have been made (or there are none that can be made) and the property remains below EPC C.</u> c) <u>Where the proposed energy efficiency measures are not appropriate for the property due to potential negative impact on fabric or structure.</u> d) <u>Where the minimum energy performance requirements would unacceptably harm the heritage significance of a heritage asset.</u> 	
MM14	370a	<p>370a. Purpose Built Student Accommodation (PBSA) is accommodation built, or converted, with the specific intention of being occupied by students. Such accommodation is usually provided in the form of cluster flats with shared facilities, individual en-suite units, or studios, and relates to buildings which are not classified by planning use class, or licensing, as HMOs.</p>	<p>The amendments provide clarification in regard to need for further student accommodation. This needs to be assessed and reflected in the SA report.</p>
	370b	<p>370b. The Council’s policy framework seeks to address student accommodation needs arising from educational establishments, whilst not prejudicing other economic, environmental and social objectives from being achieved across the district.</p>	
	370c	<p><u>370c. Policy B5 sets out the overall strategy to manage student accommodation. In accordance with the strategy set out by Policy B5, Policy H2A facilitates PBSA on-campus as a first priority, and sets out that it will only be allowed on other sites where a need can be demonstrated. Policies B5 and H2A set out that as a first priority PBSA should be developed on-campus, and that it will only be allowed on other sites where a need can be demonstrated. Policy H2A sets out the policy requirements for all new, extensions to and conversions to PBSA. on sites not allocated for student accommodation, including the demonstration of need in the form of a formal agreement between a developer and an education provider, confirming the number of bed-spaces and accommodation type required.</u></p>	

370d	<p><u>370d. The SHMA that underpinned the Core Strategy housing targets acknowledged the complexity of the population growth in Bath due to its large student population and stated that it is appropriate to provide more detailed local projections with more localised considerations. Therefore, the Council has been engaging with both of the city’s Universities to help understand their expected future growth and associated student accommodation requirements and the impact of student growth on wider housing requirements.</u></p>	
370e	<p><u>370e. The current future growth projections for the University of Bath and Bath Spa University have been analysed to provide information on the additional PBSA bedspaces required in Bath to meet projected growth. The estimated number of additional bedspaces required to facilitate the universities’ future growth over the Plan period is set out in the Authority Monitoring Report for University Growth and Student Accommodation Requirements. The Council will continue to work closely with the two Universities to understand growth projections on an annual basis throughout the Plan period.</u></p>	
370f	<p><u>370f. Accommodation required for first year students arising from the future growth of Universities will be met by new on-campus PBSA development allocated through policy SB19. It is established practice that the Universities guarantee PBSA accommodation for first year students, but not for second and third year students. This has resulted in the significant expansion of the student lettings market in the form of HMOs.</u></p>	
370g	<p><u>370g. Any PBSA bedspaces proposed off-campus must either meet the growth-related need of an educational establishment in the District, evidenced by the provision of a formal agreement with the establishment, or meet the need of second and third year university students who would often otherwise reside in Houses in Multiple Occupation (HMOs) across the city.</u></p>	
370h	<p><u>370h. The following tables show an average cost comparison summary between renting a bedspace within a private PBSA development within the city, renting a university-led PBSA bedspace, and renting a room in a HMO. The first table shows an average cost comparison for PBSA in general, and the second table shows an average cost comparison only for cluster flats.</u></p>	

<u>Accommodation type</u>	<u>Average cost per person per week (2021)</u>
<u>Private PBSA bedspace</u>	<u>£214</u>
<u>University PBSA bedspace</u>	<u>£159</u>
<u>HMO</u>	<u>£125</u>

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

Para 370i

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

Para 370j

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

Para 370k

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

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

	<p>370I</p> <p>Policy H2A PBSA</p>	<p>370I. Policy H2A criterion g) refers to provision of adequate storage for recycling and refuse, having regard to Waste Planning Guidance. Such guidance can be accessed on the Council’s website at the following link: https://www.bathnes.gov.uk/services/bins-rubbish-and-recycling/waste-strategy-statistics-and-health-safety/waste-planning-guida</p> <p><u>Policy H2A PBSA</u></p> <p><u>Purpose built student accommodation of an appropriate scale and design will be permitted:</u></p> <p><u>a) 1. On allocated sites where student accommodation use is specifically identified within the Development Principles; or</u></p> <p><u>b) 2. Elsewhere in the district (except for areas restricted by policy B5), only where it can be demonstrated that there is a need for additional student accommodation, and subject to the provisions of policy B5. All proposals for new, extensions to, or conversions to, In these locations proposals for Purpose-Built Student Accommodation on sites not allocated for student accommodation, will be required to demonstrate that:</u></p> <p>i. <u>There is a need for additional student accommodation of the type and in the location proposed, evidenced by a formal agreement between the developer and a relevant education provider located within the District, for the supply of bed spaces created by the development; or</u></p> <p>ii. <u>The proposed development meets the needs of second and third year university students.</u></p> <p><u>All proposals for Purpose Built Student Accommodation proposals will also be required to demonstrate that:</u></p> <p>ii. <u>a. The proposal will not result in a significant negative impact on retail, employment, leisure, tourism, housing or the council’s wider strategic objectives;</u></p>	
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| | | <ul style="list-style-type: none"> iii. <u>b. The site is in a location accessible by sustainable transport methods, including to the educational establishment to which it is associated;</u> iv. <u>c. The use of the site for student accommodation is appropriate in relation to neighbouring uses;</u> v. <u>d. The development will not have an unacceptable impact on the amenity of surrounding residents. A management plan must be provided prior to occupation of the development, to ensure adequate management arrangements have been incorporated;</u> vi. <u>e. The internal design, layout and size of accommodation and facilities are of an appropriate standard;</u> vii. <u>f. The proposal provides an appropriate level of car parking having regard to relevant standards the Transport and Development SPD, and provides adequate provision for servicing, pick up and drop off;</u> viii. <u>g. The proposal provides adequate storage for recycling/refuse and bicycles, in line with relevant standards having regard to Waste Planning Guidance and the Transport and Development SPD;</u> ix. <u>h. The development has been designed in such a way that it is capable of being re-configured through internal alterations to meet general housing needs in the future if necessary; and</u> x. <u>i. The proposal accords with other relevant Local Plan policies relating to, but not limited to, impact on the historic environment, high quality design, landscape, transport and access, flood risk and drainage, nature conservation, pollution and contamination, and responding to climate change.</u> | |
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MM15	387e	For the purposes of this policy, residential development includes student accommodation, co-living, build to rent, specialist housing and older person housing all forms of residential accommodation where Building Regulations under Approved Document M: Volume 1 (dwellings) apply.	The amendment provides further clarification on forms of residential accommodation. The amendments do not affect the content or implementation of the policies in the Plan and do not therefore affect the findings of the SA report.
MM16	ED1B	POLICY ED1B: CHANGE OF USE & REDEVELOPMENT OF B1 (A) OFFICE TO RESIDENTIAL USE 1. Change of use (i.e. conversion) The conversion of office space (B1a) to residential C3 is normally permitted development, subject to the exceptions set out in the GPDO GDPO . (which includes listed buildings). The principle of change of use through conversion of listed buildings in office use to C3 residential use is also accepted, subject to the provisions of Policy HE1. provided there is no adverse impact on the significance of the listed building.	The amendments provide further clarity in line with the NPPF. However, the amendments do not affect the findings of the SA report.
MM17	RE1	POLICY RE1: EMPLOYMENT USES IN THE COUNTRYSIDE Proposals for employment uses in the countryside outside the scope of Core Strategy Policies RA1 and RA2 will be permitted providing they are consistent with all other relevant policies, and involves: i) replacement of existing buildings; ii) the limited expansion, intensification or redevelopment of existing premises or redevelopment of previously developed land where it is not habitat functionally linked to a European site; and iii) they would not lead to dispersal of activity that prejudices town and village vitality and viability	The amendments will help protect European sites. This needs to be assessed and reflected in the SA report.
MM18	ST2	POLICY ST2: SUSTAINABLE TRANSPORT ROUTES Development which prejudices the use of safeguarded land including former railway land for sustainable transport purposes as shown on the Policies Map will not be permitted.	The policy wording revert back to the original adopted policy. However, the amendments do not affect the findings of the SA report.
MM19	ST2A	POLICY ST2A: Active Travel Routes RECREATIONAL ROUTES	For clarification with regards to references to other documents

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

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

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

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

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

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

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

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

Amend Clause vi. to clause v.

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

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

Amend Clause 7 to clause 6

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

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

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

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

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

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

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

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

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

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

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



MM28 SB25 St Martins Hospital

SB25 St Martins Hospital

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

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

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

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

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

8. Sports facilities

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

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

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

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

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

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

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

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

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

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

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

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



MM30
Policy SB26
Transport
Interchanges

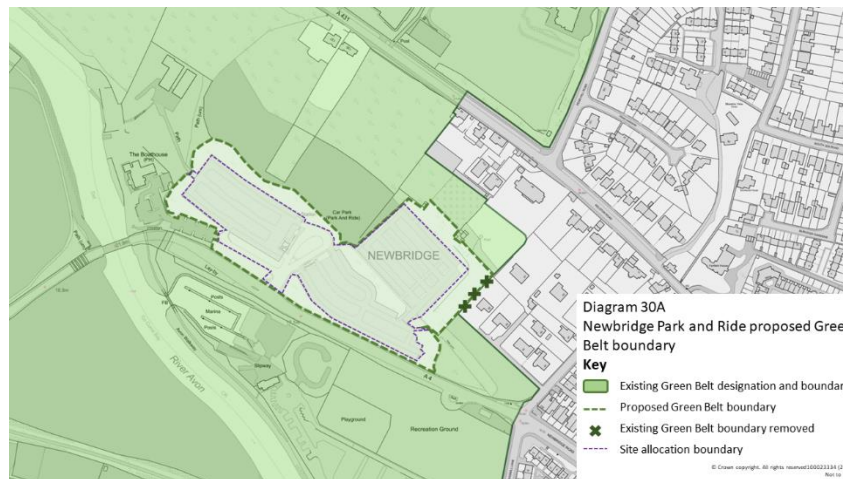
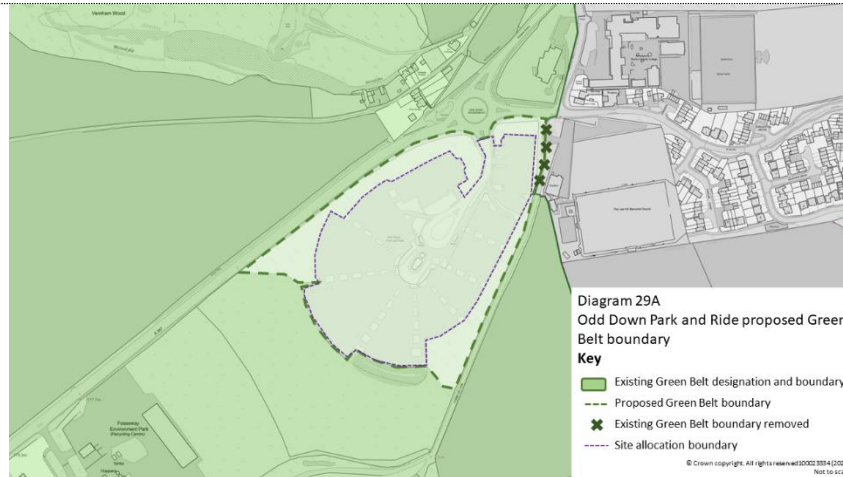
1. Deliver multi-modal transport interchanges, the appropriate uses for which ~~are set out in the supporting text for policy ST6 of the Local Plan Partial Update~~ include, but are not limited to, safe and secure cycle parking; electric bike hire and charging; micro mobility such as e-scooters; walking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

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

Insert after criterion 10:

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

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



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

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

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

MM37	Table 5	Table 5: Saved Local Plan policies from the B&NES Local Plan (2007) no longer required and will be obsolete with deleted by the adoption of the Placemaking Plan	Editorial amendments which do not affect the findings of the SA report.																		
MM38	New Table 8	New table 8 Remove ST2 as it is reverted back to the original policy.	Editorial amendments which do not affect the findings of the SA report.																		
MM39	New Table 9	New Table 9 Core Strategy/Placemaking Plan policies that will be obsolete deleted in the Local Plan Partial Update	Editorial amendments which do not affect the findings of the SA report.																		
MM40	New Table 11	Table 11: Saved Bath & North East Somerset Council Local Plan policies that are now obsolete deleted (i.e. no longer form part of the Development Plan)	Editorial amendments which do not affect the findings of the SA report.																		
MM41	Appendix 3 New table listing Strategic policies	<p><u>Appendix 3: Local Plan Strategic Policies</u></p> <table border="1"> <tr> <td><u>Volume 1 - District-wide Strategy and Policies</u></td> </tr> <tr> <td><u>DW1 District-wide spatial Strategy</u></td> </tr> <tr> <td><u>RA1 Development in the villages meeting the listed criteria</u></td> </tr> <tr> <td><u>RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria</u></td> </tr> <tr> <td><u>SD1 Presumption in favour of Sustainable Development</u></td> </tr> <tr> <td><u>CP1 Retrofitting Existing Buildings</u></td> </tr> <tr> <td><u>SCR6 Sustainable Construction for New Build Residential Development</u></td> </tr> <tr> <td><u>SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</u></td> </tr> <tr> <td><u>CP3 Renewable Energy</u></td> </tr> <tr> <td><u>CP4 District Heating</u></td> </tr> <tr> <td><u>CP5 Flood Risk Management</u></td> </tr> <tr> <td><u>CP6 Environmental Quality</u></td> </tr> <tr> <td><u>HE1 Historic Environment</u></td> </tr> <tr> <td><u>NE2 Conserving and Enhancing the Landscape and Landscape Character</u></td> </tr> <tr> <td><u>NE3 Sites, Habitats and Species</u></td> </tr> <tr> <td><u>CP7 Green Infrastructure</u></td> </tr> <tr> <td><u>CP8 Green Belt</u></td> </tr> <tr> <td><u>CP9 Affordable Housing</u></td> </tr> </table>	<u>Volume 1 - District-wide Strategy and Policies</u>	<u>DW1 District-wide spatial Strategy</u>	<u>RA1 Development in the villages meeting the listed criteria</u>	<u>RA2 Development in villages outside the Green Belt not meeting Policy RA1 criteria</u>	<u>SD1 Presumption in favour of Sustainable Development</u>	<u>CP1 Retrofitting Existing Buildings</u>	<u>SCR6 Sustainable Construction for New Build Residential Development</u>	<u>SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings</u>	<u>CP3 Renewable Energy</u>	<u>CP4 District Heating</u>	<u>CP5 Flood Risk Management</u>	<u>CP6 Environmental Quality</u>	<u>HE1 Historic Environment</u>	<u>NE2 Conserving and Enhancing the Landscape and Landscape Character</u>	<u>NE3 Sites, Habitats and Species</u>	<u>CP7 Green Infrastructure</u>	<u>CP8 Green Belt</u>	<u>CP9 Affordable Housing</u>	The amendment clarifies which policies are considered as strategic policies in line with the NPPF. This does not directly affect the content or implementation of the policies in the Plan and do not therefore affect the findings of the SA report.
<u>Volume 1 - District-wide Strategy and Policies</u>																					
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<u>CP9 Affordable Housing</u>																					

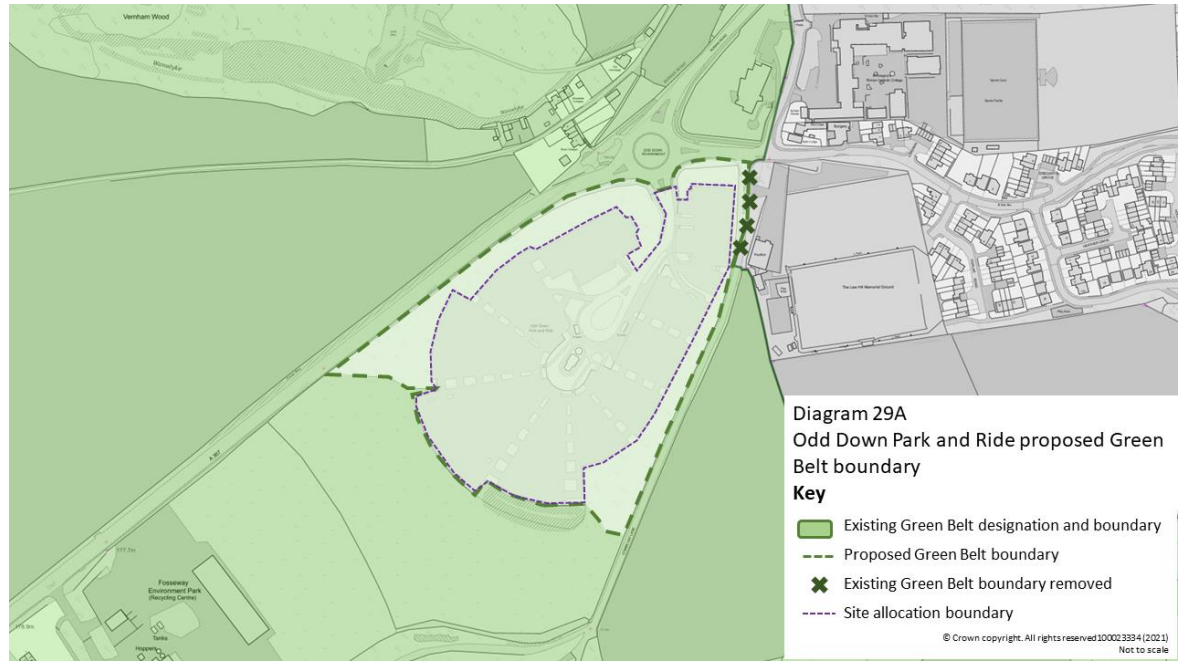
	<u>RA4 Rural Exceptions Sites</u>		
	<u>CP10 Housing Mix</u>		
	<u>CP11 Gypsies, Travellers and Travelling Showpeople</u>		
	<u>RA3 Community Facilities and Shops</u>		
	<u>ED2A Strategic (*) and other primary industrial estates</u>		
	<u>CP12 Centres and Retailing</u>		
	<u>ST1 Promoting sustainable travel and Healthy Streets</u>		
	<u>CP8a Minerals</u>		
	<u>CP13 Infrastructure Provision</u>		
	<u>Volume 2 - Bath</u>		
	<u>B1 Bath Spatial Strategy</u>		
	<u>B4 The World Heritage Site and its setting</u>		
	<u>B2 Central Area Strategic Policy</u>		
	<u>SB4 – Bath Quays North & Bath College</u>		
	<u>SB7 – Green Park Station West & Sydenham Park</u>		
	<u>SB8 Western Riverside</u>		
	<u>B3 Strategic Policy for Twerton and Newbridge Riversides</u>		
	<u>SB11 – Former MoD Fox Hill Park</u>		
	<u>B5 Off-Campus Student Accommodation and Teaching Space</u>		
	<u>SB19 University of Bath at Claverton Down</u>		
	<u>SB26 – Park and Ride Sites</u>		
	<u>B3a Land adjoining Odd Down, Bath Strategic Site Allocation</u>		
	<u>Volume 3 - Keynsham</u>		
	<u>KE1 Keynsham Spatial Strategy</u>		
	<u>KE2 Town Centre/Somerdale Strategic Policy</u>		
	<u>KE2a Somerdale</u>		
	<u>KE3a: Land adjoining East Keynsham Strategic Site Allocation</u>		
	<u>KE3c – East of Keynsham – Former Safeguarded Land</u>		
	<u>KE3d – East of Keynsham Former Safeguarded Land</u>		
	<u>KE4 Land adjoining South West Keynsham Strategic Site Allocation</u>		

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

MM42 Annex 1

SB26 Odd Down Park and Ride

See the assessment for each policy.



SB26 Newbridge Park and Ride



SB26 Lansdown Park and Ride



Diagram 31A
Lansdown Park and Ride proposed Green Belt boundary

- Key**
- Existing Green Belt designation
 - Proposed Green Belt boundary
 - Site allocation boundary

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Not to scale