



## Bath and North East Somerset Core Strategy (Part 1 of the Local Plan)

### Sustainability Appraisal of the Adopted Core Strategy

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**Bath & North East Somerset Council**

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## Separate Annexes:

The full list of Annexes for the SA is provided below. The content of the annexes is summarised. Annexes which are out of date are shown in *italicised text*:

Annex A: Policy, Plan and Programme Review (April 2011) This annex provides the policy context for the SA and has been regularly updated throughout the development of the Core Strategy.

Annex B: Baseline Data (April 2011) This annex sets out the baseline data for the SA which has contributed to the SA objectives and has also been used within the assessment. This has been regularly updated throughout the development of the Core Strategy (also see Table 4.3).

Annex C: Core Strategy Spatial Options consultation document (2009) Summary of Sustainability Appraisal Findings (April 2011) This annex sets out the results of the assessment of the initial options.

Annex D: Assessment of the Adopted Core Strategy (July 2014) This annex sets out the findings of the assessment of the policies within the Adopted Core Strategy.

*Annex E: Appraisal of the Submission Core Strategy, Urban Extensions Commentary (April 2011) This annex provides a discussion of the District Strategy with and without urban extension options. Not included as an annex to the Adopted Core Strategy but available at [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)*

*Annex F: Mitigation and Residual Effects of the Submission Core Strategy Policies (April 2011). Not included as an annex to the Adopted Core Strategy but available at [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)*

*Annex G: Recommendations and Residual Performance of the Submission Core Strategy Policies (April 2011) Not included as an annex to the Adopted Core Strategy but available at [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)*

Annex H: Potential Cumulative Effects (July 2014) This annex sets out the findings of the cumulative assessment of the policies within the Adopted Core Strategy.

Annex I Contextual Indicators Monitoring Programme (July 2014) this annex sets out the monitoring programme of the potential significant effects for the SA.

Annex J Draft Core Strategy (December 2010) Composite Schedule of Significant Changes Screening assessment (September 2011) The schedule outlines further proposed significant changes to the draft Core Strategy resulting from issues raised through the preliminary comments and questions from the Inspector (ID/1 and ID/4).

*Annex K: Assessment of Housing Contingency Sites (September 2011) This annex presents the findings of an assessment of greenfield housing contingency location(s) in the plan and discusses the implications of including the sites within plan policy. Not included as an annex to the Adopted Core Strategy but available at [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)*

Annex L: Locational Alternatives Appraisal Matrices (March 2013) this annex presents appraisal findings for the following options:

- Stage 1 District-wide locational sequence assessments
- Stage 2 Bath environ assessments, Keynsham environ assessments, South East Bristol assessments;
- Stage 3 Site specific assessments; and
- Stage 4 Growth level assessments.

Annex M: Volume 1 Screening of Proposed Changes to the Submitted Core Strategy (March 2013) and Volume 2 Screening of Main Modifications and Additional Modifications (July 2014) This annex is divided into two volumes. It presents the findings of the screening exercises of the changes to the Submitted Core Strategy proposed by Bath and North East Somerset Council (B&NES). The screening process has identified changes which are considered to make a difference to the Sustainability Appraisal of the Core Strategy.

*Annex N Policy Appraisal Matrices (November 2013) This annex has been incorporated into Annex D: Assessment of the Core Strategy as proposed to be adopted (July 2014)*

Annex O Site Appraisal Matrices (November 2013) this annex sets out the appraisal of individual development parcels within the potential Green Belt allocations. These appraisals have informed the wording of the site allocation policies within the Core Strategy as proposed to be adopted, in particular, the Placemaking Principles which set out mitigation required through masterplanning in order to deliver the sites.

## Glossary

Acronym and Title	Explanation
AAP (Area Action Plan)	A Development Plan Document that provides a detailed planning policy framework for a part of the Council's area that is a key area for change or conservation.
AMR (Annual Monitoring Report)	A document within the LDF that monitors progress in implementing the Local Development Scheme and the effectiveness of the Council's adopted policies.
Core Strategy	A Development Plan Document that sets out the key elements of the planning framework, including strategic objectives and core policies, with which other DPDs must be in conformity.
Development Plan	The statutory framework for planning decisions, comprising the Regional Spatial Strategy and the Development Plan Documents prepared by local planning authorities (including the County Council and District Councils).
DPD (Development Plan Document)	The main type of Local Development Document which form part of the Development Plan, and include a Core Strategy, site specific allocations, development control policies and area action plans.
LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents.
Local Plan	A plan prepared by district, unitary and national park authorities but which is being superseded by Development Plan Documents.
NPPF (National Planning Policy Framework)	Published in March 2012, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. The NPPF consolidates and replaces most previous planning policy guidance from Government.
Proposals Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents.
RSS (Regional Spatial Strategy)	A document, forming part of the development plan prepared by the regional planning body that provides the strategic framework within which local authorities prepare their Development Plan Documents.
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SCI (Statement of Community Involvement)	A document within the LDF setting out the County Council's proposals for involving the local community and other stakeholders in the preparation of LDDs and the determination of planning applications.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.

# 1 Introduction

## 1.1 Background

The preparation of the Bath & North East Somerset (B&NES) Core Strategy 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; and
- 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/>).

The integrated process is therefore termed Sustainability Appraisal (SA) and it incorporates the requirements of the SEA Regulations. The SA is being carried out by B&NES Planning Services and ENVIRON, using a team of consultants experienced in SA and SEA of local authority spatial planning documents.

This report is the main output of the SA and has been produced alongside the production of the plan and is published at the same time.

There have been significant changes made to the Core Strategy to address soundness issues raised by the Inspector in his Report on the Examination into the B&NES Core Strategy (24<sup>th</sup> June 2014). Changes were considered in a number of stages and all reasonable options were assessed throughout using the SA framework. The SA report sets out how the SA influenced the production of the Core Strategy. Whilst efforts have been made to make the report itself as accessible as possible, the SA is complex due to the number of assessments and range of options assessed, including outcomes presented in the annexes. The report is prepared using a consistent approach, and is presented in full for transparency. In utilising the SA process as an integral part of plan making to assess the options and inform the strategy in an iterative way, its apparent complexity and length is unfortunately unavoidable.

The table below sets out the key stages and relevant SA reports/Annexes. All documents are available from the Core Strategy Examination Core Document from;

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)

Core Document number is shown as CDXX/X.

**Table 1.1 Core Strategy and SA report iterations**

<b>Core Strategy</b>	<b>Accompanying SA reports</b>	<b>Consultation</b>	<b>Notes</b>
Publication Draft Core Strategy CD5/5	Publication draft Core Strategy SA report (Nov 2010) CD4/A10	16th Dec 2010 to 3rd Feb 2011	
The Draft Core Strategy submitted (3rd May 2011) CD5/7	Draft Core Strategy SA report (April 2011) CD4/A13		Some changes to the Publication Draft Core Strategy were made responding to the consultation comments.
Changes proposed to the submitted Core Strategy (CD5/27) The examination was temporarily suspended to allow the Council to respond to the Inspector's preliminary comments and questions in ID/1 and ID/4.	Core Strategy Proposed Changes SA report (September 2011) CD4/A17 Updated again following review of the Bath Compensatory Storage (flood risk mitigation measures) CD4/A20 and 21	19 <sup>th</sup> Sep – 21 <sup>st</sup> Oct 2011	A Housing Contingency Assessment was undertaken. The Council decided not to identify additional housing contingency. Annex K presents the findings of the Contingency Assessment for the sake of completeness and robustness.
January to March 2012: Examination hearings June 2012: Examination suspended to enable the Council to undertake further work to address the Inspector's preliminary conclusions.			
March 2013: Changes to the Core Strategy agreed by the Council and published for consultation	Submitted Core Strategy Proposed Changes SA Report CD9/A1/3	26th March – 8th May 2013	Changes include the inclusion of urban extension locations to respond to up-to-date and re-assessed housing requirements.
November 2013 Amendments to the Proposed Changes to the Core Strategy published for consultation	Addendum to the Sustainability Appraisal Report on the Proposed Changes to the Submitted Core Strategy published in March 2013 (November 2013) CD10/A1/1	11th November – 20th December 2013	Changes include the allocation of urban extension sites to respond to the Inspector.
<b>June 2014 Main modifications received from the Inspector Additional modifications proposed by the Council</b>	<b>Adopted Core Strategy SA Report (this report)</b>	<b>N/A</b>	<b>No consultation proposed.</b>

## 1.2 Structure of This Report

This SA report includes the required elements of an environmental report as required by the SEA Regulations. Table 1.1 signposts the relevant sections of the SA report that represent the required contents of the environmental report.

<b>Table 1.2: Contents of the SA report</b>	
<b>SEA Regulations – requirement for an environmental report</b>	<b>Where covered in the SA Report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.
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 is addressed in Section 4 and Annex A.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.	Section 4 and Annex B
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 4 and Annex B
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 Annex A
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 Annexes C, D, L, O and H (the definition of significance is addressed in Section 3.3).
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 Annex D.
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 5. Difficulties are addressed in Section 3.6.
A description of measures envisaged concerning monitoring in accordance with Regulation 17.	Section 7 and Annex I.

<b>SEA Regulations – requirement for an environmental report</b>	<b>Where covered in the SA Report</b>
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 (Regulation 12(3) and (4))	The whole report does this.
Consultation 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 (Regulation 13).	The public and environmental authorities have been given the opportunity to comment at key stages throughout the plans development. The consultation periods are listed in Table 1.1.

This chapter provides an introduction to the Core Strategy and related SA process. The rest of this report is structured as follows:

- Section 2 describes the content and main objectives of the Core Strategy;
- Section 3 outlines the methodology used in the SA;
- Section 4 describes the plan's relationship with other plans, programmes and environmental / sustainability objectives and the sustainability baseline;
- Section 5 sets out the summary reasons for selecting the alternatives dealt with and the results of the appraisal of options considered in the development of the Core Strategy;
- Section 6 sets out the results of the appraisal of the proposed changes to policies within the Core Strategy as proposed to be adopted;
- Section 7 outlines initial proposals for monitoring the residual sustainability effects; and
- Section 8 describes the next steps.

### **1.3 Habitats Regulations Assessment**

The Core Strategy has been subject to a parallel Habitats Regulations Assessment (HRA). HRA of plans is a requirement of the Conservation of Habitats and Species Regulations 2010 and relates to the protection of European designated nature conservation sites.

A screening exercise has identified that four European designated sites could be at some potential risk from indirect effects from the Core Strategy such as habitat damage or disturbance. These 4 sites are as follows and were identified as requiring more detailed screening:

- Bath & Bradford-on-Avon Bats SAC
- Chew Valley SPA
- North Somerset and Mendip Bats SAC
- Mells Valley SAC

In a similar way elements of the Core Strategy were reviewed to gain an initial understanding of where and what the main issues of concern would be. This approach flagged up the following sections as needing detailed review in the HRA:

- Chapter 1: Vision & District-wide spatial strategy;
- Chapter 2: Shaping the future of Bath - a spatial strategy;
- Chapter 5: Rural Areas Spatial Strategy; and
- Chapter 6: Core policy framework.

An HRA of the Core Strategy Publications Document was completed in November 2010. This concluded that the different elements of the Core Strategy as amended, to address the issues raised within the HRA, and when considered alongside the requirements of the Place Making DPD proposed, are not likely to result in significant effects upon any European site within or adjacent to B&NES. This can be accessed here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/DCSAppraisal-HabitatRegulationAssessment.pdf>

An HRA Screening was undertaken on the Schedule of significant changes proposed for the Core Strategy following consultation on the draft Core Strategy and the Inspectors preliminary comments and questions. This concluded that the proposed changes when considered alongside the requirements of the Place Making DPD, are not likely to result in significant effects upon any European site within or adjacent to B&NES. The findings of the HRA can be found within the report titled 'Assessment of Likely Significant Effect on a European Site' and is available here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-HabitatRegulationsAssessment.pdf>

Proposed Changes to the Submitted Core Strategy introduced a number of greenfield development locations. A further draft HRA screening assessment was undertaken to inform the Council's consideration, on 4th March 2013, of these changes to the Core Strategy. This draft report can be found here:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/scspc\\_hra\\_2013.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/scspc_hra_2013.pdf). An HRA of the Proposed Changes to the Submitted Core Strategy which were agreed by the Council on the 4th March 2013 and some minor revisions to policies was undertaken in March 2013 and this HRA report was consulted on alongside the Proposed Changes to the Submitted Core Strategy. This HRA can be viewed here:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/cd9-a2a\\_hra\\_march\\_2013\\_revised.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/cd9-a2a_hra_march_2013_revised.pdf)

In connection with the publication of a series of Core Strategy Amendments in November 2013 and building on the March 2013 HRA, a further HRA was undertaken specifically on two strategic housing allocations (with development requirements) and associated Green Belt amendments at Odd Down and Weston in Bath. It concluded that the likelihood of a significant effect on the SAC identified is excluded in relation to these policy amendments. This HRA report is here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building->

[Control/Planning-Policy/Core-Strategy/CoreDocumentsnotsavedelsewhere/cs\\_amendments\\_hra.pdf](#)

A record of the HRA process and final conclusions on the Inspector's recommended modifications to the Submitted Core Strategy will be published alongside the final SA of the Core Strategy. Since the Inspector has made no significant additional changes to those subject to the HRA in November 2013 except for the deletion of the proposed Strategic Allocations at Weston, there no further HRA will be required. For completeness and clarity a note outlining the final HRA of the Core Strategy as proposed to be adopted and summarising HRA undertaken during the preparation of the Core Strategy has been produced by the Council.

#### **1.4 Consultation on the Sustainability Appraisal**

A draft SA Report was first published for consultation alongside the Publication Core Strategy during the period 16th December 2010 to 3rd February 2011. The purpose of that consultation was to provide the statutory environmental bodies and other interested parties with the opportunity to express their opinion on the SA Report. It also enabled the reader to use the information within the SA Report to guide their deliberations on the plan.

The SA of the Proposed Changes to the Submitted Core Strategy 2013 was undertaken in March 2013. This report was an update of previous SA reports that have been provided throughout the drafting of the Local Plan process. The SA report produced at this stage focused purely on the Proposed Changes to the Submitted Core Strategy, therefore only the following SA documents were consulted on:

- The SA report and Non-Technical Summary (this report);
- The results of a screening exercise on the Proposed Changes to the Submitted Core Strategy that sets out in detail which changes were considered significant and therefore which changes to the plan have been assessed (Annex M);
- The SA matrices of the Proposed Changes to Submitted Core Strategy (Annex D); and
- The SA matrices of the locational alternative appraisal (Annex L).

The SA report was also consulted on alongside the Proposed Changes to the Submitted Core Strategy 2013 for a 6 week period, 26th March – 8th May 2013.

However the previous annexes are available on the Councils website:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)

In November 2013 Amendments to the Proposed Changes to the Core Strategy were published for consultation with an Addendum to the Sustainability Appraisal Report. This dealt with changes to the allocation of urban extension sites to respond to the Inspector and was available for consultation from the 11th November to the 20th December 2013.

## 2 Bath & North East Somerset Core Strategy Development Plan Document

### 2.1 Spatial Planning in Bath and North East Somerset

Spatial planning in Bath and North East Somerset is currently guided by the saved policies within the Bath and North East Somerset Local Plan. The process is also influenced by a variety of strategy and policy documents at the national, regional and local level which relate to specific issues such as employment land, open space or biodiversity.

A typical LDF consists of a number of Local Development Documents (LDDs) including:

- A Core Strategy (Part 1 of the Local Plan) which outlines the vision, objectives and policies for spatial land use planning in a LPA area;
- Area Action Plans which are a type of Development Plan Document (DPD) focused upon a specific location or an area subject to conservation or significant change (for example major regeneration);
- Site Allocations DPD which outlines the sites which have been selected to accommodate housing and other development; and
- Supplementary Planning Documents (SPD) may cover a range of issues, both topic and site specific, which may expand policy or provide further detail to policies in a Development Plan Document.

This report only covers the SA process for the preparation of the Bath & North East Somerset Core Strategy.

### 2.2 The Content of the Core Strategy (Part 1 of the Local Plan)

The Core Strategy is a key policy document for Bath & North East Somerset (B&NES) that puts in place a strategic planning framework to guide change and development in the District over the next 20 years. It sets out a Spatial Vision for the District and seven Strategic Objectives which expand this Vision into specific issues for the area which need to be addressed. Sustainable Development is the core principle underpinning the Core Strategy, expressed through the Spatial Vision and Strategic Objectives. The Core Strategy sets out the policy framework for the District's different places, as well as general policies.

1. Introduction, Vision and District-wide spatial strategy	
2. Bath	6. Core Policies
3. Keynsham	
4. Somer Valley	
5. Rural Areas	
7. Monitoring and Review	

## 2.3 The Core Strategy Vision, Strategy and Objectives

The Vision is supported by seven Strategic Objectives. These are presented below.

<b>Objective 1</b>	SCS Driver: Climate Change
<p><b><i>Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate</i></b></p> <ul style="list-style-type: none"> <li>• reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services</li> <li>• ensuring the location and layout of new development enables and encourages people to make the fullest possible use of public transport, walking and cycling</li> <li>• encouraging and supporting the increased generation and use of renewable and low carbon energy, including through the delivery of community led schemes</li> <li>• promoting sustainable and energy efficient design and construction</li> <li>• shaping places so as to minimise vulnerability and provide resilience to impacts arising from climate change including increased flood risk</li> <li>• facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals</li> <li>• maintaining and enhancing a network of connected and multifunctional green spaces for people and wildlife serving climate change adaptation and mitigation purposes</li> </ul>	

<b>Objective 2</b>	SCS Driver: Growth
<p><b><i>Protect and enhance the District's natural, built and cultural assets and provide green infrastructure</i></b></p> <ul style="list-style-type: none"> <li>• ensuring that growth and development takes place within the environmental capacity of the District</li> <li>• making optimum use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible</li> <li>• helping to conserve and enhance the quality &amp; character of our built and natural heritage</li> <li>• maintaining and enhancing an accessible and multifunctional network of well linked green spaces</li> <li>• helping to conserve, enhance and restore the diversity and resilience of the District's wildlife</li> <li>• helping to avoid water, air, light and noise pollution and the contamination of land</li> <li>• capitalising on the role our heritage has in promoting local distinctiveness, place-making and supporting regeneration</li> <li>• maintaining an outstanding built &amp; natural environment by ensuring that new development responds appropriately to the locally distinctive context and meets high standards of design</li> <li>• facilitating continuing and wide participation in cultural activities</li> </ul>	

<p><b>Objective 3</b></p>		<p>SCS Driver: Economy Inequalities Locality</p>
<p><b><i>Encourage economic development, diversification and prosperity</i></b></p> <p>The Council's Economic Development Strategy seeks to stimulate a more productive, competitive and diversified economy across the District and promotes a higher value added economy (smart growth) where indigenous companies are retained and able to grow, other knowledge based sectors are attracted to the area and the industrial sector continues to contribute to the local economy.</p> <ul style="list-style-type: none"> <li>• increasing the availability of modern office and unit space in Bath thereby enabling indigenous companies to expand and the city to better respond to external demand</li> <li>• maintaining an appropriate supply of land in Bath for industrial processes and services to ensure the city retains a mixed economy</li> <li>• enabling tourism to continue to make an important contribution to the economy of Bath and promoting the tourism potential of other parts of the District e.g. by facilitating the provision of visitor accommodation</li> <li>• capitalising on innovation opportunities arising from higher education institutions, improving educational facilities to help provide the skills that support knowledge based sectors and retaining those skills and talents in the city and wider area</li> <li>• repositioning Keynsham as a more significant business location enabling it to attract new employers to compensate for the closure of Cadbury Somerdale</li> <li>• ensuring that a sufficient and responsive supply of appropriate land and premises is available and improvement of skills is facilitated at Midsomer Norton and Radstock to help strengthen their roles as employment centres for the southern part of the District</li> <li>• enabling small scale local employment development, including those related to innovation opportunities, in the rural areas</li> </ul>		

<p><b>Objective 4</b></p>		<p>SCS Driver: Growth Inequalities Demographic Change</p>
<p><b><i>Invest in our city, town and local centres</i></b></p> <ul style="list-style-type: none"> <li>• Bath city centre and Keynsham, Midsomer Norton and Radstock town centres need to be improved as centres for social and economic activity and as places for entertainment, culture and shopping. The local and neighbourhood centres across the urban and rural parts of the District need to be sustained, so they continue to play an important role in meeting the day to day needs of their local residents.</li> <li>• enhancing Bath's central shopping area, to maintain its competitiveness, diverse offer and reputation for independent and niche retailing</li> <li>• introducing more commercial space, suitable for a range of enterprises, as part of new mixed use developments on underperforming sites in and close to Bath city centre</li> <li>• improving the quality and capacity of shops within the core of Keynsham and Midsomer Norton town centres</li> <li>• introducing more office and residential floor space into Keynsham, Midsomer Norton and Radstock town centres</li> <li>• improving the quality of the public realm in the city, town and local centres</li> <li>• providing better pedestrian and cycle routes into and within the city, town and local centres</li> </ul>		

- 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.

<p><b>Objective 5</b></p>		<p>SCS Driver: Economy Inequalities Locality</p>
<p><b><i>Meet housing needs</i></b></p> <ul style="list-style-type: none"> <li>• enabling the delivery of new homes needed to respond to expected demographic and social changes and as far as possible to support the labour supply to meet our economic development objectives</li> <li>• ensuring that the new homes provided are of high quality design and reflect and cater for a range of incomes and types of household, including those in need of affordable housing</li> <li>• addressing the accommodation needs of gypsies &amp; travellers</li> <li>• ensuring the accommodation needs of any increase in the number of students can be met sustainably</li> <li>• ensure that the development of new homes is aligned with the provision of the necessary infrastructure</li> </ul>		

<p><b>Objective 6</b></p>		<p>SCS Driver: Inequalities</p>
<p><b><i>Plan for development that promotes health and well being</i></b></p> <ul style="list-style-type: none"> <li>• enabling more opportunities for people to lead healthier lifestyles and have a greater sense of well-being through facilitating active modes of travel, encouraging social interaction and designing high quality, safe streets and spaces</li> <li>• promoting and delivering local employment, training and regeneration opportunities that can contribute to a reduction in the health and social inequalities across the District encouraging and facilitating increased local food production</li> <li>• ensuring the timely provision of social and physical infrastructure, including health, welfare, spiritual, recreational, leisure and cultural facilities</li> </ul>		

<p><b>Objective 7</b></p>		<p>SCS Driver: Economy &amp; Growth</p>
<p><b><i>Deliver well connected places accessible by sustainable means of transport</i></b></p> <p>In conjunction with the Joint Local Transport Plan, the LDF will deliver this by:</p> <ul style="list-style-type: none"> <li>• locating and designing new development in a way that reduces the need and desire to travel by car and encourages the use of public transport, walking and cycling</li> <li>• ensuring that development is supported by high quality transport infrastructure which helps to increase the attractiveness of public transport, walking and cycling</li> <li>• promoting improved access to services especially for rural and more remote areas</li> </ul>		

### 3 Sustainability Appraisal Methodology

#### 3.1 Approach adopted for this Sustainability Appraisal

The methodology for this appraisal was developed in accordance with guidance published by the ODPM (now DCLG) as outlined in the Table 3.1 below. Stage A of the SA was undertaken by Council Officers within the Planning Policy Team with advice from ENVIRON UK Ltd consultants. ENVIRON consultants subsequently undertook the options appraisals, the appraisal of the Publication Core Strategy and subsequent proposed changes to the Submitted Core Strategy in collaboration with the Officers within the Planning Policy Team. The assessment of the major and additional modifications and the adopted Core Strategy have also been undertaken in collaboration with the Officers within the Planning Policy Team.

<b>Table 3.1: Key Tasks for Sustainability Appraisals</b>	
<b>SA Stage</b>	<b>Purpose of the SA Stage</b>
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>	
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	To document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed
A2: Collecting baseline information	To provide an evidence base for sustainability issues, effects prediction and monitoring
A3: Identifying sustainability issues and problems	To help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring
A4: Developing the SA framework	To provide a means by which the sustainability of the plan can be appraised
A5: Producing scoping report and consulting on the scope of the SA	To consult with statutory bodies with social, environmental, or economic responsibilities to ensure the appraisal covers the key sustainability issues
<b>Stage B: Developing and refining options and assessing effects</b>	
B1: Testing the DPD objectives against the SA framework	To ensure that the overall objectives of the DPD are in accordance with sustainability principles and provide a suitable framework for developing options
B2: Developing the DPD options	To assist in the development and refinement of the options, by identifying potential sustainability effects of options
B3 and B4: Predicting and evaluating the effects of the DPD	To predict the significant effects of the DPD and assist in the refinement of the DPD
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	To ensure that all potential mitigation measures and measures for maximising beneficial effects are considered and as a result residual effects are identified
B6: Proposing measures to monitor the significant effects of implementing the DPD	To detail the means by which the sustainability performance of the DPD can be assessed

<b>Table 3.1: Key Tasks for Sustainability Appraisals</b>	
<b>SA Stage</b>	<b>Purpose of the SA Stage</b>
<b>Stage C: Preparing the Sustainability Appraisal Report</b>	
C1: Preparing the SA Report	To provide a detailed account of the SA process (in a format suitable for public consultation and decision makers), including the findings of the appraisal and how it influenced the development of the DPD
<b>Stage D: Consulting on the preferred options and SA Report</b>	
D1: Public participation on the preferred options of the DPD and the SA Report	To provide the public and statutory bodies with an effective opportunity to express their opinion on the SA Report and to use it as a reference point when commenting on the DPD.

### 3.2 Stage A: Scoping

An SA Scoping Report of the Core Strategy DPD was produced in June 2007 to help ensure that the SA process covered the key sustainability issues for spatial planning in Bath & North East Somerset.

ENVIRON supported Bath & North East Somerset officers in the development of the Scoping Report from an early stage and undertook an independent review and verification of the report in 2007 prior to its publication.

The Scoping Report presents the outputs of all of 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 Core Strategy DPD. From all of the information collected, an "SA Framework", or set of sustainability objectives, was developed, against which the various components of the Core Strategy have been appraised. A draft SA Framework was included in the Scoping Report.

The data and the draft SA Framework presented within the Scoping Report has been updated in response to the consultation responses received on the Scoping Report. Some of the information presented within the Scoping Report was updated in February 2010 because a considerable amount of time had passed since the Scoping Report was prepared in 2007. The Framework was updated taking into account the publication of the National Planning Policy Framework in December 2012 and new baseline information was also collated in 2013. The updated data has informed the appraisal of the Core Strategy. The updated Scoping Report information can be found in Section 4. .

### 3.3 Stage B: Assessing Options

The effects of the strategic options have been assessed in broad terms with the aim of assisting in the selection of the preferred options. This has been an iterative process with the following key stages:

- Mid 2008 informal comments were provided by ENVIRON on the emerging options (the assessment focused on the appropriateness of the vision and objectives for the plan as a whole and each sub area). These comments were presented and discussed at a meeting with Bath and North East Somerset Council planning policy team and used to inform the development of the consultation version of the Spatial Options Paper;

- Late 2008 further comments were provided by ENVIRON on the emerging options and were again presented and discussed at a meeting with Bath and North East Somerset Council planning policy team. These recommendations were used internally by Bath and North East Somerset Council to help formulate spatial options and core policies;
- In August 2009 a Core Strategy Spatial Options document was assessed and the results presented in an Interim Sustainability Appraisal Report (ENVIRON September 2009) which accompanied the Core Strategy Spatial Options document during a consultation period which ran from 19th October to 11th December 2009 (with comments accepted until 15th January 2010);
- In August/September 2011 a Housing Contingency Assessment was undertaken, informed by the SA Framework to ensure that these further options had been thoroughly assessed within the SA. This assessment undertook a relative comparison of the housing contingency sites and their potential implications for the overall SA of the Core Strategy;
- In February/March 2013 the Proposed Changes to the Submitted Core Strategy were assessed. The results are presented in Annex D and L of this report and subject to public consultation from 26<sup>th</sup> March to 8<sup>th</sup> of May 2013. This appraisal was reviewed in the light of changes made to the Submission version of the Core Strategy in response to comments received both during the consultation period and subsequently by the Planning Inspector; and
- In November 2013 an addendum report to the SA Report to the Proposed Changes to the Submitted Core Strategy which were published in March 2013 was produced by Bath and North East Somerset Council Planning Policy team. The March Changes indicated the broad locations for urban extensions leaving the Placemaking Plan to define the most suitable sites for development. However the Inspector (ID40) raised his concerns regarding clarity and the deliverability of housing development sites within the 5 year period. Responding to the Inspector's concern, the Council has identified specific sites for allocation within the broad areas indicated previously. The SA addendum focused on the amendments to the Proposed Changes to the Submitted Core Strategy. The consultation on this addendum ran from 11th November to 20th December 2013. This addendum has been integrated within this SA report and the annexes to this addendum have been included as follows:
  - Policy Appraisal Matrices (Annex N) have been integrated within Annex D; and
  - Site Appraisal Matrices (Annex O).

### **Assessment techniques**

Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is a relatively simple matrix. 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.

A 'no plan' scenario has not been developed as part of the options development. However, this has been taken into account as each issue, option and policy has been assessed against the current social, environmental and economic characteristics of the area and the

likely future situation without a Core Strategy based on the trends in the baseline identified in the Scoping Report (future baseline).

Significance has been defined within the appraisal of the Core Strategy as follows:

<b>Table 3.2: Significance criteria</b>		
<b>Score</b>	<b>Description</b>	<b>Symbol</b>
Major positive impact	The option / plan achieves all 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	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	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	The option / plan conflicts with all 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	?

On the basis of the criteria set out within Table 3.2, significant effects have been considered to be major positive, major negative effects, plus any minor negative or uncertain effects. Uncertain effects are considered to be significant because they could potentially result in major positive or major negative effects. Minor negative effects are considered to be significant because, although not a major effect, a minor negative effect might on its own be significant due to the degree to which it conflicts with the SA question and/or the sensitivity of receptors.

### **3.4 Stage C: Preparing the SA Report and Stage D: Consulting on the SA Report**

This document is the latest version of the SA Report. It outlines the significant effects on the environment, social and economic factors of the latest version of the plan and the reasonable alternatives considered as part of the issues and options assessment. 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.

Various versions of this SA report have been produced which report on different stages of the assessment. These are listed in table 1.1. It should be noted that at each stage, mitigation measures were proposed to address any identified significant negative effects or any uncertainties. At each stage the Council's response to the mitigation measures is recorded and is clearly set out in each of the previous SA reports. This SA report describes

the assessment of the submission plan which incorporates any changes made by the Council to address the mitigation measures.

### **3.5 Difficulties in compiling information or undertaking the appraisal**

#### **Baseline Data**

Some data gaps have been identified within Annex B and Table 4.2 in Section 4. Where there are gaps in the baseline, this has made it difficult to predict the future evolution of the baseline characteristics without the implementation of the Core Strategy.

There is no 'noise map' for the district and no other information is available relating to the noise baseline.

#### **Carrying out the Appraisal**

The purpose of this work is to assess the sustainability implications of any significant changes to the Adopted Core Strategy. There have been many changes to the Adopted Core Strategy, some more significant than others. Deciding which changes could have a significant effect is potentially complex. This process has been managed through carrying out an in depth screening process aimed at identifying changes that are significant in terms of the SA objectives.

Another difficulty has been found in recoding the changes made to the appraisal results, in a transparent and easy to understand way. This process has been managed in previous iterations of the SA Reports through underlining new text and highlighting removed text in strikethrough to provide an audit trail of changes. This final SA report has been updated along with its annexes to ensure it reflects the final Adopted Plan. Underlining and strikethrough has been removed for clarity.

SA relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available, responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using an expert, judgement-led qualitative assessment. A 'precautionary approach' is taken, especially with qualitative judgements.

The SEA Regulations state that effects assessment should include an assessment of secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. At this strategic level, the information is often not available to assess to this level of detail. However, where information is available on the likelihood of different types of impacts this has been included within the assessment.

## 4 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. ODPM guidance (2005) extends this to include other sustainability objectives).*

### 4.1 The plan's relationship with other plans and programmes (policy context)

As identified in Section 3.1 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.

Reviews of relevant plans and programmes were presented in the Scoping Report. The review has been updated in February 2010 in order to take account of publications since the last update of the review undertaken in June 2007 and this is presented in Annex A.

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 are presented in Table 4.1.

<b>Topic</b>	<b>Sustainable Development Messages</b>
Air quality and noise	<ul style="list-style-type: none"> <li>• Improve air quality and reduce air, noise and light pollution;</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Protect and enhance biodiversity;</li> </ul>
Climate change and flood risk	<ul style="list-style-type: none"> <li>• Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change;</li> </ul>
Community, health and well-being	<ul style="list-style-type: none"> <li>• Improve peoples' health and reduce health inequalities;</li> <li>• Protect and provide access to appropriate levels of open space;</li> </ul>

**Table 4.1: Sustainable Development Messages Identified in the Review of Plans, Policies and Programmes**

	<ul style="list-style-type: none"> <li>• Create mixed, safe communities and promote social inclusion;</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Promote high quality and sustainable tourism;</li> <li>• Ensure a resilient and economically sustainable food system;</li> </ul>
Energy and carbon emissions	<ul style="list-style-type: none"> <li>• Support low carbon economies and achieve successful and competitive businesses both urban and rural;</li> <li>• Promote energy efficiency;</li> <li>• Promote and provide for renewable energy;</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Protect and enhance the historic environment;</li> <li>• Promote good design and sustainable construction;</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Meet strategic housing requirements for the district;</li> <li>• Provide affordable housing to meet identified needs;</li> <li>• Promote good design and sustainable construction;</li> <li>• Incorporate the principles of sustainable development;</li> </ul>
Natural resources	<ul style="list-style-type: none"> <li>• Make the best use of previously developed land;</li> <li>• Promote higher densities of development in accessible locations;</li> <li>• Protect soil resources including high quality agricultural land;</li> <li>• Promote water efficiency;</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and provide access to appropriate levels of open space;</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Reduce the need to travel and promote sustainable transport options; and</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Ensure natural resources are used efficiently and waste is minimised, reused or recycled.</li> </ul>

## 4.2 How sustainability objectives have been taken into account

In 2007, when the scoping stage of the SA was undertaken, a framework of SA Objectives was developed by B&NES to be used as a framework for appraising the DPDs of the B&NES LDF, including the Core Strategy. This framework of SA Objectives was consulted on in order to ensure that it addresses the key sustainability issues within B&NES.

ENVIRON undertook a review of the SA Framework in 2008 prior to appraisal of options. 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;
- The framework was linked to the RSS whilst at the same time ensuring that it also reflects the local issues identified within the objectives and within the scoping report; and

- 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 from 23 to 20.

As the changes made to the SA Framework in 2008 did not constitute a change in scope, the revised framework was not consulted on specifically following the review. Consultees were given the opportunity to comment on the revised SA Framework in 2009 when the Interim Sustainability Appraisal Report (ENVIRON September 2009) was consulted on.

Following the update of the PPPs in February 2010, two new appraisal questions were added to the SA Framework to reflect the objectives within documents published since 2007 and these are shown in italics in Table 4.2.

In December 2012 the Sustainability Framework was reviewed to ensure that the latest Government planning policy contained within the new National Planning Policy Framework (March 2012) was fully taken into account in the Core Strategy and the SA. This review led to some minor changes to the Sustainability Objectives and some additional appraisal questions, and these changes are shown below in Table 4.2 as underlined text.

<b>Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)</b>	
Appraisal questions added in July 2010 are shown in <i>italics</i> Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined	
<b>SA Objectives</b>	<b>Detailed questions: Does the policy/option ...</b>
Objective 1: Improve accessibility to community facilities and local services	Help everyone access basic services easily, safely and affordably Increase access to and participation in community and cultural facilities and activities
Objective 2: Improve the health and well-being of all communities	Improve Health Reduce Health inequalities Promote healthy lifestyles, especially routine daily exercise
Objective 3: Meet identified needs for sufficient, high quality and affordable housing	Help make suitable housing available and affordable for everyone <u>Help development viability and deliverability</u>
Objective 4: Promote stronger more vibrant and cohesive communities	Promote stronger more cohesive communities
Objective 5: Reduce anti-social behaviour, crime and the fear of crime	Reduce crime and fear of crime
Objective 6: Improve the availability and provision of <u>employment</u> training	Give everyone access to learning, training, skills and knowledge
Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid	Give everyone in the region access to satisfying work opportunities, paid or unpaid Reduce poverty and income inequality Provide a diverse range of employment opportunities in a variety of sectors
Objective 8: <u>Build a strong, competitive</u>	Increase the circulation of wealth within the local authority

**Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)**

Appraisal questions added in July 2010 are shown in *italics* Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined

<b>SA Objectives</b>	<b>Detailed questions: Does the policy/option ...</b>
economy and <del>Enable</del> <u>enable</u> local businesses to prosper	area Reduce vulnerability of the economy to climate change and harness opportunities arising <u>Contribute to the vitality and viability of town centres.</u> <u>Support a prosperous rural economy</u>
Objective 9: Increase availability of local produce and materials	Meet local needs locally <i>Support local food producers</i>
Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	Make public transport, cycling and walking easier and more attractive <u>Promote sustainable transport to reduce the need for major transport infrastructure</u>
Objective 11: Reduce the need and desire to travel by car	Reduce the need/desire to travel by car
Objective 12: Protect and enhance local distinctiveness	Protect and enhance landscape and townscape <u>Ensure potential impacts of development on AONB and landscape character and its statutory purpose are assessed</u> Value and protect diversity and local distinctiveness including rural ways of life
Objective 13: Protect and enhance the district's historic, environmental and cultural assets	Maintain and enhance cultural and historical assets
Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change)	Protect and enhance habitats and species (taking account of climate change) <u>Ensure potential impacts of development on the conservation objectives for local, national and international designated sites are assessed</u>
Objective 15: Reduce land, water, air, light, noise pollution	Minimise land, water, air, light, noise pollution
Objective 16: Encourage sustainable construction	<u>Help d</u> Development that demonstrates sustainable design and construction Minimise consumption and extraction of minerals
Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure	Reduce non-renewable energy consumption and 'greenhouse' emissions Promote sustainable energy generation and distribution
Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change)	Reduce vulnerability to, and manage flood risk (taking account of climate change) <i>Enable us to cope with hotter, drier summers (shade,</i>

**Table 4.2: SA Framework (revised in July 2010 and December 2012/January 2013)**

Appraisal questions added in July 2010 are shown in *italics* Changes made to the SA Objectives and appraisal questions as a result of the B&NES SA Objectives Review in December 2012 are shown as underlined

<b>SA Objectives</b>	<b>Detailed questions: Does the policy/option ...</b>
	<i>ventilation, ground conditions etc)</i>
Objective 19: Encourage careful and efficient use of natural resources	Promote the conservation and wise use of land Keep water consumption within local carrying capacity limits (taking account of climate change) Minimise consumption and extraction of minerals
Objective 20: Promote waste management <u>in accordance with the waste hierarchy</u> (Reduce, Reuse and Recycle)	Reduce waste not put to any use

This updated version of the SA Framework has been used to appraise the sustainability of the Proposed Changes to the Submitted and the Core Strategy as proposed to be adopted.

### 4.3 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.*

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: [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy)

Key baseline data was updated between February 2010 and August 2010, and again in November 2013 as it became available and Table 4.3 presents key updated baseline data. In addition, trend information reported in the Scoping Report has been used to identify the “future baseline”, the potential evolution of the baseline in the absence of the plan.

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<b>Air quality</b>	
<p>Nitrogen dioxide concentrations in Bath are increasing. An AQMA for nitrogen dioxide (NO<sup>2</sup>) exists along the A4 London Road (Bath), including Bathwick Street. It is likely that the whole of the city of Bath will be declared an AQMA.</p> <p>An AQMA has been declared in the centre of Keynsham.</p> <p>There are no AQMAs in Midsomer Norton, Radstock or elsewhere in the district.</p>	<p>Over the next 5-10 years there is the potential for air quality to either remain the same or decline in within Bath and air quality could decline in Keynsham without improvements to traffic levels on the High Street. The Bath Package is a major transport programme designed to provide an improved public transport system, relieve traffic congestion and improve emissions. It includes the provision of a bus rapid transit scheme, increased park and ride parking spaces and creating a more cyclist and pedestrian friendly city. There is some uncertainty regarding the funding of the Bath Package, however, following the general election in May 2010 and therefore the future traffic situation, transport infrastructure and air quality in Bath is uncertain.</p>
<b>Noise</b>	
<p>There is a gap in the baseline data regarding noise levels within the District.</p>	<p>Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.</p>
<b>Biodiversity</b>	
<p>The following sites are designated for nature conservation:</p> <ul style="list-style-type: none"> <li>• SPA: Chew Valley Lake</li> <li>• SAC: Combe Down and Bathampton Mines, part of the 'Bath &amp; Bradford-on-Avon Bats SAC'.</li> <li>• SAC: Compton Martin Ochre Mine is a component site of the North Somerset and Mendip Bats SAC.</li> <li>• There are 59 SSSIs in B&amp;NES and 300 locally designated sites. 71% of SSSI units are in favourable condition.</li> <li>• There are 300 locally designated sites.</li> </ul> <p>A BAP priority habitat is mapped in the Scoping Report.</p>	<p>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.</p> <p>Climate change is likely to disadvantage some species through altering seasons, changing habitats, causing habitat fragmentation (e.g. through drought) and introducing new species which could compete with others for space or could prey on them. However, climate change may also benefit some species for the same reasons.</p>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Preliminary Ecological surveys and Assessment 2008 and 2013</li> <li>• Preliminary Arboricultural Assessment (CD10/E2-E6)</li> <li>• Bat Survey Weston Bat Survey (CD10/E9)</li> <li>• South West Keynsham further detailed ecological survey (CD10/E10)</li> <li>• Green Field Site Emerging Allocations – Ecological Issues (CD10/E11)</li> <li>• Core Strategy Amendments Habitat Regulations Assessments (Nov 2013)(CD10/A2)</li> </ul>	
<b>Climate change and flood risk</b>	
<p>The areas prone to flooding tend to follow the main rivers.</p> <p>The areas most at risk of flooding are:</p> <ul style="list-style-type: none"> <li>• Bath - at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). 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 Flood Risk Management Strategy Report (produced by Atkins in June 2010) identified that the preferred flood risk solution to allow development of sites within Bath, that lie below the 1% AEP (1 in 100 year) +20% (climate change allowance) flood level, would be a combination of on-site flood defences and provision of a compensatory storage area upstream of Bath. Phase 1 of a study commissioned by BANES to investigate the provision of compensatory storage upstream</li> </ul>	<p>Global temperatures are predicted to rise between 1.4 – 5.5°C over the 21st Century. Climate change is likely to increase the areas at risk of flooding in the long term.</p> <p>Other effects of climate change are reported to be<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• The region is becoming warmer and by the 2050s average temperatures may be as much as 3.5°C warmer in summer;</li> <li>• High summer temperatures are becoming more frequent, and very cold winters are becoming increasingly rare;</li> <li>• Winters are becoming wetter (a 5 - 20% increase is expected by the 2050s), whilst summers are becoming drier (10 - 40% decrease by the 2050s);</li> <li>• Relative sea level continues to rise, and could be as much as 80cm</li> </ul>

<sup>1</sup> Warming to the idea - South West Region Climate Change Impacts Scoping Study (South West Climate Change Impacts Partnership, January 2003)

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>of Bath city centre to balance future loss of flood storage volume from the delivery of allocated sites has been completed (WYG 2011). Following the Flood Risk Management Strategy, the Hydraulic Modelling has now been completed. The Black and Veatch Bath Flood Risk Management Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes and implement compensatory flow conveyance schemes.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources.</li> </ul> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Water Infrastructure and Geotechnical Prioritisation Report (CD9/13)</li> </ul>	<p>higher by the 2080s;</p> <ul style="list-style-type: none"> <li>• Changes to insurance costs and coverage are expected, in particular in vulnerable geographic areas or economic sectors; and</li> <li>• Loss of habitats and indigenous species could occur as well as longer growing seasons and increased potential for novel agricultural crops.</li> </ul> <p>In the absence of the Core Strategy, development will not necessarily be accompanied by sustainable drainage measures and pollution may increase.</p>
<b>Community and well being</b>	

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>In rural areas the level of service deprivation is naturally high due to geographical distance to the services. Wards with particular barriers to accessing local services include Chew Valley South, Clutton and Mendip.</p> <p>There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the district.</p> <p>There are 115 LSOAs in the B&amp;NES Unitary Authority area. According to the Indices of Multiple Deprivation (IMD) 2007, 4 of these 115 areas are among the most deprived 20% nationally. They are home to about 5,600 people. 4 different wards (out of the 37 in B&amp;NES) contain one such area, all are in Bath.</p> <p>No areas in B&amp;NES are within the most deprived 10% nationally. The most deprived Lower Super Output Area (LSOA) is part of Twerton ward, Bath, which is among the most deprived 14% of English LSOAs.</p> <p>Bath City Centre, the South West area of Bath City and North Keynsham experience the highest levels of recorded priority crime in B&amp;NES.</p> <p>Life expectancy in the district is higher than the regional and national averages. However, people living in electoral wards with the lowest index of deprivation have a lower life expectancy by 4.6 years than those living in the most affluent wards.</p> <p>The Sport England survey 2006 showed that 23.8% of residents regularly participated in moderate intensity sport and active recreation. This was the top 25% of local authorities.</p> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Transport Study Local Education Requirements for the sites (CD10/E21)</li> <li>• Transport Study</li> <li>• Wales &amp; West Utilities Information Gas Pipeline – Broadmoor lane, Weston (CD10/E15)</li> </ul>	<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>In 2008 the Office for National Statistics estimated that the population of B&amp;NES in 2006 was 173,100 and that between 2006 and 2026 the population of the district will increase by 9.5%.</p> <p>Nationally, predicted future trends in population dynamics are: rising household numbers, reflecting increasingly rapid decline in household size, due to ever increasing life expectancy, more households separating and higher inward migration both from other areas of the UK and internationally.</p> <p>The number of over 80 year olds in the district has been projected to increase by 16% by 2026. The impact of an aging population will impact on healthcare provision in the future.</p> <p>Obesity is an increasing issue facing the whole of the country.</p>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<ul style="list-style-type: none"> <li>Valuing people, place and nature a Green Infrastructure Strategy (CD10/E17)</li> </ul>	
<b>Economy and employment</b>	
<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.</p> <p>The percentage of the economically active population of B&amp;NES which are unemployed is lower than the UK and regional percentages.</p> <p>Wage rates are lower than the UK average and there are many low skill/wage jobs.</p> <p>There are some wards in Radstock which experience comparatively high levels of unemployment linked to patterns of deprivation mapped in the indices of deprivation.</p> <p>The English Indices of Deprivation (2004) ranks B&amp;NES as the 259th (73.76%) least deprived local authority out of 354 Local Authorities. Within Bath, there are pockets of deprivation, most severely in the Twerton West and Whiteway areas.</p> <p>Kingsmead and Whiteway are within the 10% most deprived areas for Crime and Disorder and Kingsmead is also within the 10% most deprived for Health and Disability, Income and Living Environment Deprivation.</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.</p> <p>Whitchurch is within the 10% most deprived areas for Crime and Disorder.</p> <p>The super output areas of Midsomer Norton and Radstock vary in their ranking in the Index of Multiple Deprivation. The four wards of Writhlington, Westfield North and Midsomer Norton West were in the 50% most deprived areas, with Clandown in the 40% most deprived according</p>	<p>Without intervention the pattern of skills levels and wages within the district is likely to remain the same.</p> <p>The patterns of deprivation are likely to follow existing trends and will respond to external pressures.</p> <p>Unemployment in some wards in Radstock, again, may remain the same, without intervention to improve skills levels and the diversity of employers in the area.</p> <p>Local food producers may continue to experience barriers to expansion.</p> <p>The district, especially Bath, may experience a lack of office space.</p>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>to the 2004 IMD.</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>The Bath and North East Somerset area, especially Bath, currently faces a projected deficit in the provision of office space.</p> <p>There are a number of Local Food Suppliers in the District and the North East Somerset &amp; Bath Local Food Partnership was set up in 2007 to encourage the production, sale, purchase and consumption of quality foods produced in the local area. The Partnership commissioned a survey in to local food production in the B&amp;NES area. Key findings included a need for the planning system to support barriers to expansion of local food producers.</p>	
<b>Historic environment</b>	
<p>Bath was designated a World Heritage site in 1987.</p> <p>There are 37 Conservation Areas, 11 Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in B&amp;NES (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register 2010.</p> <p>The area which was formerly part of the Somerset coalfield retains a rich industrial heritage.</p> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Heritage Asset Study</li> <li>• GB Review Stage 2</li> <li>• Addendum to Landscape &amp; Visual Impact Assessment: (October 2013)(CD10/E11 – E13)</li> </ul>	<p>If no development takes place (in the absence of the plan) the value of the designated sites and areas should remain the same. However, climate change may put historic assets at risk due to extreme weather events, flooding, hotter, drier summers and wetter winters.</p>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<b>Housing</b>	
<p>High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers.</p> <p>Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the overall need for affordable housing in B&amp;NES is concentrated in Bath City.</p> <p>Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath &amp; North East Somerset. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals.</p> <p>Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials.</p> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• SHMA (CD9/H4)</li> <li>• Strategic Greenfield Allocations Viability Test (CD10/E7)</li> <li>• Register of Town or Village Greens ((CD10/E4)</li> </ul>	<p>It is unknown how many housing developments will come forward within the next 5 years due to the economic downturn of recent years. It may remain difficult to secure a mix of decent affordable homes.</p> <p>Without the pro-active planning represented by the plan, it is unlikely that B&amp;NES will be able to provide enough affordable housing to satisfy future requirements.</p> <p>With the improvements in the Building Regulations the sustainability of new houses is likely to improve.</p> <p>Historically there has been a statistically low level of demand for gypsy and traveller sites with some unauthorised occupation of land by gypsy and travellers within the district. However, there is a national shortage of these types of sites and the West of England Gypsy and Traveller Accommodation Assessment (2007) recommends that 19 permanent pitches and 20 transit pitches are found for the gypsy and travelling communities in B&amp;NES in the period 2006-2011. The report also indicates that one plot for travelling showpeople should be provided in B&amp;NES by 2011.</p>
<b>Land</b>	
<p>B&amp;NES has prepared a Remediation Statement (2002) 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>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Strategic Greenfield Allocations Viability Test (CD10/E7)</li> </ul>	
<b>Landscape</b>	
<p>There are 2 AONBs in the District – Mendip and Cotswolds AONBs. The district has a varied landscape represented by 18 LCAs. Large areas of B&amp;NES are Green Belt (61%).</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>Large areas of Radstock are covered by a Conservation Area.</p> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <p>WHS Setting and AONB Landscape and Visual Impact Assessment Preliminary Arboricultural Assessment (CD10/E2-6)</p> <p>GB Review Stage 2</p>	<p>Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change.</p> <p>Without the Core Strategy, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.</p>
<b>Transport</b>	
<p>Over 50% of residents travel out of the area to work. The average journey to work is 13.23km (comparatively high). 2001 data showed a high proportion of the population travelling to work by car.</p> <p>There is no direct link to the motorway network in B&amp;NES and Bath suffers particularly from the sub-region's poor internal transport links.</p>	<p>The Bath Package is a major transport programme designed to provide a modern integrated easy to use public transport system. This includes the provision of a bus rapid transit scheme and creating a more cyclist and pedestrian friendly city. There is some uncertainty regarding the funding of the Bath Package following the general election in May 2010 and therefore</p>

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<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>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>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Transport Access Assessment (CD9/I2/1-27) (CD10/E8)</li> <li>• Transport Access Assessment (CD9/I2/1-27) (CD10/E8)(CD10/E22)</li> </ul>	<p>the future traffic situation and transport infrastructure in Bath is uncertain.</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. Nonetheless, if the interventions set out in the Bath Package are successfully implemented, this situation can be controlled in Bath.</p>
<b>Waste</b>	
B&NES is one of the top recycling authorities within the country, recycling 41% of	Levels of recycling have been increasing and there is no reason to believe

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
<p>household waste in 2009/10.</p> <p>Waste infrastructure: 2 x waster transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots.</p> <p>Every day B&amp;NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset.</p>	<p>that this trend will change.</p> <p>However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.</p>
<b>Energy and carbon emissions</b>	
<p>CO<sub>2</sub> emissions from B&amp;NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes)</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>A renewable energy research study has been undertaken.</p> <p>Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings.</p> <p>New Key Evidence used (Core Document Number) to inform the November 2013 assessment:</p> <ul style="list-style-type: none"> <li>• Renewable Energy potential for B&amp;NES Green Belt sites Assessment (CD10/E16)</li> <li>• Renewable Energy Assessment for B&amp;NES Green Belt sites (CD10/E17)</li> </ul>	<p>With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years.</p> <p>Historic buildings may be difficult to make more energy efficient in light of existing planning controls.</p> <p>On-site renewable energy technologies are developing in response to Part L of the Building Regulations and targets set in other areas of the UK. The percentage of energy generated from renewable sources is likely to increase in the future.</p>
<b>Water</b>	
<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>With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.</p>

<b>Table 4.3: Summary of the Sustainability Baseline Data</b>	
<b>Sustainability baseline / issues / characteristics of the area</b>	<b>Suggested evolution without the plan</b>
The far east and far west of the district is covered by Ground Source Protection Zones (including a part of Bath).	

## 5 Options Appraisal Results and Reasons for Selection

*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.*

### 5.1 Introduction

The SEA Regulations require that the Environmental Report outlines the reasons for selecting the alternatives dealt with. ODPM guidance 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 (see Section 3.3 of this report for details of the options considered);
- 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.

Several appraisals of the sustainability of different spatial options have been undertaken during the development of the Core Strategy, and the results of these assessments have influenced subsequent iterations of the Core Strategy since its first publication.

A summary of the different assessments of options is presented in Section 5.3.

### 5.2 Assumptions made during the assessment

SA 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 an expert, judgement-led qualitative assessment. A 'precautionary approach' is taken, especially with qualitative judgements and mitigation is suggested if there is any doubt as to the effect of the plan.

The nature of the Core Strategy is that it is an overarching strategic document which presents the core spatial planning policies and provides the policy 'hooks' on which to 'hang' subsequent development plan policies and documents.

In light of this, the appraisal has:

- Indicated where assessment is not possible or where additional data is required; and
- Indicated the mitigation needed in two ways:
  - Direct mitigation: indicate where changes to the Core Strategy DPD is needed to include specific measures to deal with a potential negative impact or a lack of information;
  - Indirect mitigation: indicate matters that need to be developed as the Core Strategy is further developed or where information needs to be provided within another planning document.

### **5.3 The reasons for selecting alternatives**

The process of preparing the Core Strategy is itself one that involves consideration of issues and options. Consideration of alternatives as required by the SEA Regulations has therefore been an integral part of that process. The reasons for developing and selecting the strategy as chosen at different stages has been outlined in previous SA reports and is not repeated here. However, a summary of the issues and options assessments that have been carried out at each stage of the SA process and where to find out more information, such as their findings, is outlined below.

### **5.4 Options Appraisals in 2008**

The Core Strategy Issues and Options Paper (October 2008) was appraised by the SA consultants. Comments and recommendations were fed back to B&NES officers as the paper was developed. The results of this process are recorded in the Core Strategy Spatial Options- Interim Sustainability Appraisal September 2009, which can be found here:

<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/SpatialOptions/CSSO-SustainabilityAppraisal.pdf>

### **5.5 Spatial Options Appraisals (2009)**

The Core Strategy Spatial Options Consultation document (October 2009) set out discreet options which were subject to sustainability appraisal in August 2009. These included: district wide spatial options and spatial options for Bath, a new neighbourhood in an urban extension to Bath, Keynsham, New Neighbourhood at South East Bristol, Midsomer Norton and Radstock, and options for Rural areas. The consultation document also outlined core policies.

Detailed policy wording was not included in the Spatial Options document. At this stage the issues dealt with by the policies along with a suggested policy direction were indicated. The conclusions of the SA at the Options stage, along with the consultation responses and additional evidence, were used to inform the preparation of policy wording included in the Publication Core Strategy.

The full results of the Spatial Options appraisals are presented within the Core Strategy Spatial Options Interim Sustainability Appraisal Report Appendix A (September 2009, Revised December 2009 CD4/A6), which can be found here:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core\\_documents\\_list.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf)

## 5.6 Additional work on Urban Extensions (August 2011)

Through the appraisal of the Spatial Options Consultation document (October 2009) the SA appraised and compared the merits and disadvantages of two options for urban extensions to the South East of Bristol, at Whitchurch and at Hicks Gate which adjoined the Bristol City Council administrative area and two options for urban extensions to Bath, at Twerton to the west of the city, and on the Odd Down plateau to the south.

The chosen District Spatial Strategy included within the Publication Core Strategy moved away from urban extensions. The options presented within the Core Strategy Spatial Options consultation document (October 2009) did not include an option with no urban extensions. As such, it was difficult to compare the potential positive and negative effects of the options considered in the Spatial Options document with the spatial strategy presented within the Publication and the Submission Core Strategy.

In order to ensure that the sustainability implications of the District Spatial Strategy (DW1) which did not include urban extensions were fully understood, an additional assessment was undertaken to examine the implication of moving away from the options of urban extensions considered in the Core Strategy Spatial options consultation document (October 2009). The assessment considered and compared (as far as possible) the effects of the options which included urban extensions appraised through SA in 2009 and the effects of the Publication Core Strategy District Spatial Strategy appraised as a part of the whole Publication Core Strategy in 2010.

An assessment was undertaken in August 2011 to assess the relative performance of the housing contingency sites, which included the four sites considered previously, however the scale and the area of development have been modified. This assessment can be found in full in Annex K. This assessment was undertaken using the SA Framework used to assess the previous options and thus for the purposes of the Regulations, was compatible with previous assessments and informed the development of the plan. The assessment not only considered a relative comparison of the four sites, but also considered the sites relative to the existing plan – that is without release of Green Belt. Therefore in regard to this updated assessment, and for the purposes of Article 5.1 of the SEA Directive *and St Albans District Council v Secretary of State for Communities and Local Government* we consider that reasonable alternatives for this policy area have been considered.

## Transport Strategy

Changes to some aspects of the Council's Transport Strategy for Bath were made within the Submission version of the Core Strategy and these are detailed within Annex J of the SA Report (ENVIRON, 2011). The Measures included are:

- Bath Transport Package – comprising a range of measures including three extended Park & Ride sites; upgrading nine routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key routes into the city displaying information about car parking availability;
- Improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Mid Somer Norton;
- Rail improvements, such as the electrification of Great Western Railway mainline by 2016; the new 15 year GWR franchise (including the Greater Bristol Metro Project);

and increasing the capacity of local rail services travelling through Bath Spa rail station, improving attractiveness of rail travel to and from Bath;

- B&NES has been awarded Local Sustainable Transport Fund key component funding for a number of measures and also been invited by the Department for Transport to submit a major bid to the Local Sustainable Transport Fund for £25.5million jointly with the other three West of England authorities;
- Creating a more pedestrian and cyclist-friendly city centre through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas;
- Other improvements to walking and cycling infrastructure through the Council's Integrated Transport annual settlement and the implementation of 'Smarter Choices' for transport e.g. through the development of travel plans for new and existing sites and the expansion of car clubs;
- Updating the Council's Parking Strategy for Bath which will broadly maintain central area car parking at existing levels in the short term and continue to prioritise management of that parking for short and medium stay users.

Therefore there has been the deletion of the previously proposed new Park and Ride site to the east of the city. The reasons for this deletion was to allow alternatives to be developed possibly involving rail, to maximise the potential benefits of electrification of the GWR and the awarding of an extended rail franchise to achieve substantial modal shift.

In addition the Council agreed to:

- instruct officers to work on alternatives to Bathampton Meadows park and ride, possibly involving rail, as part of the future Transport Strategy;
- liaise with Wiltshire Council and other authorities about measures to remove some of the through traffic along the London Road and other cross border transport issues;
- implement measures to remove HGVs from London Road - this 10% of traffic creates 40% of the pollution;
- instruct officers to examine how we can obtain substantial "modal shift" from the private car to rail in recognition of potential for rail expansion with the electrification of the GWR and the awarding of an extended rail franchise.

### **5.7 Appraisals of the Proposed Changes to the Submitted Core Strategy including urban extension locational alternatives**

Options have continued to be tested as part of the assessment of the proposed changes. This was undertaken as part of the Green Belt Site Allocations Sustainability Appraisal which was published in March 2013 as Annex L to the SA Report.

Detailed studies such as the Addendum to the Landscape & Visual Impact Assessment and Preliminary Ecological Surveys and Assessment have set out the impact and effects of new development and potential for mitigations helping to gain further understanding of the potential allocation sites and informing the site selection process. The site specific SA (Annex O) helped to avoid the areas which have higher negative effects on sustainability objectives without appropriate mitigation. The results of the assessments of the selected Green Belt sites / site allocations were presented as Annex O to the SA Report and were published in November 2013.

This SA Report includes an assessment of the main modifications received from the Inspector and the additional modifications proposed by the Council. The only significant changes requiring additional assessment within the SA were the removal of BREEAM and Code standards where they had previously appeared within the Core Strategy policies. This affected policies CP2 Sustainable Construction, B3A Land adjoining Odd Down, KE3A Land adjoining East Keynsham, KE4 Land adjoining South West Keynsham and RA5 Land at Whitchurch. The appraisals of these policies have been amended within Annex D and Table 6.1 and this change has meant that these policies in some cases perform less well against the following SA Objectives:

- SA Objective 16: Encourage sustainable construction;
- SA Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure;
- SA Objective 19: Encourage careful and efficient use of natural resources; and
- SA Objective 20: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle).

The Council had proposed a change to make a fifth strategic housing allocation requiring land to be removed from the Green Belt at Weston, Bath. Following the submission of additional assessments the Inspector has not recommended that this be taken forward as a modification to the submitted plan as the exceptional circumstances necessary to change Green Belt boundaries and to justify major development in an Area of Outstanding Natural Beauty are not met in that location for the scale of development proposed. The removal of the Weston site from the adopted Core Strategy is reflected within Annex D and Table 6.1. It is also discussed with regards to cumulative effects in Section 6.1.

The SA Adoption Statement (see Section 8 of this report for details) will outline the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.

## **5.8 How the SA has informed development of the Core Strategy**

The SA has presented the positive and negative effects of the options previously consulted on in order to inform decision making. In most cases, no one option was identified as a preferred option with regards to the SA. The SA of options and subsequent SA of proposed changes have influenced the development of the Core Strategy as proposed to be adopted in the following specific ways:

- The Core Strategy objectives now include references to health and wellbeing, addressing health inequalities, safety, increasing local food production, provision and access to training, especially in the Somer Valley, reducing the need and desire to travel by car and access to high quality sustainable transport, promoting local character and distinctiveness, the protection and provision of green infrastructure, climate change, energy and CO<sub>2</sub> reduction;
- More detail is provided in relation to flood mitigation measures needed in specific settlements e.g. Bath;
- Greater emphasis on how air quality issues will be addressed in Bath have been included in the Bath Strategy chapter;
- Creating safe places has been included in the Environmental Quality Policy (CP6);

- References to the need to consider archaeological impact of CHPs and cumulative impacts of new developments on social infrastructure / community facilities have been added to supporting text;
- Greater emphasis has been given to increasing the availability of local produce and materials in the Core Strategy;
- The addition of cultural assets to the policy covering historic environment (policy CP6);
- Enhancement as well as protection/safeguarding of nature conservation assets has been added to the policy covering nature conservation (CP6) and also taking account of climate change through the enhancement of wildlife corridors and green infrastructure;
- Issues of sustainable construction are now covered in a specific sustainable construction policy;
- A specific decentralised energy policy is now included (policy CP4);
- Consideration of pollution and utilities provision is included in policy CP11 Gypsies, Travellers and Travelling Showpeople Policy;
- Sites for gypsies, travellers and travelling showpeople are suitably located to allow access by sustainable modes of transport (CP11);
- Centres and retailing (policy CP12) now supports the provision of markets and community facilities within settlement centres;
- Greater emphasis is given to sustainable transport in the Rural Areas Strategy chapter;
- Inclusion of the reuse of the Cadbury's buildings in policy KE2;
- The provision of training and improving skills is dealt with in the place-based policies, where skills levels have been identified in certain places (i.e. Midsomer Norton and Radstock policy SV1);
- The Somer Valley vision and spatial strategy refers to the need to improve skills in the Somer Valley area in order to deliver growth in the local economy in that area;
- The Sustainable Construction Core Policy CP2 encourages the reuse and recycling of demolition materials;
- Affordable Housing (policy CP9) is now required to be integrated within a development and should not be distinguishable from market housing; and
- Landscape and visual assessment, ecological and archaeological studies have been undertaken to inform the assessment and allocation of greenfield sites in the Core Strategy (see Annex O). Further work will be needed to inform the masterplanning of these sites at MoD Ensleigh, Odd Down, Keynsham and Whitchurch.

## 6 Results of the Appraisal

*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.*

The full results of the appraisal of the Core Strategy as proposed to be adopted are reported in Annex D, with supporting information provided within annexes L and O to this report. Potential cumulative effects of the Core Strategy are identified in Section 6.1 and within the matrices in Annex D, L and H.

### 6.1 Summary of the Findings of the Appraisal

Table 6.1 presents the significant effects of the vision, strategic objectives, policies and strategies of the Core Strategy. Significant effects are considered to be those which are potential major positive, major negative, minor negative and uncertain. Unless otherwise stated, the effects in Table 6.1 are over the short, medium and long term. The effects presented in Table 6.1 include potential cumulative effects where found.

Please note that the assessment process that is presented in Annex D has drawn on the information provided as part of Annex L and Annex O in relation to the following policies:

- Policies B3A and B3C;
- Policies KE3A, KE3B and KE4; and
- Policy RA5.

<b>Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA</b>	
<b>Policy or Strategy</b>	<b>Summary of Significant Effects of the Policy</b>
<b>Vision and Objectives</b>	The vision and objectives generally perform well against the SA objectives. Potential major positive effects have been identified in relation to 14 of the SA Objectives. No major negative effects have been identified.
<b>District Strategy</b>	Potential major positive effects have been identified in relation to 7 of the SA Objectives. No major negative effects have been identified. No potential cumulative effects have been identified with the final version of policy DW1.
<b>Bath Spatial Strategy policies (excluding site allocation policies appraised separately): Bath Vision, Policy B1 Bath Spatial Strategy, Policy B2 Central Area Strategic Policy, Policy B3 Strategic Policy for Twerton and Newbridge Riverside, Policy B4 the World Heritage Site and its Setting and Policy B5 Strategic Policy for Bath's Universities</b>	<p>Major positive effects are identified with regards to 4 of the SA Objectives. Uncertain effects are identified over the short, medium and long terms in relation to Objective 14: Encourage and protect habitats and biodiversity. The uncertainty is recorded in relation to the effects of the flood management scheme suggested for development sites in Bath. This is because it will be necessary to develop the design of the proposed flood defence scheme prior to submission of a planning application and Flood Defence Consent application. This application is likely to require environmental assessment and mitigation where required. No major negative effects have been identified.</p> <p>No potential cumulative effects for Bath city have been identified. Potential cumulative effects of the allocated sites (appraised separately) will also be considered as a part of the development of the Placemaking Plan DPD which will include more detailed policies for the allocation sites.</p>
<b>Policy B3C Extension to MOD, Enslleigh</b>	<p>All effects of this policy are in the medium and long term because it is not expected that this site will be developed within the short term.</p> <p>Major positive effects in the medium and long term are identified with regards to 8 of the SA objectives</p> <p>Uncertain effects are identified in relation to the following SA Objectives:</p> <ul style="list-style-type: none"> <li>• Objective 12: Protect and enhance local distinctiveness;</li> <li>• Objective 13: Protect and enhance the district's historic, environmental and cultural assets; and</li> <li>• Objective 15: Reduce land, water, air, light, noise pollution.</li> </ul> <p>Policy B3C requires survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects will be mitigated through the masterplanning process.</p> <p>No major negative effects have been identified.</p>

<b>Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA</b>	
<b>Policy or Strategy</b>	<b>Summary of Significant Effects of the Policy</b>
<b>Policy B3A Land adjoining Odd Down, Bath - Strategic Site Allocation</b>	<p>Major positive effects in the short term are identified with regards to 7 of the SA objectives.</p> <p>Uncertain effects are identified with regards to the following SA objectives</p> <ul style="list-style-type: none"> <li>• Objective 12 Protect and enhance local distinctiveness;</li> <li>• Objective 13: Protect and enhance the district's historic, environmental and cultural assets; and</li> <li>• Objective 15 Reduce land, water, air, light, noise pollution.</li> </ul> <p>Policy B3A requires survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects can or will be mitigated through the masterplanning process.</p> <p>No major negative effects have been identified.</p>
<b>Policy KE1 Keynsham Spatial Strategy and Policy KE2 Town Centre/Somerdale Strategic Policy</b>	<p>Major positive effects were identified in relation to 8 SA Objectives. A potential positive cumulative effect has been identified with regards to encouraging and protecting biodiversity through the protecting, linking up and enhancement of the green infrastructure network in and around Keynsham. No major negative effects have been identified.</p>
<b>Keynsham Additional Policies – Policy KE3 Land adjoining East Keynsham and Policy KE3B Safeguarded Land</b>	<p>Major positive effects in the short, medium and long term are identified with regards to 8 of the SA objectives.</p> <p>Uncertain effects in the short, medium and long terms are identified with regards to the following SA objectives:</p> <ul style="list-style-type: none"> <li>• Objective 12 Protect and enhance local distinctiveness; and</li> <li>• Objective 15 Reduce land, water, air, light, noise pollution.</li> </ul> <p>Policies KE3 and KE3B require survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects can or will be mitigated through the masterplanning process.</p> <p>No major negative effects have been identified.</p>
<b>KE4 South West Keynsham</b>	<p>Major positive effects in the short, medium and long term are identified with regards to 9 of the SA objectives.</p> <p>Uncertain effects in the short, medium and long terms are identified with regards to SA objective 15 Reduce land, water, air, light, noise pollution. Policy KE4 requires survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that</p>

<b>Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA</b>	
<b>Policy or Strategy</b>	<b>Summary of Significant Effects of the Policy</b>
	<p>the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects can or will be mitigated through the masterplanning process.</p> <p>No major negative effects have been identified.</p>
<p><b>Somer Valley policies:</b>  <b>Policy SV1 Somer Valley Spatial Strategy;</b>  <b>Policy SV2 Midsomer Norton and Town Centre Strategic Policy; and</b>  <b>Policy SV3 Radstock Town Centre Strategic Policy</b></p>	<p>The Somer Valley policies have a positive effect with regards to the SA Objectives. Major positive effects were identified with regard to 14 of the SA objectives. No major negative effects have been identified.</p>
<p><b>Rural Delivery policies:</b>  <b>Policy RA1 Development in the villages meeting the listed criteria;</b>  <b>RA2 Development in villages outside the Green Belt not meeting policy RA1 criteria;</b>  <b>Policy RA3 Community facilities and shops; Policy RA4 Rural Exception Sites</b></p>	<p>The appraisal of the rural delivery policies has not identified any significant positive or negative effects.</p> <p>The appraisal strategy generally has a mixed or neutral performance with regards to the SA Objectives. With regards to a number of the SA objectives, the strategy has the potential to have both a minor positive and a minor negative performance. This is because the rural delivery strategy aims to maintain current levels of access to services and facilities in villages, including through a presumption for retention of village grocery shops and support for new community facilities and shops.</p> <p>Such mixed performances have been recorded with regards to 9 of the SA Objectives. Minor positive effects have been identified in relation to 4 of the SA objectives.</p>
<p><b>RA5 Whitchurch</b></p>	<p>Major positive effects in the short, medium and long terms are identified with regards to 7 of the SA objectives.</p> <p>Uncertain effects in the short, medium and long terms are identified with regards to the following SA objectives:</p> <ul style="list-style-type: none"> <li>• Objective 12 Protect and enhance local distinctiveness;</li> <li>• Objective 13 Protect and enhance the district’s historic, environmental and cultural assets; and</li> <li>• Objective 15 Reduce land, water, air, light, noise pollution.</li> </ul>

<b>Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA</b>	
<b>Policy or Strategy</b>	<b>Summary of Significant Effects of the Policy</b>
	<p>Policy RA5 requires survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects can or will be mitigated through the masterplanning process.</p> <p>No major negative effects have been identified.</p>
<b>Core Policies</b>	
<b>SD1 Presumption in Favour of Sustainable Development</b>	<p>The policy mainly has a neutral or positive performance with regards to the SA Objectives.</p> <p>Potential major positive effects have been identified in relation to 3 SA Objectives. No major negative effects have been identified.</p>
<b>CP1 Retrofitting Existing Buildings, CP2 Sustainable Construction, CP3 Renewable Energy, CP4 District Heating</b>	<p>The energy hierarchy policy and policies CP1 to CP4 generally perform well against the SA Objectives. Potential significant positive effects have been identified in relation to 9 of the SA Objectives.</p> <p>A potential positive cumulative effect has been identified which is that the measures encourages through the energy hierarchy policy and policies CP1 to CP4 could result in an overall cumulative effect on reducing greenhouse gas emissions.</p>
<b>CP 5 Flood Risk Management</b>	<p>This Flood Risk Policy is not relevant to a number of SA Objectives, but where it is relevant, the policy performs well.</p> <p>Potential major positive effects have been identified in relation to 2 SA objectives.</p> <p>No major negative effects have been identified.</p>
<b>CP6 Environmental Quality</b>	<p>The Environmental Quality policy performs well with regards to the SA objectives. A number of potential major positive effects have been identified in relation to 5 SA Objectives:</p> <p>Text has been added to the policy since Submission so that it allows for developments which mitigate and adapt to the impacts of climate change as long as the benefit outweighs any harm to the significance of the heritage asset. This change to the policy has led to the introduction of uncertainty alongside the major positive 'scores' relating to SA Objective 13: Protect and enhance the district's historic, environmental and cultural assets.</p> <p>No major negative effects have been identified.</p>
<b>CP7 Green Infrastructure</b>	<p>The Green Infrastructure policy performs well. No potential negative or uncertain effects have been identified.</p> <p>A number of potential major positive effects have been identified in relation to 4 SA Objectives.</p> <p>A potential positive cumulative effect has been identified for 'SA Objective 14: Encourage and protect habitats and</p>

<b>Table 6.1: Summary of the Significant Effects of the Core Strategy Policies identified within the SA</b>	
<b>Policy or Strategy</b>	<b>Summary of Significant Effects of the Policy</b>
	<p>biodiversity (taking account of climate change)' through the provision of additional green infrastructure and achieving greater connectivity of habitats across the district and sub-region. This could benefit a variety of species in climate change adaptation, improve biodiversity and reduce habitat fragmentation.</p> <p>No major negative effects have been identified.</p>
<b>CP8 Green Belt</b>	<p>The Green Belt Core Policy has a neutral performance against most of the SA objectives.. One potential major positive effect has been identified in relation to 'SA Objective 12: Protect and enhance local distinctiveness'.</p> <p>No major negative effects have been identified.</p>
<b>CP8a Minerals</b>	<p>Potential major positive effects have been identified for 7 of the SA Objectives. No major negative effects have been identified.</p>
<b>CP9 Affordable Housing and CP10 Housing Mix</b>	<p>Both policies generally perform well, and in particular major positive effects were recorded with regards to 'SA Objective 3: Meet identified needs for sufficient, high quality and affordable housing'. No potential negative or uncertain effects have been identified.</p>
<b>CP11 Gypsies, Travellers &amp; Travelling Showpeople Policy</b>	<p>Potential major positive effects are identified in relation to 2 SA Objectives. No major negative effects have been identified.</p>
<b>CP12 Centres and Retailing</b>	<p>This policy generally performs well. Major positive effects have been identified in relation to 6 SA Objectives:</p> <p>No potential negative or uncertain effects have been identified.</p>
<b>CP 13 Infrastructure Provision Policy</b>	<p>Potential major positive effects have been identified in relation to 2 SA objectives.</p> <p>There is an indirect relationship between crime and safety and the provision of social infrastructure, which could help to reduce anti-social behaviour by providing welfare and leisure facilities for young people;</p> <p>An indirect positive effect may occur as some jobs may be provided through the provision of social infrastructure such as healthcare, education, welfare, leisure etc; and</p> <p>An indirect effect of this policy could be the enhancement of biodiversity through the provision of green infrastructure, which would also provide benefits for wildlife in light of climate change by providing migration routes between habitats.</p> <p>No potential minor negative effects or cumulative effects have been identified.</p>

Mitigation measures and recommendations were put forward in the appraisal matrices and these have been considered by the policy authors. The mitigation measures and recommendations put forward by the consultants have been responded to by policy authors and, where relevant, the assessment matrices in Annex D have been amended to reflect the residual effects.

## 6.2 Potential Cumulative Effects

The SEA Regulations require an assessment of cumulative effects. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. The term can also be used to describe synergistic effects, which interact to produce a total effect greater than the sum of the individual effects.

The potential cumulative effects for the different policies within the plan have been identified as part of the appraisal of the individual policies and are recorded within Table 6.1 in this report and in the appraisal matrices within Annex D.

Cumulative impacts associated with options for the locational alternatives are identified within Annex L. These include potential cumulative negative impacts associated with the development of housing in the Somer Valley and rural areas because there could be potential for housing development to put additional strain on existing facilities and services, without mitigation. Similar concerns were recorded in association with the higher growth level (approximately 16,000 homes 12,700 homes (option 2) plus 3200 homes on greenfield land) assessed as a part of that exercise.

Previously, the SA for Policy DW1 District Strategy stated that the effects against SA Objectives 12, 13 and 14 (relating to landscape, ecology and cultural heritage) was uncertain because it depends on the detailed location of the new development. The potential for cumulative effects associated within these issues was therefore also unknown. Further studies have now been completed and have informed the assessment in Annex O. These studies include the AONB Landscape and Visual Impact Assessment, the Green Belt review, the World Heritage Site Landscape and Visual Impact Assessment, the Preliminary Ecological Surveys and Assessment, Weston Bat Survey and Preliminary and Arboricultural Assessment. These studies informed the site specific appraisals (Annex O) and helped site selection to avoid areas with significant harm without mitigations. They have also been used to inform the Placemaking Principles for the site allocation policies.

No potential cumulative effects have been identified with the final version of policy DW1. However, this does not mean that potential cumulative effects of the development sites will not need to be considered through the Development Management Process. Such potential effects will also be considered as a part of the development of the Placemaking Plan DPD which will include more detailed policies for the allocation sites.

The Council had proposed a change to make a fifth strategic housing allocation requiring land to be removed from the Green Belt at Weston, Bath and this was appraised as a part of the SA of the proposed changes to the submitted Core Strategy in November 2013. Following the submission of additional assessments the Inspector has not recommended that this be taken forward as a modification to the submitted plan as the exceptional circumstances necessary to change Green Belt boundaries and to justify major development in an Area of Outstanding Natural Beauty are not met in that location for the scale of development proposed. The rejection of the Weston Green Belt Allocation as an option reduces the risk of cumulative negative effects on Bath, with regards to 'SA Objective 12:

Protect and enhance local distinctiveness’, ‘SA Objective 13: Protect and enhance the district’s historic, environmental and cultural assets’ and ‘SA Objective 15: Reduce land, water, air, light, noise pollution’. The rejection of the Weston site results in a lesser contribution to housing delivery and therefore the achievement of ‘SA Objective 3: Meet identified needs for sufficient, high quality and affordable housing’, however, the overall contributions of the rest of the District Strategy are still considered to result in a major positive with regards to this SA Objective in the appraisal of the adopted Policy DW1 (see Annex D for further details of the appraisal).

A separate cumulative effects assessment has been undertaken following the assessment of the individual policies. The cumulative effects assessment has considered potential cumulative effects of other programmes, plans, policies and projects with the effects of the Core Strategy for B&NES and the cumulative effects of different policies within the plan.

The programmes, plans, policies and projects have been identified on the basis of forthcoming activities / development which would occur within the plan period to 2029 and relate only to published plans or related documents (such as options consultation documents).

The cumulative assessment with the other plans, policies and projects is presented in Table H.1 of the separate Annex H and the key findings are summarised in Table 6.2.

Potential negative cumulative effects have been identified in relation to air quality and traffic as a result of the Bristol Core Strategy.

In addition, uncertain cumulative effects have been identified in relation to the following plans:

- North Somerset Core Strategy; and
- West of England Joint Waste Core Strategy.

### **6.3 Residual Effects**

The mitigation measures and recommendations put forward by the consultants have been responded to by policy authors and, where relevant, the assessment matrices within Annex D have been amended to reflect the residual effects. The summaries at the end of each assessment matrix include comments regarding the differences that mitigation and recommendations have made to the performance of policies assessed.

Table 6.2 presents the potential residual cumulative effects of the Core Strategy which have not been directly addressed by revisions to the Core Strategy.

Indicators for monitoring these potential residual effects are proposed in Section 7.

<b>Table 6.2: Cumulative Effects of the Core Strategy and other relevant Plans and Programmes</b>				
<b>Policy or Strategy of the Core Strategy</b>	<b>Potential cumulative effects</b>	<b>Reasoning</b>	<b>Suggested mitigation</b>	<b>Response from policy authors</b>
West of England Joint Waste Core Strategy	Uncertain potential for negative cumulative effects on air quality and traffic.	<p>This potential effect would be in combination with the B&amp;NES Core Strategy, particularly Policies BA1, B3A, KE1 and KE3A in relation to allocated residual waste management site at:</p> <ul style="list-style-type: none"> <li>• BA19 Broadmead Lane, Keynsham; and</li> <li>• BA12 Former Fuller's Earth Works, Fosseway, Bath.</li> </ul> <p>The potential technology to be used at these sites would be determined by a private planning application.</p>	Any planning applications for residual waste treatment facilities would be subject to Environmental Impact Assessment which would include the consideration of cumulative effects. This effect is very uncertain. No further mitigation can be suggested in this instance which would reduce the uncertainty.	No response required.
North Somerset Core Strategy	<p>The potential for a negative cumulative effect in relation to the B&amp;NES Core Strategy is uncertain.</p> <p>A potential positive cumulative effect is identified.</p>	<p>The expansion of Bristol Airport could potentially increase traffic movements across B&amp;NES, if increased flights are proposed. However, the potential for a negative effect with regards to traffic is uncertain as it is not clear whether increases in traffic on certain roads within B&amp;NES is likely.</p> <p>A potential positive cumulative effect could occur in relation to the promotion of</p>	There is no mitigation that can be put forward to reduce the uncertainty of whether a cumulative effect could occur and it is not within the remit of the B&NES Core Strategy to address potential effects of traffic associated with Bristol Airport.	No response required.

		local businesses. The expansion of Bristol airport could support high value businesses in combination with improvements to office space within the B&NES District.		
Bristol Core Strategy	Potential negative cumulative effect on air quality and traffic congestion	There is a focus of new housing development in south Bristol. This could potentially increase traffic commuting into Bath from Bristol which could potentially lead to a negative cumulative effect on air quality and traffic congestion affecting Bath and Keynsham.	The Bath Package would mitigate for cumulative effects with regards to air quality and traffic in Bath.  The Greater Bristol Bus Network will link Bristol, Bath, Keynsham, Midsomer Norton and Radstock with showcase bus corridors. The Greater Bristol Bus Network would mitigate for cumulative effects in Keynsham by improving the bus services between Bristol, Keynsham and Bath.	No response required.
West of England Joint Transport Plan	A potential positive cumulative effect could occur because the purpose of the JLTP is to support development in Bath	A potential positive cumulative effect could occur because the development of a high quality public transport network could support development in the three main settlements in Bath and North East Somerset and support travel between them in a sustainable way.	None required.	No response required.

## 7 Monitoring

### 7.1 Introduction

*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 (1) 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 (2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with 17(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 remedial action where necessary.

The monitoring undertaken on the Core Strategy 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 including any unforeseen effects; and
- Provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

The requirements of the SEA Regulations focus on monitoring the environmental effects of the plan. This equates to the plan's potential and identified significant effects so that any unforeseen or unintended effects can be identified quickly. It may be difficult to implement monitoring mechanisms for unforeseen effects, or to attribute such effects to the implementation of the Core Strategy 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 Annex I).

The Good Practice Guide on Local Development Frameworks advises that the monitoring of significant sustainability effects should be integrated with other monitoring of Local Development Frameworks. For this reason, B&NES Council will report significant sustainability effects in future regular Local Plan reporting. The significant sustainability effects indicators have been drawn from the indicators in the baseline data of this SA (contextual indicators). The indicators aim to:

- Focus on the key sustainability issues identified in the appraisal;
- Provide information to identify when problems, including unforeseen ones, arise; and
- Contribute to addressing deficiencies in data availability identified in this appraisal.

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 Core Strategy, or for further policy guidance to be developed (for example an SPD).

The residual effects of the Core Strategy are set out in tables 6.1 and 6.2. These are largely predicted to be positive. However, uncertain effects have been identified in relation to the following and, because the effects are uncertain, they should be treated as potentially significant:

- Uncertain cumulative effects on traffic and air quality in association with the North Somerset Core Strategy (Bristol Airport expansion), the West of England Joint Waste Core Strategy and the Bristol Core Strategy;
- Uncertain effects of the flood management scheme proposed for development sites in Bath. This is because it will be necessary to develop the design of the proposed flood defence scheme prior to submission of a planning application and Flood Defence Consent application;
- Uncertain effects on SA Objectives 12 (local distinctiveness), 13 (historic and cultural heritage) and 15 (pollution) are identified in relation to Policy B3A, B3C, KE3, KE3B and RA5 because the masterplanning process is being relied upon to avoid potential negative effects;
- Uncertain effects regards to 'SA Objective 15 Reduce land, water, air, light, noise pollution' in relation to Policy KE4 because the masterplanning process is being relied upon to avoid potential negative effects;
- Policy CP6 uncertain effects the major positive effects relating to SA Objective 13 (historic and cultural heritage) because the policy allows for developments which mitigate and adapt to the impacts of climate change as long as the benefit outweighs any harm to the significance of the heritage asset.

Table 7.1 set outs the proposed significant effects monitoring programme. It is important that the indicators suggested are compatible as far as possible with those used by B&NES. Table 7.1 and Table I.1 in Annex I identify the proposed source of indicators.

**Table 7.1: Proposed Monitoring Programme – Significant Effects Indicators**

Potential issue	Proposed indicators	Published targets	Source of data	Frequency of reporting
Potential negative effects of the housing allocation sites with regards to heritage and culture, pollution and local distinctiveness	<p>Potential effects (as appropriate – see Table 6.1 and Annex D) in relation to:</p> <ul style="list-style-type: none"> <li>SA Objective 12 Protect and enhance local distinctiveness;</li> <li>SA Objective 13 Protect and enhance the district's historic, environmental and cultural assets; and</li> <li>SA Objective 15 Reduce land, water, air, light, noise pollution.</li> </ul>	See the Placemaking Principles within the site allocation policies. See also the Placemaking Plan DPD.	Environmental Statements (ES) submitted with planning applications on these sites. Planning obligations including any management plans deemed necessary.	Reported in the ES and any management plan reporting required through planning obligations.
Potential negative effects of flood defense schemes in Bath	Potential effects in relation to SA Objective 14: Encourage and protect habitats and biodiversity. (taking account of climate change)	None	Environmental Statements (ES) submitted with Flood Defence Consent application.	Reported in the ES.
Congestion	Average AM peak journey time per mile	Targets included in West of England Local Transport Plan 3.	Local Transport Plan 3 monitoring	Annual
Air quality	Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1.3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm <sub>10</sub> ), sulphur dioxide)	Member States are required to reduce exposure to PM2.5 in urban areas by an average of 20% by 2020 based on 2010 levels. It obliges them to bring exposure levels below 20 micrograms/m <sup>3</sup> by 2015 in these areas. Throughout their territory Member States will need to respect the PM2.5 limit value set at 25.	B&NES	Bi-annual

## 8 Next Steps

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.

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 Core Strategy DPD;
- 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 Core Strategy DPD 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 Core Strategy DPD.

For further information on the timetable with regard to the next steps in the production of the Core Strategy please contact the Planning Policy team on 01225 477548.