



Bath & North East Somerset
Core Strategy

Sustainability Appraisal Report
Annex C: Core Strategy Spatial Options consultation document (2009)
Summary of Sustainability Appraisal Findings

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1.1 Introduction

This Annex presents summary findings of the SA of options presented within the Core Strategy Spatial Options Consultation document (October 2009). 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), which can be found here:

<http://www.bathnes.gov.uk/environmentandplanning/planning/localdevelopmentscheme/Pages/corestrategy.aspx>

1.2 Summary findings

1.2.1 District-Wide Strategy

District Wide Vision and Objectives

The District wide vision reflects local issues and only a small number of gaps have been identified where it is not consistent with the coverage of the SA objectives. The SA team welcome the apparent prioritisation of climate change within the Strategic Objectives.

Protecting habitats and biodiversity is not sufficiently covered within the vision or the Strategic Objectives. It is recommended that Green Infrastructure is referred to within the vision, as key infrastructure required to accommodate development and should also ideally be included within Strategic Objective 2 such as “ensuring a network of green infrastructure is established and enhanced across the district and that biodiversity is enhanced”.

Reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity should be included in Strategic Objective 1. The potential impact of climate change on the economy should also be picked up more clearly within Strategic Objective 1 ‘tackle the causes and effects of climate change’.

Several sub-objectives should be added to or would sit better under ‘Strategic Objective 2: Accommodate development growth requirements in a sustainable way and supported with the necessary infrastructure’. This includes pollution, resources use, waste management and sustainable construction.

Currently there are a number of sub-objectives listed e.g. focus development in locations served by efficient and reliable public transport, which are not linked to Code Policies or the District wide spatial development strategy which perhaps should be.

The vision includes ensuring that residents, visitors and workers can get around the district safely and with ease, but this does not necessarily mean by means other than the private car and this is therefore a potential inconsistency.

Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles.

District Wide Spatial Options

There is not much difference between the two options with regards to many of the SA objectives, however, Option 2, which focuses a little less development on the cities / urban extensions and more in Midsomer Norton and Radstock, Keynsham and the rural areas

should better facilitate regeneration in these towns in order to improve their sustainability and provide more facilities and employment within certain villages.

Encouraging the development of sustainable or local energy sources and energy infrastructure has not been included within the options and nor has water supply. This should be considered as the need for climate change mitigation and adaptation has been identified as a key spatial issue for the district. Therefore as a minimum, reference should be made to the appropriate core policies.

Option 1 performs well for reducing the reliance on car travel due to the sustainable location of new development focusing on the cities and along existing and potential new public transport links. However, it is noted in the Core Strategy options document that major improvements to the strategic transport infrastructure would be required along the A4 corridor for both options. Option 1 may perform better than Option 2 with regard to the provision of larger development sites (SE Bristol urban extension and brownfield land in Bath) which may improve the feasibility of decentralised energy.

Option 2 appears to perform best in maintaining cultural and historical assets as it reduces the pressure to develop Bath which holds great historic value. This option also performs well in supporting rural economies and retaining local distinctiveness. Option 2 presents greater opportunities to provide affordable housing in the rural area and within Keynsham, Midsomer Norton and Radstock.

Various suggestions have been made to improve detail in the options in order to address specific gaps. For example, the Core Policies at present do not identify where specific flood mitigation measures will be needed and as the Flood Management Strategy shows, these will differ depending on the settlement and therefore this should be acknowledged within the District-wide spatial strategy options.

1.2.2 Approach to the Urban Extensions

Please note that this summary has been updated following consultation responses received in relation to the Interim Sustainability Appraisal Report (September 2009)

New Neighbourhood in an urban extension to Bath vision and objectives

Overall, the vision and objectives for the Bath urban extension are consistent with, and cover the majority of the SA objectives. However, a potential conflict has been identified between SA objectives 10 and 11 and the Bath urban extension objective 13 which aims to provide access by a range of transport modes, including the car. Although car access will be provided for within the urban extension, its inclusion within the objective 13 creates a tension with the SA objectives.

A number of recommendations are made as follows:

- Reference should be made to the core policies which are proposing specific standards / design codes / guidance for the urban extensions which deals with sustainable construction.
- Care should be taken to reference how the waste produced in the extension will be managed (provision of some details from the West of England Joint Waste Core Strategy would be useful).
- Other than reference to flooding, resilience to the impacts of climate change are not considered within the vision or objectives. Ensuring that the urban extension buildings,

businesses and infrastructure are adapted to the impacts of climate change could be added to the vision or objectives.

- The objectives would be strengthened through including reference to specific habitats or species, particularly enhancing BAP species and habitats through the development and achieving a net gain in biodiversity.

New Neighbourhood in an urban extension to Bath: Options SWB1 and SWB2

The SWB1 option could provide space for industrial and bulky retail uses relocated from the city centre as part of the spatial strategy for Bath. Option SWNB1 therefore provides good opportunities for contributing to the economic vitality of the city and performs well in relation to public transport accessibility. An air pollution mitigation strategy would be needed for this option, as it could increase traffic on roads where there are existing air quality issues. Option SWB1 is in the vicinity of an area of flood risk, however, development in these areas can be avoided. Option SWB2 is not located within an area of flood risk, although both options would need to provide SUDS.

Option SWB2 would also present opportunities for employment growth to the south of Bath and would provide access to employment in Odd Down and good access to the City Centre by public transport. The Odd Down Park and Ride facility is partially located within the site.

Both options present challenges in terms of landscape impact, some of which will be difficult to mitigate. Both options could affect the distinctiveness of nearby villages, such as South Stoke and Newton St Loe. Option SWB1 would have a major landscape impact as the location is highly visually prominent and would have a negative impact on the integrity of the setting of the Bath World Heritage Site. Option SWB2 may present landscape and visual effects which can be more effectively mitigated.

Both options present challenges for community cohesion between existing and new communities. Option SWB1 may present the most challenging physical circumstances due to the separation of the site from the existing community and facilities of Twerton by the steep-sided Newton Brook valley.

Neither of the options detail the type of services and facilities that would be provided within each extension and whether these might differ and therefore there is uncertainty over whether each option could provide facilities for neighbouring areas or whether they would share any existing facilities. This could have an impact on community cohesion as well as access to services and facilities.

Both options have potential for negative effects on biodiversity. All sites are Greenfield and could result in the loss of habitats. Option SWB2 (and possibly also SWB1) has the potential to affect bats which are highly protected. The HRA screening assessment has identified the potential for effects on Natura sites with relation to each of the options considered. Further work will be carried out as part of the next stage of the HRA to examine the potential for these impacts in more detail and to identify appropriate mitigation strategies. Option SWB1 would have a significant effect on the green belt and could affect habitats of the River Avon. Both options have the potential to provide access to natural green space and contribute to green infrastructure.

The options are similar in their potential to promote walking and cycling. Option SWB2 appears to present the easiest walking and cycling topography on the site due to the flat topography but a steep descent into the town centre could discourage walking and cycling into the city. Option SWB1 could be well served by public transport into the city centre, and

via walking and cycling along the river corridor but its topography could discourage walking and cycling to access local facilities.

Supply of water is mentioned in the text relating to Option SWB2 but is not dealt with as clearly within Option SWB1. Option SWB presents opportunities to put in place a sustainable plan for waste management and energy generation across the whole urban extension in conjunction with a proposed strategic residual waste management facility.

New Neighbourhood at South East Bristol vision and objectives

A number of gaps have been identified within the vision and spatial objectives as follows:

Addressing community cohesion in the Whitchurch area, particularly in relation to impacts on the existing communities, should be given more consideration, especially in the vision and objectives.

Impacts on other elements of the environment, such as air quality and soils should ideally be mentioned within the spatial objectives.

There is some uncertainty relating to transport (objectives 10 and 11) because the South East Bristol transport package is still under development and it is therefore difficult to understand how travel will be managed for an urban extension.

New Neighbourhood at South East Bristol: options

The urban extensions to the South East of Bristol would benefit from access to new and proposed facilities within south Bristol, such as the proposed new hospital at Hengrove and new academy (secondary) school in Brislington. However, access from the Whitchurch area is dependent on securing a good public transport service into these areas and the city centre. Access to facilities in Keynsham from the Whitchurch may cause considerable impact on the village of Queen Charlton.

The Hicks Gate area has good access to Bristol facilities and services due to good public transport accessibility however, the site is located near to peripheral land uses such as the Park and Ride and a retail park at Brislington. However, an urban extension at Hicks Gate could provide an 'anchor' for some of the surrounding peripheral land uses and create a sense of community in this area.

Both potential urban extensions could potentially provide a range of facilities and services although the Hicks Gate site would need to be developed comprehensively with land in the Bristol City administrative area in order to provide sufficient capacity.

Development at the Whitchurch location could increase traffic on the A37 which is already congested and the new residents could be affected by the existing congestion issues. There is uncertainty over the impact on noise and air quality from transport that could be associated with an urban extension at Whitchurch as the option is reliant on the South East Bristol transport package, which is still under development.

Both options would have the potential to deliver affordable housing.

Both options have the potential to contribute to the economy of Bristol. Stockwood, the area adjacent the Whitchurch in Bristol experiences out-commuting for employment and has a low level of jobs by ward and it is therefore important that new employment is provided in the urban extension to prevent increasing this problem. The market for commercial space in the Whitchurch area needs to be investigated as the potential to provide certain types of jobs may be limited.

The Hicks Gate option could provide employment development, which could help to reduce the distances travelled by Keynsham residents for work.

The Whitchurch location could potentially result in the loss of Skylark habitat (priority species and Section 41 species). There are some nature conservation features within the Hicks Gate area, including a SNCI bordering the site and potentially important hedgerows on the site. An urban extension at Hicks Gate could improve the management of the SNCI.

The Whitchurch urban extension options would have impacts on the setting of Grade II* Lyons Court Farm and the medieval field pattern at the edge of Whitchurch.

Development of the Hicks Gate option would reduce the gap between Keynsham and Bristol and compromise the greenbelt function that the area is currently providing. According to consultation responses, no significant archaeological potential has so far been identified at the Hicks Gate site. Listed Buildings and registered Park and Gardens on the site have the potential to form a key part of a green infrastructure network and the overall context of an urban extension, ensuring their integration and protection.

The Whitchurch option has the potential to impact the setting of the scheduled ancient monument Maes Knoll and the Chew Valley skyline, however, development proposals have been pulled back and reduced in scale in order to avoid areas with potential for these impacts. An urban extension here would significantly affect the distinctiveness of Whitchurch village as a separate settlement. Some land parcels considered for development in the Whitchurch area could disrupt the green link and visual separation of Whitchurch and surrounding settlements.

How the Whitchurch extension will be supplied with water and energy should be addressed. No specific mention is given to how the Urban extension will deliver a “zero-carbon development” apart to references to Code levels and how this will relate to the existing settlement of Whitchurch. Will any existing buildings be connected to a CHP network? Will existing buildings be retrofitted with energy efficient and renewable energy technologies in order to bring benefit to existing residents? If Whitchurch is to be integrated within the urban extension a target should be set for carbon emissions from existing buildings and activities such as transport and the extension should be considered comprehensively.

Factors common to all of the urban extension options

All of the urban extension options would result in the development of Greenfield land and the loss of soil resources. They would all need to be designed with an integrated multifunctional green infrastructure network, which provide SUDS / surface water infiltration / rainwater interception, habitats and recreation functions.

Large scale developments such as urban extensions offer significant benefits over smaller scale developments in respect of local energy sources and district energy infrastructure, and as such offer greater sustainability benefits in this respect.

Another benefit of urban extensions is that they allow a comprehensive community to be created, which is well planned and with adequate infrastructure. When designed and planned well, urban extensions can provide benefits to surrounding neighbourhoods. A challenge to successful urban extensions is achieving cohesion between existing and new communities.

1.2.3 Bath

Bath Vision and Objectives

The vision is specific to Bath and has been developed from the issues identified. A number of comments and recommendations are made relating to the vision and objectives for Bath as follows:

- The main gap within the vision and objectives are in relation to sustainable consumption. The vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. greater emphasis should be given to generating more energy used within the city from low carbon and renewable sources. An additional objective could be added (or text added to objective 11) which covers minimising resource use and ensuring sustainable, secure design.
- Risks of climate change should ideally be added to the first paragraph in the vision where 'harnessing the need to change' is referred to. Objective 14 should ideally be strengthened, in order to recognise other factors which lead to flood risk within Bath (such as sewers), the need for flood resilient design and the need for infrastructure to offset loss of floodplain capacity from development in the city (according to the Flood Risk Management Strategy Scoping Study, Capita Symonds, May 2009). Vulnerability to flood risk will be a key issue for Bath city centre with the onset of climate change.
- The Vision would benefit from inclusion of reducing the impact of transport on the environment and people and reducing light pollution within the city.
- In objective 13, reference should be made to the areas of particular importance for habitats, protected species and biodiversity and issues of climate change impact upon biodiversity.
- It may be appropriate to specifically reference local markets within strategic objective 5.
- Care needs to be taken to ensure that the objectives address the full range of health issues especially health inequalities and linking the provision of leisure and recreation facilities to the promotion of healthy lifestyles.
- Community cohesion and integration with regard to the urban extension has not been addressed within the vision and objectives, here, for the whole of Bath, and in the vision and objectives specific to the urban extension.
- It may be worth making specific reference to Key Worker Accommodation in relation to housing provision where relevant.
- It is important to consider equitable access to employment both paid and unpaid rather than just focusing on wealth generation.

Bath Spatial Options

The appraisal has not found a vast degree of difference between options A and B, however the minimum concentration options (1b and 2b) have been identified as having potential benefit in terms of placing more employment and retail within the new urban extension which should improve it's sustainability, reducing the need for HGVs to travel into the centre by locating bulky retail uses outside of the centre and potentially increasing local access to employment uses in areas other than the centre.

A number of recommendations have been made within the matrix. These include:

- The high level principles and conceptual response for the central area should include an additional bullet: “Include flood risk mitigation measures in accordance with the Flood Risk Mitigation Strategy”.
- As a minimum reference should be made to the appropriate core policies which deal with sustainable construction and energy.
- The green infrastructure network should be referred to with regard to the potential location of development and how new development might be able to contribute to the green infrastructure network within the city. The green Infrastructure network and strategy is currently under development.
- Care will be needed not to increase light pollution, particularly in the river corridor area and it would be advisable to mention avoiding light pollution within any design principles for Bath.
- There is no mention of reducing the need/desire to travel by car within the options. The travel strategy for Bath should be mentioned.
- Reference could be made to providing more learning opportunities within Bath and how school places will be delivered to new school-age population, including new residents of the urban extension.

1.2.4 Keynsham

Keynsham Vision and Objectives

The vision and objectives have good coverage of the SA Objectives, although a number of gaps have been identified. Recommendations have been made in relation to some gaps, however, others are considered to be dealt with sufficiently within the District-wide vision and objectives or the reader is referred to comments made in relation to the appraisal of the District-wide vision and objectives. The recommendations are:

- As flood risk is an important issue within the town it should be mentioned within the vision and/or objectives.
- The vision and objectives could be strengthened to include access to good education facilities, particularly as secondary school provision is being reviewed.
- Ensuring the community is safe should be included in the vision and/or objectives.

Keynsham Spatial Options

The key differences between the options 1 and 2 are the more intensive use of the strategic site in Option 2 and for mixed use instead of office led regeneration. Option 2 would provide a higher number of new homes (1,600) which it is proposed will bring with it more developer contributions to be used to improve the public realm in the High Street and thus boost the regeneration of the retail sector in the High Street.

Options 1 and 2 perform similarly on a number of aspects but the greater number of homes proposed in the strategic site may make low carbon / renewable energy technologies more viable and potentially a higher standard of sustainable construction although numbers of new housing are relatively low and therefore economies of scale may not be as possible as they would be in an urban extension, for example.

Option 2 also uses more Greenfield land for development and therefore provides less access to green space than option 1 and may present increased flood risk as it will reduce green space which provides a water attenuation function. It should be demonstrated that the options, particularly Option 2, will provide sufficient accessible green space for all. Green infrastructure should be included within spatial plans for the town.

As option 2 could involve more development of green space at the Somerdale factory site (which will be providing a water attenuation function), this option performs less well than option 1 in terms of flood risk. In order for the Core Strategy to be robust, the suitability for land within the Somerdale site for development should be determined, particularly if Option 2 is taken forward as a preferred option.

The development planned in Keynsham presents a key opportunity to reduce the town's carbon footprint and a strategy for this e.g. including specific targets for sustainable construction or particular projects, such as food production, should be considered at this stage.

1.2.5 Midsomer Norton and Radstock

Midsomer Norton and Radstock Vision and Objectives

The spatial vision has been further developed and is now more future focused and discusses both how the area will retain its identity and role but also how it will develop its future identity and role. The vision now addresses issues such as a step change in jobs, regeneration, becoming a more self contained hub, having a rich natural environment and the vision now states that the area will be a centre for sustainable energy.

The objectives have also been strengthened with the addition of a new objective on local employment opportunities, strengthened objectives on wider economic benefits and low carbon business opportunities (objective 1), further consideration of reducing out-commuting (objective 5), building on the identities of town centres (objective 3) and meeting housing needs in order to strengthen communities. Two areas of weakness have been identified in the objectives. The first is the removal of the following from the housing objective: "by providing an appropriate mix of dwellings in sustainable locations". It would be useful if the concept of sustainable housing were re-instated to the objectives. The second is the fact that the vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

Midsomer Norton and Radstock Spatial Options

Option 1 performs better in some of the environmental criteria because the general level of development in Option 1 is lower (1000 houses and 1050 jobs compared to 1700 houses and 1900 jobs for Option 2) and more likely to occur on previously developed land. This means that significant Greenfield land is less likely to be required and fewer natural resources are needed to service new development. Option 1 is also less likely to cause out commuting. However, both options will maintain the separation between settlements and local settings and identifies and the effect of both options on most of the key environmental criteria will depend on how the core policies of the LDF are applied.

Option 2 performs better than Option 1 in many of the social criteria as many of the regeneration objectives and highlighted projects (such as the Midsomer Norton town park) need funding from private development to guarantee their success. Option 1 consists mainly of development that is already in the pipeline (has planning permission or is allocated in the Local Plan) so is unlikely to bring any new developer funding. Because of the quantum of development, Option 1 will also contribute less to the provision of affordable houses and health/education services.

Option 2 performs better economically as it will provide for more jobs and will also provide different types of employment sites from town centre office development, mixed use development and business park development uses. It will help the area be more self sustaining than Option 1 and will therefore need to include more sustainable transport measures to work. However, the risk of out-commuting is higher with Option 2.

Some issues that require consideration as the preferred option is further developed are:

- As the policy develops it will be important to set out what additional healthcare facilities might be needed in the town under the preferred option.
- Access to learning is a major issue in Midsomer Norton and Radstock and therefore should appear more prominently in the preferred options document. It is discussed in the spatial options document but not in a detailed way.
- It is unclear where the difference in 850 jobs comes from (between options 1 and 2) and a more detailed breakdown will be needed in the preferred options document.
- The preferred option should address the vulnerability of the areas' economies to climate change.
- The preferred option needs to be clearer about the infrastructure that will be developed to support development.
- The amount of detail and the coverage of the sections on the strategic sites need to be consistent. Radstock, for instance addresses green corridors, quality design and energy issues and Midsomer Norton does not. Energy issues, in particular are key aspects of the strategic sites that needs development.
- None of the options include mitigation for pollution and this should be included as the strategy progresses.
- It is currently unclear whether flood issues would stop development of housing on strategic sites in Midsomer Norton and Radstock and the preferred options paper needs to address this issue.

1.2.6 Rural Areas

Rural Areas Vision and Objectives

The options presented in the rural areas section deal with a diverse number of issues and the options are not mutually exclusive as in other policy areas.

The spatial vision has been further developed although there have been few significant changes. The main changes are the removal of the specific reference to the Cotswold's and Mendips AONBs. The addition of a reference to healthier lifestyles and the addition of references to functional networks of priority habitats that are more resilient to climate change.

The objectives have also been strengthened with the addition of a two new objectives on protecting and enhancing the natural environment and increasing availability of local produce and materials. Other issues have also been strengthened in the objectives including the consideration of easy, safe and affordable access to services, the provision of high quality public transport that is accessible and improved walking and cycling routes. Only one area of weakness has been identified and this is the fact that the vision and objectives do not deal with sustainable construction and resource consumption (water, energy, waste, materials) which, given the overarching objectives of the plan, should be integrated into all of the objectives for each local area within the plan. An additional objective could be added which covers minimising resource use and ensuring sustainable, secure design.

Rural Areas Policy Options

The options presented in the rural areas section deal with a diverse number of issues and the options are not mutually exclusive as in other policy areas. Policy Issue Rural A has three options – selecting a select number of policy C settlements (option 1), selecting a longer list of policy C settlements (option 2) and there is also the option of whether to include settlements which are in the Green Belt. Policy Option 1 would be positive in many ways because it would enable services and facilities to be developed in key settlements and the quantum of development likely would make these services (and public transport services) more viable. However, those villages which are remote from this select list would have more difficulty accessing rural services. Option 2 would mean more villages have access to a policy C settlement but the levels of development in this more dispersed pattern may mean none of these services are actually viable. This is made more difficult if the green belt settlements are removed as the majority of the district is green belt. More work is needed on the location and likely scale of development in the green belt before deciding development is unsuitable.

Policy Issue Rural B discusses a rural affordable housing exceptions policy. This policy could be positive in those villages where there is an acute affordability problem. However, the policy could result in development in unsustainable locations. Rural exception sites should be used in conjunction with other policy instruments which tackle affordability more widely.

Policy Issue Rural C addresses rural diversification and would lead to stronger, more cohesive communities through sense of ownership and improved use of current rural facilities. Under option C, all of the elements mentioned in the list in the spatial options document should be included in the policy.

1.2.7 Core Policies

There has been significant development of the Core Policies since the last feedback in 2008. Many of the comments made by the SA team have been taken on board including better references to community participation, cohesion and health, reducing crime, access to services, availability of local produce, local distinctiveness, sustainable construction and supply of renewable energy. In general the core policies do address the important issues and when fully developed should lead to a comprehensive set of policies. However, there are some areas that need development and some of these are discussed below:

Affordable housing proposed policy approach: A number of options are proposed and these should be developed based on evidence and should be tailored to the very different areas in

the district. The strategic viability assessments will be used to develop these policies so the policies that are developed are likely to be based on evidence and be as tailored as possible. However, it is not clear at the moment what the difference between the two rural policy options is and this should be clarified.

Prosperous economy proposed policy approach: It would be useful if the policy as it is developed is more specific about the growth sectors in the district and how it will specifically assist development in these sectors.

Sustainable construction proposed policy approach: It would be useful if wider issues of sustainable construction are included for non residential development – for example BREEAM targets. It would also be useful if comprehensive sustainable design and construction requirements for all major development were set out in a SPD in the form of essential and preferred targets for each type of development. This could include wider issues of resource use. It would also be useful if development thresholds were discussed. In the table would “all other proposals” refer to developments over 10 dwellings / 1000m²? It’s not clear from the policy.

Renewable energy proposed policy approach: Some clarity is required concerning the difference between the two columns in the renewables table. It would also be helpful if the units and technologies are defined. At the moment it is unlikely that a member of the public would understand this policy. In addition, it would be useful if the policy addressed the potential for the development of energy infrastructure to affect the integrity of Natura 2000 sites.

Flood risk management proposed policy approach: Consider whether it would be useful to include a flooding policy in light of the recommendations within the PPS25 good practice guide that “Core Strategy LDDs reflect the Council’s strategic planning policies and approach to flood risk.” It would be useful for policy to address other aspects of climate change adaptation and also sustainable drainage systems and the levels of attenuation that developments should attain. This can either be in the flood risk policy or within a sustainable construction policy / SPD.

Safeguarding minerals proposed policy approach: it would be useful if the policy addressed the potential of minerals development to affect the integrity of Natura 2000 sites. At this stage this could be fairly minimal (the addition of ...including the effect on sites designated as Natura 2000 sites to bullet point 3).

The HRA screening assessment has identified the potential for effects on Natura sites with relation to the potential provision of renewable energy infrastructure, flood risk management, safeguarding minerals, waste, gypsies travellers etc., and historic environment. The avoidance of these potential impacts will be addressed in later stages of the HRA. In addition, the HRA has identified the potential for impacts on Natura sites from any major infrastructure provision and accessibility and transport provision which may need further review once details are known. This will be examined in more detail during the next stage of the HRA.