

**SUSTAINABILITY APPRAISAL**

**OF THE**

**BATH AND NORTH EAST SOMERSET**

**GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE**

**SITE ALLOCATIONS**

**DEVELOPMENT PLAN DOCUMENT (DPD)**

**ISSUES AND OPTIONS CONSULTATION PAPER**

**SUSTAINABILITY APPRAISAL REPORT**

**DECEMBER 2011**

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## SEA DIRECTIVE REQUIREMENTS CHECKLIST

To allow for ease of reference the location of specific requirements of the SEA Directive to be found within this report are set out in Table 1, below.

It should be noted that this is the first stage report being produced as an ongoing assessment process of the Site Allocations DPD. Further assessments will be conducted at each stage of the development of the DPD and reports will record how the SEA / SA process should inform each stage of that document.

*Table 1: SEA Directive requirements checklist*

<b>Environmental Report<sup>1</sup> requirements</b>	<b>Section of this report</b>
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Scoping report
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping report / Section 5
(c) the environmental characteristics of areas likely to be significantly affected;	Scoping report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping report
(e) 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;	Scoping report / Section 4
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 5 (and subsequent Final SA Report)
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 5 (and subsequent Final SA Report)

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<sup>1</sup> As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5 (and subsequent Final SA Report)
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Subsequent Final SA Report
(j) a non-technical summary of the information provided under the above headings.	Section 1 (and subsequent Final SA Report)

## **1 Non-Technical Summary**

### **1.1 Introduction**

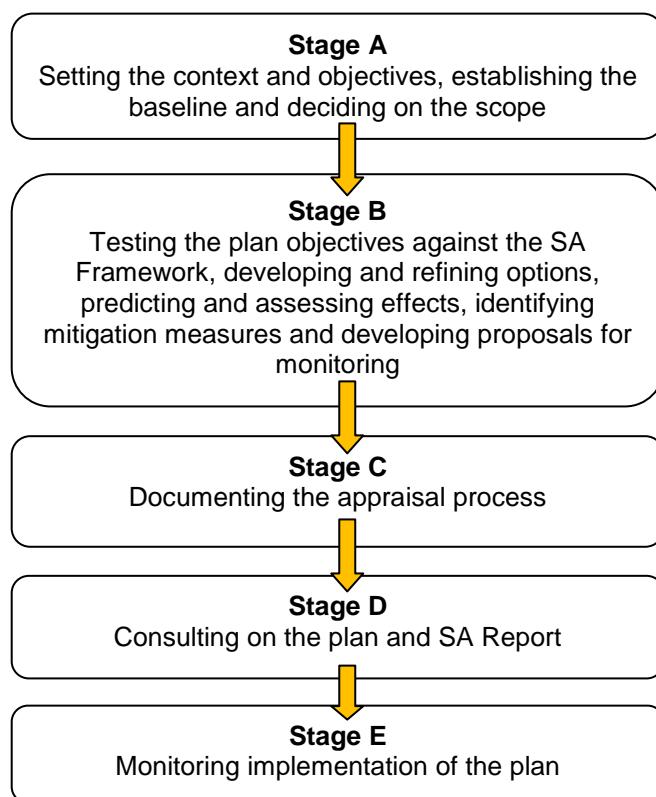
1.1.1 Under the Planning and Compulsory Purchase Act 2004, the Local Development Framework (LDF) for Bath and North East Somerset will replace the existing Local Plan. The LDF acts as a folder of documents that will set the policy and context for development in the district for the period leading up to 2026. Amongst other plans the LDF will contain a number of statutory plans (Development Plan Documents or DPDs), which carry the full weight of the development plan. The Government guidance documents *Planning for Gypsy and Traveller Caravan Sites, Circular 01/2006* and *Planning for Travelling Showpeople, Circular 04/2007* set out the obligation for Local Authorities to allocate sufficient sites for Gypsies, Travellers and Travelling Showpeople in site allocation DPDs. Furthermore the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD must undergo a **Sustainability Appraisal** (see below).

### **1.2 Sustainability Appraisal**

- 1.2.1 SA involves the identification and evaluation of the Strategy's impacts on economic, social and environmental objectives – the three dimensions of sustainable development. The SA process incorporates the requirements of a new European law on the environmental assessment of plans (referred to as the 'Strategic Environmental Assessment Directive').
- 1.2.2 The SA process, incorporating SEA, involves five key stages. These are set out in Figure 1, overleaf.
- 1.2.3 Stage A involved establishing the framework for undertaking the SA, setting a number of sustainable development objectives against which the DPD could be assessed – together with an evidence base to help inform the appraisal. The framework and evidence base are documented in the Bath and North East Somerset Core Strategy

Scoping Report, which has been subject to consultation, and is available on the Council's website. Furthermore, an addendum to that Scoping Report was prepared relating specifically to the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD. This was subject to consultation in 2010. That document and the Council's responses to all consultation responses received are available on the Council's dedicated DPD webpages at [www.bathnes.gov.uk/planningfortravellers](http://www.bathnes.gov.uk/planningfortravellers).

*Figure 1.1: Staged approach to SA*



- 1.2.4 This report, Stage B in the SA process, focuses on the issues and options for developing the draft DPD. Although not a formal requirement of the SEA Directive it has been prepared to help demonstrate that sustainability considerations have been incorporated into the development of the Site Allocations DPD from an early stage, and to provide information for stakeholders as well as an audit trail of the appraisal process. The appraisal findings documented in this report will be taken into account by the Council in the development and

choice of the preferred options that will provide the basis for the Site Allocations DPD.

### **1.3 Issues and Options**

1.3.1 The appraisal of different options in preparing the DPD is one of the central roles of the SA. The SA is used to help inform the decision maker on developing a draft DPD on what trade-offs are required and what the associated environmental, social and economic impacts are likely to be. This information should assist Bath and North East Somerset Council in preparing a plan that finds an optimal balance of economic, environmental and social objectives in delivering its aims.

1.3.2 Sustainability appraisals focus on the consideration of different options. The Issues and Options consultation paper for the Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocations DPD sets out a series of questions based on a number of issues and site selection criteria which have been the subject of this appraisal:

- Issue 1: Site Size
- Issue 2: Site Tenure
- Issue 3: Rural Exception Site
- Issue 4: Mixed Use Sites
- Issue 5: Location of Sites

### **1.4 Conclusions**

6.1 The assessment has given some clear conclusions:

- **Option 3** (Mix of large and small scale sites) of **Issue 1** performs most positively against the SA objectives, having most flexibility and being best able to meet the accommodation needs of all members of the travelling community.

- Individually, none of the 5 options of **Issue 2** perform more positively against the SA objectives. A general recommendation that site tenures be made available according to need and where land availability and ownership permits arose from this issue.
- **Option 1** (Rural Exception Site policy) of **Issue 3** performed most positively against the SA objectives. This option is recommended as being brought forward through the DPD to assist delivery of affordable sites.
- **Options 1** (On-site business use where practical) and **2** (no business use on any sites) of **Issue 4** perform most positively against the SA objectives. The SA however recommends that where mixed-use or business-use sites are considered appropriate, that such use be strictly controlled to mitigate against any negative impacts.
- The SA of **Issue 5** indicated the need to mitigate against any social impacts of site screening. The use of the scoring system in applying the site selection criteria was highlighted as a potential concern due to the use of weightings. The SA determined that this should not be altered, but that preferred sites being brought forward through the next stage of the DPD are subject to rigorous SA.

6.2 Where mitigation or enhancement measures have been identified, these are recommended as being taken forward through future drafts of the main DPD.

## **2 Introduction**

### **2.1 Context**

- 2.1.1 Bath and North East Somerset Council is currently preparing the Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD) as part of the Bath and North East Somerset Local Development Framework (LDF).
- 2.1.2 The Gypsies, Travellers and Travelling Showpeople Site Allocations DPD will be a statutory plan that will provide specific planning policy and guidance. This will provide a framework for the planning of Gypsy, Traveller and Travelling Showpeople accommodation and the selection of appropriate sites, alongside the Council's emerging Core Strategy.
- 2.1.3 The Site Allocations DPD Issues and Options SA Report has been published as part of the public consultation on the main DPD in order to inform the decision making process, and the future selection of preferred options. The final Site Allocations DPD is due for adoption in late 2013.
- 2.1.4 This report outlines the Sustainability Appraisal carried out by Bath and North East Somerset Council Officers, as peer reviewed by ENVIRON for the Issues and Options consultation paper.

### **2.2 Aims of the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD**

- 2.3.1 Bath and North East Somerset Council, as part of the Bath and North East Somerset Local Development Framework (LDF), has recently prepared the first stage Issues and Options consultation paper for the development of the Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document. The Site Allocations DPD will form part of the statutory development plan and will assist in the determination of planning applications.

- 2.3.2 The Site Allocations DPD will be a statutory plan that will allocate land for development as Gypsy, Traveller or Travelling Showpeople sites. It may also provide specific planning policy and guidance. This will provide a framework for the planning of Gypsy, Traveller and Travelling Showpeople accommodation and the selection of appropriate sites and will form part of the LDF alongside the Council's emerging Core Strategy, as included in the Council's Local Development Scheme (LDS).
- 2.3.3 The Site Allocations DPD will principally set out proposals identifying a number of sites for Gypsy and Traveller pitches and a Travelling Showpeople yard to meet demand up to 2016. The Site Allocations DPD may also plan for additional need, subject to the collection of further evidence of need beyond that time. The need for accommodation over the period to 2016 is as set down in the West of England Gypsy Traveller Accommodation (and Other Needs) Assessment, which identified a need for 22 permanent pitches in Bath and North East Somerset between 2006 and 2016.
- 2.3.4 The Site Allocations DPD will address the full range of land use and planning issues that need to be taken into account in bringing forward Gypsy, Traveller and Travelling Showpeople sites over the plan period, including how those sites relate to the settled community.

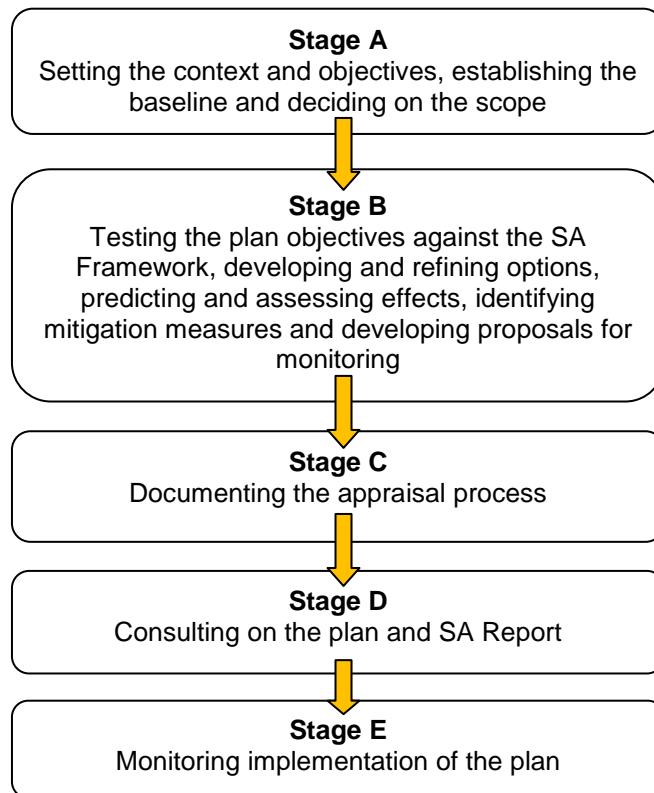
### **2.3 Sustainability Appraisal of the Site Allocations DPD Issues and Options**

- 2.3.1 Under the Planning and Compulsory Purchase Act 2004, each Local Development Document, the main components of a Local Development Framework (LDF), must undergo a Sustainability Appraisal (SA). SA involves identifying and evaluating a plan's impacts on the community, the environment and the economy – the three dimensions of sustainable development. It also recommends approaches to avoiding or reducing negative impacts. The findings of SA are considerations in the development of the Site Allocations DPD

to assist in it achieving its aims and maximising its contribution to future sustainability.

- 2.3.2 The SA process incorporates the requirements of European law, requiring certain plans and programmes to undergo a formal Strategic Environmental Assessment (SEA). SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including many Local Development Documents (LDDs).
- 2.3.3 SA and SEA are thus both statutory requirements. The Government's approach to this dual requirement is to incorporate the requirements of the SEA Directive into a wider SA process which considers economic and social as well as environmental effects. The Government guidance on undertaking SA of LDDs that incorporates the requirements of the SEA Directive<sup>4</sup> ('the Guidance') was published in 2005. The combined SA / SEA process is referred to in the Guidance and in this document as 'Sustainability Appraisal (SA)'.
- 2.3.4 The Guidance advocates a staged approach to undertaking SA (see Figure 2, overleaf).

*Figure 2.1: Staged approach to SA*



2.3.5 Stage A involved establishing the framework for undertaking the SA, setting a number of sustainable development objectives against which the DPD could be assessed – together with an evidence base to help inform the appraisal. The framework and evidence base are documented in the Bath and North East Somerset Core Strategy Scoping Report, which has been subject to consultation, and is available on the Council's website. Furthermore, an addendum to that Scoping Report was prepared relating specifically to the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD. This was subject to consultation in 2010. That document and the Council's responses to all consultation responses and the peer review conducted by ENVIRON is available on the Council's dedicated DPD webpages at [www.bathnes.gov.uk/planningfortravellers](http://www.bathnes.gov.uk/planningfortravellers).

2.3.6 In order to take a more focused approach to the appraisal of the Site Allocations DPD that best reflects its aims, the objectives originally set out in the Sustainability Appraisal Scoping Report were amended following peer review by ENVIRON and Officer discussion. The original

20 Sustainability Appraisal Framework objectives set out in the Core Strategy SA were consolidated to form 11. Those 11 covered the same themes but in a more focused manner.

- 2.3.7 Stage B of the SA process involves the main body of appraisal work. With respect to the Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocations DPD, this involves assessing the five main issues and site selection criteria. The options posed in the SA and the findings of that appraisal will inform the future development of the Site Allocations DPD.
- 2.3.8 This report documents the appraisal of the issues and options proposed by the Council and summarises their potential economic, social and environmental implications. This report, although not a formal requirement, has been prepared both to inform future choices and to help demonstrate that sustainability considerations have been incorporated into the development of the Site Allocations DPD from an early stage. It also serves the purpose of providing information to stakeholders as well as an audit trail of the appraisal process. The appraisal findings documented in this report will be taken into account by the Council in the development and choice of the preferred options that will provide the basis for the final Site Allocations DPD.

## **2.4 What Happens Next?**

- 2.4.1 Following the consideration of responses to the Issues and Options consultation paper and Call for Sites, a Preferred Options consultation will be undertaken, addressing potential site allocations. A further SA Report will also accompany that consultation document. The SA of that document will be published for full formal consultation (as required by Regulation 26 of the Town and Country Planning (Local Development) Regulations, 2004).

## **2.5 SA Report Structure**

2.5.1 As a great deal of information is set out in the Scoping Report already published by the Council, this report does not repeat the baseline data nor the plans and programmes relevant to the assessment. Section 4 sets out the appraisal methodology used to assess the Issues and Options paper and Section 5 sets out the results of that appraisal. Section 6 sets out the conclusions arising from the report.

### **3 Appraisal Methodology**

#### **3.1 Introduction**

3.1.1 SA seeks to consider the sustainability of **options**. The Issues and Options consultation paper for the Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocations DPD sets out a series of issues and options:

- Issue 1: Site Size
- Issue 2: Site Tenure
- Issue 3: Rural Exception Site
- Issue 4: Mixed Use Sites
- Issue 5: Location of Sites
- Summary of Criteria and Methodology for Assessing Sites

3.1.2 This stage of the SA process involves assessing the options against the SA framework – essentially the SA objectives (see Appendix A). This reflects the Guidance which states that:

*“The options need to be compared with each other and with the current social, environmental and economic characteristics of the area which is subject to the DPD and the likely future situation without a DPD. In doing so they need to be tested against the SA framework”.*

3.1.3 Options can be described as the range of rational choices open to plan-makers for delivering the plan objectives. In line with the Guidance this report considers the term ‘options’ to be synonymous with the term ‘alternatives’.

3.1.4 The need to consider and appraise options stems partly from the requirements of the SEA Directive:

Under the SEA Directive, plan and programme proponents should ensure that:

*“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described*

*and evaluated” (Article 5(1)) and the Environmental Report should include “an outline of the reasons for selecting the alternatives dealt with” (Annex I(h)).*

- 3.1.5 It is not the SA’s role to determine which options should be chosen as the basis for progressing a document. SA instead provides decision-makers with information to inform decisions alongside other evidence.

### **3.2 Plan Objectives**

- 3.2.1 The guidance on SA sets out 6 stages to completing Stage B. Stage B1 of the guidance is designed to test the DPD objectives against the sustainability appraisal framework. DPD objectives were identified through the Core Strategy Scoping Report but have since been consolidated, taking into account responses received by statutory consultees and the recommendations set out by ENVIRON in their role as Critical Friend. The changes made by the Council to those comments and recommendations are set out in Appendix A.

### **3.3 Appraisal Methodology**

- 3.3.1 The ‘Environmental Report’ required under the SEA Directive should include:

*“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” (Annex 1(h))*

- 3.3.2 The appraisal involved assessing the performance of each option of the issues against each SA objective. The appraisal was a qualitative exercise based on professional judgement on the part of Council Officers taking into account the information gathered in the Scoping Report Addendum (2010, as amended 2011) and the background information set out in the Site Allocations DPD Issues and Options consultation paper. The appraisal of the options was carried out in October 2011.

- 3.3.3 As Government guidance requires Local Authorities to set out a strategy for the provision of suitable accommodation for Gypsies, Travellers and Travelling Showpeople it was not considered appropriate to carry out a ‘No Plan’ situation assessment. The assessment process therefore involved the comparison of the various options set out in the Council’s Site Allocations DPD Issues and Options consultation paper and any further options identified through the assessment process. Table 4.1 in Section 4 provides a summary of the results.
- 3.3.4 The impacts of the options on each objective were defined as having a positive impact, no significant / clear link, an adverse impact, uncertain due to insufficient information or not applicable due to no link. The assessment is based on the criteria included in Table 3.1, below. Where two symbols are used in the scoring of options, this is denoted by the use of */*.

*Table 3.1: Appraisal scoring symbols*

Score Signifier	Likely effect on the SA Objective
<b>+</b>	Positive impact
<b>- / +</b>	No significant effect or no clear link
<b>-</b>	Adverse impact
<b>Uncertain</b>	Uncertain due to insufficient information
<b>Not applicable (or) N/A</b>	No link

- 3.3.5 A summary is included for each set of options beneath each issue’s matrix at Appendix B. Each summary included information on the key issues arising, potential mitigation measures, sources of uncertainty and assumptions in making the assessment. Each also includes any recommendations made for future drafts of the DPD.

## **4 Issues and Options Appraisal Results**

### **4.1 Introduction**

- 4.1.1 This section sets out the key findings from the appraisal of the Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocations DPD Issues and Options consultation paper.
- 4.1.2 The appraisal matrices summary set out at Table 4.1 assists in identifying issues of importance such as; where the burden of negative impacts lie; which options are characterised by a high degree of uncertainty, and which options perform well. It provides an overview of the general performance of the different options against the SA objectives. The detailed appraisal tables set out at Appendix B should be referred to for more information on the background to the appraisal scores and full mitigation and enhancement measures.

### **4.2 Assessment of the Issues and Options Consultation Paper**

- 4.2.1 Each option in turn has been assessed against the SA objectives and its significant potential effects set out and recorded in tables.
- 4.2.2 The assessments identified a number of areas where potential issues may arise and whether those issues may be resolved through the DPD or existing methods, such as the development management system. A number of recommendations have come forward based on the appraisal results. Those recommendations will be taken into account in considering consultation responses to the Issues and Options paper and then how to progress future drafts of the DPD, including the Preferred Options consultation paper.

Table 4.1: Summary of the Significant Effects of the Issues identified within the SA

<b>Issue</b>	<b>Summary of Significant Effects of the Issue (before mitigation)</b>
<b>1. Site Size</b>	<p>Option 3 (mix of large and small scale sites) records no significant negative impacts arising against the SA objectives.</p> <p>Options 1 (all large scale sites) and 2 (all small scale sites) highlight potential negative impacts against objective 3:</p> <ul style="list-style-type: none"> <li>• Would not necessarily meet the needs of those wishing to live in separate family groups.</li> </ul> <p>Option 2 also identifies a potential negative impact against objective 10:</p> <ul style="list-style-type: none"> <li>• Large scale sites are more likely to concentrate pollution-producing activities.</li> </ul> <p>Uncertainty is marked against objectives 1, 2, 4, 5, 7, and 11. This is largely due to these objectives being site-specific issues that are not considered to be altered by site size.</p>
<b>2. Site Tenure</b>	<p>None of the options identified for Issue 2 were found to have any potential significant impacts against the SA objectives. This was largely shown as arising from individual objectives having site / location specific impacts not determined by the form of tenure.</p> <p>Site development and ongoing management are identified as being important in mitigating any environmental impacts arising from the allocation of sites.</p> <p>Objective 3 indicates that each of the options assessed in the appraisal would have no significant positive or negative effect on meeting the affordable accommodation needs of the travelling community. This is due to each option meeting the need for a specific tenure and not the wider needs of the whole community. This objective indicated the need to provide a range of tenures to meet all needs.</p> <p>Uncertainty or the indication that the objective does not apply to that issue is marked against all objectives, except for objective 3. This is due to those objectives being site specific issues that are not considered to be altered by site tenure.</p>

<b>3. Rural Exception Site</b>	<p>Option 1 (Rural Exception Site policy) identifies significant positive impacts against SA objectives 1-4, 7 and 8. These are largely social impacts, including the protection of rural ways of life, access to health facilities and the reduction of social exclusion, though the positive environmental impact of access to sustainable transport options is also highlighted.</p> <p>Option 2 (no Rural Exception Site policy) identifies negative impacts against the SA objectives 1-4 and 7. These largely arise from the removal of the opportunity to develop sites in appropriate locations with access to various services and facilities. It also identifies the following negative impacts:</p> <ul style="list-style-type: none"> <li>• Without the use of a rural exception site policy it may be more difficult to allocate land for sole use as affordable development. (Objective 3)</li> <li>• This would reduce the ability to promote more cohesive communities. (Objective 3)</li> <li>• Without a rural exception site policy it may be more difficult to reduce social exclusion as site allocations may be displaced to less sustainable locations. The failure to provide for affordable only sites may also reduce the long term sustainability of sites and so increase social exclusion. (Objective 4)</li> <li>• The absence of a rural exception site policy may reduce the opportunity for development of sites in locations with access to services and facilities by sustainable transport. (Objective 7)</li> </ul> <p>Option 3 (remove land from the Green Belt) does not identify any negative impacts against the SA objectives. It does not however recognise any positive impacts against the objectives. This option does not therefore indicate any benefit at this stage of assessment.</p> <p>Uncertainty largely arises for this issue against environmental objectives, including 6, 8, 9, 10 and 11. Those objectives are site specific issues that are not considered as being affected by the use of a rural exception site policy to determine site location.</p>
<b>4. Mixed Use Sites</b>	<p>Whilst each of the options have significant levels of uncertainty recorded against most of the SA objectives Option 1 generally performs well, showing no negative effects. Potential positive effects are identified against objectives 4, 5 and 7 which seek to promote stronger communities, access to employment opportunities and sustainable transport. Similar to this, Options 3 and 4 indicate positive effects against objective 4.</p>

	<p>Option 2 records the greatest negative effects against the SA objectives, notably as regards social impacts arising from the restriction of employment opportunities:</p> <ul style="list-style-type: none"> <li>• No business use on any sites is likely to completely restrict economic activities of travelling communities and give rise to social exclusion by antagonising those communities. (Objective 4)</li> <li>• This option would restrict training opportunities. (Objective 5)</li> <li>• Restriction of on-site business use is likely to increase the need to travel by car to a place of employment. (Objective 7)</li> </ul> <p>Conversely, against objectives 8, 10 and 11 this option shows positive impacts resulting from the absence of additional development producing additional flood risk, pollution and visual intrusion on the landscape.</p> <p>The remaining objectives otherwise show no impact against the SA objectives at this stage of understanding of the issues. As shown by the mitigation information set out the , the negative impacts arising from the options may be mitigated through rigorous management practices.</p>
<b>5. Location of Sites</b>	<p>The single negative impact identified from the assessment of the site selection criteria arose from the site screening criterion, against objective 4:</p> <ul style="list-style-type: none"> <li>• The presence of or ability of a site to be screened will assist in protecting environmental and historic assets, but may present additional barriers to social integration.</li> </ul> <p>There is the potential for this impact to be mitigated on a site by site basis.</p> <p>The other significant information arising from the assessment of Issue 5 was the quantitative scoring system which utilises a comparison system that applies a balancing exercise to site selection. The conclusion arising from this assessment was that:</p> <ul style="list-style-type: none"> <li>• As the site selection methodology and criteria are to be used as a comparative measure only and not as a fully decisive methodology for identifying preferred sites it is not considered appropriate to alter the methodology. To ensure the site scoring system achieves a balance of factors all sites should be subject to rigorous assessment against the same sustainability criteria as in the SA Framework objectives.</li> </ul>

## 5 Conclusions

5.1 The assessment has given some clear conclusions:

- **Option 3** (Mix of large and small scale sites) of **Issue 1** performs most positively against the SA objectives, having most flexibility and being best able to meet the accommodation needs of all members of the travelling community.
- Individually, none of the 5 options of **Issue 2** perform more positively against the SA objectives. A general recommendation that site tenures be made available according to need and where land availability and ownership permits arose from this issue.
- **Option 1** (Rural Exception Site policy) of **Issue 3** performed most positively against the SA objectives. This option is recommended as being brought forward through the DPD to assist delivery of affordable sites.
- **Options 1** (On-site business use where practical) and **2** (no business use on any sites) of **Issue 4** perform most positively against the SA objectives. The SA however recommends that where mixed-use or business-use sites are considered appropriate, that such use be strictly controlled to mitigate against any negative impacts.
- The SA of **Issue 5** indicated the need to mitigate against any social impacts of site screening. The use of the scoring system in applying the site selection criteria was highlighted as a potential concern due to the use of weightings. The SA determined that this should not be altered, but that preferred sites being brought forward through the next stage of the DPD are subject to rigorous SA.

5.2 Where mitigation or enhancement measures have been identified, these are recommended as being taken forward through future drafts of the main DPD. These include:

- Individual site development taking account of the specific landscape and townscape context, including local distinctiveness.
- Location specific site sizes should take into account the potential impact on habitats and species, including any improvement works that may be required.
- If a rural exception site policy is taken forward in the DPD its wording should include strong provisions to ensuring accessibility to local services and facilities, as well as access to sustainable transport options.
- Business use should be strictly controlled to take account of the character and appearance of the surrounding area.

## Glossary

Acronym and Title	Explanation
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.
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.
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.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) for the formal strategic assessment of certain plans and programmes which are likely to have significant effects on the environment.

## **APPENDIX A**

### **SUSTAINABILITY APPRAISAL OBJECTIVES**

**Table A** sets out the original objectives included within the Sustainability Appraisal Scoping Report and the changes made to those objectives following the peer review recommendation made by ENVIRON within their review (September 2011) that the objectives be more targeted and relevant to the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD.

Original Objectives	Changes	Integrated Objectives
Ob. 1 Improve accessibility to community facilities and local services	<i>Retained as a separate objective.</i>	<b>Objective 1</b> Improve accessibility to community facilities and local services
Ob. 2 Improve the health and well-being of all communities	<i>Retained as a separate objective.</i>	<b>Objective 2</b> Improve the health and well-being of all communities
Ob. 3 Meet identified needs for sufficient, high quality and affordable housing	<i>Retained as a separate objective.</i>	<b>Objective 3</b> Meet identified needs for sufficient, high quality and affordable housing
Ob. 4 Promote stronger more vibrant and cohesive communities	Objectives 4 and 5 merged and questions integrated as these have similar aims and are more focused for the purposes and scope of the Site Allocations DPD.	<b>Objective 4</b> Promote safer, stronger more vibrant and cohesive communities
Ob. 5 Reduce anti-social behaviour, crime and the fear of crime		
Ob. 6 Improve the availability and provision of training	Objectives 6, 7 and 8 merged with questions integrated to the new objective to cover the full breadth of issues. These were merged as they have similar aims and needed to be	<b>Objective 5</b> Access to business, employment and skills opportunities
Ob. 7 Ensure communities have access to a wide range of employment opportunities, paid or unpaid		

Ob. 8 Enable local businesses to prosper	more focused for the purposes and scope of the Site Allocations DPD.	
Ob. 9 Increase availability of local produce and materials	Objectives 9, 16, 17, 19 and 20 merged. Those objectives covered very similar issues that would not have been useful individually in assessing the Site Allocations DPD which is narrowly focused on a single subject. The merge allows the SA to produce meaningful results.	<b>Objective 6</b> Promoting sustainable construction and efficient use of resources
Ob. 10 Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	Objectives 10 and 11 merged as the aims of these are similar and the use of questions covering both issues ensures the original purpose is not lost.	<b>Objective 7</b> Promoting access to sustainable transport
Ob. 11 Reduce the need and desire to travel by car		
Ob. 12 Protect and enhance local distinctiveness	Objectives 12 and 13 merged. These sought to achieve similar aims which could be effectively balanced in a single objective and by including individual questions relating to the original objectives.	<b>Objective 8</b> Protect and enhance the district's distinct historic, environmental and cultural assets
Ob. 13 Protect and enhance the district's historic, environmental and cultural assets		
Ob. 14 Encourage and protect habitats and biodiversity (taking account of climate change)	<i>Retained as a separate objective</i>	<b>Objective 9</b> Encourage and protect habitats and biodiversity (taking account of climate change)

Ob. 15 Reduce land, water, air, light and noise pollution	<i>Retained as a separate objective.</i>	<b>Objective 10</b> Reduce land, water, air, light and noise pollution
Ob. 16 Encourage sustainable construction	Merged with Objectives 9, 17, 19 and 20 (see original Objective 9).	
Ob. 17 Ensure the development of sustainable and/or local energy sources and energy infrastructure	Merged with Objectives 9, 16, 19 and 20 (see original Objective 9).	
Ob. 18 Reduce vulnerability to, and manage flood risk (taking account of climate change)	<i>Retained as a separate objective.</i>	<b>Objective 11</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)
Ob. 19 Encourage careful and efficient use of natural resources	Merged with Objectives 9, 16, 17 and 20 (see original Objective 9).	
Ob. 20 Promote waste management in accordance with the waste hierarchy (reduce, reuse and recycle)	Merged with Objectives 9, 16, 17 and 19 (see original Objective 9).	

## **APPENDIX B**

### **ISSUES AND OPTIONS**

### **FULL ASSESSMENT MATRICES**

Issue 1: Site Size						
Objective	Detailed Questions: Does the option...	Commentary / Performance	Mitigation	Performance of Objective		
				Option 1: All large scale sites	Option 2: All small scale sites	Option 3: Mix of large and small scale sites
<b>Ob. 1</b> Improve accessibility to community facilities and local services	1. Improve accessibility to community facilities and local services?	Sites have yet to be selected. Each option is not considered to perform differently because access will depend on individual site location(s).	None.	1. Uncertain	1. Uncertain	1. Uncertain
<b>Ob. 2</b> Improve the health and well-being of all communities	1. Improve access to health facilities?	Sites have yet to be selected. Each option is not considered to perform differently because access will depend on individual site location(s).	None.	1. Uncertain	1. Uncertain	1. Uncertain
<b>Ob. 3</b> Meet identified needs for sufficient, high quality and affordable housing	1. Help meet the accommodation needs of all sectors of the travelling community?  2. Help make accommodation affordable for all sectors of the community by allocating sites	Option 3 would give greatest flexibility and over the long term.  Site size does not directly impact on tenure.	Option 3 should be taken forward to allow for flexibility in delivery of accommodation to meet all needs.  None.	- 1. Would not necessarily meet the needs of those wishing to live in separate family groups.  2. Not applicable	- 1. Would not necessarily meet the needs of those wishing to live on larger sites.  2. Not applicable	+ 1. Allows the option of meeting all needs.  2. Not applicable

	for a range of tenures?					
<b>Ob. 4</b> Promote safer, stronger more vibrant and cohesive communities	1. Promote stronger more cohesive communities through provision of authorised sites in sustainable locations?  2. Reduce social exclusion through provision of authorised sites?  3. Reduce crime and fear of crime through allocation of land for provision of authorised sites?	Sites have yet to be selected. Each option is not considered to perform differently because social factors will depend on individual site location(s).	None.	<b>1. Uncertain</b>  <b>2. Uncertain</b>  <b>3. Uncertain</b>	<b>1. Uncertain</b>  <b>2. Uncertain</b>  <b>3. Uncertain</b>	<b>1. Uncertain</b>  <b>2. Uncertain</b>  <b>3. Uncertain</b>
<b>Ob. 5</b> Access to business, employment and skills opportunities	1. Will there be access to educational and training opportunities?  2. Give all sectors of the community access to work	Sites have yet to be selected. Each option is not considered to perform differently because access will depend on individual site location(s).	None.	<b>1. Uncertain</b>  <b>2. Uncertain</b>	<b>1. Uncertain</b>  <b>2. Uncertain</b>	<b>1. Uncertain</b>  <b>2. Uncertain</b>

	opportunities, paid or unpaid?					
<b>Ob. 6</b> Promoting sustainable construction and efficient use of resources	<p>1. Promote development that demonstrates sustainable construction principles?</p> <p>2. Promote waste management and resource efficiency?</p>	<p>Sites have yet to be selected. Site specific issue that cannot be determined at this stage.</p> <p>Waste management and resource efficiency is largely a site specific issue as this will alter the required scale of management and resource requirements. Site location will influence this due to proximity to existing waste facilities or collection at existing residential areas. Thus this objective cannot be determined at this stage but may be influenced by site size.</p>	<p>None.</p> <p>Site development and ongoing site management will be important in promoting waste management and resource efficiency. It is beyond the scope of the DPD to influence ongoing site management. No mitigation is required.</p>	<p><b>1. Uncertain</b></p> <p>+/-</p> <p>2. Large scale sites may reduce the overall level of on-site waste management across all sites and reduce resource use.</p>	<p><b>1. Uncertain</b></p> <p>+/-</p> <p>2. Provision of small scale sites is likely to a greater level of waste management but this is partly dependent on site location. The development of small scale sites may also impede general resource efficiency but this is dependent on site set-up and ongoing management.</p>	<p><b>1. Uncertain</b></p> <p><b>Uncertain</b></p> <p>2. Uncertain as partly dependent on site location and on-site management.</p>
<b>Ob. 7</b> Promoting access to sustainable transport	<p>1. Make public transport, cycling and walking easier and more attractive?</p> <p>2. Reduce the need/desire to</p>	<p>Sites have yet to be selected. Each option is not considered to perform differently because access to / need for transport will depend on individual site location(s).</p>	<p>None.</p>	<p><b>1. Uncertain</b></p> <p><b>2. Uncertain</b></p>	<p><b>1. Uncertain</b></p> <p><b>2. Uncertain</b></p>	<p><b>1. Uncertain</b></p> <p><b>2. Uncertain</b></p>

	travel by car?					
<b>Ob. 8 Protect and enhance the district's distinct historic, environmental and cultural assets</b>	<p>1. Protect and enhance landscape and townscape?</p> <p>2. Value and protect diversity and local distinctiveness including rural ways of life?</p> <p>3. Maintain and enhance cultural and historical assets?</p>	<p>Sites have yet to be selected. Site location(s) and development are key influences on this issue and so effects cannot be determined. Small scale sites are likely to have a reduced visual impact however.</p> <p>This is largely a site location issue though small scale sites are more likely to be able to meet this objective.</p> <p>Cannot be determined at this stage as this is site location specific.</p>	<p>Individual sites will have to take account of specific landscape and townscape context in development. This is considered by the DPD site assessment criteria.</p> <p>Individual site development will require attention to local distinctiveness.</p> <p>None.</p>	<p><b>-/+</b> 1. Large scale sites may be more likely to have a greater visual impact on landscape and townscape though this is partly dependent on site specific location and development.</p> <p><b>-/+ / Uncertain</b> 2. More difficult for large scale sites to value and protect local distinctiveness. Would require closer attention to site development.</p> <p><b>3. Uncertain</b></p>	<p><b>-/+</b> 1. Small scale sites more likely to have reduced visual impact on landscape and townscape though this is partly dependent on site specific location and development.</p> <p><b>-/+ / Uncertain</b> 2. Dependent on site location and development but more likely to value and protect local distinctiveness.</p> <p><b>3. Uncertain</b></p>	<p><b>Uncertain</b> 1. Uncertain as partly dependent on site specific locations and development.</p> <p><b>-/+ / Uncertain</b> 2. Uncertain as dependent on site location and development.</p> <p><b>3. Uncertain</b></p>
<b>Ob. 9 Encourage and protect habitats and biodiversity</b>	1. Protect and enhance habitats and species (taking account of climate)	Sites have yet to be selected. This is largely a location specific issue of which the impact cannot be determined at this	Location specific site sizes should take into account the potential impact on habitats and species,	<p><b>-/+ / Uncertain</b> 1. Large scale sites may reduce overall level of habitat</p>	<p><b>-/+ / Uncertain</b> 1. Small scale sites may increase the number of</p>	<p><b>-/+ / Uncertain</b> 1. Mix of site sizes may allow greater scope for sites to be</p>

(taking account of climate change)	change)?	stage.	including any improvement works. This will be done through the Habitats Regulation Assessment process.	disturbance but have greater impact on specific locations.	habitats and species impacted on by site development. Small scale sites may also allow for better habitat management.	located where the least harmful / most beneficial impacts may arise from site development. This is largely to be determined by site location(s).
<b>Ob. 10</b> Reduce land, water, air, light and noise pollution	1. Minimise land, water, air, light and noise pollution?	Though this is partly a site location and management specific issue it is likely that the occupation of large scale site sizes will concentrate pollution-producing activities.	Site specific management should aim to reduce pollution of all types. This is beyond the scope of the DPD but will be managed on a site by site basis through the development management system.	- 1. Large scale sites are more likely to concentrate pollution-producing activities due to occupation in single location(s).	+ 1. Small scale sites are more likely to disperse pollution-producing activities due to greater number of sites.	-/+ 1. A mix of site sizes will disperse pollution-producing activities across a number of sites.
<b>Ob. 11</b> Reduce vulnerability to, and manage flood risk (taking account of climate change)	1. Reduce vulnerability to, and manage flood risk (taking account of climate change)?	Sites have yet to be selected. This is a location specific issue of which the impact cannot be determined at this stage.	None. Flood risk is considered within the DPD site assessment criteria.	1. <b>Uncertain</b>	1. <b>Uncertain</b>	1. <b>Uncertain</b>

<b>Issue 1</b> <b>Commentary</b>	<p>The appraisal has identified a number of locational issues such as impact on landscape and townscape, habitats and biodiversity, pollution and flood risk which need to be considered in the selection of sites to be allocated in the next stage of the preparation of the DPD. The mitigation measures identified for site size are as below:</p> <ul style="list-style-type: none"> <li>• Option 3 should be taken forward to allow for flexibility in delivery of accommodation to meet all needs.</li> <li>• Individual sites will have to take account of specific landscape and townscape context in development. This is considered by the DPD site assessment criteria. (Options 1 and 2)</li> <li>• Individual site development will require attention to local distinctiveness. (Options 1, 2 and 3)</li> <li>• Location specific site sizes should take into account the potential impact on habitats and species, including any improvement works. This will be done through the Habitats Regulation Assessment process. (Options 1, 2 and 3)</li> <li>• Site specific management should aim to reduce pollution of all types. This is beyond the scope of the DPD but will be managed on a site by site basis through the development management system. (Option 1 and 3)</li> </ul> <p>A number of these issues are already considered by the site assessment criteria.</p> <p>Whilst the impact of site size against many of the framework's objectives is at this stage largely uncertain, what is clear from this assessment is that none of the options perform much better than the others. The effects on most objectives are largely unknown or uncertain because it is predominantly the site location, not the scale of individual sites, which will have an impact with regards to these objectives. Differences in site size will have differing impacts on factors such as landscape and cultural heritage, pollution and the protection of biodiversity, but the full extent of such impacts may only be fully understood once site locations have been identified.</p> <p>Though the overall performance of each option is largely uncertain, the performance of Option 3 indicates the greatest level of flexibility against the objectives. That option shows the following performance:</p> <ul style="list-style-type: none"> <li>• Allows the option of meeting all [accommodation] needs. (Objective 3)</li> <li>• Mix of site sizes may allow greater scope for sites to be located where the least harmful / most beneficial impacts may arise from site development. This is largely to be determined by site location(s). (Objective 9)</li> <li>• A mix of site sizes will disperse pollution-producing activities across a number of sites. (Objective 10)</li> </ul> <p>All impacts noted at this stage are speculative and subject to change where individual sites are brought forward; site management must be effective to ameliorate against potential adverse impacts relating to affordable housing, landscape and heritage assets and pollution. Whilst site management is administered by the development management system and thus beyond the scope of the DPD the suggested approach to site size is to explore site capacity and site specific circumstances</p>
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against the SA framework objectives to uncover any specific, significant impacts.

**A general recommendation of this assessment therefore is to take forward Option 3 as the best performing option against the SA objectives.**

Issue 2: Site Tenure								
<b>Objective</b>	<b>Detailed Questions</b>	<b>Commentary / Performance</b>	<b>Mitigation</b>	<b>Performance of Objective</b>				
				Option 1: Privately owned for owner-occupation by single or extended family	Option 2: Privately owned and managed to be rented by Gypsies and Travellers	Option 3: Publicly owned and managed by a Registered Social Landlord or local authorities.	Option 4: Privately co-owned sites (more than one family group)	Option 5: Community Land Trust site(s)
Ob. 1 Improve accessibility to community facilities and local services?	1. Improve accessibility to community facilities and local services?	Site tenure does not impact on access to facilities.	None.	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable
Ob. 2 Improve the health and well-being of all communities	1. Improve access to health facilities?	Sites have yet to be selected. Location specific factor that cannot be determined at this stage. No option is considered to	None.	1. Uncertain	1. Uncertain	1. Uncertain	1. Uncertain	1. Uncertain

		have a different performance.						
Ob. 3 Meet identified needs for sufficient, high quality and affordable housing	1. Help meet the accommodation needs of all sectors of the travelling community?	Each of these options would satisfy the occupation needs of some members of the travelling community, but would not meet the whole range of needs as shown by the evidence base of the DPD.	A combination of the options is recommended to meet individual needs on specific sites as these come forward through the consultation.	-/+ 1. This option would meet the private-rented accommodation needs of the travelling community but would not meet the need for other tenures.	-/+ 1. This option would meet the private-rented accommodation needs of the travelling community but would not meet the need for other tenures.	-/+ 1. This option would meet the public-rented accommodation needs of the travelling community but would not meet the need for other tenures.	-/+ 1. As with Option 1, this would meet the private accommodation needs of the travelling community who are content to co-own sites but would not meet the need for other tenures.	-/+ 1. This option would meet the accommodation needs of the travelling community where they are able to form a CLT or rent pitches on a CLT site, but would not meet the need for other tenures.
	2. Help make accommodation affordable			-/+ 2. This option does not provide for a range	-/+ 2. This option does not provide for a range of	-/+ 2. This option would make specific	-/+ 2. This option does not provide for a range of	-/+ 2. This option does not specify how such a

	for all sectors of the community by allocating sites for a range of tenures?			of tenures and so would not make accommodation affordable for all members of the community. It would however allow those able to provide private pitches to establish accommodation for themselves and thus reduce the need for affordable pitches to be provided.	tenures and so would not make accommodation affordable for all members of the community. It would however allow those able to privately rent pitches to do so, reducing the need for affordable pitches to be provided.	provision for affordable pitches and assist in making accommodation affordable but would not meet all tenure needs by allowing for a range of tenure provision.	tenures and so would not make accommodation affordable for all members of the community. It would however allow those able to co-own sites privately to establish pitches and so reduce the overall level of need for affordable sites to be provided.	site would be managed and thus what tenure need this would meet. The option would assist in providing one form of site provision but does not provide for a range of tenures and so would not meet the objective's requirement to make accommodation affordable for all sectors of the community.
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Ob. 4 Promote safer, stronger more vibrant and cohesive communities	1. Promote stronger more cohesive communities through provision of authorised sites in sustainable locations?	Site tenure is unlikely to affect community cohesion. Factor determined more by site location.	None.	1. <b>Uncertain</b>	1. <b>Uncertain</b>	1. <b>Uncertain</b>	1. <b>Uncertain</b>	1. <b>Uncertain</b>
	2. Reduce social exclusion through provision of authorised sites?	Site tenure should not directly affect social exclusion, which can be influenced by the location and design of sites with respect to existing communities.	None.	2. <b>Uncertain</b>	2. <b>Uncertain</b>	2. <b>Uncertain</b>	2. <b>Uncertain</b>	2. <b>Uncertain</b>
	3. Reduce crime and fear of crime through allocation of land for provision of authorised sites?	Fear of crime and reduction of crime is a site specific management issue that is not determined by site tenure.	None.	3. <b>Uncertain</b>	3. <b>Uncertain</b>	3. <b>Uncertain</b>	3. <b>Uncertain</b>	3. <b>Uncertain</b>

Ob. 5 Access to business, employment and skills opportunities	<p>1. Will there be access to educational and training opportunities?</p> <p>2. Give all sectors of the community access to work opportunities, paid or unpaid?</p>	<p>Site tenure does not impact on access to employment or skills opportunities but is instead a site location issue that cannot be determined at this stage.</p>	None.	<p>1. Not applicable</p> <p>2. Not applicable</p>				
Ob. 6 Promoting sustainable construction and efficient use of resources	<p>1. Promote development that demonstrates sustainable construction principles?</p> <p>2. Promote waste management</p>	<p>Sites have yet to be selected. Site specific issue that cannot be determined at this stage.</p> <p>Waste management and resource efficiency is</p>	<p>None.</p> <p>Site development and ongoing site management will be important in promoting waste management</p>	<p>1. Not applicable</p> <p>2. Not applicable</p>				

	t and resource efficiency?	largely a site specific issue as this will alter the required scale of management and resource requirements. It is not considered that any of the options will perform differently against the objective.	and resource efficiency. It is beyond the scope of the DPD to influence ongoing site management. No mitigation is required.					
Ob. 7 Promoting access to sustainable transport	1. Make public transport, cycling and walking easier and more attractive?  2. Reduce the need/desire to travel by car?	Sites have yet to be selected. Location specific issues that cannot be determined at this stage. No option is considered to have a different performance.	None.	1. Not applicable  2. Not applicable				

Ob. 8 Protect and enhance the district's distinct historic, environmental and cultural assets	1. Protect and enhance landscape and townscape? 2. Value and protect diversity and local distinctiveness including rural ways of life? 3. Maintain and enhance cultural and historical assets?	Sites have yet to be selected. Site location(s) and development are key influences on this issue and so effects cannot be determined. Site tenure is not considered to impact on this objective, with no option performing differently.	None.	1. Not applicable  2. Not applicable  3. Not applicable				
Ob. 9 Encourage and protect habitats and biodiversity (taking account of	1. Protect and enhance habitats and species (taking account of	Sites have yet to be selected. Location specific so impacts cannot be determined. No option is	None.	1. Not applicable				

climate change	climate change)?	considered to perform differently.						
Ob. 10 Reduce land, water, air, light and noise pollution	1. Minimise land, water, air, light and noise pollution?	Site tenure is not considered to impact on this objective as this is a location specific issue.	None.	1. Not applicable				
Ob. 11 Reduce vulnerability to, and manage flood risk (taking account of climate change)	1. Reduce vulnerability to, and manage flood risk (taking account of climate change)?	Site tenure is not considered to impact on this objective as this is a location specific issue.	None.	1. Not applicable				

<b>Issue 2</b> <b>Commentary</b>	<p>Options 4 and 5 were not included with the consultation version of the DPD. These have been included as additional options in the SA to review the full range of tenure options available to be used in allocating sites through the DPD.</p> <p>Site tenure has no relationship with most of the SA objectives. <b>As against objective 3 however there is a clear recommendation arising that a range of site tenures should be provided to meet all tenure needs of the travelling community in Bath and North East Somerset.</b> At present the performance of each option shows that individually each would provide accommodation for a narrow section of the community but would not meet the objective's need to provide, and make affordable, accommodation for the whole community.</p> <p>Options 1, 4 and potentially 5 would assist those able to self-provide or privately rent land at rents not in line with CLG (Department for Communities and Local Government) planning definitions of 'affordable' and would reduce the overall level of affordable sites to be provided. The allocation of land for more affordable forms of tenure, as with Options 2, 3 and potentially 5, would perform most positively against this objective though individually each would not meet all needs of the travelling community.</p> <p><b>The DPD should allow for provision to be made for all accommodation needs of the travelling community. This should be by allowing for site tenure to be determined based on the availability and ownership of land.</b></p>
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Issue 3: Rural Exception Site						
Objective	Detailed Questions	Commentary / Performance	Mitigation	Performance of Objective		
				Option 1: Rural Exception Site policy	Option 2: No Rural Exception Site policy	Option 3: Remove land from Green Belt
Ob. 1 Improve accessibility to community facilities and local services	1. Improve accessibility to community facilities and local services?	<p>Use of a rural exception site policy would improve the potential for allocation of sites adjacent to settlements with good accessibility to local services and facilities.</p> <p>The removal of land from the Green Belt would not assist in achieving this objective.</p>	<p>If a rural exception site policy is taken forward in the DPD its wording should include strong provisions to ensuring accessibility to local services and facilities. Such a policy may reduce developments in the open countryside. This does not mitigate any negative impact of the options, but enhances the DPD.</p>	<p><b>+</b> 1. The use of a rural exception site policy would likely have strong provisions to ensure accessibility.</p>	<p><b>- / Uncertain</b> 1. The absence of a rural exception site policy may reduce the opportunity for development of sites in appropriate locations with good accessibility to local services and facilities.</p>	<p><b>Not applicable</b> 1. The removal of land from the Green Belt would not specifically improve accessibility.</p>
Ob. 2 Improve the health and well-being of all communities	1. Improve access to health facilities?	Use of a rural exception site policy would improve the potential for allocation of sites adjacent to	A rural exception site policy should include strong reference to accessibility to health facilities.	<p><b>+</b> 1. A rural exception site policy should include provisions to</p>	<p><b>- / Uncertain</b> 1. The absence of a rural exception site policy may reduce the</p>	<p><b>1. Not applicable</b></p>

		settlements with good accessibility to health facilities.		ensure accessibility to health facilities.	opportunity for development of sites in appropriate locations with good accessibility to health facilities.	
Ob. 3 Meet identified needs for sufficient, high quality and affordable housing	<p>1. Help meet the accommodation needs of all sectors of the travelling community?</p> <p>The use of a rural exception site policy would aid meeting the needs of all sectors of the travelling community by making specific allowance for development restricted to affordable pitches. This would meet the objective's aims.</p> <p>The removal of land from the Green Belt would not assist in achieving this objective.</p>	<p>The use of a rural exception site policy should genuinely enable development of affordable sites and so free up sites for other forms of development elsewhere.</p>	<p>Use of a rural exception site policy should genuinely enable development of affordable sites and so free up sites for other forms of development elsewhere.</p>	<p>+ 1. A rural exception site policy would facilitate the provision of land for use as affordable sites only. This would assist those members of the travelling community not able to access less affordable forms of accommodation.</p> <p>+ 2. By allocating land for</p>	<p>- 1. The absence of a rural exception site policy may reduce the opportunity for affordable development of sites.</p> <p>- 2. Without the use of a rural</p>	<p><b>Not applicable</b></p> <p>1. The removal of land from the Green Belt would not assist in providing affordable housing.</p> <p><b>Not applicable</b></p> <p>2. The removal of land from the</p>

	all sectors of the community by allocating sites for a range of tenures?			affordable sites through a rural exception site policy land elsewhere can be prioritised for non-affordable forms of development.	exception site policy it may be more difficult to allocate land for sole use as affordable development.	Green Belt would not assist in providing a range of tenures.
Ob. 4 Promote safer, stronger more vibrant and cohesive communities	1. Promote stronger more cohesive communities through provision of authorised sites in sustainable locations?	Use of a rural exception site policy is more likely to enable social cohesion by enabling the development of affordable sites in sustainable locations. The removal of land from the Green Belt would most likely antagonise the settled community and have a negative impact on this objective.  Social exclusion is more likely to be reduced in the short	A rural exception site policy should require sites to be in genuinely sustainable locations that allow for social interaction between the travelling and settled communities. This is more likely to improve community cohesion and reduce social exclusion between different communities.	+ 1. A rural exception site policy is likely to enable development of sites adjacent to existing settlement boundaries in sustainable locations and so assist in community integration and cohesion.	- 1. Without the use of a rural exception site policy it may be more difficult to allocate land in sustainable locations. This would reduce the ability to promote more cohesive communities.	- 1. It is not necessary to remove land from the Green Belt to allocate land as a Gypsy or Traveller site; to do so may reduce the ability to improve community cohesion by perceived 'special treatment' not allowed for other developments in existing planning policy.

	<p>2. Reduce social exclusion through provision of authorised sites?</p> <p>3. Reduce crime and fear of crime through allocation of land for provision of authorised sites?</p>	<p>and long term by the provision of sites in locations that meet the SA's sustainability requirements.</p> <p>Fear of crime and reduction of crime is a site specific management issue that is not determined by site tenure; use of a rural exception site policy would not assist in the achievement of this objective.</p>	None.	<p><b>+</b> 2. Use of a rural exception site policy would assist in reducing social exclusion by the location of sites adjacent to existing settlement boundaries, promoting social integration.</p> <p><b>3. Uncertain</b></p>	<p><b>-</b> 2. Without a rural exception site policy it may be more difficult to reduce social exclusion as site allocations may be displaced to less sustainable locations. The failure to provide for affordable only sites may also reduce the long term sustainability of sites and so increase social exclusion.</p> <p><b>3. Uncertain</b></p>	<p><b>-</b> 2. It is not necessary to remove land from the Green Belt to allocate land as a Gypsy or Traveller site; to do so may aggravate social exclusion as this would likely be viewed as 'special treatment' not already allowed in existing planning policy.</p> <p><b>3. Uncertain</b></p>
Ob. 5 Access to business, employment and skills opportunities	1. Will there be access to educational and training opportunities?	The use of a rural exception site policy would formalise the potential development of sites on land adjacent to	The use of a rural exception site policy would likely enhance the DPD by formalising the development of affordable pitches	<p><b>+</b> 1. The use of a rural exception site policy is likely to assist in the</p>	<p><b>-/+</b> 1. The absence of such a policy would not remove the ability for sites to be</p>	<p><b>Not applicable</b></p> <p>1. Removal of land from the Green Belt would not impact on accessibility</p>

	2. Give all sectors of the community access to work opportunities, paid or unpaid?	existing settlement boundaries, though this can be achieved without such a policy. This would likely have a positive impact on this objective, though this is still subject to site specific locations.	adjacent to settlement boundaries in sustainable locations. This would be useful in achieving this objective.	development of sites in locations with accessibility to educational and training opportunities.  + 2. Similarly, the use of such a policy is likely to assist in access to opportunities to work.	developed in locations with accessibility to educational and training opportunities.  -/+ 2. The absence of such a policy would not detract from the ability to achieve this objective.	to employment and training opportunities.  <b>Not applicable</b> 2. The removal of land from the Green Belt would not impact on access to work opportunities.
Ob. 6 Promoting sustainable construction and efficient use of resources	1. Promote development that demonstrates sustainable construction principles?  2. Promote waste management and resource efficiency?	Use of a rural exception site policy should have no bearing on this issue.	None.	1. <b>Not applicable</b>  2. <b>Not applicable</b>	1. <b>Not applicable</b>  2. <b>Not applicable</b>	1. <b>Not applicable</b>  2. <b>Not applicable</b>

Ob. 7 Promoting access to sustainable transport	<p>1. Make public transport, cycling and walking easier and more attractive?</p> <p>2. Reduce the need/desire to travel by car?</p>	<p>Use of a rural exception site policy would improve the potential for allocation of sites adjacent to settlements with sustainable transport options, though this would not be the sole method of achieving this objective.</p> <p>Allocation of rural exception sites will be partly guided by access to local services and facilities which should reduce the need to travel by car.</p> <p>The removal of land from the Green Belt would not impact on this objective.</p>	<p>A rural exception site policy should include strong reference to access to sustainable transport options and reducing the need to travel by car.</p>	<p><b>+</b></p> <p>1. Use of a rural exception site policy would assist in achieving development in locations with access to sustainable transport options.</p> <p><b>+</b></p> <p>2. Use of a rural exception site policy would assist in achieving development in locations with good transport</p>	<p><b>- / Uncertain</b></p> <p>1. The absence of a rural exception site policy may reduce the opportunity for development of sites in locations with access to services and facilities by sustainable transport though this is not the sole method of achieving development in accessible locations.</p> <p><b>- / Uncertain</b></p> <p>2. As above, this option may reduce the opportunity for development in sustainable locations that reduce need for</p>	<p><b>Not applicable</b></p> <p>1. Removal of land from the Green Belt would not impact on access to sustainable transport options.</p> <p><b>Not applicable</b></p> <p>2. The removal of land from the Green Belt would not impact on this objective.</p>
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				options that may reduce the need to travel by car.	travel by car.	
Ob. 8 Protect and enhance the district's distinct historic, environmental and cultural assets	<p>1. Protect and enhance landscape and townscape?</p> <p>2. Value and protect diversity and local distinctiveness including rural ways of life?</p> <p>3. Maintain and enhance cultural and historical assets?</p>	<p>The use of a rural exception site policy would include provisions to enhance landscape and townscape, however, potential effects on landscape and townscape are a locational issue which cannot be determined at this stage.</p> <p>Rural ways of life, including the traditional travelling way of life, would be protected by allowing for rural exception site development.</p> <p>Effects on cultural and historic assets is a location specific issue that cannot be</p>	<p>A rural exception site policy should ensure character and appearance of surrounding area is protected. This would enhance the performance of the DPD.</p>	<p><b>1. Uncertain</b></p> <p>+ 2. Use of a rural exception site policy would ensure rural ways of life were safeguarded.</p> <p><b>3. Uncertain</b></p>	<p><b>1. Uncertain</b></p> <p><b>Uncertain</b> 2. The absence of a rural exception site policy would not prevent the achievement of this objective.</p> <p><b>3. Uncertain</b></p>	<p><b>Not applicable</b> 1. The removal of land from the Green Belt would not impact on this objective.</p> <p><b>Not applicable</b> 2. The removal of land from the Green Belt would not impact on this objective.</p> <p><b>Not applicable</b> 3. The removal of land from the Green Belt would not impact on this objective.</p>

		determined at this stage.				
Ob. 9 Encourage and protect habitats and biodiversity (taking account of climate change)	1. Protect and enhance habitats and species (taking account of climate change)?	Location specific so impacts cannot be determined. The use of a rural exception site policy will have no effect on habitats and species.	None.	<b>1. Not applicable</b>	<b>1. Not applicable</b>	<b>1. Not applicable</b>
Ob. 10 Reduce land, water, air, light and noise pollution	1. Minimise land, water, air, light and noise pollution?	Sites have yet to be selected. Location specific so impacts cannot be determined. The use of a rural exception site policy will have no effect on pollution.	None.	<b>1. Not applicable</b>	<b>1. Not applicable</b>	<b>1. Not applicable</b>
Ob. 11 Reduce vulnerability to, and manage flood risk (taking account of climate change)	1. Reduce vulnerability to, and manage flood risk (taking account of climate change)?	Sites have yet to be selected. Location specific so impacts cannot be determined. The use of a rural exception site policy will have no effect on flood risk.	None.	<b>1. Not applicable</b>	<b>1. Not applicable</b>	<b>1. Not applicable</b>

<b>Issue 3</b> <b>Commentary</b>	<p>Option 3 was not included with the consultation version of the DPD. This has been included as an additional option in the SA to review the full range of options available in the consideration of a rural exception site policy in the DPD. The option to remove land from the Green Belt is only supported by Government policy in exceptional circumstances. This option does not impact on the SA objectives, nor is it considered necessary to remove land from the Green Belt to allocate land as a Gypsy or Traveller site to meet the SA objectives.</p> <p>With regards to the SA Framework objectives, the inclusion of a rural exception site policy would have a positive impact compared with the alternative option of not bringing forward such a policy or removing land from the Green Belt. A majority of the objectives are not applicable against these options as they are location specific. The use of a rural exception site policy may assist the delivery of pitches in locations with good access to services, facilities and transport options for example, but would the absence of such a policy would not prevent this. The removal of land from the Green Belt clearly would not assist in the delivery of the SA objectives, and would have largely negative impacts against Objective 4:</p> <ul style="list-style-type: none"> <li>• It is not necessary to remove land from the Green Belt to allocate land as a Gypsy or Traveller site; to do so may reduce the ability to improve community cohesion by perceived ‘special treatment’ not allowed for other developments in existing planning policy.</li> <li>• It is not necessary to remove land from the Green Belt to allocate land as a Gypsy or Traveller site; to do so may aggravate social exclusion as this would likely be viewed as ‘special treatment’ not already allowed in existing planning policy.</li> </ul> <p>The enhancement measures identified by this assessment are as below, and focus on the use of a rural exception site policy:</p> <ul style="list-style-type: none"> <li>• A rural exception site policy should require sites to be in genuinely sustainable locations that allow for social interaction between the travelling and settled communities. This is more likely to improve community cohesion and reduce social exclusion between different communities. (Objective 1)</li> <li>• Use of a rural exception site policy should genuinely enable development of affordable sites and so free up sites for other forms of development elsewhere. (Objective 2)</li> </ul>
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- A rural exception site policy should include strong reference to accessibility to health facilities. (Objective 3)
- If a rural exception site policy is taken forward in the DPD its wording should include strong provisions to ensuring accessibility to local services and facilities. Such a policy may reduce developments in the open countryside. This does not mitigate any negative impact of the options, but enhances the DPD. (Objective 4)
- A rural exception site policy should ensure character and appearance of surrounding area is protected. This would enhance the performance of the DPD. (Objective 5)
- A rural exception site policy should include strong reference to access to sustainable transport options and reducing the need to travel by car. (Objective 7)
- The use of a rural exception site policy would likely enhance the DPD by formalising the development of affordable pitches adjacent to settlement boundaries in sustainable locations. (Objective 8)

**This assessment recommends that a Rural Exception Site policy is brought forward where this would assist the delivery of sites. This assessment also recommends that such a policy genuinely ensures factors such as the surrounding area's character is retained or protected.**

Issue 4: Mixed Use Sites							
Objective	Detailed Questions	Commentary / Performance	Mitigation	Performance of Objective			
				Option 1: On-site business use where practical	Option 2: No business use on any sites	Option 3: Specify which Use Classes acceptable on-site	Option 4: Separate residential and business use sites
Ob. 1 Improve accessibility to community facilities and local services	1. Improve accessibility to community facilities and local services?	Business use (or absence of) on-site is not likely to impact on this objective.	None.	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable
Ob. 2 Improve the health and well-being of all communities	1. Improve access to health facilities?	Business use (or absence of) on-site is not likely to impact on this objective.	None.	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable
Ob. 3 Meet identified needs for sufficient, high quality and affordable housing	1. Help meet the accommodation needs of all sectors of the travelling community?	Business use (or absence of) on-site is not likely to impact on this objective.	None.	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable

	2. Help make accommodation affordable for all sectors of the community by allocating sites for a range of tenures?						
Ob. 4 Promote safer, stronger more vibrant and cohesive communities	1. Promote stronger more cohesive communities through provision of authorised sites in sustainable locations?	The restriction of business use on-site may produce unnecessary restrictions on long-term use of sites. Option 1 offers the most flexibility in site selection. Certainty to both the travelling and settled communities is the most important factor in promoting stronger more cohesive	On-site business use should be carefully considered on a site by site basis to ensure it is appropriate in each location. Where appropriate separate use sites should be brought forward.  Careful consideration of site use for	+  1. Conflict may arise where unauthorised use of sites for business use occurs. Providing certainty by regulating the location of business use can improve certainty to all communities and therefore work towards achieving this SA objective.	-/+  1. Not allowing any business use would unnecessarily restrict the business opportunities of the travelling communities and possibly encourage antipathy. This option would however also provide certainty that no business use would be allowed on-site	-/+  1. Conflict may arise where unauthorised use of sites for business use occurs (whether non-compliance on sites with permission for specific business use or any business use on sites with no permission for business use). By restricting business use communities can be certain of	-/+  1. Separate sites for business and residential use may enable each use to be provided in appropriate locations, allowing for wider choice of site allocations.

		<p>communities. Social exclusion is more likely to be reduced in the short and long term by providing certainty of site use for business purposes. A blanket policy of no business use is likely to unreasonably restrict economic activities and exacerbate social exclusion.</p> <p>No impact noted.</p>	<p>business purposes is needed prior to allocation.</p> <p>None.</p>	<p>-/+</p> <p>2. On-site business use may exacerbate social exclusion where appropriate management controls are not in place. It may also give rise to further social exclusion by preventing social integration. However without on-site business use site</p>	<p>which may be suitable, though this is dependent on sites coming forward for allocation.</p>	<p>development and improve community awareness. Specifying use classes may however be unnecessary and restrict long term use of the site for future users.</p>	
2. Reduce social exclusion through provision of authorised sites?				<p>-</p> <p>2. No business use on any sites is likely to completely restrict economic activities of travelling communities and give rise to social exclusion by antagonising those communities.</p>	<p>+</p> <p>This option is likely to provide most certainty to both travelling and settled communities and so promote social cohesion. This may reduce social exclusion.</p>	<p>-/+</p> <p>2. This option would create certainty for both travelling and settled communities but may still result in social exclusion by separating sites and antagonising</p>	

	through allocation of land for provision of authorised sites?			occupants may have no legal manner of conducting business.			community relations.
Ob. 5 Access to business, employment and skills opportunities	<p>1. Will there be access to educational and training opportunities?</p> <p>2. Give all sectors of the community access to work opportunities, paid or unpaid?</p>	Access to training opportunities and work, paid or unpaid, is supported by options 1, 3 and 4.	Any business uses should be determined on a site by site basis to enable access to employment without adversely affecting surrounding uses.	<p><b>+</b> 1. This option would allow for training opportunities.</p> <p><b>+</b> 2. This option would allow for commercial activities and so would support access to work.</p>	<p><b>-</b> 1. This option would restrict training opportunities.</p> <p><b>-</b> 2. By restricting on-site business activities this option is likely to heavily restrict employment opportunities.</p>	<p><b>-/+</b> 1. This option would restrict training opportunities.</p> <p><b>-/+</b> 2. This option would allow for some commercial activities and so would support access to work.</p>	<p><b>-/+</b> 1. This option may restrict training opportunities by reducing access to employers.</p> <p><b>-/+</b> 2. This option would allow for access to work but would likely restrict the opportunities for this.</p>

Ob. 6 Promoting sustainable construction and efficient use of resources	1. Promote development that demonstrates sustainable construction principles?	Business use (or absence of) on-site is not likely to impact on this objective.	None.	1. Not applicable	1. Not applicable	1. Not applicable	1. Not applicable
	2. Promote waste management and resource efficiency?			2. Not applicable	2. Not applicable	2. Not applicable	2. Not applicable
Ob. 7 Promoting access to sustainable transport	1. Make public transport, cycling and walking easier and more attractive?  2. Reduce the need/desire to travel by car?	Business use (or absence of) on-site is not likely to impact on attractiveness of public transport.  On-site business use will likely however significantly reduce the need to travel by car for work	None.	1. Not applicable  + 2. On-site business use would reduce the need to travel by car to primary place of employment.	1. Not applicable  - 2. Restriction of on-site business use is likely to increase the need to travel by car to a place of employment.	1. Not applicable  +/- 2. Restricting the Use Class of business use is likely to restrict site occupants to those requiring the site(s) for forms of employment allowed by site conditions. This option will thus	1. Not applicable  - 2. Separate business use is likely to increase the need to travel by car to a place of employment .

		<p>purposes, particularly to the primary place of employment. For this reason Options 1 and 3 perform most positively.</p>				<p>have a positive impact, though it may also require occupants to travel by car to another place of employment.</p>	
Ob. 8 Protect and enhance the district's distinct historic, environmental and cultural assets	<p>1. Protect and enhance landscape and townscape?</p> <p>2. Value and protect diversity and local distinctiveness including rural ways of life?</p> <p>3. Maintain and enhance cultural and historical assets?</p>	<p>On-site business use may impact on landscape and townscape but may be sufficiently controlled to ameliorate affects.</p> <p>Impact on local distinctiveness and diversity would be site location dependent though restricting this would remove</p>	<p>Business use should be strictly controlled to take account of the character and appearance of the surrounding area. Any additional policy text to that in existing adopted planning policy should have clear reference to this.</p>	<p>-/+</p> <p>1. On-site business use may give rise to adverse impacts on landscape and townscape where the use is not strictly controlled. It may however have no impact where business use is not out of keeping with the surroundings or does not involve substantial equipment, for example.</p>	<p>+</p> <p>1. No on-site business use would prevent any visual intrusion on landscape and townscape from employment use.</p>	<p>-/+</p> <p>1. On-site business use may give rise to adverse impacts on landscape and townscape but would be controlled.</p>	<p>-/+</p> <p>1. This would be dependent on site specific location but may give rise to visual intrusion where not adequately controlled.</p> <p>2.</p>

		<p>the opportunity for negative impacts.</p> <p>Impact on cultural and historical assets is site location dependent and cannot be determined at this stage.</p>		<p><b>2. Uncertain</b></p> <p><b>3. Uncertain</b></p>	<p><b>+</b></p> <p>2. No impact on local distinctiveness.</p> <p><b>3. Uncertain</b></p>	<p><b>2. Uncertain</b></p> <p><b>3. Uncertain</b></p>	<p><b>Uncertain</b></p> <p><b>3. Uncertain</b></p>
Ob. 9 Encourage and protect habitats and biodiversity (taking account of climate change)	1. Protect and enhance habitats and species (taking account of climate change)?	Impact on habitats and species is site location dependent and cannot be determined at this stage. No option is considered to perform differently at this stage.	None.	<p><b>1. Uncertain</b></p>	<p><b>1. Uncertain</b></p>	<p><b>1. Uncertain</b></p>	<p><b>1. Uncertain</b></p>
Ob. 10 Reduce land, water, air, light and noise	1. Minimise land, water, air, light and noise	Business uses may result in pollution arising from economic	Pollutants will need to be sufficiently controlled by	<p><b>- / Uncertain</b></p> <p>1. Business use may result in pollution.</p>	<p><b>+</b></p> <p>1. No business use would prevent</p>	<p><b>- / Uncertain</b></p> <p>1. Business use may result in pollution but this</p>	<p><b>- Uncertain</b></p> <p>1. Business use may result in</p>

pollution	pollution?	activities not already occurring from residential use.	appropriate management. This will be managed by the development management system.		pollution from economic activities.	could be controlled by the form of permitted Use Class.	pollution.
Ob. 11 Reduce vulnerability to, and manage flood risk (taking account of climate change)	1. Reduce vulnerability to, and manage flood risk (taking account of climate change)?	Business use may result in greater flood risk than that arising from sole residential use due to additional development; risk should be mitigated.	Controls should be put in place to manage flood risk. The site selection criteria take account of this at this early stage but allocations should make clear reference to any mitigation works required.	-/+ 1. On-site business use may increase flood risk through additional development, though this may be controlled.	+ 1. Restricting business use would prevent flood risk arising from economic activities.	-/+ 1. On-site business use may increase flood risk through additional development, though this may be controlled.	-/+ 1. On-site business may increase reflect flood risk through additional development, though this may be controlled.

<b>Issue 4</b> <b>Commentary</b>	<p>The impacts of each option against a number of the Framework's objectives are not certain, including biodiversity and health and well-being.</p> <p>The greatest numbers of positive impacts are shown against Options 1 and 2. These are broadly split between social and environmental benefits, with Option 1 performing most positively against social objectives and Option 2 against environmental objectives, as below:</p> <ul style="list-style-type: none"> <li>• Conflict may arise where unauthorised use of sites for business use occurs. Providing certainty by regulating the location of business use can improve certainty to all communities and therefore work towards achieving this SA objective. (Option 1, Objective 4)</li> <li>• This option would allow for training opportunities. This option would allow for commercial activities and so would support access to work. (Option 1, Objective 5)</li> <li>• On-site business use would reduce the need to travel by car to primary place of employment. (Option 1, Objective 7)</li> <li>• No on-site business use would prevent any visual intrusion on landscape and townscape from employment use. No impact on local distinctiveness. (Option 2, Objective 8)</li> <li>• No business use would prevent pollution from economic activities. (Option 2, Objective 10)</li> <li>• Restricting business use would prevent flood risk arising from economic activities. (Option 2, Objective 11)</li> </ul> <p>Options 3 and 4 by contrast perform less well, with less flexibility than Option 1 and negative impacts against objectives 10 and 7. Whilst positive and negative impacts have been noted by this assessment, a number of potential mitigation or enhancements have also been identified, as below:</p> <ul style="list-style-type: none"> <li>• On-site business use should be carefully considered on a site by site basis to ensure it is appropriate in each location. Where appropriate separate use sites should be brought forward. Careful consideration of site use for business purposes is needed prior to allocation. (Objective 4)</li> <li>• Any business uses should be determined on a site by site basis to enable access to employment without adversely affecting surrounding uses. (Objective 5)</li> <li>• Business use should be strictly controlled to take account of the character and appearance of the surrounding area. Any additional policy text to that in existing adopted planning policy should have clear reference to this. (Objective 8)</li> </ul>
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- Pollutants will need to be sufficiently controlled by appropriate management. This will be managed by the development management system. (Objective 10)
- Controls should be put in place to manage flood risk. The site selection criteria take account of this at this early stage but allocations should make clear reference to any mitigation works required. (Objective 11)

**The recommendation of this assessment is to ensure sufficient controls are put in place on any mixed-use or business-use sites to mitigate against any potential negative impacts, including impact on landscape and pollution.**

## **Issue 5: Location of Sites**

This matrix appraises the site selection scoring matrix (located at Appendix B of the consultation version DPD). This appraisal seeks to identify any SA objectives that have not been addressed by the criteria or any underlying conflicts with the objectives in order to assess if changes are needed to achieve an effective, balanced scoring system.

The scores attributed within the Issue 5 matrix are the same as for Issues 1-4, but are reiterated below for clarity. The scoring matrix for Issue 5 also has additional colour highlighting positive and negative impacts to make this more readily accessible.

<b>Score Signifier</b>	<b>Likely effect on the SA Objective</b>
+	Some positive benefit
-/+	No significant effect or no clear link
-	Moderate adverse impact
<b>Uncertain</b>	Uncertain due to insufficient information
<b>Not applicable (or) N/A</b>	No link

Issue 5: Location of Sites														
Site Selection Criteria	SA Objective	1	2	3	4	5	6	7	8	9	10	11	Comments	
		Facilities & Services	Health & Well-being	Housing	Communities	Business & Employment	Construction & Resources	Access to Transport	Physical assets	Biodiversity	Pollution	Flood Risk		
Site location		+	+	N/A	+	+	N/A	+	+	N/A	N/A	N/A	This criterion seeks to achieve sustainable access to a number of factors, including transport and employment. This is in accordance with the baseline evidence which suggests social and physical isolation is a major factor which the Site Allocations DPD should seek to resolve.	
Proximity to Food Shop		+	+	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	By ensuring close proximity to a food shop this criterion supports key objectives, including social integration and health and well-being.	
Proximity to Primary School		+	+	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	This criterion also supports key social objectives, including health and well-being and safer, stronger communities.	
Proximity to Doctor's Surgery		+	+	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	This criterion supports the social objective of health and well-being as well as indirectly supporting others.	
Proximity to Transport node		+	+	N/A	+	N/A	N/A	+	N/A	N/A	N/A	N/A	This criterion, by ensuring access to a public transport node also indirectly supports other social objectives.	

<b>Site Selection Criteria</b>	<b>SA Objective</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>Comments</b>	
Site Screening		N/A	N/A	N/A	N/A	-	N/A	N/A	N/A	+	+	+	N/A	The presence of or ability of a site to be screened will assist in protecting environmental and historic assets, but may present additional barriers to social integration.
Green Belt		N/A	N/A	N/A	N/A	+	N/A	N/A	N/A	+	N/A	N/A	N/A	Development of sites within the Green Belt may give rise to conflict with the settled community. Protection of the Green Belt can help maintain an open landscape. The criterion is weighted so sites outside the Green Belt are considered more positively.
Landscape Designations		N/A	+	+	N/A	N/A	The criterion seeks to avoid land in these areas which should have a positive impact for sustainable development.							
European Protected Species		N/A	+	N/A	N/A	N/A	This criterion will give rise to the use of a Habitats Regulation Assessment which will independently assess the impact of sites, having a positive interrelationship with SA.							
Flood Risk		N/A	+	N/A	N/A	+	This criterion seeks to prevent and/or mitigate against potential flood risk issues; it has a positive impact against objective 11. It also indirectly impacts on health and well-being by protecting site residents.							
Contaminated Land		N/A	+	N/A	N/A	N/A	This criterion will protect site residents from developments on unsuitable land.							
Proximity to Hazardous Place		N/A	+	N/A	N/A	N/A	This criterion will protect site residents from developments on unsuitable land.							

<b>Site Selection Criteria</b>	<b>SA Objective</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>Comments</b>
Brownfield Land		N/A	N/A	N/A	N/A	N/A	+	N/A	+	N/A	N/A	N/A	This criterion will support the reuse of previously developed land which should indirectly protect and enhance the District's physical assets by making efficient use of land.
Safe Vehicular Access		N/A	+	N/A	N/A	By ensuring safe vehicular access this criterion will support the health and well-being of site residents.							
Parking, Turning & Servicing Space		N/A	+	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	This criterion is a development management issue that does not directly impact on any objectives but will likely support the health and well-being of site residents by ensuring sites are appropriate for long term use. It may also have a positive impact on objective 5, in supporting the provision of on-site parking for employment use.
Additional Traffic Capacity		N/A	N/A	N/A	+	+	N/A	N/A	+	N/A	N/A	N/A	The ability of the existing road network to absorb additional traffic will indirectly support integrated communities by mitigating against a potential area of conflict, as well as supporting access via the road network to business and employment. It will also reduce the need for additional infrastructure.
Noise Issues		N/A	+	N/A	+	N/A	N/A	N/A	N/A	N/A	+	N/A	This criterion will support the integration of communities and mitigate against noise pollution issues.

<b>Issue 5</b> <b>Commentary</b>	<p>In determining how to assess Issue 5 it was noted that the criteria set out in Appendix B of the Issues and Options paper is essentially a list of planning constraints, as arising from national planning policy guidance, the Bath and North East Somerset Local Plan policy HG.16 and the Draft Core Strategy policy CP11. As stated in the note attached to that appendix, those criteria are non-determinative and are to be used in carrying out a comparative assessment of any sites coming forward as part of the Call for Sites. Mitigation works are possible on a number of criteria and the matrix should be considered in that context, as an uncertain or negative impact may be improved by mitigation works on specific sites.</p> <p>The most significant aspect of Issue 5 drawn out from the SA is the methodology by which sites are to be assessed. The use of the numerical scoring system in Appendix B of the Issues and Options paper is not considered fully robust due to its imposition of arbitrary numerical scores. This concern is compounded by the use of weighting which introduces a further system of comparison between the criteria. However, that weighting system is derived from national planning guidance which indicates that a balance of factors should be weighed to assess the relative benefits of site allocations and developments.</p> <p><b>As the site selection methodology and criteria are to be used as a comparative measure only and not as a fully decisive methodology for identifying preferred sites it is not considered appropriate to alter the methodology. To ensure the site scoring system achieves a balance of factors all preferred sites should be subject to rigorous assessment against the same sustainability criteria as in the SA Framework objective.</b></p> <p>A number of comments set out in the ‘mitigation’ section of this assessment for Issues 1-4 indicate that the site selection criteria and scoring system already take account of a number of significant issues, including flood risk and pollution, or is otherwise beyond the scope of the DPD, being administered by the development management system. Where the suggested mitigation works do not require change to the site scoring system these instead recommend the use of clear policy wording to ensure site allocations take account of, or mitigate against the impacts identified in this and future iterations of SA. This is identified in Issue 3 (Rural Exception Site policy) and Issue 4 (Mixed Use Sites).</p>
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