CD/PMP/MM3/3

Bath & North East Somerset Council

Annex D Draft Plan Appraisals Main Modifications

Bath & North East Somerset Draft Placemaking Plan Draft Sustainability Appraisal Report

Date: **January 2017**

1. Introduction

- 1.1 This Annex is an addendum to Annex D of the Sustainability Appraisal (SA accompanying the B&NES Placemaking Plan. The Draft Placemaking Plan was submitted to the Secretary of State to be examined by an independent Planning Inspector in April 2016. The Examination hearings took place in September/October 2016. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation on the Main Modifications.
- 1.2 The screening process has identified main modifications which are considered to make a difference to the Sustainability Appraisal (SA) of the Placemaking Plan (i.e. that the previous assessment of the submitted Placemaking Plan requires amendments) and are therefore considered to be significant.
- 1.3 The policies below are identified for reappraisal through the SA screening.

Policy HE1 Historic Environment

Policy GB3 Extensions and alterations to buildings in the Green Belt

Policy CR4 Dispersed Local Shops

Policy ST6 Park and Ride

Policy ST7 Transport, Access and Development Management

Policy SB1 Cattlemarket Site

Policy SB19 University of Bath

Policy SSV4 Welton Bag Factory

1.4 In order to show the results of the Main Modification appraisals clearly, new text is shown underlined and deleted text is shown with strike through to the last published Annex D matrices to the SA Report that accompanied the submitted Placemaking Plan. This table will be incorporated to the final SA Report.

Policy No. & HIS	IISTORIC ENVIRONMENT - HE1				
SA Objectives	Short term	Med term	Long term	Commentary	
Objective 1: Improve the health and well-being of all communities	+	+	+	The draft policy supports the achievement of this SA Objective by protecting and enhancing the district's historic, environmental and cultural assets which should help improve well-being of communities.	
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	0	0	0	This policy is not likely to have an effect on this objective.	
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0	0	0	This policy is not likely to have an effect on this objective.	
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++	++	++	The draft policy seeks to protect and enhance the district's historic, environmental and cultural assets. This adds value to regeneration and attracts business, acting as a stimulus to economic growth as highlighted in the supporting text.	
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	N/A	N/A	N/A	This SA Objective is not applicable to this draft policy.	
Objective 6: Protect and enhance local distinctiveness	++	++	++	The draft policy requires development to enhance or better reveal any heritage assets' significance and setting and avoid substantial harm to any heritage assets. This relates to protecting and enhancing local distinctiveness	
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	++	++	++	The draft policy requires development to enhance or better reveal any heritage assets' significance and setting and avoid substantial harm to any heritage assets. This relates to protecting and enhancing the district's historic, environmental and cultural assets. Although it reflects national policy and guidance. It supports the Core Strategy's strategic policies for the historic environment and its positive approach to the conservation of the	

Policy No. & HI	STORIC I	ENVIROI	NMENT -	HE1
SA Objectives	Short term	Med term	Long term	Commentary
				District's heritage assets.
				The Policy seeks to ensure that the policy requirements responding to historic environment are considered through viability assessments.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to this draft policy.
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	This SA Objective is not applicable to this draft policy.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to this draft policy.
Objective 11 Increase resilience to climate change	0	0	0	This policy is not likely to have an effect on this objective.
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	+	+	+	The emerging policy seeks to protect and enhance the district's historic assets which support careful and efficient use of existing buildings.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This SA Objective is not applicable to this draft policy.

Policy No. & Title	GB3: EXTENSIONS AND ALTERATIONS TO BUILDINGS IN THE GREEN BELT				
SA Objectives	Short term	Med term	Long term	Commentary	
Objective 1: Improve the health and well-being of all communities	N/A	N/A	N/A	This SA Objective is not applicable to this policy.	
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	0	0	0	This policy approach applies to buildings for residential and businesses, It may have a negative effect on the accommodation needs of rural housing as it potentially limits the ability to extend accommodation to meet individual need. A careful balance should be taken between the accommodation needs of business against the desire to avoid the gradual erosion of the countryside. NPPF and other Development Management policies will assist to do so.	
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0	0	0	Neither option will affect this SA Objective.	
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	0	0	0	This policy approach applies to buildings for residential and businesses, It may have a negative effect on the accommodation needs of rural businesses. A careful balance should be taken between the accommodation needs of business against the desire to avoid the gradual erosion of the countryside. NPPF and other Development Management policies will assist to do so.	
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	N/A	N/A	N/A	This SA Objective is not applicable to this policy.	
Objective 6: Protect and enhance local distinctiveness	0	0	0	Extensions to buildings in the Green Belt which will be allowed providing they do not represent a disproportionate addition over and above the size of the original dwelling or contribute to the deterioration in rural character as a result of the cumulative effect of dwelling extensions. This should result in a neutral impact on this SA Objective.	

Policy No. & Title	GB3: E	XTENSIC	ONS AND	ALTERATIONS TO BUILDINGS IN THE GREEN
SA Objectives	Short term	Med term	Long term	Commentary
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	N/A	N/A	N/A	This SA Objective is not directly applicable to this policy. However, there are other adopted and emerging Development Plan policies which would apply - see Table 4.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not directly applicable to this policy. However, there are other adopted and emerging Development Plan policies which would apply - see Table 4.
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 11 Increase resilience to climate change	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This SA Objective is not applicable to this policy.

Allowing extensions to buildings in the Green Belt under the terms of the policy will help protect and enhance local distinctiveness.

Policy No. & Title	DISPER	RSED LO	CAL SHOP	PS – CR4
SA Objectives	Short term	Med term	Long	Commentary
Objective 1: Improve the health and well-being of all communities	++	++	++	Within the scope of planning powers this policy will seek to encourage the provision of new small shops in suitable cases to provide continuing key retail services to their local residential communities. This should result in a major positive impact on this SA Objective.
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+	+	+	Within the scope of planning powers this policy will seek to encourage the provision of new small shops in suitable cases to provide continuing key retail services to their local residential communities. It also seeks to protect existing small shops considering viability issues. This should result in a minor positive impact on this SA Objective.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++	++	++	Within the scope of planning powers this policy will seek to encourage the provision of new small shops in suitable cases to provide continuing key retail services to their local residential communities. This should result in a major positive impact on this SA Objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 6: Protect and enhance local distinctiveness	N/A	N/A	N/A	This SA Objective is not applicable to this policy. However, there are other adopted and Development Plan policies which would apply - see Table 4.
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	N/A	N/A	N/A	This SA Objective is not applicable to this policy. However, there are other adopted and Development Plan policies which would apply - see Table 4.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 11 Increase	N/A	N/A	N/A	This SA Objective is not applicable to this policy.

Policy No. & Title	DISPERSED LOCAL SHOPS – CR4			
SA Objectives	Short term	Med term	Long term	Commentary
resilience to climate change				
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	N/A	N/A	N/A	This SA Objective is not applicable to this policy.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This SA Objective is not applicable to this policy.

The NPPF states that the sequential approach should not be applied to applications for small scale rural offices or other small scale rural development. The draft Plan allows development of appropriately located small-scale local shops which can often serve day to day needs and offer valuable social and community benefits. Therefore it contributes well to objectives 1, 3 and 4.

Policy No. & PA	ARK & RIE	DE - ST6		
Objectives	Short term	Med term	Long term	Commentary
Objective 1: Improve the health and well-being of all communities	+	+	+	This policy will only allow development which has no unacceptable impact on environmental assets and amenity including the World Heritage Site and its setting and the Cotswolds AONB and This policy requires the benefits of Park & Ride development to be balanced against the harm to the natural and historic environment and also ensures provision is made for the needs of those with impaired mobility and for the safety and security of all users. This should have a positive impact on health and well-being.
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	N/A	N/A	N/A	This Objective is not applicable to this policy.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0+	0+	0+	This policy will only allow development which has no unacceptable impact on environmental assets and amenity including the World Heritage Site and its setting and the Cotswolds AONB and This policy requires the benefits of Park & Ride development to be balanced against the harm to the natural and historic environment and also will ensure provision is made for the needs of those with impaired mobility and for the safety and security of all users.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	+	+	This policy is not likely to have an effect on this objective. Development of new or expansion of existing Park and Ride sites will help manage the traffic in Bath which have a positive effect on this objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	++	++	++	In supporting the development of new and additional Park & Ride facilities, this policy will help reduce traffic congestion and shorten journeys to the City centre. The policy also seeks to ensure there is no unacceptable impact on surrounding road network and its capacity to safely accommodate potential traffic generation and have a major positive impact on this Objective.
Objective 6: Protect and enhance local distinctiveness	0	0	0	This policy will only allow development which has no unacceptable impact on environmental assets and amenity including the World Heritage Site and its setting and the Cotswolds AONB and result in a neutral impact on this Objective. This policy requires clear and convincing justification for any harm identified to the WHS or significance of other designated heritage assists, with the degree of public benefit weighed against the level of harm. The policy also requires development within AONB to be considered in accordance with the national policy. This facilitates a balanced approach and result in a neutral impact on this Objective.
Objective 7: Protect and enhance	0	0	0	This policy will only allow development which has no unacceptable impact on environmental assets and

Policy No. & P				
Objectives	Short term	Med term	Long term	Commentary
the district's historic, environmental and cultural assets				amenity including the World Heritage Site and its setting and the Cotswolds AONB and result in a neutral impact on this Objective. This policy requires clear and convincing justification for any harm identified to the WHS or significance of other designated heritage assists, with the degree of public benefit weighed against the level of harm. This facilitates a balanced approach and results in a neutral
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)		0	0	impact on this Objective. This policy will only allow development which has no unacceptable impact on environmental assets and amenity which includes Natura 2000 sites (SACs/SPA) and result in a neutral impact on this Objective. This policy only allows proposals complying with the provisions of Policy NE3 in terms of European Sites and results in a neutral effect on this Objective.
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	This policy is not likely to have an effect on this objective.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	This policy is not likely to have an effect on this objective.
Objective 11 Increase resilience to climate change	9 0	0	0	This policy is not likely to have an effect on this objective.
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction		0	0	This policy is not likely to have an effect on this objective.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This Objective is not applicable to this policy.

This policy will only allow development which has no unacceptable impact on environmental assets and amenity This policy requires the benefits of Park & Ride development to be balanced against the harm to the natural and historic environment and therefore has a minor positive impact on Objectives 1 and 3. A minor positive impact on Objective 4 and major positive impact on Objective 5 by helping reduce traffic congestion and shorten journeys to the City centre. The policy also seeks to ensure there is no unacceptable impact on surrounding road network and its capacity to safely accommodate potential traffic generation. The policy will have a neutral impact on the other applicable Objectives.

Policy No. & TR	ANSPOR	T, ACCES	SS AND D	EVELOPMENT MANAGEMENT - ST7
Objectives	Short term	Med term	Long term	Commentary
Objective 1: Improve the health and well-being of all communities	++	++	++	The policy requires development to provide a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking. This relates to making it easy to reach everyday destinations by active travel. The policy also requires an appropriate level of parking, including for motor cycles and people with disabilities. This will ensure that sufficient parking provision is made for these vehicle types when considering a range of development types and have a major positive impact on this Objective.
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	+	+	+	The policy requires that an appropriate level of on-site servicing and vehicle parking and cycle parking is provided in accordance with the parking standards as set out in the Schedules accompanying the policy. The Policy also allows a flexible approach in applying the Standards where justified. This will help enhance the quality of residential development and have a minor positive impact on this Objective.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+	+	+	The policy requires that an appropriate level of on-site servicing and vehicle parking and cycle parking is provided in accordance with the parking standards as set out in the Schedules accompanying the policy. The Policy also allows a flexible approach in applying the Standards where justified. This will help enhance the quality of development and have a minor positive impact on this Objective.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	+	+	The policy requires that an appropriate level of on-site servicing and vehicle parking and cycle parking is provided in accordance with the parking standards as set out in the Schedules accompanying the policy. The Policy also allows a flexible approach in applying the Standards where justified. This will help enhance the quality of development and have a minor positive impact on this Objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	++	++	++	The policy requires development to provide, if appropriate, a high standard of highway safety; safe and convenient access for pedestrians, cyclists and with mobility impairments; provision of cycle parking / storage; facilities for electric vehicles; adequate vehicular access; no increase in traffic of excessive volume; no increase in on-street parking; any improvements to the transport system required to render the development acceptable; an appropriate level of on-site parking. This relates to prioritising access to good public transport and safe walking and cycling infrastructure over facilities for private cars, and incorporation of electric vehicle charging points into new developments or ensuring they can be retrofitted.

Policy No. & TR	ANSPOR	T, ACCES	SS AND D	EVELOPMENT MANAGEMENT - ST7
Objectives	Short term	Med term	Long term	Commentary
				The Policy also allows a flexible approach in applying the Standards where justified. and will It has a major positive impact on this Objective.
Objective 6: Protect and enhance local distinctiveness	N/A	N/A	N/A	This Objective is not applicable to this policy. However, there are other adopted and emerging Development Plan policies which would apply - see Table 4
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	0	0	0	The policy requires that no traffic mitigation measures are required that would harm the historic environment. This should result in a neutral impact on this Objective.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	0	0	0	The policy requires that no traffic mitigation measures are required that would harm the historic environment. This should result in a neutral impact on this Objective.
Objective 9: Reduce land, water, air, light, noise pollution	+	+	+	The policy requires that development provides facilities for charging plug-in and other ultra-low emission vehicles which will result in a positive impact on this Objective.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	This policy is not likely to have an effect on this objective.
Objective 11 Increase resilience to climate change	0	0	0	This policy is not likely to have an effect on this objective.
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	0	0	0	This policy is not likely to have an effect on this objective.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This Objective is not applicable to this policy.

The policy will have a major positive impact on Objectives 1 and 5 <u>and</u> a minor positive impact on Objective 9. and neutral impact on other applicable Objectives. The policy also requires that an appropriate level of on-site servicing and vehicle parking and cycle parking is provided and result in a minor positive impact on Objectives 2 - 4.

Policy No. & Title	Cattlemarket Site SB1 Mixed use development that includes the potential wider redevelopment of the Hilton site					
SA Objectives	ST	MT	LT	Commentary		
Objective 1: Improve the health and well- being of all communities	++	++	++	Site is within Bath City Centre, and easy walking and cycling distance for many Bath residents. Site is within walking distance of Bath Spa train station for easy access to and from Keynsham and other settlements outside B&NES. Site allocation includes provision for riverside walkway. Site allocation includes provision of landscaping, wildlife areas and open space		
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	++	++	++	Site allocation makes provision for homes, including affordable housing. The draft Plan does not facilitate student accommodation on this site as it will impede the delivery of other Council objectives.		
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti- social behaviour, crime and the fear of crime	++	++	++	Site allocation includes provision for a mixed use development, ensuring natural surveillance at different times of the night and day. Site development requires the provision of public spaces and improvements to the public realm		
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++	++	++	Site allocation includes provision for B1 office use, A1/A3 uses, and potentially a replacement hotel providing an adequate supply of land to support a diverse range of employment opportunities. This also allows residents to work locally. The Policy also ensures implementation of a deliverable scheme relating to the wider area including the adjacent Hilton Hotel is not prejudiced.		
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	++	++	++	Site is within Bath City Centre, and within easy walking and cycling distance for many Bath residents. Site is within walking distance of train station for easy access to Keynsham and other settlements outside B&NES		
Objective 6: Protect and enhance local distinctiveness	++	++	++	Site allocation requires development to respond to the character of this part of the conservation area and includes a requirement to conserve the Cornmarket Building. Site allocation requires development to repair the broken		

Policy No. & Title	Cattlemarket Site SB1 Mixed use development that includes the potential wider redevelopment of the Hilton site				
SA Objectives	ST	MT	LT	Commentary	
,				street frontage of Walcot Street by re-establishing the historic building line. Site development requires the provision of public spaces	
				and enhancement of the public realm Site allocation protects longer distance views and includes provision of landscaping, wildlife areas and open space	
Objective 7: Protect and enhance the district's historic, environmental	++	++	++	Site allocation requires development to respond to the character of this part of the conservation area and includes a requirement to conserve the Cornmarket Building and in line with Bath Building Height Strategy.	
and cultural assets				Site development requires the provision of public spaces and enhancement of the public realm	
				Site allocation protects longer distance views. Site allocation includes provision of landscaping, wildlife	
				areas and open space	
Objective 8: Encourage and protect habitats	+	+	+	Existing function of the Cattlemarket vaults as bat roost to be protected.	
and biodiversity and geodiversity (taking account				Biodiversity value of the river to be retained and enhanced, including its role as a dark corridor.	
of climate change)				Development requirements include restoration and enhancement of the biodiversity value of the river and river edge and provide a riverside walk.	
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	The land is within the Coal Authority defined Development Low Risk Area. The site is outside the Surface Coal Resource Plan area. In general, it increase activity and therefore generate a degree of air, light and noise pollution, although current use as a car park will generate air and noise pollution so the effects are likely to be neutral. The policy requires that lighting from buildings to maintain a dark corridor for bats.	
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	The land is predominantly in Flood Zone 1. The small area adjacent to the River is in FZ 2. This site is located within the Enterprise Area and included in the Core Strategy B1 Bath Spatial Strategy and B2 Central Area Strategic Policy, therefore the location of the general growth areas was justified through the Core Strategy high level Sequential Test. Development is required to respond to the flood risk associated with the site. The draft Plan requires restoration and enhancement to the biodiversity value of the river and the river edge by retaining and enhancing the green edge to the riverside which helps to avoid development at the areas with FZ2. Other development management policies apply particularly for drainage.	

Policy No. & Title	Mixed	Cattlemarket Site SB1 Mixed use development that includes the potential wider redevelopment o Hilton site				
SA Objectives	ST	MT	LT	Commentary		
Objective 11 Increase resilience to climate change	0	0	0	Other development plan policies apply.		
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	+	+	+	The site is a previously developed land and promotes efficient use of land. Other development plan policies apply that encourage sustainable construction.		
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0	0	0	Covered by Development Management Policies in the Joint Waste Core Strategy		

A mixed use development optimising its central location and high accessibility to sustainable modes of transport is proposed in each of the options. The development and design principles safeguard valued heritage assets, and provide protection and enhancement for biodiversity. Given its current neglected appearance, and use as a surface level car park, the development of this site will generally be very positive when measured against sustainability criteria, making positive contributions to objectives 1 -9 and 12. Development proposals will repair the current broken street frontage helping to improve the economic vitality of Walcot Street.

Policy No. & Title	SB.19 University of Bath Campus at Claverton Down			
SA Objectives	ST	MT	LT	Commentary
Objective 1: Improve the health and well-being of all communities	+	+	+	The zonal text enables the further provision of facilities for sports and recreation. General principle (i) states that The loss of publically accessible playing pitch capacity to other type's development will only be permitted if that capacity is replaced elsewhere within the city or its immediate environs. Any reduction in non-publically accessible capacity is a matter for the University as it weighs this resource against its overall institutional and campus priorities. The green and clear zones also maintain access to existing open space. This objective will be secured by the application other relevant Development Management policies.

Policy No. & Title	SB.19	Univer	sity of B	ath Campus at Claverton Down
SA Objectives	ST	MT	LT	Commentary
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	+	+	+	This enables more student accommodation on —campus but general criterion (a) requires that a balanced portfolio of new provision so that the growth of the University reduces its impact on the realisation of objectives for normal housing. Criterion (q) requires that follow-on supply and demands be addressed to inform decision-making. It is not possible to state /specify the level of development is acceptable in urban design terms without further evidence. This will be assessed at Development Management stage. Tying in permissions for academic space to student accommodation projects on-campus was considered as a means of ensuring that teaching (recruiting) capacity was matched with student housing on campus. However, it is considered that the policy as now worded, the HMO Article 4 Direction and other site specific allocation policies in the Enterprise Area will enable balanced development on-campus. Further there are reasons why academic space needs to be built even if numbers were not to increase.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	++	++	++	The site can accommodate university related uses include variety of space for education, business, conference, IT, sports, health, arts and social, catering and retail which helps promote stronger more vibrant and cohesive communities on campus. This objective will be also secured by the application other relevant Development Management policies.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++	++	++	The University of Bath is a major employer in the District. Both options enable it to invest within the non-Green Belt part of its estate, which will likely enable growth and an increase in job opportunities. Tying in permissions for academic space to student accommodation projects on-campus was considered as a means of ensuring that teaching (recruiting) capacity was matched with student housing on campus. However, it is considered that the policy as now worded, the HMO Article 4 Direction and other site specific allocation policies in the Enterprise Area will achieve balanced development on-campus. It is not possible to state /specify the level of development is acceptable in urban design terms without further evidence. This will be assessed at Development Management stage
Objective 5: Ensure everyone has access to high quality and	++	++	++	Criterion (g) is more specific - In all circumstances development should enable sustainable transport choices to be made including bus use to and from the campus/estate and pedestrian and cyclist circulation to, from and within the

Policy No. & Title	SB.19	Univer	sity of E	Bath Campus at Claverton Down
SA Objectives	ST	MT	LT	Commentary
affordable public transport and promote cycling and walking				campus/estate. This includes retaining but not increasing an operational level of car parking of not more than 2,200 spaces so as not to harm the patronage of sustainable transport modes, their viability, or cause additional car trips to and from the campus.
Objective 6: Protect and enhance local distinctiveness	+/0	+/0	+/0	The campus is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. The Sulis Club is a 'satellite' recreational ground on the edge of the Claverton plateau with pitches, tennis courts and a clubhouse. It is also wholly in the World Heritage Site, Cotswolds AONB and Green Belt. The campus is already substantially developed. There is scope for further intensification but this requires careful management. In order to effectively manage development within the AONB and to ensure impact on the wider AONB is comprehensively considered, the Policy requires the University to undertake a full and detailed assessment preceding a planning application.
				The policy is comprehensive in terms of the inclusion of general and area specific development principles that relate to this objective. This objective will also be secured by the application other relevant Development Management policies.
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	++	++	++	The main Claverton Down campus is within The City of Bath World Heritage Site. The slightly detached University medical centre is within the Conservation Area itself. Directly to the north is Bathampton Camp Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting.
				The campus is already substantially developed. There is scope for further intensification but this requires careful management. The zonal approach and policy wording policy is comprehensive in terms of the inclusion of general and area specific development principles that relate to this objective. This objective will also be secured by the application other relevant Development Management policies.
Objective 8: Encourage and protect habitats and biodiversity and				The campus is already substantially developed. There is scope for further intensification but this requires careful management. This will be achieved by the application of zonal approach '3'

Policy No. & Title	SB.19 University of Bath Campus at Claverton Down					
SA Objectives	ST	MT	LT	Commentary		
geodiversity (taking account of climate change)	0 +	0/+	0/+	(green zone) and '5' (clear zone), general principles (f) and (j), and area specific principle 'P' (AONB north of the Avenue). This will neutralise negative effects and could potentially generate positive outcomes.		
				This objective will also be secured by the application other relevant Development Management policies.		
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	Whilst the areas concerned are not 'classic AONB' development has the potential to affect the qualities of the wider AONB by virtue of illuminating areas of the campus that are dark at present and causing light spill. This is also an issue in respect of the SAC. The general intensification other parts of the campus also have the potential to increase light spill. The application of zonal approach (2) for the AONB to the north of the Avenue, and general design criteria (J) and area specific criterion (p) will moderate/mitigate the potential for light population impacts This objective will also be secured by the application other relevant Development Management policies. The land is within the Coal Authority defined Development Low Risk Area. The site is outside the Surface Coal Resource Plan area.		
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	Flood Zone 1- This objective will be secured by the application other relevant Development Management policies.		
Objective 11 Increase resilience to climate change	0	0	0	This objective will be secured by the application other relevant Development Management policies.		
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	+	+	+	The draft policy encourages careful and efficient use of the brownfield land within the campus. This objective will be also secured by the application other relevant Development Management policies.		
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0	0	0	This objective will be secured by the application other relevant Development Management policies.		

Policy No. & Title	SB.19 University of Bath Campus at Claverton Down			
SA Objectives	ST	MT	LT	Commentary

Approach

Extend the policy area to cover whole estate (including Green Belt, but do not remove further land from the Green Belt). Include much more specific policy in the form of a framework plan and general and area specific design criteria. Do not include a liking mechanism and instead rely on other Policies. to ensure balanced use of estate (i.e. Article 4 Direction re HMOs and, CS Policy B5 and related site allocations policies in the Enterprise Area.

Key Points

Approach promotes/enables more sustainable outcomes across more SA objectives than current LP Policy. Alterative devolves many key concepts to be determined in a non-statutory masterplan. Approach is more comprehensive in its spatial and development principles for specific areas of the Campus. A number of Objectives e.g. 10-13 will be also achieved by the application of other development management policies.

Policy No. & Title	Welton Bag Factory SSV4			
SA Objectives	ST	MT	LT	Commentary
Objective 1: Improve the health and well-being of all communities	++	++	++	The site is adjacent to Midsomer Norton Town Centre with its health facilities. The site is located within walking distance of town centre bus stops. The policy requires an improved crossing between the site and the High Street at Stones Cross which will make it easier to walk to the Town Centre. The policy also requires de-culverting the Wellow Brook to provide continued natural sections as part of west to east GI corridor which helps achieve this objective.
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	++	++	++	The Policy states that the priority will be to deliver a mixed use development of employment and residential including affordable housing.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	++	++	++	The site is currently vacant with many unoccupied industrial buildings and no public access. Redevelopment would open up the area for the public and improve connections to the High Street.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	+	+	The site is currently in an employment use, although the occupier has vacated the factory and relocated. There is little prospect of the factory re-opening. SSV4 states that the priority is to deliver an appropriate mix of employment floorspace and housing. Therefore, although redevelopment is likely to provide less employment floorspace than is currently on site, there will be more jobs provided than at present, and this is assessed as being positive. This relates to providing an adequate supply of land for employment opportunities and helping to reduce travel distances to work.

Policy No. & Title	Welton Bag Factory SSV4			
SA Objectives	ST	MT	LT	Commentary
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	+	+	+	Development would be adjacent to the town centre (walking distance of shops, facilities and public transport) The Policy requires to provide a more direct and attractive connection between the site and the High Street via Stone's Cross and north to south and west to east pedestrian links through the site.
Objective 6: Protect and enhance local distinctiveness	+	+	+	The site is adjacent to MN Conservation Area and the former brewery building is within the Conservation Area. MN and Welton CA is registered as at risk by Historic England. The policy requires retention and reuse of the former brewery subject to robust economic viability testing measured against the value of the whole development allocation, and taking full account of the heritage value and wider possible uses of the former brewery building.
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	+	+	+	The site is adjacent to MN Conservation Area and the former brewery building is within the Conservation Area. The policy requires retention and reuse of the former brewery and contributing to enhance the character and appearance of the Conservation Area.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	++	++	++	The Wellow Brook is currently culverted through this site. The policy requires incorporation of a high quality green infrastructure route by de-culverting the Wellow Brook. This relates to the objective of encouraging and protecting habitats and biodiversity
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	A small part of the site is within the Coal Authority defined Development High Risk Area. The 'Development High Risk Area' for the coal mining legacy will be defined on the Policies Map within which the submission of a Coal Mining Risk Assessment would be necessary to support a development proposal. Policy PCS6 'Unstable Land' states that the onus will be with the developer and/or landowner for securing a safe development and for submitting the necessary Risk Assessment(s) to support the proposal. The site is also within the Surface Coal Resource Plan area. Potential ground constraints and contamination across site Development would be adjacent to the town centre, minimising traffic congestion (more people will be able to walk/cycle) Potential ground constraints and contamination across site
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	Flood Zone 1, 2 and 3 The Policy requires de-culvert the Wellow Brook that currently runs underneath the site. This could be restored to mimic the upstream natural sections through the site providing habitat creation/enhancement route linking with the Welton Green community space This would provide a significant local asset and

Policy No. & Title	Welt	Welton Bag Factory SSV4		
SA Objectives	ST	MT	LT	Commentary
				could help to achieve Water Framework Directive objectives for the watercourse.
				The policy requires locating more vulnerable uses outside of the floodplain.
				Other Development Management Policies apply. Flood risk assessment, Land contamination reports, WFD assessment (either screening or full assessment) and Ecological surveys are necessary.
Objective 11 Increase resilience to climate change	0	0	0	Other Development Management Policies apply
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	++	++	++	Development is on a brownfield site
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	0	0	0	Joint Waste Core Strategy policies apply.

The draft Policy has the potential to result in major or minor positive effects with regards to objectives 1, 3, 4, 5, 6, 7, 8 and 12.

In order to address negative effects and enhancement measures identified through the previous appraisals the Development Requirements and Design Principles set specific requirements as below;

- Enhance the Conservation Area and its setting including retention and reuse of the former Brewery building.
- Improve pedestrian and cycling connections both north to south and east to west connecting to existing
 cycle and bridleway for new and neighbouring residential community.
- De-culvert the Wellow Brook to provide continued natural sections
- Appropriate ecological mitigation to be included
- Coal Mining Risk Assessment is necessary

Other Development Management Policies would help address issues identified.