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# Bath & North East Somerset Council

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Improving People's Lives

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

**Sustainability Appraisal Report  
Non-Technical Summary**

**Date January 2023**



## 1. Introduction

- 1.1. This Sustainability Appraisal Report: Non-Technical Summary relates to the Bath & North East Somerset (B&NES) Local Plan Partial Update (LPPU).
- 1.2 Following the review, in spring 2020 the Council commenced work on the LPPU which amends or updates parts of the adopted Core Strategy and Placemaking Plan (together comprising the Local Plan) to better address Council priorities. In summary the key proposed elements or scope of the partial update are set out below. Table 3 in the main report provides a summary of new and revised policies.
- Updating policies in order that they better address the climate and ecological emergency
  - Replenish housing supply in order that the Core Strategy housing requirement can be met and the necessary supply of housing land is maintained
  - Addressing a limited range of other urgent local issues
  - Amending policies for clarity and to ensure they are aligned with current national policy
- 1.2. The LPPU was subject to a process called Sustainability Appraisal (SA), which assesses the likely effects of a plan on social, economic, and environmental issues using the SA Objectives below.

**Table 1 B&NES SA Objectives**

<b>SA Objective</b>	<b>Description</b>
Objective 1	Improve the health and well-being of all communities, and reduce health inequalities
Objective 2	Meet identified needs for sufficient, high quality housing including affordable housing
Objective 3	Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime
Objective 4	Build a strong, competitive economy and enable local businesses to prosper
Objective 5	Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure
Objective 6	Protect and enhance local environmental distinctiveness and the character and appearance of landscape
Objective 7	Conserve and enhance the historic environment, heritage/cultural assets and their settings
Objective 8	Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)
Objective 9	Reduce land, water, air, light, noise pollution
Objective 10	Reduce vulnerability to, and manage flood risk (taking account of climate change)
Objective 11	Reduce negative contributions to and Increase resilience to climate change
Objective 12	Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

## 2. How sustainability and environmental considerations and the Sustainability Appraisal Report have been integrated into the Local Plan Partial Update (LPPU)

### SA Stage A Scoping

- 2.1. The SA Scoping Report on the LPPU was produced and consulted upon in April 2020 to help ensure that the SA process covered the key sustainability issues for spatial planning in Bath & North East Somerset. From all of the information collected, a “SA Framework”, or set of sustainability objectives, was developed, against which the various components of the LPPU have been appraised. [The final Scoping Report](#) was published in October 2020.

### SA Stage B Developing and refining alternatives and assessing effects

- 2.2. Preparation of the LPPU involved production of a [LPPU Commencement Document](#) to stimulate discussion of issues (April 2020), the production of “options” in [the LPPU Options Consultation document](#) (January 2021) and the publication of [a pre-submission Draft Plan](#) (August 2021).

The LPPU Options Document was appraised by the Policy authors and reviewed by the SA lead officer. SA matrices for these options were published for consultation alongside the Options document.

[SA report for Options Document](#)  
[SA Report Appendix 1 \(appraisals\)](#)

### SA Stage C Prepare the sustainability appraisal report

#### Draft Plan Aug 2021

- 2.3 Following the consultation on the SA of the Options document (7th Jan – 18th Feb 2021), all options were reviewed taking into account matters such as representations received through the consultation, conformity with the Core Strategy framework, engagement with key stakeholders, changes in national policy and guidance, up-to-date evidence and land availability & viability. The appraisals of alternative options were published alongside the pre-submission Plan. Full appraisals are presented in [Annex C](#) of the SA report accompanied [the pre-submission Draft Plan](#).

#### Draft Plan for submission Dec 2021

The Draft LPPU Plan and draft Sustainability Appraisal Report were submitted to the Secretary of State to be examined by an independent Planning Inspector in December 2021

[The draft SA report](#) (Aug 2021)

#### Modifications to the submitted LPPU Draft Plan (Sept- Nov 2022)

Following the hearings that took place in May/June 2022, the Inspector invited comments on the Main Modifications to the Submitted LPPU Draft Plan. The Main Modifications are those which the Inspector considers are

necessary to make the plan sound/and or legally compliant. All Main Modifications were screened for further appraisal.

[Updated Draft SA Report](#)

[Main Modifications Screening Appendix I](#)

### **3. Key outcome: Potential cumulative effects of Local Plan (Core Strategy, Placemaking with LPPU)**

- 3.1. The LPPU updates key Development Management policies and allocates further sites in order to ensure the Council's Planning Framework is aligned with the Council's priorities and that specifically it helps to facilitate solutions.
- 3.2. The SA process helps to identify '**significant**' environmental effects. On the basis of the criteria set out through the SA Scoping Report stage, **significant effects** have been considered to be **major positive, major and minor negative effects, plus uncertain effects**. The likely cumulative effects for the Local Plan (Core Strategy, Placemaking Plan with Partial Update) are described in Section 8 of the main report. The key significant effects identified on adoption and implementation of the LPPU are summarised below.
- 3.3. **Significant positive cumulative effects** were identified in relation to SA Objectives below.

#### **Objective 1 (health and well-being)**

- By directing additional new housing development to existing main settlements, the strategy will encourage walking and cycling by locating new jobs and housing close to existing workforces, facilities and services.
- Policy SB18 supports Royal United Hospital Estate Strategy (2014) which specifically sets out the proposed RUH Redevelopment programme that will improve health facilities.
- The retained policies to manage pollution, contamination and safety help to achieve this objective.
- Proposed transport policy amendments encourage more accessible developments, closer to everyday destinations reachable by active travel through provision of high-quality cycling and walking infrastructure options.
- The Infrastructure Delivery Programme is also updated to reflect the LPPU.

#### **Objective 2 (housing)**

- The Core Strategy Policy DW1 sets out housing targets and the broad distribution of new housing development. The new housing sites were identified by applying the sequential approach established by the Core Strategy, considering the main urban areas of Bath, Keynsham and Somer Valley. The safeguarded sites in

Keynsham are released for development through the LPPU. These additional allocations help maintain the supply of housing sites to meet the district's overall housing targets (market and affordable housing) as well as the provision of a 5 year housing land supply.

- The revised Policy H7 with accessibility standards helps to address housing needs of older people.
- The pressure to manage new student accommodation continues to increase. Policy B5 prioritises the delivery of office space and general housing development in the city. The revised Policy SB19 sets out further guidance and requirements for Claverton Campus and new Policy H2a (PBSA) will help better manage new PBSA.
- Through the revised Policy H2 new build HMOs, the change of use to HMOs from other uses, and intensification of existing HMOs provides opportunity to direct further HMOs in the areas with lower HMO concentration and provide good quality homes catering for population groups unable to afford other forms of private accommodation.
- RA1 and RA2 continue to guide new development in the rural villages.
- The retained policies (Policies D1-D10, CP9, RA4, H1-H8, CP10 and CP11) help achieve the delivery of good quality housing and affordable housing to meet the fully objectively assessed housing needs.

### **Objective 3 (communities)**

- The site allocations direct most new housing development to the main urban areas in Bath, Keynsham and Somer Valley, which have the majority of higher order services and facilities, including social, cultural and community facilities. This helps to promote stronger more vibrant and cohesive communities.
- The original NE2 requires development to incorporate green space within the scheme that positively contributes to creating a high-quality environment by providing sustainable public access and other landscape benefits. The revised Policy NE3, new Policy NE3A and Policy NE5 strengthens the protection of biodiversity. The provision of new habitats to achieve Biodiversity Net Gain might be delivered as multi-functioning publicly accessible open/natural/green space.
- The revised transport policies further encourage development accessible to community, social and cultural facilities by sustainable transport modes, including supporting disabled people and others with restricted mobility.
- The retained policies (Policy LCR1-LCR9, RA3) help provide or manage a range of appropriate and accessible community, social and cultural facilities.
- The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.

## Objective 4 (economy)

- The Milsom Quarter area is currently in decline, shown by falling footfall and increasing vacancy rates, greater than other areas of the City Centre. Many upper floors are also currently under utilised or empty. Redeveloping this area will provide more attractive and diverse range of employment opportunities.
- The revised Policy ED2A with the Locksbrook Creative Industrial Hub and amended Policy ED2B strengthen the protection of industrial land and encourage the delivery of new opportunities. The new allocation of Weston Island enables the relocation and retention of employment uses from elsewhere within the city, particularly from the Enterprise Zone and will continue to provide employment provision.
- The revised Policy SB19 creates more employment opportunities in growth sectors as the policy defines university-related uses to include research and allied business incubation. This will help improve access to local training, work experience and apprenticeships. The University of Bath is the second biggest employer in the District therefore facilitating meeting long-term requirements for the university on campus (48,000 sqm) has a major positive effect.
- Use of park and ride sites as transport interchanges seeks to provide local workers with better and more sustainable choices of transport contributing to the regions ambition to be a driving force for clean and inclusive growth.
- The amendments to the Policy SSV9 include a limited amount of higher value uses to enable delivery and investment in the site. This will also bring the benefit of a greater mix of uses to facilitate a more diverse range of employment opportunities.
- Revised Policy RE1 allows the limited expansion, intensification or redevelopment of previously developed land in the rural areas which helps to increase the supply of employment land and provide a diverse range of employment opportunities.
- Revised transport policies encourage developments which reduce travel distances from homes to workplaces, with sustainable transport options. Proposed amendments include detail regarding travel plans, which need to be tailored to the specific development and the location context in order to ensure that an optimal package of measures is provided to enable future users of the development to travel sustainably, thus supporting clean and inclusive growth.
- Other retained and revised employment policies help build a strong, competitive economy and enable local businesses to prosper.

## **Objective 5 (transport)**

- By locating the majority of new housing and employment development close to the existing main settlements in the District, the LPPU allocations help promote accessibility by public transport and cycling and walking. However, the potential development sites allocated in the Core Strategy and draft Placemaking Plan will have a cumulative impact on traffic congestion (although the impact on the highway network is shown not to be severe and is mitigated). The Transport Strategy makes some recommendations taking into account these development sites.
- The amendments to Policies ST1-ST7 strengthen existing policies in relation to access to public transport, safe walking and cycling routes, reducing dependence on the private car and discouraging short car journeys. Proposed amendments to Policy ST2A include reference to Active Travel Routes and requires *‘Opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising these routes, should be investigated and implemented wherever feasible.’*
- New Policy SCR9 requires electric vehicle charging infrastructure.
- The retained Policy CP13 requires new developments to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.

## **Objective 12 (resources)**

- In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley. The safeguarded land in Keynsham is greenfield land but the sites were already removed from the Green Belt and safeguarded for development.
- The new Policies SCR6 and 7 help new development to be net zero carbon by reducing heat and energy use. In order to minimise energy use development proposals should seek to optimise energy efficiency through building fabric and carefully considered design, orientation and innovation.
- Policy CP2 requires applicants to demonstrate that waste and recycling during construction and in operation have been addressed as well as the type, lifecycle and source of materials to be used.
- The site allocation policies require specific measures where identified.

3.4 Potential **minor positive and negative mixed cumulative effects** were identified in relation to SA Objective below.

## **Objective 6 (landscape)**

- The site allocation policies require protection and enhancement measures specific to relevant sites recommended by key studies.
- Policy CP3 sets out the suitable areas for renewable energy development. The provision of renewable energy projects has the potential to result in a negative effect on the surrounding landscape, including cumulative impact from projects. The significance of the

negative impact will depend on the size of energy generation and how it protects areas of valued landscape and townscape. The Land Sensitivity Assessment for wind energy was updated to identify suitable areas for development. The policy avoids the areas with a 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for wind energy) and sets out criteria to be used to assess individual development. The policy seeks to focus ground mounted solar development on areas where landscape impact will be less, but it does not prevent ground mounted solar development in the area with 'high' landscape impact (indicated as the low potential areas in the CP3 Landscape Sensitivity for solar) however it requires that applicants demonstrate that adverse impacts on the landscape can be satisfactorily mitigated.

- The revised Policy NE2 requires great weight to be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities. Proposed amendments to Policy CP7(Green Infrastructure) and NE1 (Development and Green Infrastructure) support effective and functional GI design focusing on nature-based solutions which include protecting, managing, and enhancing landscape character.
- The provision of new transport related infrastructure will have the potential to increase negative impacts on areas of valued landscape and townscape. The park and ride sites will be removed from the green belt and allocated for use as multi-modal transport interchanges (Policy SB26). The sites are all very sensitive in terms of landscape, due to their locations on the edge of the city. This sensitivity is decreased due to the sites already being developed for park and ride uses. Removal of the sites from the green belt has been informed by a Green Belt harm assessment and consideration of exceptional circumstances.
- Policy SB26 ensures the protection of the surrounding landscape by requiring built form to be of an intensity, scale and massing appropriate to the sensitive landscape setting of the sites, minimising visual impact from the surrounding areas. Any development will be required to be informed by a Landscape Visual Impact Assessment for each site, taking into consideration potential impact on AONBs and other sensitive landscape features.
- The Claverton Campus (University of Bath) is almost completely surrounded by the Cotswolds AONB. Although the campus cannot be seen from the centre of Bath, its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. The Visual Impact Assessment was prepared and informed the key development areas with minimum buffer distances and maximum height restrictions.
- Policy KE3c and KE3d (East of Keynsham) Building heights generally limited to 2/2.5 storeys, ensuring that development will not

interrupt the skyline views from Queen Charlton Conservation Area and Cotswolds AONB.

- The retained urban design policies (D1-D10) also contribute to achieving a higher quality townscape.

#### **4. Conclusion**

- 4.1.** An ambitious approach to addressing climate change is embedded in the LPPU. The target of becoming a Carbon Neutral District by 2030 is ahead of the Government target of net Zero Carbon by 2050. There are specific criteria which new development will be required to meet to contribute to this target. In accordance with the locational sequential approach, the new housing sites are identified in the main urban areas (brownfield land) of Bath, Keynsham and Somer Valley to ensure the continued supply of housing sites. The prioritisation of sustainable modes of transport at new development to discourage the use of private vehicles is expected to help mitigate impacts relating to both climate change and air pollution. The LPPU reflects national policy on biodiversity net gain and seeks to protect the existing quality and function of green infrastructure as well as supporting new provision. These requirements are expected to be of particular importance considering the presence of international and national biodiversity sites (including RAMSAR, SACs, SPAs and SSSI) within its boundaries.