

**Bath and North East Somerset**

**Draft Local Plan Partial (LPPU) Update**

**Draft Sustainability Appraisal Report**

**Updated Appendix H Consultation comments and Council responses**

*This appendix includes the comments received for the draft SA published alongside the Pre-Submission document (Reg 19 consultation)  
and replaces Appendix H of the draft SA report Aug 2021.*

**Date**

**December 2021**

## Appendix H Consultation comments and Council responses

<b>B&amp;NES Local Plan Partial Update SA Scoping Report summary comments and council's responses</b> <b>[Scoping Report consultation:28th April to 3rd June 2020]</b>	
<b>Historic England</b>	
<p>Thank you for sharing a draft Scoping Report for consideration.</p> <p>Our planning system is based on the principle of delivering sustainable development, a component of which is making the best of our heritage assets. Heritage will play an increasingly important role in stimulating regeneration post COVID-19, informing sustainable growth and securing positive change that helps safeguard our historic places and heritage assets. Heritage is not just an environmental consideration but also an important economic and social factor.</p> <p><b>3.4 Heritage, Archaeology and Landscape</b></p> <p>As archaeology is a component of 'heritage', separate reference shouldn't be unnecessary. A more significant issue is a combination of landscape and heritage, as the two are discrete planning matters. An unfortunate consequence of combining the two may be that any assessment may indicate harm to a heritage asset but not the landscape, or visa versa; how will this be recorded and an accurate evaluation derived? This also doesn't appear to tally with Obj 7 in Annex B? Is this more up to date?</p> <p><b>Recent changes, trends and issues</b></p> <p>It would be helpful to appreciate how these <i>changes, trends and issues</i> have been informed. Is there a topic paper? Reference is made to information in 2016 although more up-to-date information is now available e.g. the national Heritage at risk Register is published annually. There is also reference to a report relating to twentieth-century heritage from 2011. This section would benefit from updating. This is further illustrated by a lack of reference to matters such as climate change, the future of the historic high street and the implications of COVID19.</p> <p>The first bullet point in this <i>Recent changes and trends</i> section is as follows. <i>"In accordance with the latest guidance from Historic England, every CA in the district will have a 'CA Appraisal'. In 2016, the Keynsham CA Appraisal was completed. Further appraisals are being drafted.</i></p> <p>Have others been completed since 2016? What do the CA appraisals indicate are the trends, changes and issues? Will all the outstanding appraisals be available to you to inform the SA and the Plan?</p> <p><b>Paragraph 3.4.17</b></p> <p>Unfortunately this section appears to narrowly define the relationship between the historic environment and the delivery of</p>	<p>Comments are helpful and noted.</p> <p>For the appraisal objectives, Objective 6 cover landscape issues and Objective 7 covers heritage and archaeology.</p> <p>The reference to the Heritage Topic Paper is added. The Topic Paper and various updated assessments will be available to assess options through the Partial Update process.  <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/historic_environment_topic_paper.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/historic_environment_topic_paper.pdf</a></p> <p>Further analysis is added in the report.</p>

<p>sustainable development and in turn how the development plan can positively respond. The table in this section of the SA appears reactive and limited, failing to reflect national policy, guidance and advice. <a href="https://historicengland.org.uk/advice/planning/planning-system/">https://historicengland.org.uk/advice/planning/planning-system/</a></p> <p>It isn't clear why HMOs are referred to in the table (light blue coloured).</p> <p><b>Paragraph 3.2.19</b> The proposed SA Framework and its component parts in relation to the historic environment might benefit from a critical review. Guidance is respectfully offered in the following advice note. <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p> <p>As previously mentioned an amalgamation of landscape and heritage matters may confuse/distort the SA assessment and accuracy. Separate objectives might therefore be considered.</p> <p>An alternative objective might be: <i>To conserve and enhance the historic environment, heritage assets and their settings.</i></p> <p>Or if they continue to be combined the following alternative might be considered:</p> <p><i>Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place.</i></p> <p>Objective 7, <i>Appraisal questions/prompts (would the policy/option lead to...)</i> <i>Development that affects cultural and historic assets and their settings?</i> <i>Well-designed development that is well related and provides physical connection to the surrounding townscape/landscape?</i></p> <p>When undertaking the SA would either of the above questions be as useful as they might in helping you to assess the relative impact of a proposal. For example, does the first question determine whether the effect is positive or negative, and the degree of any likely harm?</p> <p>The second question is probably immaterial at this stage as the design of a proposal will not be known</p>	<p>Text deleted.</p> <p>SA objective 6 covers landscape matters and objective 7 covers historic and archaeology matters and these objectives were reworded for clarity as below.</p> <p>Objective 6: To protect and enhance local environmental distinctiveness and the character and appearance of landscape</p> <p>Objective 7: To conserve and enhance the historic environment, heritage/cultural assets and their settings</p>
<p>yet and one has to assume anyway that it will be well designed to accord with national design policy. Also is it clear why a “physical connection to the surroundings” is a determinant of sustainability re the historic environment? Perhaps these two questions could be revisited?</p> <p>A simple alternative question might be, <i>Will development safeguard, and where appropriate enhance, the significance of any</i></p>	

<p><i>affected heritage asset, historic townscape/landscape? Or Will the proposal conserve and/or enhance heritage assets, their setting and the wider historic environment?</i></p> <p>I do hope these comments will help to refine your Sustainability Appraisal, to avoid or minimise any adverse effect, maximise potential benefits, identify appropriate mitigation and in doing so deliver sustainable development.</p>	
<p><b>Amanda Grundy Wessex Team Natural England</b></p>	
<p>Thank you for your consultation on the above, which was received by Natural England on 28th April 2020.</p> <p>The SEA Directive sets out the topics that a SA/SEA must cover in its assessment. Natural England is an identified consultation body for biodiversity including flora, fauna, human health, soil (including waste and contaminated land issues), water (water quality and resources), air, climatic factors (including strategic flood risks), material assets (including geological interests and infrastructure), cultural heritage and Landscape. We are the lead authority for biodiversity and landscape and identified as a source of information for soils, material assets and cultural heritage.</p> <p>We consider the Sustainability Appraisal Scoping Report is clearly presented and demonstrates a good understanding of the Plan area and the wider context of the partial review, including with respect to the climate and nature emergency and relevant changes to national policy and legislation. We particularly welcome the consideration given to the natural environment, which is thorough and is reflected across policy topic areas.</p> <p>The Environment Bill represents a significant shift in approach to meeting environmental challenges and opportunities and will bring forward new requirements for local delivery of the 25 Year Environment Plan. Key components include local nature recovery strategies, improved green infrastructure delivery and securing measurable net gains for biodiversity from development. BANES is well placed to deliver those goals, building on work already underway in the district and with partners in the West of England.</p> <p>Nature recovery requires a strategic approach to strengthen ecological networks and protect and enhance natural capital on which the districts economy and communities depend. The SA scoping report begins to recognise this but there is scope to make it a cornerstone of the framework. Similarly, the Joint Green Infrastructure Strategy (and BANES GI Strategy that it will inform) promotes the need to integrate green infrastructure objectives across different policy areas and we would encourage that to be applied through the SA assessment framework.</p> <p>We are pleased to see the importance of landscape and landscape character is recognised in the SA scoping document which</p>	<p>Comments are helpful and noted.</p>

notes that almost a third of the District lies within the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty. The SA Scoping notes the influence of the Local Plan DPD in relation to avoiding harmful impacts on protected landscapes in Objective 6: Protect and enhance local environmental distinctiveness...and in the accompanying question - Avoidance of harmful impacts of development on all landscapes including AONB landscape character and its statutory purpose?

While this is welcome in principle, the SA and local plan should also recognise that development close to the boundaries of protected landscapes (within their settings) can be inconsistent with the purposes of AONB and impact on their special qualities. While we appreciate there is not specific reference to the settings of protected landscapes in the NPPF, the PPG on Landscape notes that the duty on public bodies to have regard to the purpose of NP/AONB is relevant in considering development in their setting. This is a particularly important consideration, noting that in practice, most development is likely to come forward outside than within AONB boundaries.

The key issues to be addressed in the partial review appear reasonable.

The baseline review considers European and nationally designated sites within the district, noting the rare bats associated with Bath & Bradford on Avon Bats SAC and North Somerset & Mendip Bats SAC and the important flight lines and foraging habitat associated with these SACs.

We understand the Council intends to produce technical guidance for development affecting rare bats associated with the European sites, however we could not see a reference to this in the consultation documents.

Recognising that habitats and landscape features outside the designated site boundary are critical to the protection of the bats and to meeting the conservation objectives for the European site, we would welcome an update on the progress of the guidance.

We are pleased the Council recognises the opportunities and obligations presented by the Environment Bill, including securing a 10% biodiversity net gain from new development and establishing a local nature recovery network. We note that updated and renewed habitat and priority habitat baseline data is being produced for the WoE - the detail and scale of this data is not specified, but we expect that it will help to inform a B&NES Local Nature Recovery Strategy and provide a basis for directing and prioritising any BNG contributions secured from new development.

Notwithstanding the above, in most situations, we would expect robust site based ecological surveys will also be required to identify more precisely the habitats and species present, how these could be affected, and to inform mitigation measures.

Natural England supports the use of the Defra metric to calculate BNG requirements in accordance with CIEEM biodiversity net gain principles. The Defra metric has been updated recently to include a wider range of interests, including linear features and connectivity.

Habitat Regulation Assessment will be carried out alongside the Sustainability Appraisals.

<p>The WoE GI strategy is being prepared by the WoE authorities, including B&amp;NES, which will help to ensure cross boundary issues and opportunities are identified. As noted in the SA scoping report, there is also a need to understand the ecological connections in relation to Mendip and Wiltshire neighbouring authorities.</p> <p>We have reviewed the sustainability objectives and accompanying questions and offer the following recommendations:</p> <p>Objective 8 Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p> <p>The questions appear focused on development management and minimising harm, which is important, but more could be done to make nature recovery ambitions core to the assessment framework. For example, we note the question ‘Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?’ This could be improved by also asking whether the development could make a positive contribution to the nature recovery network.</p> <p>Objective 9 Reduce land, water, air, light, noise pollution</p> <p>While the objective includes light pollution, a corresponding question/prompt would be helpful to ensure it is accounted for when assessing development proposals. Lighting can have harmful effects on people, wildlife, landscape and perceptions of landscape such as tranquillity and dark skies – it also requires energy. While we recognise there is a need for lighting for safety reasons, the local plan should ensure every effort is made to minimise increases in lighting levels and light spill.</p> <p>Objective 9 also refers to water pollution and again we suggest a corresponding question is needed to ensure water quality is taken into account in the plan preparation and when assessing new development proposals.</p> <p>We would also recommend that a question/prompt is needed to ensure potential air quality impacts on wildlife sites are considered.</p> <p>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)</p> <p>We suggest the questions relating to SUDS would benefit from an explanation about the range of functions that well designed SUDS can provide and what would be expected from new development. For example water quality, ecology, and place making, as well as managing surface water and flood risk.</p> <p>In addition, as per comments above, it would useful to check how green infrastructure can be better integrated into the</p>	<p>Objective 8 – additional question ‘Would the policy/option lead to: enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery network?’</p> <p>Objective 9 – additional question ‘Would the policy/option lead to: minimise increase in light pollution?’</p> <p>Objective 9 – additional question ‘Would the policy /option lead to: Development that minimises exposure to poor air quality, noise pollution and water pollution?’</p> <p>Objective 10 – additional question’ Would the policy/option lead to: promote best practice for SuDs?’</p> <p>Objective 8 – additional question ‘Would the policy/option lead to: enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery</p>
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<p>framework – many of the objectives could include a prompt/question related to GI.</p> <p>We note the Council intends to undertake a Habitat Regulations Assessment of the Local Plan alongside the SA and would be pleased to comment further on both these assessments in due course.</p>	<p>network.?’</p>
<p><b>Environment Agency</b> <b>Mark Willitts</b></p>	
<p>We have reviewed the SA scoping report and offer the following comments:</p> <p><b>Objective 9</b> We advise reference should be made to the requirements of the Avon Act. This is particularly important given the powers it gives the local authority in protecting the sensitive natural thermal springs.</p> <p><b>Objectives 10 and 11</b> The Planning Act 2008 (section 182) advises “<i>Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.</i>” The SA and evidence based must be revised to address this requirement. We advise the objectives must be linked and reference made to UKCP18 guidance.</p> <p>In addressing the above, the Strategic Flood Risk Assessment must be updated, taking into account the latest UKCP18 climate change predictions and best available flood data. It is particularly important reference is made in the above objectives to the delivery of flood risk management infrastructure in respect of climate change adaption and mitigation.</p> <p><b>General comments</b> We note a number of minor typographical errors appear in the consultation documentation and trust these will be corrected. We advise the evidence base must be updated to ensure it is contemporaneous and that the plan is based on a sound evidence base.</p> <p>We would very much welcome further discussion with your authority on the above points at an appropriate time. Please do not hesitate to contact us should you have any further queries.</p>	<p>Objective 9 – additional question ‘Would the policy/option lead to: protect the natural thermal spring under County of Avon Act 1982?’</p>

<b>B&amp;NES Local Plan Partial Update interim SA Report summary comments and council's responses [Options Consultation 7th January to 18th February 2021]</b>	
<b>Historic England</b> <b>Rohan Torkildsen</b>	
<b>Potential new and refined allocations</b> We presume that an understanding of the significance of each site and its setting has informed the proposed Options and that further evidence will be gathered, and made available, to inform the next iteration, as recommended by Interim Sustainability Appraisal Report (November 2020).	Further evidence was prepared and informed the preparation of the Reg 19 draft plan.
<b>Natural England</b> Amanda Grundy	
We broadly concur with the SA findings, which identifies the potential for negative or uncertain effects on landscape and ecology to result from some of the policy proposals, particularly those relating to housing allocations and including renewable energy infrastructure and the need for more detailed assessments.	Further appraisals for development management policies and site allocations were undertaken to inform the draft LPPU.

<b>B&amp;NES Local Plan Partial Update Draft SA Report (LPPU Regulation 19 consultation) summary comments and council's responses Draft LPPU Consultation 27th August to 8th October 2021</b>	
<b>374 Natural England</b>	<b>Responses</b>
<p>Policy CP3 and the Sustainability Appraisal</p> <p>The LPPU Reg 18 consultation presented 2 options (plus no change) for CP3 about the approach to which areas should be defined as potentially suitable for renewable energy development and shown on the policies map. We note that Option 2 has been taken forward, which includes Landscape Character Areas (LCA) with moderate/low potential for wind energy and corresponding moderate/high landscape sensitivity.</p> <p>The SA presents the assessment of the environmental effects of each of the options in Table 10 'Summary appraisal results of the Options' M6/DM7 New Policy for Harnessing wind energy (amendment to Policy CP3), which found ...Option 2 which allows a wider</p>	<p>Agreed that there may be a difference in the potential effects of Option 1 and Option 2 presented in the interim SA Report (Jan 2020) and Local Plan Partial Update Options document (Jan 2020), but for both the effects are likely to be negative and uncertain dependent on the policy wording in the Reg 19 Plan and implementation of the policy. As such both options were assessed as negative and uncertain, and mitigation stated that '<i>a policy for wind energy development would allow for identification of suitable sites and allow for mitigation and enhancement measures. Site specific mitigation and enhancement measures should be included in the policies.</i>'</p> <p>Identifying the areas suitable for wind energy has a positive effect on achieving</p>



area for consideration would have major positive effects on objective 4 (economy), objective 11 (climate change) and objective 12 (resources). However, there are negative or uncertain effects that have been identified for environmental objectives.

Appendix C Local Plan Partial Update alternative options appraisal matrices (Ref DM5 Emerging policy approach for wind energy development), presents the assessment of the options against all SA objectives, but does not appear to differentiate between Option 1 and 2 in relation to the environment, noting the findings and mitigation for 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 setting; and Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change) are identical.

In our view Options 1 and 2 are substantially different in terms of the greater spatial area and uncertain implications for landscape and ecological impacts of Option 2 and we consider that further assessment of the potential environmental effects of this option is warranted to explain and justify its selection.

more renewable energy. Including the moderate-high landscape sensitivity area will increase potential locations and opportunities. However, a number of uncertain effects are identified on natural and historic environmental objectives.

In order to inform draft Policy CP3, Landscape Sensitivity Assessment for Renewable Energy Development (Aug 2021) was prepared. This is an update from the 2010 study which informed the preparation of the Core Strategy.

The Landscape Sensitivity Assessment (LSA) for Renewable Energy Development provides judgements on the landscape potential of different parts of the B&NES landscape (based on landscape type) to accommodate solar photovoltaic (PV) and wind energy development in the future. The results of this study provide an indication of landscape sensitivity (and potential) across the district and helped to assess the landscape impact in drafting Policy CP3. The assessment also includes information on the mitigation of landscape impact of renewable energy proposals within these landscape types e.g. in terms of location, mitigation form etc. The assessment will also allow the Council to identify broad areas for renewable energy development and establish a local policy framework for such development, in line with the National Planning Policy Framework (paragraph 151).

Draft Policy CP3 was amended to reflect the latest evidence and include detailed development requirements in considering wind energy proposals. (See Table 10 of the draft SA report Aug 2021)

*Policy CP3 states that*

*1) Proposals for all renewable and low carbon energy-generating and distribution networks, will be supported in the context of sustainable development and climate change, where:*

*a) ----*

*b) They will not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated or do not accord with national policy, including:*

- impacts to biodiversity;*
- landscape and visual impacts including cumulative effects;*
- impacts on the special qualities of all nationally important or protected*

	<p>landscapes; and c) ----</p> <p>It refers to national policy and NPPF paragraphs 176 and 177 that would apply to any applications proposed in nationally designated landscape including the Cotswolds and Mendip Hills Areas of Natural Outstanding Beauty.</p> <p>Planning applications will also need to be subject to and supported by a landscape and visual impact assessment to fully demonstrate and understand the impacts.</p> <p>Landscape Sensitivity Assessment Renewable Energy Development (Aug 2021) <a href="https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20Renewable%20Energy%20Landscape%20Sensitivity%20Assessment%20-%20combined.pdf">https://beta.bathnes.gov.uk/sites/default/files/2021-08/B%26NES%20Renewable%20Energy%20Landscape%20Sensitivity%20Assessment%20-%20combined.pdf</a></p> <p>Landscape Sensitivity Analyses for Wind Energy Development (2010) <a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/landscape_sensitivity_analysis_for_wind_energy.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Sustainability/landscape_sensitivity_analysis_for_wind_energy.pdf</a></p>
<p><b>415 Redrow Homes Limited</b></p>	
<p>Both the Partial Update and its associated Sustainability Appraisal have failed to adequately assess reasonable alternatives in justifying the approach adopted. The Partial Update remains largely Bath and Keynsham centric and there is no apparent evidence, including in the SA, as to whether reasonable alternatives, including on the edge of Bristol, have been considered.</p> <p>Given this uncertainty, the Council should have assessed all reasonable alternatives, including through the Sustainability Appraisal (SA), prior to the publication of the consultation to ensure that the approach taken was deliverable, effective and justified in the context of paragraph 25 of the National Planning Policy Framework.</p> <p>The previously adopted approach to Whitchurch, which recognises its proximity to Bristol, remains sound and should be also recognised within the Partial Update as a reasonable</p>	<p>Planning Practice Guidance (Para 9) states that <i>'The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.</i></p> <p>The scope of the Local Plan Partial Update is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy &amp; Placemaking Plan. The reasonable alternatives appropriate to the scope of the Partial update and necessary in terms of replenishing housing supply to address the shortfall towards the end of the plan period were identified and assessed</p>

<p>alternative to meeting the needs of both B&amp;NES and of Bristol City. As such, the sustainability of Whitchurch as a location for development is referenced at paragraph 53 of the Core Strategy and this is carried forward into the Partial Update.</p>	<p>following the location spatial priorities established through the Core Strategy.</p> <p>The Annex L of the Core Strategy SA report sets out the locational spatial assessment.</p> <p><a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_l.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/scspc_sa_annex_l.pdf</a></p> <p>Further information on the Council's approach to the Housing Requirement and Housing Supply can be found in the Topic Papers on 'Housing Requirement and Housing Supply' and 'Purpose and Scope of the Local Plan Partial Update'.</p>
<p><b>345 The Duchy of Cornwall</b></p>	
<p>It is not clear what approach has been taken to explore reasonable alternatives, including alternative sites and strategies. If the LPPU does not address the spatial strategy elements that are raised in these representations, then at the very least it should explore how different approaches to site selection have been considered which are consistent with the current spatial strategy. It appears from the limited information within the SA that little account has been taken of the range of sites presented to BaNES as part of the recent Call for Sites exercises described at the beginning of these representations. For the LPPU to be justified, it must be demonstrated how reasonable alternatives have been properly considered throughout the plan-making process. This is set out in the NPPG, which explains: "The sustainability appraisal needs to consider and compare all reasonable alternatives as a plan evolves..." [NPPG ID 11-018-20140306, Copperfield emphasis] 54. The Interim SA does not appear to make any reference to reasonable alternatives, which is unfortunately not consistent with the guidance.</p> <p>One of the issues raised during the Joint Spatial Plan (JSP) Examination was a lack of proper consultation and consideration of reasonable alternatives against which to test the proposals. It would be unhelpful for all if this plan were to suffer the same issue. As such it is suggested that reasonable alternatives are properly and fully considered. From a housing and community perspective, one such alternative is land West of Bath (Appendix A), which is known to the Council and has been submitted as part of the latest Call for Sites exercise. The Duchy of Cornwall would welcome dialogue with the Council about how meeting some of the housing and community needs in this location would align with</p>	<p>As explained above, the scope of the Local Plan Partial Update is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements set out in the Core Strategy &amp; Placemaking Plan. The reasonable alternatives against the spatial priorities and strategy of the Core Strategy needed to address the housing supply shortfall have been identified and assessed. All the sites submitted through the Call for Sites were assessed and presented in the Housing, Economic Land Availability Assessment which helped to identify reasonable alternative sites in line with the Core Strategy spatial priorities.</p>

<p>emerging policy changes and would represent an appropriate part of the Council's development strategy.</p>	
<p><b>156 Taylor Wimpey UK Ltd</b></p>	
<p>Land at Chilcompton Road, Midsomer Norton offers an opportunity to deliver a sustainable development that would ensure the consistent delivery of dwellings through the remainder of the Plan period. The site is fully within the control of Taylor Wimpey and development is deliverable. It is anticipated that the site could accommodate a scheme of circa. 120 dwellings and could contribute to the Council's short-medium land supply. It should be noted that the site and a proposed scheme is supported by all necessary and relevant technical evidence, supporting its delivery. The site has also been promoted through each stage of the LPPU (identified as MSN38b and MSN38A). The Council's HELAA considered development of this site to be potentially achievable, however, it is unclear whether the site was subsequently assessed, and it is not noted as part of the Sustainability Appraisal supporting the LPPU.</p>	<p>Comment noted.</p> <p>As set out above sufficient alternative development sites were identified by assessing sites in accordance with the Core Strategy spatial priorities in order to address the housing supply shortfall. Substantial greenfield sites in the Somer Valley such as this were not considered as reasonable alternatives.</p>
<p><b>204 Kingswood School</b></p>	
<p>The Sustainability Appraisal Site Assessment for Kingswood School Upper Playing Fields should be reviewed to re-consider allocation of the site. (Detail commentary is submitted)</p> <p>Summary conclusion as below.</p> <p>The proposals will deliver development on previously developed land in a sustainable and accessible location in line with the Development Plan spatial strategy. The proposals will make appropriate provision for replacement and new sports facilities as well as providing opportunities for tree planting and biodiversity to integrate with the adjacent SNCI. We disagree that there would be a major negative effect on biodiversity as part of the site is previously developed land and there has not been a thorough assessment of the managed sports pitches. Residential development would also have wider public benefits as it forms a critical part of the school's future investment and funding strategy. It would allow the school to generate funds for reinvestment in major school capital projects to further enhance the array of current buildings, maintain its Grade II listed buildings and heritage structures, improve sustainability and to reduce environmental impact. It is recommended that the land comprised of tennis courts and car parking within the upper playing fields site is re-considered as an allocation to deliver new housing at the edge of Bath, on brownfield land outside of the green belt. It is a deliverable site that aligns with the Local Plan spatial</p>	<p>Comments noted.</p> <p>The site was promoted through the LPPU options consultation and HELAA Call for Sites. The site is located within and at the edge of the Bath City boundary and positive effects on various SA objectives are identified through the site assessment in the SA. However there are negative effects were identified on the landscape (major negative), historic and ecology objectives.</p>

<p>strategy and would make a valuable contribution to housing supply in the current plan period to 2029.</p>	
<p><b>291 Gladman Land off Old Road, Writhlington for up to 255 dwellings</b></p>	
<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. Bath and North East Somerset Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.</p>	<p>Comment noted. The draft SA report sets out the process undertaken and justification (alongside supporting evidence underpinning the LPPU) for the Council's policy choices.</p>
<p><b>252 Chew Valley Area Forum Climate &amp; Nature Emergency Working Group</b></p>	
<p>Nature Protection We noticed in one of the documents (sustainability appraisal scoring), the score includes "well lit spaces" in its "design out crime". However excess lighting is something to be avoided in rural areas if we want to encourage healthy wildlife habitats and dark skies. This lighting also uses power and high colour temperature which can have a far greater adverse effect on moth populations than low colour temperature ones</p>	<p>Comment noted. 'Well lit' spaces are considered and noted through SA Objective 3 (Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime) and sub-question 'Would the policy/option lead to Design out crime and promote a feeling of security through better design e.g. well-lit spaces, natural surveillance, limit non-overlooked areas?' This effect assessment also needs to be considered alongside assessment against other objectives such as the SA Objective 9. (Reduce land, water, air, light, noise pollution) and a sub question 'Would the policy/option lead to minimising increase in light and water pollution?'</p>
<p><b>337 South Gloucestershire Council</b></p>	
<p>Officers also consider that the LPPU has been prepared in accordance with relevant legislative and procedural requirements, including through the preparation of a sustainability appraisal which has informed the development of the Plan.</p>	<p>Comment noted.</p>