

Sustainability Appraisal (SA) for the Bath and North East Somerset Local Plan

SA Report (Reg 19 consultation version)

September 2026

Quality information

Prepared by	Checked by	Verified by	Approved by
CB: Associate Director	RP: Principal Environmental Consultant	NCB: Technical Director	NCB: Technical Director

Revision History

Revision	Revision date	Details	Name	Position
V0.1	July 2026	WIP for client input	CB	Associate Director
V0.2	August 2026	Draft for internal review	CB	Associate Director
V1.0	August 2026	Draft for Council review	AB	B&NES
V2.0	September 2026	Final for consultation	CB	Associate Director

Prepared for:

Bath and North East Somerset Council

Prepared by:

AECOM Limited
3 Rivergate
Temple Quay
Bristol BS1 6ER

T: +44 (0)117 901 7000
aecom.com

© 2026 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Bath and North East Somerset Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

Non-Technical Summary (NTS).....	i - viii
1. Introduction	1
1.1 Background and legal context	1
1.2 Local Plan context	1
1.4 Key land constraints	3
1.5 Scope and structure of the SA.....	4
2. Spatial strategy development and identification of reasonable alternatives	6
2.1 Chapter introduction	6
2.2 Work to date	7
2.3 Approach to identifying alternatives.....	7
2.4 Level of growth	8
2.5 Location of growth	9
2.6 Alternative growth scenarios identified at this stage.....	27
3. Appraisal of growth scenarios.....	31
3.1 Chapter overview	31
3.2 Methodology.....	31
3.3 Health and wellbeing	32
3.4 Housing	33
3.5 Communities	34
3.6 Economy	35
3.7 Transportation	36
3.8 Landscape.....	37
3.9 Historic environment.....	37
3.10 Biodiversity	38
3.11 Natural resources	39
3.12 Climate change	40
3.13 Waste	40
3.14 Conclusions.....	41
4. The Council's preferred approach.....	42
5. Appraisal of the Local Plan consultation document	44
5.1 Chapter overview	44
5.2 Methodology.....	44
5.3 Plan contents overview.....	44
5.4 Health and wellbeing	45
5.5 Housing	46
5.6 Communities	46
5.7 Economy	46
5.8 Transportation	47
5.9 Landscape.....	47
5.10 Historic environment.....	48
5.11 Biodiversity	48
5.12 Natural resources	48
5.13 Climate change	49
5.14 Waste	49

5.15 Cumulative effects	49
5.17 Conclusions and recommendations	50
6. Next steps.....	51
6.1 Plan-making and SA.....	51
6.2 Monitoring.....	51
Appendix A – Scoping information.....	53

Non-Technical Summary (NTS)

Introduction

This is the Non-Technical Summary (NTS) for the Bath and North East Somerset (B&NES) Local Plan Sustainability Appraisal (SA) Report.

The SA Report is a legal requirement and accompanies the Local Plan at Regulation 19 consultation. This report will be the main SA evidence to accompany the Local Plan into submission and examination, and it builds on existing SA work that has been undertaken since 2023.

The aim of SA is to support plan-making and stakeholder engagement, particularly by providing transparency in decision-making through its investigation and appraisal of alternative approaches.

Key things to note about SA include:

- It works within the confines of the aims and geographical scope of the local plan.
- It includes an initial 'scoping' phase, where a baseline is established under different SA topics (which all proposals can be measured against) and key issues for plan-making and SA are identified along with associated SA objectives. The topics and resultant SA objectives form the basis of the 'SA framework' which is used to structure and guide subsequent appraisals. The summary SA framework is provided in Table NTS.1 below. The regulations require that the scope is shared with Statutory Consultees (Historic England, Natural England, and the Environment Agency) which occurred back in 2023.
- The SA Report addresses the SA requirements to 1) identify and appraise reasonable alternatives to the plan approach, 2) present an appraisal of the Local Plan (as currently in consultation) and 3) present these findings to stakeholders and the public in consultation alongside the Local Plan.
- Reasonable alternatives focus on the spatial strategy. In this SA Report, they look specifically at alternative options to boost housing supply utilising 'less suitable' sites which are identified through a review of key settlements in the district.
- This NTS for the SA Report focuses on 1) summarising the steps taken to identify alternatives and then appraise them, 2) providing Council feedback in terms of why it continues to progress the preferred approach over the alternatives, 3) summarising the outcomes of a detailed appraisal of the full Local Plan, and 4) outlining the next steps for both plan-making and SA.

Table NTS.1: SA framework

SA topic	SA objective
Health and wellbeing	Improve the health and wellbeing of all communities and create healthy places
Housing	Meet identified needs for sufficient high-quality housing including affordable housing
Communities	Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime
	Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services
Economy	Build a strong, prosperous and fairer economy and enable local businesses to prosper
Transportation	Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure
Landscape	Protect and enhance local environmental distinctiveness and the character and appearance of landscapes
Historic environment	Conserve and enhance the historic environment, heritage/ cultural assets and their settings
Biodiversity	Conserve and enhance the condition and extent of biodiversity in the district
Natural resources	Reduce land, water, air, light, and noise pollution
Climate change	Reduce vulnerability to, and manage flood risk taking account of climate change
	Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change
	Encourage careful, efficient use of resources including energy and encourage sustainable design and construction
Waste	Promote waste management in accordance with the waste hierarchy

Identifying and appraising reasonable alternatives to the plan approach

Work has been undertaken to identify and appraise reasonable alternatives since 2024, including in two previous Interim SA Reports that joined versions of the Plan in Regulation 18 consultation (which included a consultation re-run in 2025).

This work has explored options at settlements within each sub-area, to establish where strategic site choices essentially exist. These are brought together to identify different broad spatial approaches to delivering against development needs.

At this stage, the Council have identified a package of sites to be allocated in the plan – referred to as the preferred approach. This preferred approach falls short of Local Housing Need (LHN) – as calculated using the Standard Method, delivering around 81% of it in total. A review of sites options at settlements has identified omission sites, or sites that could be repurposed to potentially boost supply. For each sub-area the following conclusions are drawn:

- Bath:** there remains a theoretical option for significant settlement expansion at the West of Bath site, though this undoubtedly presents a high risk to the existing UNESCO inscriptions at Bath, and in terms of evidence development to underpin the site and demonstrate its soundness. A high-risk strategy could potentially allocate this site for up to 2,000 additional new homes. The repurposing of

employment land at Roseberry Place could also contribute an additional 40 new homes.

- **Bristol to Bath Corridor:**

- **Hicks Gate:** there is the option to develop east of the roundabout though the infrastructure cost to unlock this land could have viability implications. The land east of the roundabout could deliver up to an additional 600 homes
- **Keynsham and Saltford:** options at Keynsham are largely maximised as far as reasonable, but there could be the opportunity to slightly boost numbers by repurposing employment land at the North Keynsham allocation site (adding around 120 homes). There is an omission site at the Land south of Manor Road in the south of Saltford that could deliver an additional 90 homes and is subject to a live planning application. A further omission site at East Keynsham, also subject to a live planning application could contribute around an additional 100 homes.
- **Whitchurch Village and Stockwood:** repurposing the secondary school allocation at North Whitchurch could boost housing growth here with an additional 300 homes. However, an alternative site for a new secondary school would need to be identified which would likely result in reduced housing numbers elsewhere. Any additional growth to the south (above that allocated) is likely to lead to significant impacts in relation to the Maes Knoll Scheduled Monument that would be difficult to mitigate.

- **Somer Valley:** options for growth to the north of Midsomer Norton are discounted at this stage, recognising the substantial infrastructure required to unlock the site, outputs of recent viability work and the intentions of the Council not to prejudice a comprehensive scheme coming forward here in the future. Most allocations sites are therefore focused around Radstock and Peasedown St John, with some additional growth around Paulton. The Batch site at Paulton if progressed could potentially boost supply with an additional 100 homes, but there are limited opportunities for additional strategic growth at this stage. There are employment sites that have not been progressed (at Peasedown and Westfield) that if repurposed could contribute up to an additional 900 homes.
- **Additional Tier 2 settlements:** reflecting the work the Council has done to identify the sustainability merits at settlements, there are additional rural locations that are deemed relatively accessible under consideration here. A review of the omission sites at these settlements identifies options to boost growth and collectively potentially contribute up to 380 more new homes across Bathford, Batheaston, Bathampton, Chew Magna, and Timsbury. However, this would mean significantly large scale growth being directed to Timsbury (in the region of 650 new homes).
- **Tier 3 settlements (Rural Areas):** whilst relatively less accessible areas, a review of these settlements has identified options to potentially boost the supply of homes from rural areas, to collectively contribute up to 570 more new homes. This would be spread across the settlements of Chew Stoke, Corston, Farmborough, High Littleton, Hallatrow, Temple Cloud, and Pensford.

It is evident that options to boost housing supply (in an attempt to meet LHN) at this stage relate to the progression of more problematic sites or more isolated/ rural sites, which begin to step into a 'grey area' around delivery and alignment with the spatial priorities of the Local Plan, national policy and placemaking aims. This includes the repurposing of employment land allocations, which would reduce the level of

economic development being proposed alongside housing growth and lead to higher levels of out-commuting.

Despite this, the following reasonable alternative growth strategies can be drawn together:

- **Option 1;** The preferred allocation sites (Table 2.3 – land supply equating to 81% LHN)
- **Option 2:** Boost housing supply with less suitable omission sites in well-connected areas (Land South of Manor Road at Saltford, East Keynsham, land east of the roundabout at Hicks Gate, The Batch at Paulton, and additional growth at Tier 2 settlements – land supply equating to 86% LHN)
- **Option 3:** Boost housing supply by repurposing employment land allocations (North Keynsham, Roseberry Place, Industrial Quarter at Peasedown St John, Westfield Industrial Estate at Midsomer Norton – land supply equating to 85% LHN)
- **Option 4:** Boost housing supply with omission sites in less well-connected areas (additional growth at Tier 3 settlements – land supply equating to 83% LHN)
- **Option 5:** Adopt a high-risk strategy to get closer to LHN by progressing the West of Bath site (land supply equating to 89% LHN)

Table NTS.2 provides a breakdown of housing supply under the 5 options.

Table NTS.2: District-wide alternative growth scenarios

	Option 1 (preferred approach)	Option 2 (well-connected omission sites)	Option 3 (repurposed employment land)	Option 4 (less well-connected omission sites)	Option 5 (WoB)
Commitments	5,814	5,814	5,814	5,814	5,814
Windfall allowance	1,944	1,944	1,944	1,944	1,944
Bath	877	987	917	877	2,877
Keynsham and Saltford	4,745	4,935	4,865	4,745	4,745
Whitchurch (and Stockwood)	1,745	1,745	1,745	1,745	1,745
Hicks Gate	1,934	2,534	1,934	1,934	1,934
Somer Valley	3,550	3,650	4,450	3,550	3,550
Rural areas	1,605	1,875	1,605	2,175	1,605
Total supply	22,214	23,484	23,274	22,784	24,214
LHN	27,324	27,324	27,324	27,324	27,324
% contribution to LHN	81%	86%	85%	83%	89%

**Green indicates an increase in land supply*

The summary findings for the appraisal of these options are provided in **Table NTS.3**, whilst a more detailed narrative is provided in the main report. In terms of methodology, for each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see **Table NTS.1**) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects.

With regards to the resultant summary table, the number indicates the rank and does not have any bearing on likely significant effects. If an option is ranked as 1 then it is judged to perform better against that SA topic compared to an option that is ranked 2. '=' has been used to highlight where options perform equally and cannot be differentiated between. The likely effects are summarised by colour coding, where a 'red, amber, green' (RAG) approach is taken (utilising both light green and dark green) to highlight significant negative effects, minor to moderate negative effects, minor to moderate positive effects, and significant positive effects. Grey shading denotes uncertainty.

Table NTS.3: Summary of likely effects and ranking of options

	Option 1 (preferred approach)	Option 2 (well-connected omission sites)	Option 3 (repurposed employment land)	Option 4 (less well-connected omission sites)	Option 5 (WoB)
Health and wellbeing	1	1	2	3	1
Housing	5	2	4	3	1
Communities	1	4	3	5	2
Economy	2	4	5	3	1
Transportation	1	4	3	5	2
Landscape	1	4	2	3	5
Historic environment	1	4	2	3	5
Biodiversity	1	4	2	3	5
Natural resources	1	2	2	3	2
Climate change	1	2	2	3	2
Waste	=	=	=	=	=

Council feedback regarding alternatives

The Council considers the preferred approach (Option 1) represents a proportionate and appropriate response to the standard method figure of housing need given the constraints and opportunities within the District. Specifically, the presence of the double-inscribed World Heritage Site of Bath, parts of two National Landscapes,

numerous other important heritage and landscape assets and nearly 70% of the District being designated Green Belt. The housing requirement set out in the Local Plan meets over 80% of the standard method figure of need, represents a significant uplift or step-change in housing delivery and enables a substantial element of the need for affordable housing to be met. Existing need and much of the projected future need over the plan-period would be met.

The preferred approach or strategy also enables most development to be focussed on settlements and locations that are relatively well connected by sustainable modes of transport, although some development is still directed to some smaller, less well-connected villages. The proposed strategy also seeks to protect existing employment space and provide sufficient new employment space to enable the existing balance between resident workers and jobs resulting from the 22,000 housing requirement to be maintained. The proposed strategy or approach also seeks to appropriately balance harm to the landscape and heritage assets (and mitigate that harm) against meeting housing and employment space need.

It should be noted that in planning for a housing requirement that meets around 80% of the standard method figure of need still requires significant releases of land from the Green Belt. The Council considers the 'exceptional circumstances' required to justify removing land from the Green Belt exist. As such Green Belt has not been a particularly strong factor in determining the housing requirement or spatial strategy which is focussed on prioritising development at sustainable and well-connected locations.

Option 2 (well-connected omission sites) was rejected because on balance many of the omission sites were considered to result in harm to environmental assets, including landscape character, that outweighed the limited benefits of a relatively modest increase in housing supply.

Re-purposing employment land as tested through option 3 is not favoured because the Local Plan needs to help sustain local economic prosperity and maintain a housing/employment balance through not only protecting existing employment sites and premises but also planning for new space. Pursuing a strategy that provides for significantly less employment space and additional housing is likely to result in increased out-commuting from B&NES and within B&NES due to local imbalances and undermine long term economic prosperity.

Whilst the Council has considered a range of less well-connected omission sites these are generally of a small, non-strategic scale. Most of the available and deliverable strategic opportunities promoted and assessed have been allocated. A strategy that allocates a range of smaller, non-strategic sites in relatively isolated, unsustainable and car-dependent locations would result in increased travel distances and greater use of the private car, in short highly unsustainable travel patterns. This is contrary to national policy and the council's declared climate emergency. On balance the relatively limited increase in housing supply is not considered to outweigh the harm arising from substantially increased car travel and its associated impacts.

Finally, pursuing strategic growth to the West of Bath has not been pursued at this time due to the comprehensive and thorough assessment which shows that development in this location would cause substantial harm to the World Heritage Site and that this harm is intrinsic and unavoidable. It is considered that pursuing, in this Local Plan, growth to the West of Bath given the World Heritage Outstanding Universal Values and associated attributes and the assessment evidence referred to

above would be contrary to national policy i.e. the Council would not be able to demonstrate public benefits that are site specific and so significant as to outweigh the substantial harm. However, the Council is of the view that the potential for longer-term growth in this location should continue to be explored through the preparation of the WECA Spatial Development Strategy (SDS).

As a general point it is also important to note that whilst proposing a housing requirement and spatial strategy that meets around 80% of the standard method need figure in this Local Plan (for the reasons outlined above), the Local Plan will be reviewed within 5-years in response to the WECA SDS. Work on the WECA SDS has commenced and once it has progressed B&NES will prepare a new-style Local Plan that conforms with it. Preparation of the SDS is an appropriate mechanism through which to consider the best solutions to meeting future housing need strategically and sub-regionally.

Presenting an appraisal of the Local Plan

The SA Report has appraised the full plan document considering both the spatial strategy and suite of proposed policies. The following conclusions are reached for each SA topic:

Table NTS.4: Summary of likely effects

SA topic	Likely effect
Health and wellbeing	Mixed minor effects – both minor positive and minor negative
Housing	Significant positive
Communities	Significant positive
Economy	Significant positive
Transportation	Mixed minor effects – both minor positive and minor negative
Landscape	Mixed minor effects – both minor positive and minor negative
Historic environment	Mixed minor effects – both minor positive and minor negative
Biodiversity	Minor positive effects
Natural resources	Minor positive effects
Climate change	Minor positive effects
Waste	Neutral effects

No significant negative effects are anticipated in implantation of the plan. Significant positive effects predominantly relate to the delivery of new housing, employment land and infrastructure development that will support both existing and new residents. With most development directed towards the most accessible locations in the district, minor positive effects are also considered likely in relation to climate change and transportation. The protection of key environmental assets, and measures to improve and extend green infrastructure are also considered likely to positively affect biodiversity and natural resources. Design principles will also positively support development proposals and minimise landscape and historic environment impacts.

The predicted negative effects are minor in nature and predominantly relate to inevitable increases in road users, the development of greenfield and Green Belt land, and changes affecting the historic environment – particularly sensitive archaeological assets at Whitchurch (e.g. Maes Knoll).

Next steps for plan-making and SA

Once the period for representations on the Regulation 19 version of the Local Plan / SA Report has finished, the main issues raised will be identified and summarised by B&NES Council, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination (Regulation 22), alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it. This is anticipated to take place towards the end of the year.

At Examination, the Inspector will consider representations (alongside the SA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (and undergo SA) and will then be subject to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound', the Local Plan will be formally adopted by B&NES Council. At the time of adoption, an SA 'Statement' must be published that sets out (amongst other elements) 'the measures decided concerning monitoring the Plan'.

In line with the regulations, there is a need to highlight measures to monitor the likely significant effects of the plan – proposed monitoring measures have been detailed in Chapter 6 of the main report and will be reviewed ahead of submission.

1. Introduction

1.1 Background and legal context

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Bath and North East Somerset Local Plan (herein referred to as the Local Plan).
- 1.1.2 SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and alternatives. It is a legal requirement for a Local Plan,¹ and follows the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.1.3 This SA Report has been prepared to accompany the Local Plan for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (under the legacy system). A Non-Technical Summary (NTS) for this report is provided at the start of the document. This report will be the main SA evidence to accompany the Local Plan into submission and examination. It builds on the SA work that has been undertaken to date.

1.2 Local Plan context

- 1.2.1 At this stage, the full draft Local Plan is being presented for consultation as one of the final steps leading up to submission and examination. The Local Plan has been through a process of development and change (see Table 1.1 for key published documents along the way) that is reflective of a changing national policy context.
- 1.2.2 The Local Plan first consulted on local housing need (LHN) in 2024 which was calculated (based on national policy requirements at that time) to be 725 dwellings per annum (dpa). Subsequent revisions to the National Planning Policy Framework (NPPF) later in 2024 saw LHN more than double to 1,501dpa and the Local Plan has been working to address this uplift since. This current version of the Local Plan being presented at consultation is the first full draft that identifies a preferred approach for the direction of new development, though the potential land supply has been shared previously in consultation.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012) and subsequent revisions (2025). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document. Where legislation is referenced, it should be assumed it is 'as amended'.

- 1.2.4 The spatial priorities for the Local Plan reflect the key issues and challenges facing Bath and North East Somerset (B&NES), as well as the evidence base and the outcomes of the Options consultations. The spatial priorities are:

“Our Local Plan positively plans for development in response to local needs to create attractive, healthy and sustainable places in line with the council’s Corporate Strategy.

The Plan will:

- *Create a fairer, more prosperous and sustainable economy*
- *Maximise the delivery of housing that is affordable*
- *In doing so, our plans for development must:*
- *Enable B&NES to become zero carbon by 2030 and deliver a climate resilient district*
- *Protect and enhance nature through facilitating nature recovery*
- *Improve health and well-being outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment*
- *Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities*
- *Respect, conserve and enhance our heritage assets and their landscape settings, in particular the World Heritage Sites of Bath and National Landscapes*
- *Align the timely provision of transport, health, education, social, cultural and green infrastructure with development.”*

- 1.2.5 B&NES forms part of the West of England Mayoral Combined Authority (WECA) along with Bristol, South Gloucestershire and in due course, North Somerset.²

- 1.2.6 WECA is commencing work on a regional Spatial Development Strategy (SDS) which under the Planning and Compulsory Purchase Act 2004 (as amended), will provide a long-term framework for where homes, jobs and major infrastructure should be developed across the West of England up to 2060.

- 1.2.7 Whilst B&NES will retain responsibility for its local planning functions, future Local Plans will need to align with the strategic direction set by the SDS.

² Under the English Devolution and Community Empowerment Act 2026 the government will direct an increasing proportion of future work programmes and funding through Mayoral Combined Authorities and requires all councils to be part of some form of ‘strategic authority’ working together in legally binding partnerships. WECA is the preferred ‘devolution’ partner for North Somerset.

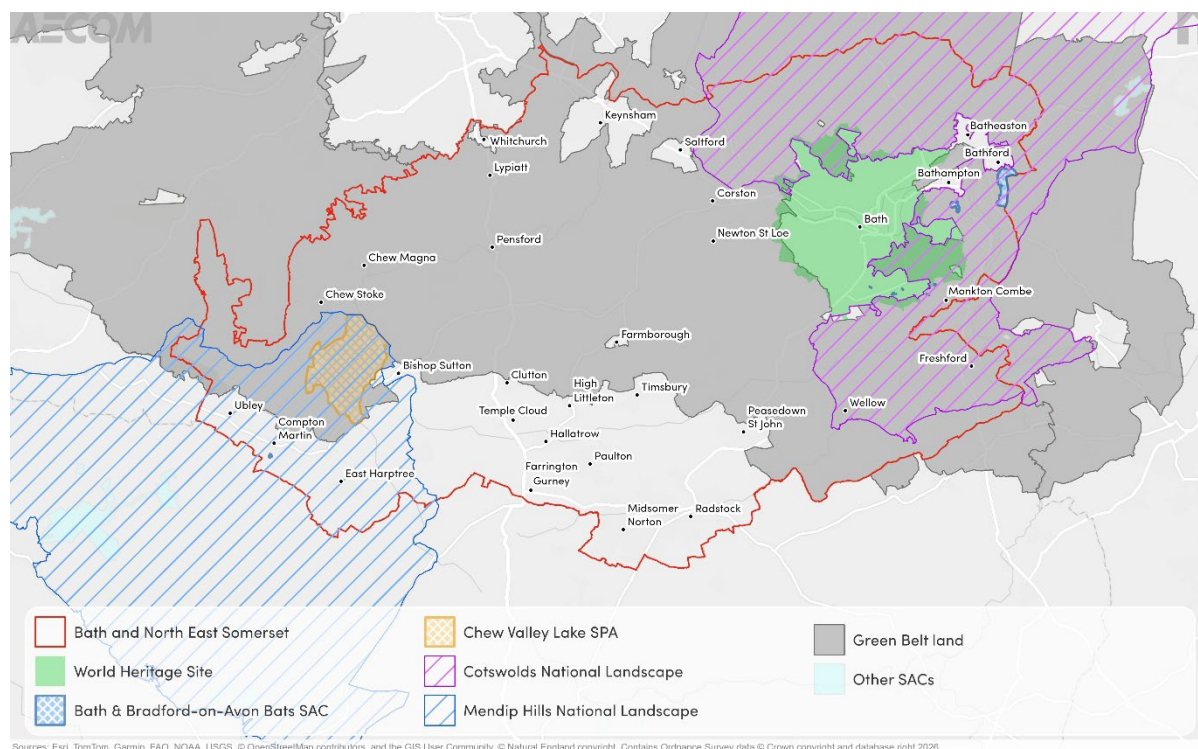
1.4 Key land constraints

1.4.1 There are key considerations for the location of growth across the district. Of note this includes:

- Bath World Heritage Site (two UNESCO inscriptions)
- Internationally designated sites for biodiversity (Chew Valley Lake Special Protection Area (SPA) and Bath & Bradford-on-Avon Bats Special Area of Conservation (SAC))
- National Landscapes (Cotswolds and Mendip Hills)
- Green Belt land (surrounding Bristol, Bath, and Bradford-on-Avon and covering near 70% of the district - washing over many settlement areas)

1.4.2 These constraints are overlaid in **Figure 1.1**, demonstrating the extent of their reach across the district. The special protections afforded to these areas will ultimately come under pressure under any future growth scenario. Key points to consider in this respect include:

- UNESCO has its own guidance for assessing impacts which operates independently of any individual country's planning system. This means that UNESCO will also consider the impact of a development/development strategy on the World Heritage Site, and should it be deemed to undermine the Outstanding Universal Value of the site, the status may be revoked. This can happen regardless of whether the development is considered acceptable or sound in terms of the NPPF and English planning system.
- A separate Habitat Regulations Assessment (HRA) is being undertaken as part of the Local Plan process to assess the potential significance of effects on the integrity of nearby internationally designated biodiversity sites. If significant effects cannot be ruled out, or appropriate mitigation identified, there will be a need to justify overriding reasons for the development being in the public interest.
- If proposing development within a National Landscape, there will be a need to justify exceptional circumstances. National Landscapes are supported by management plans which will also need to be considered as part of the plan process to avoid potential conflicts arising.
- Green Belt boundaries should only be amended in exceptional circumstances which will need to be fully evidenced and justified through the plan process.

Figure 1.1: Map of key district constraints to growth

1.5 Scope and structure of the SA

1.5.1 The SA process began with scoping, which primarily sought to:

- Establish a baseline against which proposals can be assessed;
- Identify key sustainability issues (sensitivities or opportunities) that should be a key focus for the assessment; and
- Establish a framework of SA topics and objectives that should be used as a methodological framework to structure the subsequent assessment.

1.5.2 Noting that the SA framework is a key output to guide the structure of appraisals contained within this report, a summary version is provided in Table 1.1.

1.5.3 In line with the regulatory requirements the scope was shared with statutory consultees, and their feedback was considered ahead of any assessment work commencing. Scoping was undertaken by the Council. Reflecting the nature of continually developing evidence, scoping information has been revisited and updated as appropriate at each SA reporting stage, including this stage – see **Appendix A**.

1.5.5 With the SA framework creating structure for individual assessments, the SA Report (this report) is more broadly structured as follows:

- **Chapter 2** explores factors relevant to identifying a spatial strategy for the Local Plan and establishes any reasonable alternatives to the preferred spatial approach.
- **Chapter 3** follows on to provide a comparative assessment of the preferred approach and established alternatives.
- **Chapter 4** details the Council's reasons for progressing with the preferred approach and for discounting alternatives.
- **Chapter 5** provides an assessment of the full draft Local Plan, considering the spatial strategy alongside the suite of proposed policies. This chapter concludes on the likely significant effects in implementing the Local Plan.
- **Chapter 6** completes the report by providing a brief overview of the next steps for both plan making and SA. This chapter includes early proposals for monitoring.

1.5.6 This structure seeks to meet the regulatory requirements for the SA to *"identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives"*, taking into account the objectives and geographical scope of the plan.

Table 1.1: SA framework

SA topic	SA objective
Health and wellbeing	Improve the health and wellbeing of all communities and create healthy places
Housing	Meet identified needs for sufficient high-quality housing including affordable housing
Communities	Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime
	Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services
Economy	Build a strong, prosperous and fairer economy and enable local businesses to prosper
Transportation	Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure
Landscape	Protect and enhance local environmental distinctiveness and the character and appearance of landscapes
Historic environment	Conserve and enhance the historic environment, heritage/ cultural assets and their settings
Biodiversity	Conserve and enhance the condition and extent of biodiversity in the district
Natural resources	Reduce land, water, air, light, and noise pollution
Climate change	Reduce vulnerability to, and manage flood risk taking account of climate change
	Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change
	Encourage careful, efficient use of resources including energy and encourage sustainable design and construction
Waste	Promote waste management in accordance with the waste hierarchy

2. Spatial strategy development and identification of reasonable alternatives

2.1 Chapter introduction

- 2.1.1 When identifying reasonable alternatives, there is a need for plan-makers to determine which elements of the plan present 'strategic choices' and where alternative approaches could reasonably be taken to address key planning issues.
- 2.1.2 Of note, is that this process (of identifying reasonable alternatives) has been undertaken at various stages of plan development, taking account of the most up-to-date information available at that time.
- 2.1.3 The identification of reasonable alternatives has been undertaken proportionately rather than systematically, focusing on those aspects of the plan where:
- There is meaningful scope for materially different plan approaches
 - Evidence documents or consultation feedback suggest action needs to be taken in the Plan
 - There is the potential to lead to significant effects
- 2.1.4 With these points in mind, the SA to date has predominantly focused on the spatial strategy for the Local Plan and potential alternatives in this respect. This is not discounting development management policy matters however, which were explored in 2024 when broad policy approaches were in early (shaping rather than refining) stages and choices could be identified.
- 2.1.5 At the current stage, there is a need to revisit and update the alternatives in respect of the latest evidence and consultation feedback. This chapter specifically seeks to identify reasonable alternatives to the preferred approach at this stage of plan-making. Importantly, it seeks to deliver against the regulatory need to present "*an outline of the reasons for selecting the alternatives dealt with*".³

³ The Environmental Assessment of Plans and Programmes Regulations 2004 Schedule 2 Paragraph 8

2.2 Work to date

2.2.1 **Table 2.1** outlines the plan and SA documents that have been publicised to date.

Table 2.1: Plan and SA documents publicised to date

Plan document	SA document
Local Plan Launch Document (2022)	
Local Plan targeted engagement (2023)	SA Scoping Report (2023) (undertaken by B&NES Council and shared with statutory consultees)
Local Plan Options Document 2024	Interim SA Report (2024)
Local Plan Reset Document 2025	SA Technical Note (2025)
Local Plan Options Document 2025	Interim SA Report (2025)

2.2.2 As noted, a large focus of the work to date (in relation to reasonable alternatives) has been exploring the spatial strategy for the plan. At early plan stages a lower LHN target was driving the spatial strategy, which meant that there were more options when it came to land supply. This was demonstrated in the breadth of options explored at key settlements in the Interim SA Report (2024). Early options in 2024 also sought to grapple with the level of growth (potentially targeting a higher land supply than LHN to support the unmet needs of Bristol) and the extent of Green Belt release.

2.2.3 Throughout plan development, the district has been divided into four broad sub-areas: Bath, the Bristol to Bath Corridor, Somer Valley, and Rural Areas – the settlements within which have been the starting point for the SA. This was assisted by the Housing and Economic Land Availability Assessment (HELAA), where all sites that were considered suitable, available and achievable over the plan period (and potentially beyond) were taken forward for consideration through the SA. These sites have been subject to a high-level GIS-based analysis according to a bespoke methodology developed in line with the SA framework. This was last updated in 2025 to accompany the Interim SA Report and will be updated again ahead of submission using the same methodology – to account for a small number of additional sites at this stage.

2.2.4 In 2025, the increase in LHN effectively reduced the land supply alternatives (by needing to deliver more sites as allocations). To assist in plan-making at that stage, the SA sought to explore the increased reliance on key strategic development sites that would be necessary to deliver against LHN (with options at Bath, Keynsham, Saltford and Whitchurch), whilst also testing an option that maximised growth in Rural Areas to meet and potentially exceed LHN.

2.2.5 In 2024 and 2025, the potential supply of sites was shared in consultation and feedback sought to help determine the preferred approach, but no preferred site allocations have been identified until now.

2.3 Approach to identifying alternatives

2.3.1 In identifying alternative spatial strategies there are two key elements to consider 1) the level of growth and 2) the location of growth. Both of these elements have been influenced by strategic ('top-down') factors (such as the NPPF, the standard method for calculating housing need, and unmet needs

in the region) and land supply ('bottom-up') factors (such as the HELAA, community preferences, sensitive environmental assets, Green Belt assessment work, and infrastructure capacity). All these factors need consideration to arrive at reasonable alternatives.

2.4 Level of growth

Housing

- 2.4.1 The Local Plan needs to align with the NPPF, which, since 2018, has required the use of a standard method for calculating LHN. As previously noted, more recent updates to the NPPF and adjustments to the standard method have seen a substantial increase in LHN which currently stands at **1,518 dwellings per annum**. This latest figure incorporates the most recent update to the affordability adjustment (2026), seeing an increase of an additional 17 homes per year when compared to the figure consulted on as part of the Local Plan Options Document and Interim SA Report in 2025.
- 2.4.2 This annual need equates to **a total of 27,324 new dwellings** over the entire plan period (18 years), and the Local Plan will seek to identify a land supply that can deliver against this need.
- 2.4.3 Given that the plan period runs from 2025, and there is an overlap with the plan period of the adopted plan (which runs to 2029), some housing is already planned for/ in the pipeline – referred to as existing commitments. Existing commitments are expected to contribute a total of **5,814 new homes** to LHN.
- 2.4.4 In addition to this, and reflecting the substantial increase in LHN, the Council propose a stepped trajectory which will gradually increase the annual requirement through the plan period and factor in the longer lead-in times associated with large scale strategic sites. Following adoption, the annual requirement for the first four years will be set at 760 dwellings per annum, from which it will increase to 1,518 dwellings per annum.

Employment

- 2.4.5 The Council plans for employment growth commensurate with the level of housing growth. The Economic Development Needs Assessment (EDNA) identifies B&NES as having a strong and diverse economy characterised by significant knowledge-based sectors, a strong visitor economy, industrial and manufacturing bases, and strategic opportunities along the Bristol to Bath corridor. Based on the population and housing growth estimates, the EDNA identifies an indicative floorspace requirement for additional offices, industrial areas, and warehouses within Bath, the Bristol to Bath Corridor, Somer Valley, and the rural areas – as depicted in **Table 2.2**.

Table 2.2: Employment floorspace indicative needs

Sub-Area	Office (sqm)	Industrial (sqm)	Warehouse / Logistics (sqm)	Total (sqm)
Bath	69,000 – 70,000	12,000 – 17,000	23,000 – 24,000	104,000 – 111,000
Bristol to Bath Corridor	6,000 – 9,000	7,000 – 8,000	16,000	29,000 – 33,000
Somer Valley	6,000	11,000 – 15,000	15,000	32,000 – 37,000
Rural areas	8,000 – 9,000	32,000 – 34,000	18,000 – 19,000	58,000 – 62,000
TOTAL	89,000 – 94,000	62,000 – 74,000	72,000 – 74,000	223,000 – 242,000

- 2.4.6 The proposals for the delivery of new employment land will seek to align with the objectives of the existing B&NES Economic Strategy and tackle key planning issues such as sharing the benefits of prosperity more equally across the district, co-locating affordable housing, and delivering suitable spaces to meet local business needs.
- 2.4.7 In addition, WECA has prepared a Local Growth Plan for the sub-regional economy that identifies key growth zones which will be a focus for economic investment. Two of these lie partly or wholly within B&NES: the Central Bristol and Bath Growth Zone (including the corridor between) and the Somer Valley Growth Zone. Notably, the indicative floorspace needs highlight most economic development is needed within these zones (with needs split by Sub-Area) but still highlight a substantial need across wider rural areas.

Regional position

- 2.4.8 In addition to planning for growth to meet LHN, the Council continues to assess the potential for development within the district to contribute to unmet needs arising in neighbouring Local Authority areas, namely the exported unmet housing needs from Bristol. As it stands, the plan is currently generating unmet housing needs itself meaning the potential to contribute more widely has diminished.
- 2.4.9 There is an expectation that the B&NES unmet needs generated in the latter part of the plan period, and indeed unmet needs in neighbouring authorities, would be addressed comprehensively through the emerging WECA SDS and an early review of the Local Plan (and thus not exported). This is expected to include a detailed investigation of the potential for significant settlement expansion north of Midsomer Norton and/ or development at the West of Bath.

2.5 Location of growth

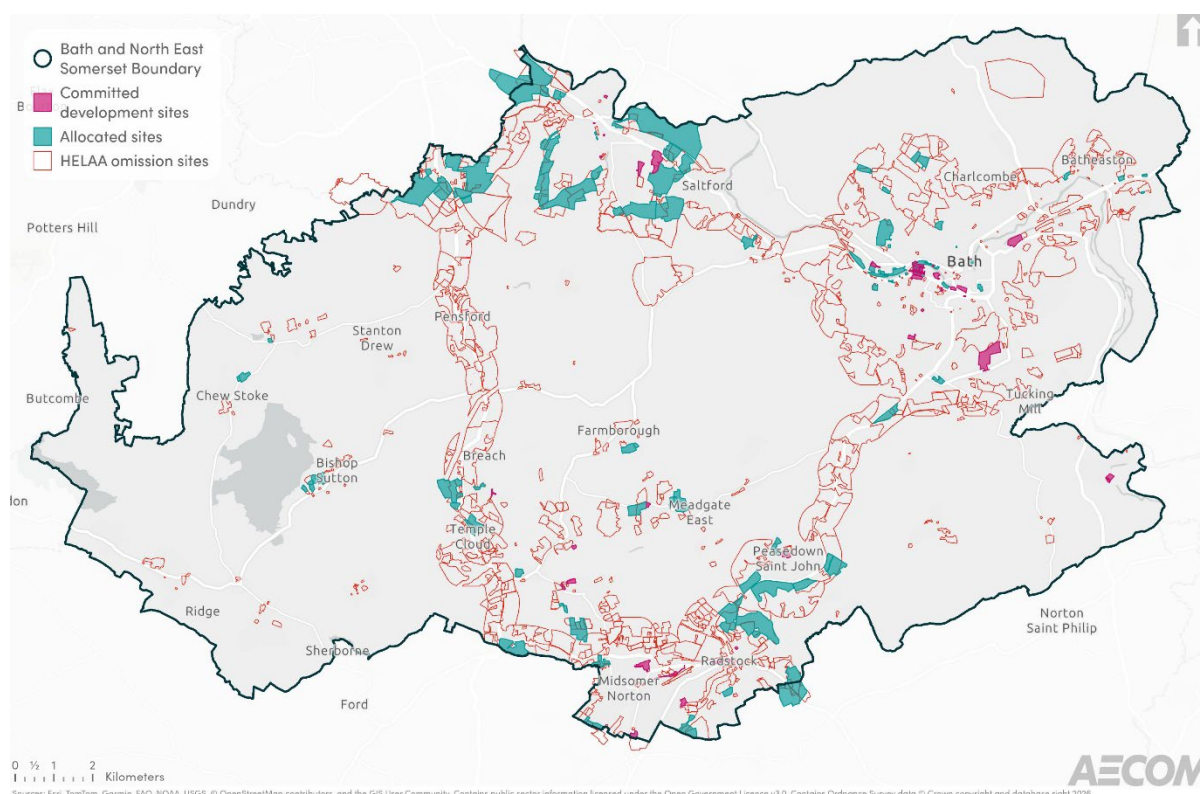
HELAA

- 2.5.1 A total of 655 sites has been identified and assessed through the HELAA which included sites identified through proactive searches undertaken by Council officers along primary transport corridors or within 400m of existing settlements. The assessment has sought to identify sites that are potentially suitable, available, and achievable over the plan period. This has whittled down the long list of sites to a short-list of suitable, available, and achievable (or potentially suitable, available and achievable) sites. The short-listed sites

have largely all been subjected to a high-level SA analysis of constraints, linked to the SA framework. This work is currently being updated to incorporate new sites and will be finalised ahead of submission. All short-listed sites have been progressed to form the 'building blocks' for reasonable alternatives.

- 2.5.2 The HELAA has informed the Council's site selection process and **Figure 2.1** provides a snapshot of all HELAA sites (irrespective of their determination as potentially suitable, available and achievable) in the context of committed development sites and shows the preferred allocation sites at this stage (using HELAA site boundaries).

Figure 2.1: HELAA sites, preferred allocation sites (using HELAA boundaries) and committed growth



Green Belt Assessment

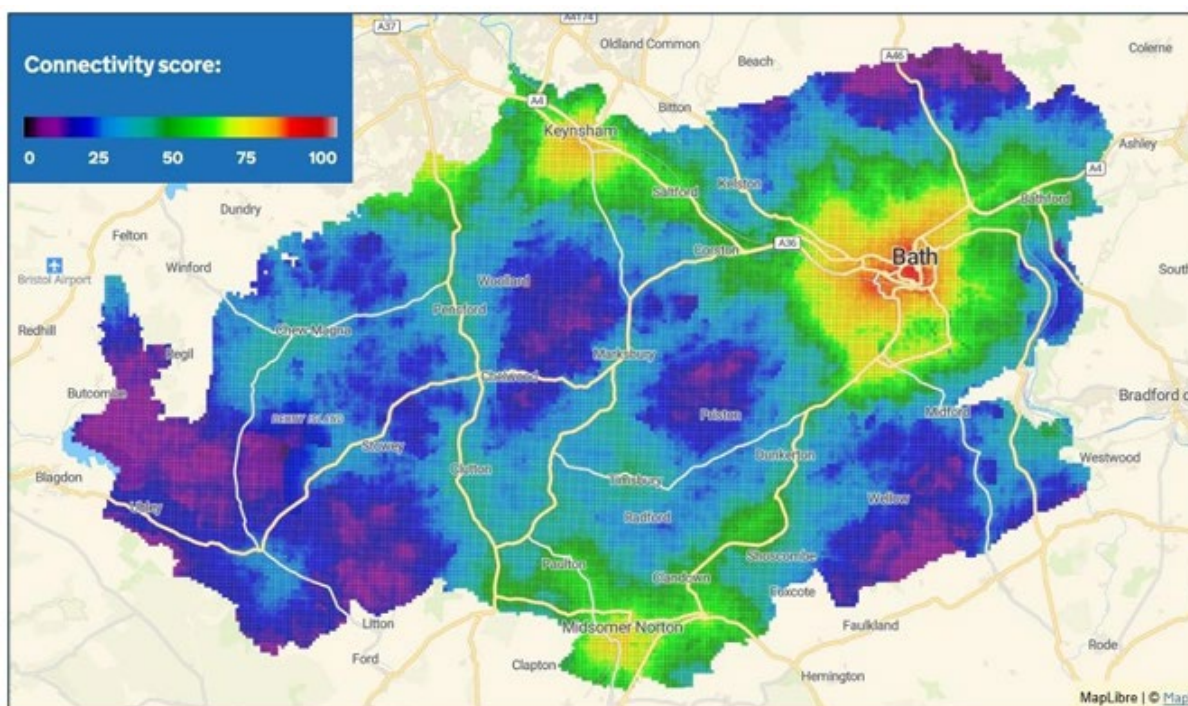
- 2.5.3 With a focus on strategic connectivity, the plan seeks to develop areas in the north of the district (along key transport corridors) which intersect the Green Belt. Accordingly, a Green Belt Assessment (GBA) has been undertaken in two stages to identify the contributions of areas of land to Green Belt purposes, and to identify areas of grey belt in accordance with the updated NPPF. The outcomes of this work have informed the identification of reasonable alternatives, particularly at the settlement scale, and will be drawn upon as necessary throughout this chapter and in subsequent assessments. Notably, there are key parcels of land that are shown to make a strong contribution to more than one of the Green Belt purposes. Additionally, there are areas surrounding key settlements, particularly Keynsham and Saltford, which are provisionally identified as Grey Belt that are not judged to strongly contribute to three of the five Green Belt purposes or be restricted by the application of policies in NPPF footnote 7. Of the 34 sites assessed in the Stage 2 assessment, 20 are provisionally identified as grey belt.

Settlement hierarchy

- 2.5.4 Another consideration is the settlement hierarchy. Instead of establishing a rigid settlement hierarchy fixed at a point in time, the plan has taken the approach of establishing settlement tiers. Typical characteristics are identified for each tier along with the settlements that fall within each tier at this point in time (notwithstanding that future development could change their relative position).
- 2.5.5 Tier 1 settlements are 'Principal Settlements' with excellent connectivity and a wide range of services and facilities. Bath, Keynsham, Midsomer Norton and Radstock fall within this tier. Tiers 2 to 5 then identify characteristics that would categorise settlements as either highly sustainable, moderately sustainable, less sustainable, or least sustainable. Whilst some Tier 4 and Tier 5 settlements contain local services and facilities, they generally have weaker public transport accessibility, lower levels of sustainable connectivity and more limited opportunities to support growth especially strategic in nature. For this reason, they have not been explored in detail through the SA as reasonable alternatives for accommodating significant growth.
- 2.5.6 In line with the new tiering of settlements, Green Belt settlements, such as **Batheaston, Bathampton, Bathford**, and **Chew Magna**, and rural settlements such as **Timsbury**, that are now captured as Tier 2 'highly sustainable' settlements are given more focus at this stage.
- 2.5.7 In addition, lower tier settlements (Tier 3) in the wider rural area (and where options exist) which are the focus of further scrutiny include:
- Bishop Sutton
 - Chew Stoke
 - Clutton
 - Corston
 - Farmborough
 - Farrington Gurney
 - Freshford
 - High Littleton and Hallatrow
 - Temple Cloud
 - Pensford

- 2.5.8 These settlements are all explored in turn below, building on existing work where appropriate.
- 2.5.9 Other Tier 3 settlements were reviewed through the settlement assessment and HELAA process, including Newton St Loe, South Stoke, Marksbury, Kelston, Monkton Combe and Hinton Charterhouse. These settlements were not identified as reasonable alternatives for growth due to a combination of limited site opportunities, environmental and infrastructure constraints, and their relationship to nearby settlements already considered through the SA. Similarly, given the lower levels of sustainable connectivity – see **Figure 2.2** - associated with Tier 4 and 5 settlements, these have not been explored in detail in terms of their strategic potential to contribute to LHN. Notwithstanding that some small-scale development sites could still come forward within these settlements, including through site allocations e.g. in Neighbourhood Plans or windfall development, but any site progression as part of the plan would largely be informed by the HELAA process. In addition to the SA, the process of selection of sites for allocation, including explanation as to why some HELAA sites have not been allocated is set out in the 'Identification of Sites for Allocation in the Draft Local Plan' Topic Paper.

Figure 2.2: Connectivity in the district (all modes except driving) taken from the Transport Topic Paper



The preferred approach

- 2.5.10 In terms of the spatial strategy, the preferred approach has been defined for each broad sub-area and the total number of homes this approach would deliver over the plan period are:
- 877 new homes across new site allocations in Bath
 - 8,424 new homes across new site allocations in the Bristol to Bath Corridor (at Keynsham, Saltford, Whitchurch, and Hicks Gate)

- 3,550 new homes across new site allocations in Somer Valley (at Midsomer Norton and Radstock, Peasedown St John, Farrington Gurney, and Paulton)
- 1,605 new homes across new site allocations in Rural Areas

2.5.11 **Table 2.3** details the site allocations that form the preferred approach. In addition to the new site allocations:

- Existing commitments are expected to contribute a total of 5,814 new homes.
- The Council has provided an allowance for windfall development equating to 1,944 new homes over the plan period.

The total supply amounts to 22,214 homes over the plan period, which is **81% of LHN**. The preferred sites would require Green Belt release equating to 2% loss of the total Green Belt area. The GBA concludes that *“this scale of loss is not likely to fundamentally undermine the purposes (taken together) of the remaining Green Belt.”*

Table 2.3: Sites allocated in the Local Plan

Site name	Housing capacity
Bath	
BWR St William land	600
BWR St William BANES land	300
BWR waste site	176
BWR remainder of car showroom land	100
Dick Lovett	253
Bath Press	277
Holburne Park	40
Mulberry Park	55
Englishcombe Lane	16
Burlington Street	15
Hartwells Garage	104
Cattlemarket and Corn market	25
Manvers Street	60
Bath Quays North	96
Bath Quays South	60
South Bank	100
RUH	100
Windsor Bridge Road	112
Comfortable Place	60
Chivers House	95
Homebase	369
22-24 Cheltenham Street	15
Wansdyke Buisness Centre	38
Land at Odd Down future phase	129
Twerton Park	80
Sion Hill	100
St Martins	50

Site name	Housing capacity
Units 1-4 Wells Road, co-living	41
Bath Equestrian Centre	36
North of Napier Road, Weston	42
Kingswood School playing fields	90
NEW06 - Car park adjacent to Combe Park	25
KING23 - land east of Station Road, Newbridge	15
Pure Gym site	45
Territorial Army site	70
McDonald's site	13
Avon Buildings	78
Bathwick Tyres site	23
East of Lidl	26
Roseberry Place	51
Upper Floors of Milsom Street	170
Bath College	60
Stable Yard Industrial Estate	40
Pinesgate Industrial Estate	50
Sainsbury's Petrol Filling Station	30
Crescent Lane, Julian Road	13
Bristol to Bath Corridor	
North Keynsham	1450
East of Avon Mill Lane	104
Ashton Way and the Labbott Car Parks	32
West Keynsham	477
South West Keynsham	952
South East Keynsham	386
West Saltford	964
South Saltford	330
Hicks Gate	1934
Devonport House and Durley Farm	50
North Whitchurch	N/A – secondary school
East Whitchurch	1042
South-West Whitchurch	703
Somer Valley	
South Peasedown	860
Land Adjacent to Bath Business Park	N/A – employment
Lower Peasedown	80
North Radstock	950
Writhlington	1,020 (300 within B&NES)
Haydon	140
Westfield Industrial Estate	N/A – employment
Chilcompton Road	160
Thicket Mead	130
Midsomer Norton High Street	N/A (regeneration site)
Farrington Road North	30

Site name	Housing capacity
Farrington Road South	70
Paulton South	300
Paulton Mendip Close	20
Farrington Gurney South	500
Rural Areas	
Bathford Nurseries	20
Box Road	N/A – employment
Ashley Road	10
Land West of Corston Lane	60
Timsbury Road	200
West Timsbury	170
East Timsbury	55
North of Fox Fields	45
West of Clutton	300
Maypole Close	30
North of Temple Cloud	130
Old Tennis Courts	20
Hedgehogs	100
West Bishop Sutton	280
Westway Farm Extension	N/A - employment

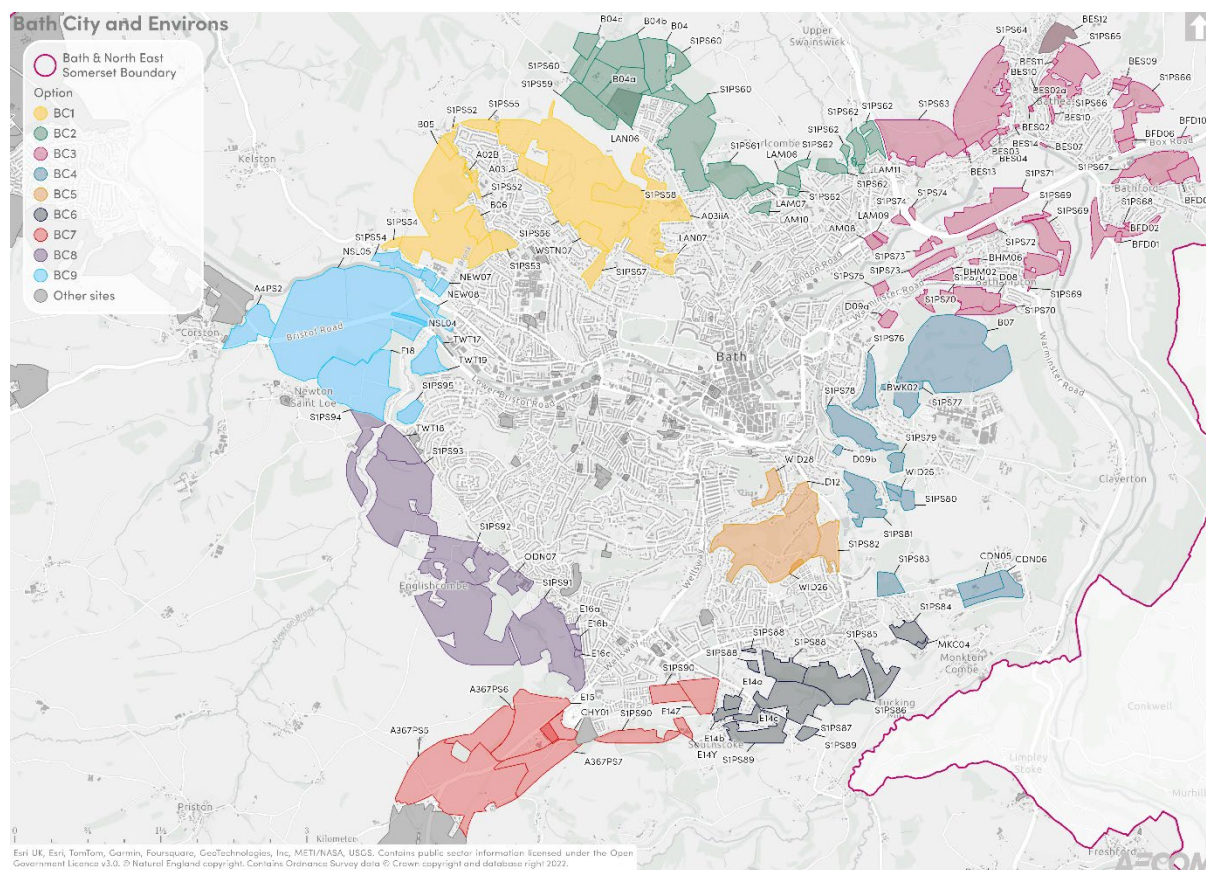
2.5.12 Notably, this land supply utilises most of the provisional ‘grey belt’ land that has been identified through the GBA.

Sub-Area: Bath City

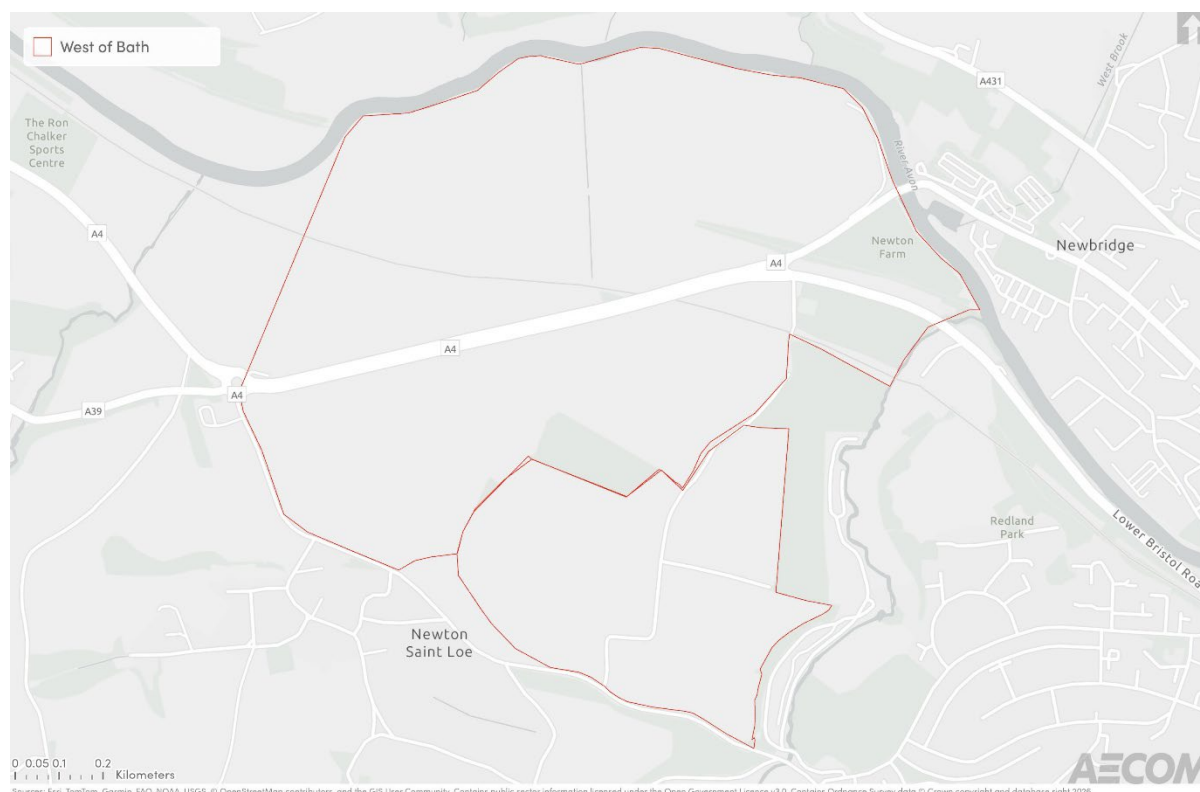
2.5.13 Strategic growth in Bath is notably constrained by its World Heritage Site (WHS) status and the surrounding Cotswolds National Landscape. Site selection within Bath is therefore heavily swayed towards smaller urban sites and employment growth at existing employment areas, where there is confidence that allocations will not undermine heritage or landscape values.

2.5.14 The SA to date has assessed a range of options surrounding Bath (as a ‘points of the compass’ exercise) – see **Figure 2.3**, originally in the 2024 Interim SA Report and updated in some areas in the Interim SA Report (2025).

Figure 2.3: Settlement options in the Interim SA Report 2024



2.5.15 There are strategic sites being progressed as allocations within Bath, including at Bath Riverside (delivering around 1,750 new homes) and at Sydenham Park (delivering around 500 new homes). One notable strategic development opportunity that is omitted from the preferred approach, is the West of Bath (WoB) which has been a significant consideration throughout plan development – see **Figure 2.4**. The site has the potential to deliver around 2,000 new homes as a strategic extension to the urban area.

Figure 2.4: West of Bath strategic site

2.5.16 The WoB site poses a significant sustainable growth dilemma. Its allocation runs a high risk of causing substantial harm to the WHS and affecting UNESCO WHS inscriptions, potentially to an extent that could see these inscriptions revoked given that the heritage impact evidence currently considers that development would likely give rise to ‘substantial harm’ to the WHS. But on the other hand, it is a significant development opportunity (and housing land contribution) located in a highly accessible (and desirable) location in the district, performing particularly well from a transport perspective. With early Planning Inspectorate advice considered (which does not recommend relying on this site as part of the housing supply for this plan), the site is not a preferred allocation site at this stage. This does not prejudice or preclude any further investigation of the site however as part of the WECA SDS or the next local plan. The site lies in the Green Belt and is notably judged to perform strongly against most of the Green Belt purposes.

2.5.17 Certain settlement areas surrounding Bath, such as Batheaston, Bathampton and Bathford, are considered separately in more detail further on in this chapter. With regards to other sites in Bath, as the evidence has developed, this has naturally refined housing numbers at the sites progressed through the HELAA and proposed in the plan. Considering the pressures on housing land supply, the Council have also revisited the site selection process and the capacities at urban sites. Notably this has:

- Identified potential additional allocation sites (for this plan) at North of Napier Road, the Equestrian Centre, Odd Down Employment Site, and Kingswood School.
- Boosted supply at some sites such as Bath College.
- Explored the potential for existing employment allocations in the adopted plan that have not yet been developed to be repurposed for housing.

One such opportunity exists at Roseberry Place but this site also has recent economic investment interest. If repurposed, the site could deliver an additional 40 homes.

- Explored the potential for deliverable sites that are not currently available to come forward in the latter part of the plan period. This is particularly applicable to areas which if were to become available, could contribute to improving the public realm or place making principles. Such areas exist at Upper Bristol Road, Avon Buildings, and Pinesway.

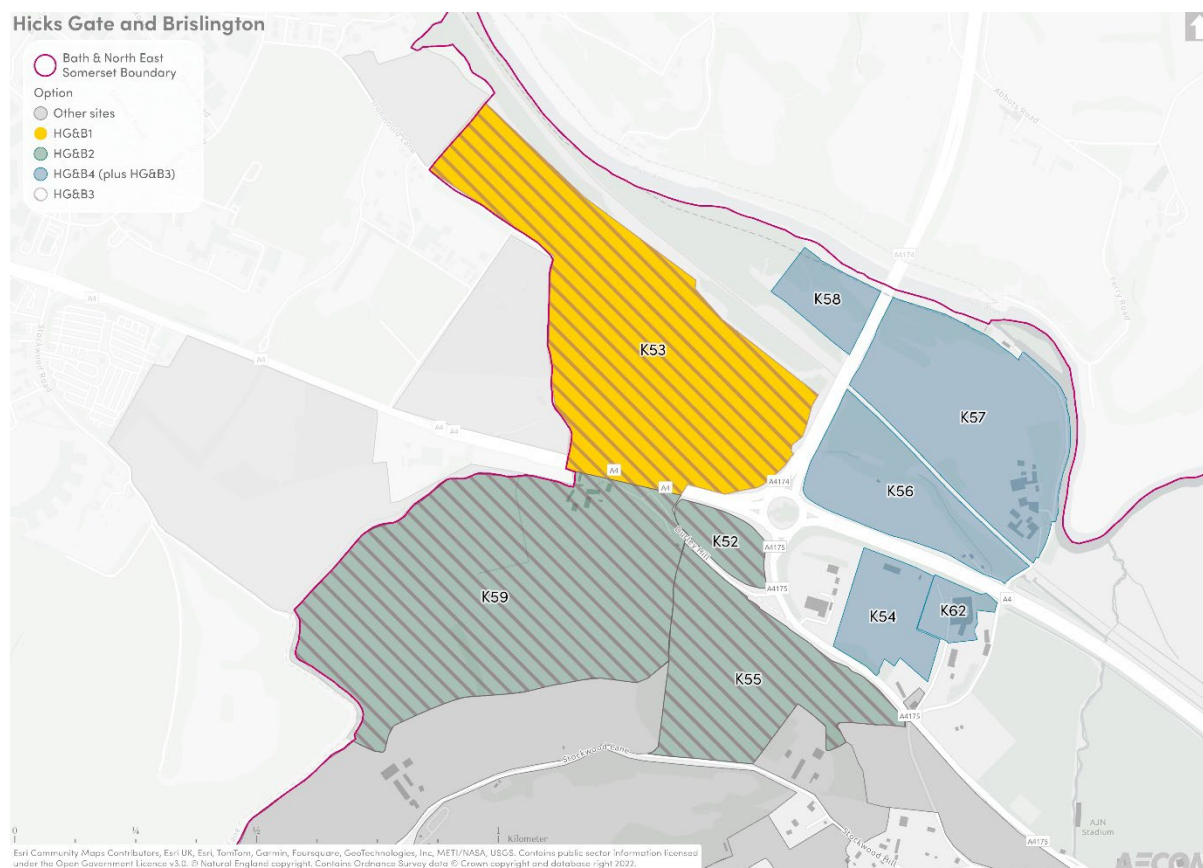
2.5.18 Another way to boost housing land supply that could be considered is the repurposing of vacant spaces above shops and encouraging smaller scale opportunities for incremental change, for example in the development of underused garage blocks. A good example of this is the feasibility study produced for a project to repurpose the space above shops within Milsom Street which has allowed the Council to provide an allowance for new dwellings in this area. However, outside of specific projects, it is very difficult to evidence such contributions as new dwelling stock (i.e., that such opportunities are not already counted within existing dwelling stock figures).

2.5.19 Whilst densities have been revisited for their potential to boost housing supply, no significant options have been identified, reflecting the individual site capacities and approach to massing in this sensitive settlement area.

Sub-Area: Bristol to Bath Corridor

Hicks Gate

2.5.20 The Hicks Gate area links with Brislington in Bristol and presents a strategic cross-boundary development opportunity. The area has been masterplanned in collaboration with both Bristol City Council and WECA to deliver between 2,500 and 3,000 new homes, a primary school, a transport interchange, and neighbourhood centres. **Figure 2.5** shows the options at Hicks Gate that were assessed in the Interim SA Report in 2024.

Figure 2.5: Hicks Gate options assessed in the Interim SA Report (2024)

2.5.21 At this stage, the contribution to the B&NES Local Plan's LHN is expected to be around 1,934 homes. Some key points to note are:

- There are flood risk considerations for development extending further east of the roundabout and implications in terms of placemaking and viability given the existing road infrastructure. However, this option was previously appraised in 2024.
- Densities are expected to be high, with an average of 66dph across the site – notably areas around the transport interchange will deliver around 100dph.

Keynsham and Saltford

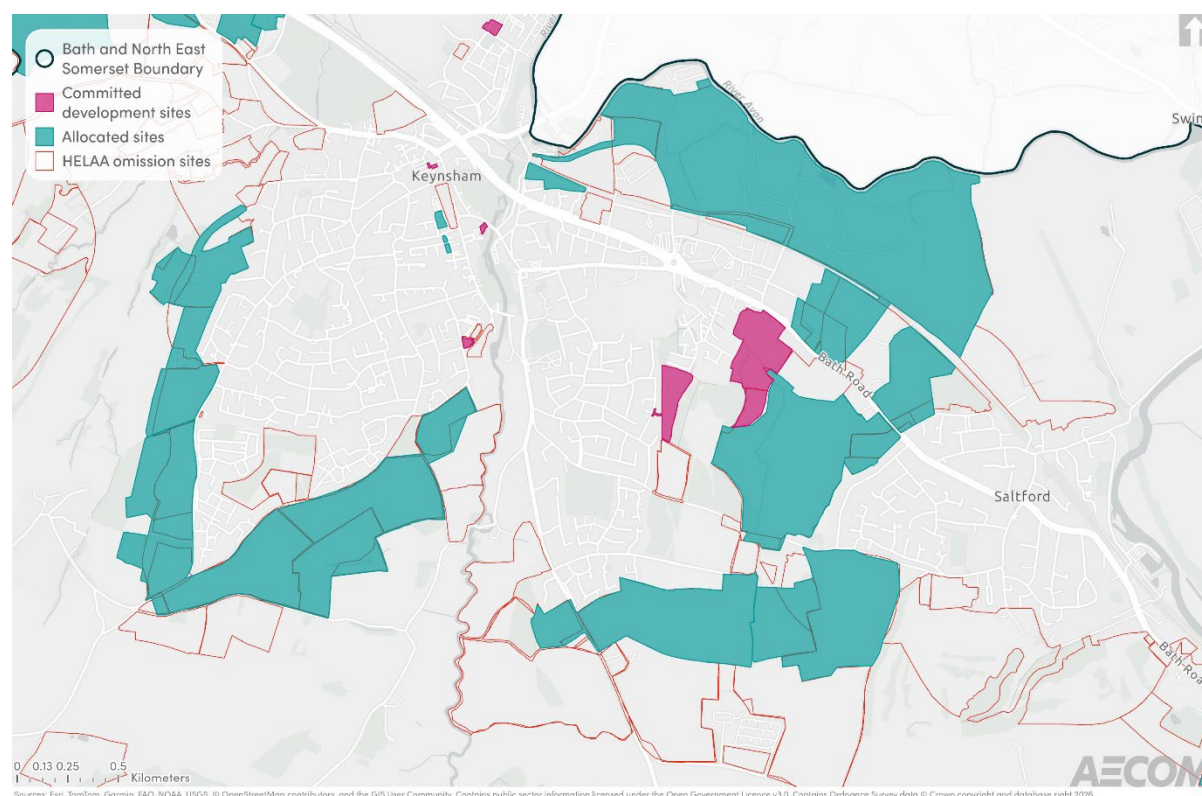
2.5.22 Keynsham is a significant focus for future growth given its strategic connectivity located on the Bath to Bristol corridor, served by both train and bus. However, there are key constraints to expansion at the settlements, such as the Cotswolds National Landscape and its setting, the floodplain of the River Avon, the Chew Valley running through Keynsham, the setting of the Queen Charlton Conservation Area, and HSE gas pipelines and their associated buffer zones (which are too expensive to relocate). Any expansion of the settlements would require Green Belt release.

2.5.23 Whilst options have been assessed in previous Interim SA Reports (2024 and 2025), **Figure 2.6** shows land availability in Keynsham and Saltford, and that the Council has allocated most of the available sites here. Key points to note include:

- The Saltford Golf Course site has been confirmed as unavailable by the landowner and is no longer deliverable or developable over the plan period.
- The East Keynsham site is not allocated but has a live planning application on it that will likely be determined ahead of submission. If approved this site would be added to the existing commitments figure.
- The Land South of Manor Road is a new site that is not allocated, but a full planning application is live on the site and if approved ahead of adoption would count towards the existing commitments figure.
- At the North Keynsham development area, a housing-led scheme forms part of the preferred approach, whilst recognising that a minimum of 3.5ha of new employment land is still expected to be delivered in line with the policy provisions of the adopted local plan (Worlds End Lane employment allocation). There could be the potential to test a housing only scheme here, given the existing viability issues associated with employment development (the viability issues relate to a new link road that would be required) but there would be associated knock-on effects with employment land supply. If the 3.5ha were repurposed, then an additional 120 homes could be estimated for assessment purposes.
- West Saltford is a preferred site where efforts are being made to align the strategic potential at both this site and the North Keynsham development area, so that a new local centre is centrally located (north of the A4) benefitting both new developments.
- The gas pipeline network creates a barrier to development in these areas (and their associated buffer zones). The potential to use these areas as strategic ecological corridors has been identified, particularly between Keynsham and Saltford where a focus on biodiversity and nature enhancement and green infrastructure development could solidify the landscape gap between the settlements here.
- Proposed allocation sites surround the south and west of Keynsham to the extent that the topography essentially allows, with steep contours associated with the Chew Valley to the east, and the setting of the Queen Charlton Conservation Area in the west. Additionally, HSE gas pipelines and their associated buffer zones constrain growth in the west.

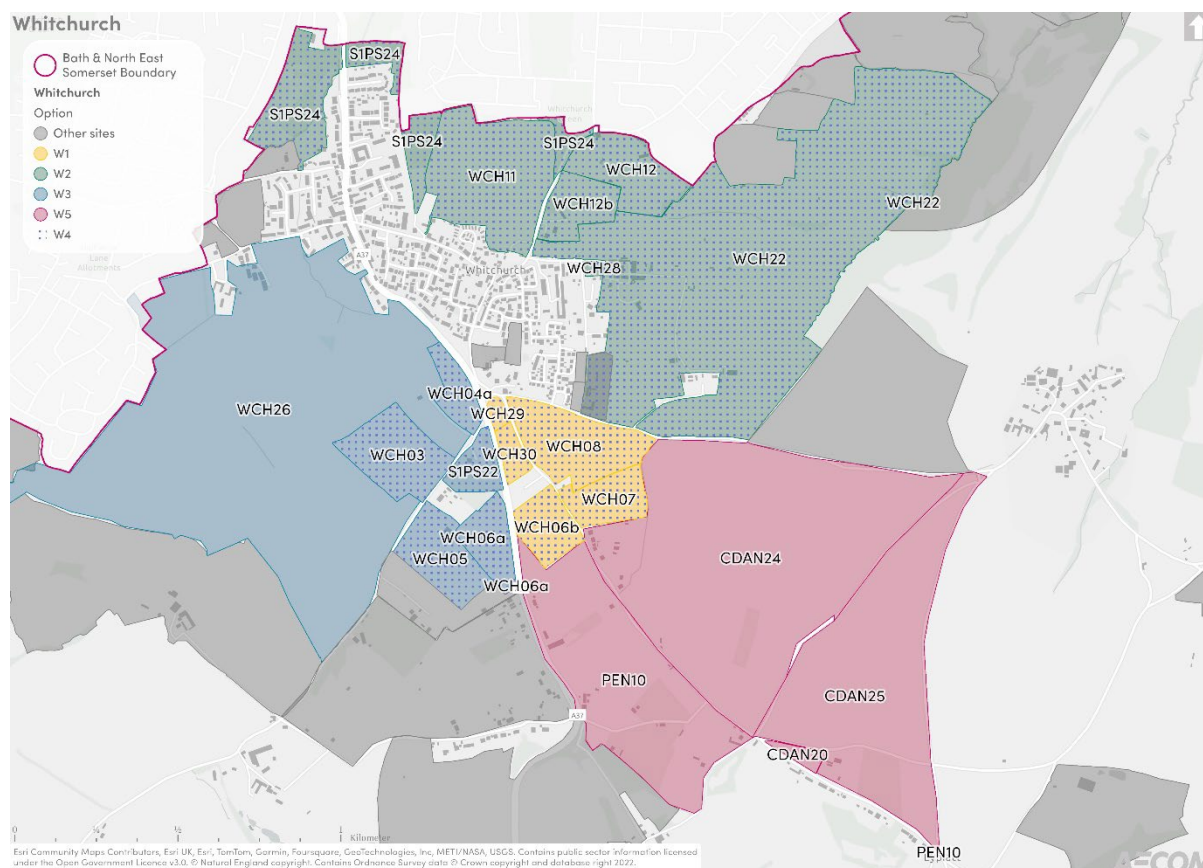
2.5.24 A notable omission site is that at the Land South of Manor Road (referenced above), where development could potentially contribute an additional 90 homes (at 30 dwelling per hectare). The site was found potentially available and potentially achievable.

Figure 2.6: HELAA and preferred allocation sites (using HELAA boundaries) in Keynsham and Saltford in the context of committed development



Whitchurch Village (and Stockwood)

- 2.5.25 Whitchurch and Stockwood adjoin the City of Bristol and their connection with the Bath to Bristol corridor delivers opportunities for relatively well-connected development. Despite this, the sites are problematic in terms of deliverability, and heritage sensitivity is high in the south-west with links to the Maes Knoll Scheduled Monument.
- 2.5.26 Options at Whitchurch have been continuously explored, with the options tested in the Interim SA Report (2025) depicted in **Figure 2.7**.

Figure 2.7: Whitchurch options tested in the Interim SA Report (2025)

2.5.27 With regards to the HELAA sites, some key points to note are:

- Both the large site that was previously identified to the southeast of Whitchurch and the site north of Stockwood are no longer available for development over the plan period.
- There is a covenant on the land in west Whitchurch restricting development. Development beyond this area has high heritage sensitivity relating to Maes Knoll. This area is largely allocated as part of the preferred approach.
- Areas to the north and south of the large site east of Whitchurch are problematic. The land to the north has high landscape sensitivity. The land to the south of the site has high heritage sensitivity relating to Maes Knoll.
- A large amount of development has been allocated surrounding the settlement. There is a clear need to consider the cumulative impact of development at Whitchurch on the Maes Knoll Scheduled Monument.
- The site at North Whitchurch has been allocated for a new secondary school. It is identified as grey belt land and could be repurposed to deliver around 300 new homes instead of a new school (as a restricted scheme taking account of the landscape sensitivities here). However, an alternative site for the school would need to be identified.

2.5.28 The choices are relatively limited for additional development within the Bristol to Bath corridor.

Sub-Area: The Somer Valley (Midsomer Norton and Radstock, Peasedown St John, Farrington Gurney, and Paulton)

2.5.29 Recognising the transport focus on the triangle of the A4/ A367 / A37, connecting Bristol, Bath and the Somer Valley, there is an emphasis on unlocking growth in the Somer Valley as part of the spatial strategy of the plan. Road connections provide good access to nearby larger towns and cities, but there is no local train service through this area.

2.5.30 With regards to the HELAA sites, some key points to note are:

- Two sites have fallen away as no longer available over the plan period – the land east of Paulton and the land north of Peasedown St John.
- The infrastructure cost associated with unlocking the land north of Midsomer Norton means that even a reduced scheme that could be deliverable within the plan period would be difficult to make viable at this stage. A smaller scheme would act as a relatively isolated parcel without sufficient economies of scale to deliver the necessary infrastructure development and is unlikely to support place making principles in this respect. By omitting this site, the Council also ensure that this plan does not prejudice or preclude a strategic urban expansion opportunity that could be unlocked in future planning (either via the WECA SDS or next Local Plan).
- Land to the south of Peasedown St John is expected to deliver a new transport hub that will assist in improving sustainable transport access in the Somer Valley.
- A cross-boundary development is being explored at Writhlington where additional homes are now expected to come forward within the B&NES boundary.
- The HELAA previously discounted the land south of Paulton on landscape sensitivity grounds, however, in revisiting the spatial strategy the site has now been reintroduced as an allocation to deliver around 300 new homes in the upper part of the site (mitigating the landscape effects to some degree).
- There are land parcels in or around existing industrial sites in the Somer Valley that are being promoted for employment development – at the Industrial Quarter in Peasedown St John and Westfield Industrial Estate in Midsomer Norton. These sites do not currently form part of the preferred approach for the plan and could be repurposed to deliver up to an additional 900 homes.
- The Batch at Paulton is a notable omission site that could deliver an additional near 100 homes. The site has not been allocated as part of the preferred approach recognising its heritage sensitivity as a non-designated heritage site (spoil heap).
- At Farrington Gurney one site is allocated in the south delivering around 500 new homes. The current school in Farrington Gurney is full with no room to expand. There are no safe walking routes to the schools in the surrounding villages. To facilitate development in the village a new school will need to be provided. The land to the south (A37PS13) has a

small area of Grade 1 farmland but the majority is Grade 3. The landowner is in the process of providing further information with regards to the site's agricultural grade, therefore this site is considered to be the most suitable for development within the village. To make a new school viable 500 homes are required. Land to the north (A37PS12 and 14) of the village has been discounted as it is Grade 1 farmland, in active use and the isolated setting of the Grade II listed church is integral to its character. Land to the west (A37PS13 and FAR16) is discounted due to its proximity to a gas pipeline.

Additional Tier 2 settlements to consider

- 2.5.31 At **Bathford** three sites (BFD03, BFD06, and BFD10) are allocated as part of the preferred strategy which together will deliver a total of 30 new homes and site BFD10 is allocated for employment use. There are four sites that have not been included as part of the preferred strategy of the plan; BFD12, BFD11, BFD01/02, and S1PS68. However, the sites are problematic, particularly in terms of landscape sensitivity and there is an access issue at BFD12 which makes this site not viable for allocation. A conservative estimate of the potential additional supply is therefore **between 30 and 60 homes** in pursuing development at sites BFD11, BFD01/02, and S1PS68.
- 2.5.32 At **Batheaston** no sites are allocated. There are 11 sites that have not been progressed as part of the preferred strategy, six of which have been identified as unsuitable / unavailable for development within the HELAA. All sites surrounding Batheaston (outside the settlement boundary) lie within the Cotswolds National Landscape, which is a significant constraint to development, but small development sites might be an option to boost housing supply in this area. Together the small sites (particularly BES02, BES03, and BES14) could potentially boost housing supply with an additional **25 homes**.
- 2.5.33 At **Bathampton** no sites are allocated, but omission sites are located both within and on the edge of the settlement. Sites on the edge of the village lie within the Cotswolds National Landscape, whilst some sites within the settlement are constrained by designated Local Green Spaces and other local sensitivities. Any additional growth would therefore be likely to be small-scale and carefully designed to respond to these constraints, but omission sites could reasonably be tested as an option to boost housing supply, with capacity for **around 25 homes**.
- 2.5.34 At **Chew Magna** one site has been allocated (CHM01) which will deliver 20 new homes. There are an additional 5 sites that have not been progressed as part of the preferred strategy. Two of these sites (CHM04 and CHM06) are relatively distant from the settlement boundary and on this basis deemed unsuitable for progression as an allocation. Two of the three remaining sites are constrained by landscape and heritage sensitivities and flood risk but could potentially boost housing supply with an **additional 70 new homes**.
- 2.5.35 A relatively high level of growth is being proposed at **Timsbury** in the preferred strategy, with comprehensive schemes to the east and west (formed of the existing East of St Mary's allocation, TIM05/16 and TIM09) delivering a total of 400 - 450 new homes. Whilst there are omission sites in Timsbury, the proposed level of growth is significant at the village scale and

so additional growth over and above this would likely be relatively small scale, reasonably capped at another **200 homes**.

Sub-Area: Rural Areas (Tier 3) settlements

- 2.5.36 With a limited supply in the key settlement areas and the context of the plan potentially generating unmet needs, there is a need to reconsider the potential for more rural development to contribute to housing needs in both the short- and long-term. Development within the rural settlements therefore warrants a particular focus through the SA. Despite this, it is recognised that these are less sustainable areas of the district, and in the context of the plan struggling to generate the necessary funding for infrastructure development and mitigation, additional rural development could exacerbate existing infrastructure issues.
- 2.5.37 At **Bishop Sutton** 5 sites have been allocated as part of the preferred strategy (BIS03b, BIS03c, BIS03d and BIS10a) which will deliver a total of 280 new homes and extension to the business park (BIS10c). There are 6 sites that have not been progressed as part of the preferred strategy (BIS10b, BIS11, BIS07, BIS06/01, BIS04/05 and BIS08), one of which is an isolated site too far removed from the settlement boundary (BIS08). The remaining five sites all have access constraints which significantly reduces the viability of development. On this basis, **no options** for additional development at Bishop Sutton can be identified.
- 2.5.38 At **Chew Stoke** one site has been allocated (CHS03) which will deliver 100 new homes. There are two additional sites that have not been progressed as part of the preferred strategy (CHS04 and CHS05). Site CHS04 is too far removed from the settlement boundary and lies within the National Landscape making this site less reasonable to progress as an alternative. However, site CHS05 alone could potentially deliver an **additional 50 new homes**.
- 2.5.39 At **Clutton** two sites have been allocated as part of the preferred strategy (CLU07 and CLU06), one of which (CLU07) is a strategic site delivering 300 new homes. CLU06 will contribute an additional 30 homes bringing the allocation total at Clutton to 330 new homes. The preferred strategy has maximised development opportunities, and no omission sites are identified/available. Therefore, **no options** can be identified. Clutton links closely with Temple Cloud, and the new provisions expected at Clutton, such as a new primary school, would be accessible for the residents of Temple Cloud.
- 2.5.40 At **Corston** one site has been allocated (COR01) which will deliver 60 new homes. There are three additional sites that have not been progressed as part of the preferred strategy (COR02, COR03 and COR04). Site COR02 is constrained by flood risk and is not considered suitable for allocation. However, COR03 and COR04 could contribute an **additional 60 homes**.
- 2.5.41 At **Farmborough** two sites have been allocated as part of the preferred strategy (FAR08 and FAR17) which together will deliver an additional 200 new homes, subject to sufficient access from Timsbury Road and capacity within the Primary School. There are 8 sites that have not been progressed as part of the preferred strategy. Three of these sites (FAR05, FAR09, and FAR10) are removed from the settlement boundary. Of these, sites FAR09 and FAR10 along with site FAR06 are separated by the A39, which is considered a significant constraint to effective placemaking. The remaining

sites are not free from constraint (FAR02, FAR03, FAR11 and FAR15), and access is a particular issue at sites FAR11 and FAR15 making these sites less viable as alternatives. FAR02 is also likely to be protected as green space if not progressed for housing, but together the remaining sites (FAR02 and FAR03) could potentially contribute an **additional 100 homes**.

- 2.5.42 At **Freshford** no sites are allocated and there is only one small omission site (FH01) which has been discounted due to accessibility constraints. Whilst Freshford benefits from a railway station, wider opportunities for growth are limited by the village's landscape setting, constraints associated with the local highway network, and the potential impact of further development on the character of the settlement. On this basis, **no reasonable alternative growth option** has been identified.
- 2.5.43 At **High Littleton** the main constraint to development is the high landscape sensitivity associated with this area and on this basis no sites are allocated at High Littleton in the preferred strategy. However, there are 9 sites surrounding the settlement (HTN01, HTN04, HTN05, HTN06a, b, and c, HTN07, HTN09, HTN10, HTN11) and two sites within Farmborough that relate more closely to High Littleton (FAR13 and FAR14), which could provide additional growth. HTN11 is a notable site for its importance in providing separation between High Littleton and Hallatrow and is not considered suitable for progression for this reason. The HTN06 sites would rely on access being created from HTN06a which makes HTN06a the most reasonable alternative at this stage – which could potentially deliver an additional 90 homes. Progressing all the omission sites would deliver too much growth at a scale that would not be proportionate to the existing settlement area and of which the landscape impact would likely be too significant. However, development at one of the larger sites, or across some of the smaller sites could be expected to deliver an **additional 100-200 new homes**.
- 2.5.44 At Hallatrow one site has been allocated as part of the preferred strategy (HAL06) which could deliver 40 new homes. There are small omission sites within the village which could deliver an **additional 20-40 new homes**.
- 2.5.45 At **Temple Cloud** one large site has been allocated (formed of TC01b, TC09, TC01c and CLU01a) as part of the preferred strategy which will deliver 130 new homes. There are 10 sites that have not been progressed as part of the preferred strategy (TC02a, TC02b, TC03, TC04b, TC04c, TC04e, TC05, TC06, TC07a, and TC07b). These sites surround the settlement edge. Progression of all the omission sites would deliver growth that is not proportionate to the existing settlement area and would likely be detrimental to the objectives of the Air Quality Action Plan recognising that Temple Cloud is a declared Air Quality Management Area (AQMA) and Temple Inn Lane is at capacity. However, the allocation of a larger site, such as the TC04 sites, or a combination of smaller sites could reasonably be expected to deliver at least an **additional 100 new homes**. Notably there are close links between Temple Cloud and Clutton, and the growth being proposed in the preferred strategy will provide facilities (such as a new primary school) to support the residents of both settlements.
- 2.5.46 At **Pensford** no sites have been allocated but omission sites surround the settlement which is reasonably well connected as it lies on the A37. There are 13 sites that have not been progressed as part of the preferred strategy.

Two of these sites (PEN08 and PEN13) were identified as potential small-scale development opportunities capable of delivering around 10 homes each. PEN13 comprises an existing employment site, whilst PEN08 is a small greenfield site crossed by a public footpath. The remaining sites were discounted due to a combination of landscape sensitivity, steep topography, their distance from the settlement boundary, or because they relate more closely to other locations considered through the SA. On this basis, the most reasonable alternative would be small-scale development at PEN08 and PEN13, which could potentially deliver an **additional 20 homes**.

2.6 Alternative growth scenarios identified at this stage

- 2.6.1 The land supply outlined in the preferred option equates to 81% of LHN. Alternatives at this stage are focused on options to boost housing supply to bring it closer to LHN, using the outcomes of the review of settlement areas.
- 2.6.2 With this context provided, the following can be said for the sub-areas in terms of drawing together options:
- **Bath:** there remains a theoretical option for significant settlement expansion at the West of Bath site, though this undoubtedly presents a high risk to the existing UNESCO inscriptions at Bath, and in terms of evidence development to underpin the site and demonstrate its soundness. A high-risk strategy could potentially allocate this site for up to 2,000 additional new homes. The repurposing of employment land at Roseberry Place could also contribute an additional 40 new homes.
 - **Bristol to Bath Corridor:**
 - **Hicks Gate:** there is the option to develop east of the roundabout though the infrastructure cost to unlock this land could have viability implications. The land east of the roundabout could deliver up to an additional 600 homes
 - **Keynsham and Saltford:** options at Keynsham are largely maximised as far as reasonable, but there could be the opportunity to slightly boost numbers by repurposing employment land at the North Keynsham allocation site (adding around 120 homes). There is an omission site at the Land south of Manor Road in the south of Saltford that could deliver an additional 90 homes and is subject to a live planning application. A further omission site at East Keynsham, also subject to a live planning application could contribute around an additional 100 homes.
 - **Whitchurch Village and Stockwood:** repurposing the secondary school allocation at North Whitchurch could boost housing growth here with an additional 300 homes. However, an alternative site for a new secondary school would need to be identified which would likely result in reduced housing numbers elsewhere. Any additional growth to the south (above that allocated) is likely to lead to significant impacts in relation to the Maes Knoll Scheduled Monument that would be difficult to mitigate.

- **Somer Valley:** options for growth to the north of Midsomer Norton are discounted at this stage, recognising the substantial infrastructure required to unlock the site, outputs of recent viability work and the intentions of the Council not to prejudice a comprehensive scheme coming forward here in the future. Most allocations sites are therefore focused around Radstock and Peasedown St John, with some additional growth around Paulton. The Batch site at Paulton if progressed could potentially boost supply with an additional 100 homes, but there are limited opportunities for additional strategic growth at this stage. There are employment sites that have not been progressed (at Peasedown and Westfield) that if repurposed could contribute up to an additional 900 homes.
- **Additional Tier 2 settlements:** reflecting the work the Council has done to identify the sustainability merits at settlements, there are additional rural locations that are deemed relatively accessible under consideration here. A review of the omission sites at these settlements identifies options to boost growth and collectively potentially contribute up to 380 more new homes across Bathford, Batheaston, Bathampton, Chew Magna, and Timsbury. However, this would mean significantly large scale growth being directed to Timsbury (in the region of 650 new homes).
- **Tier 3 settlements (Rural Areas):** whilst relatively less accessible areas, a review of these settlements has identified options to potentially boost the supply of homes from rural areas, to collectively contribute up to 570 more new homes. This would be spread across the settlements of Chew Stoke, Corston, Farmborough, High Littleton, Hallatrow, Temple Cloud, and Pensford.

2.6.3 It is evident that options to boost housing supply (in an attempt to meet LHN) at this stage relate to the progression of more problematic sites or more isolated/ rural sites, which begin to step into a 'grey area' around delivery and alignment with the spatial priorities of the Local Plan, national policy and placemaking aims. This includes the repurposing of employment land allocations, which would reduce the level of economic development being proposed alongside housing growth and lead to higher levels of out-commuting.

2.6.4 Despite this, the following reasonable alternative growth strategies can be drawn together:

- **Option 1;** The preferred allocation sites (Table 2.3 – land supply equating to 81% LHN)
- **Option 2:** Boost housing supply with less suitable omission sites in well-connected areas (Land South of Manor Road at Saltford, East Keynsham, land east of the roundabout at Hicks Gate, The Batch at Paulton, and additional growth at Tier 2 settlements – land supply equating to 86% LHN)
- **Option 3:** Boost housing supply by repurposing employment land allocations (North Keynsham, Roseberry Place, Industrial Quarter at Peasedown St John, Westfield Industrial Estate at Midsomer Norton – land supply equating to 85% LHN)
- **Option 4:** Boost housing supply with omission sites in less well-connected areas (additional growth at Tier 3 settlements – land supply equating to 83% LHN)
- **Option 5:** Adopt a high-risk strategy to get closer to LHN by progressing the West of Bath site (land supply equating to 89% LHN)

2.6.5 **Table 2.4** provides a breakdown of housing supply under the 5 options.

Table 2.4: District-wide alternative growth scenarios

	Option 1 (preferred approach)	Option 2 (well-connected omission sites)	Option 3 (repurposed employment land)	Option 4 (less well-connected omission sites)	Option 5 (WoB)
Commitments	5,814	5,814	5,814	5,814	5,814
Windfall allowance	1,944	1,944	1,944	1,944	1,944
Bath	877	987	917	877	2,877
Keynsham and Saltford	4,745	4,935	4,865	4,745	4,745
Whitchurch (and Stockwood)	1,745	1,745	1,745	1,745	1,745
Hicks Gate	1,934	2,534	1,934	1,934	1,934
Somer Valley	3,550	3,650	4,450	3,550	3,550
Rural areas	1,605	1,875	1,605	2,175	1,605
Total supply	22,214	23,484	23,274	22,784	24,214
LHN	27,324	27,324	27,324	27,324	27,324
% contribution to LHN	81%	86%	85%	83%	89%

*Green indicates an increase in land supply

2.6.6 As described above, none of the options achieve 100% LHN. To achieve 100% LHN, it is likely that a combination of all the alternatives would need to be progressed. As indicated by the findings of the current appraisal, such an approach would have significant implications for the district. These include: 1) increasing the disparity between housing growth and commensurate employment growth; 2) requiring a significant expansion of growth into rural areas; 3) presenting an increasingly higher-risk approach in terms of the key environmental designations in the area, including internationally designated sites; and 4) significantly increasing pressures on existing infrastructure

capacity. Therefore, whilst a 100% LHN option has not explicitly been assessed through the existing SA, delivering such an approach during the current plan period can be deemed unreasonable, particularly given many of the housing need issues are strategic in nature, and apply to the wider West of England Region. In this respect, options for exploring 100% LHN will be most appropriately considered in conjunction with the strategic planning work being undertaken for the wider WECA region through the forthcoming Spatial Development Strategy (SDS). This includes through the associated infrastructure capacity studies, Integrated Impact Assessment work and other evidence base studies that will be undertaken for the SDS.

- 2.6.7 With regards to employment land options, these are notably linked with the housing land supply and limited. A lower level of employment growth is tested in the housing options, as land that could be repurposed. Seeking a higher level of employment growth would likely mean repurposing housing allocation sites, thus increasing the gap to LHN further. For this reason, a higher level of employment growth is not deemed reasonable at this stage.

3. Appraisal of growth scenarios

3.1 Chapter overview

- 3.1.1 This chapter appraises the following options established in the previous chapter.
- **Option 1:** The preferred option (and suite of allocation sites)
 - **Option 2:** Boost housing supply with less suitable omission sites in well-connected areas
 - **Option 3:** Boost housing supply by repurposing employment land allocations
 - **Option 4:** Boost housing supply with omission sites in less well-connected areas
 - **Option 5:** Adopt a high-risk strategy to get closer to LHN by progressing the West of Bath site
- 3.1.2 The previous chapter provides a detailed discussion of how these options have been established considering the available evidence. The options are based on actual choices the Council are grappling with at this stage, particularly in light of a land supply shortfall against LHN.

3.2 Methodology

- 3.2.1 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see **Table 1.1**) as a methodological framework.
- 3.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 3.2.3 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects.
- 3.2.4 With regards to the resultant summary table, the number indicates the rank and does not have any bearing on likely significant effects. If an option is ranked as 1 then it is judged to perform better against that SA topic compared to an option that is ranked 2. '=' has been used to highlight where options perform equally and cannot be differentiated between. The likely effects are summarised by colour coding, where a 'red, amber, green' (RAG) approach is taken (utilising both light green and dark green) to highlight significant negative effects, minor to moderate negative effects, minor to

moderate positive effects, and significant positive effects. Grey shading denotes uncertainty.

3.3 Health and wellbeing

- 3.3.1 A key issue for health and wellbeing is the effect of additional growth on the existing capacity of healthcare facilities, particularly in the south of the district where provision is more limited. In this respect there are a few considerations.
- 3.3.2 Firstly, the preferred option (and lowest housing land supply option – Option 1) already places significant pressures on healthcare facilities in the south through key strategic development sites such as South Peasedown, North Radstock, Writhlington, Paulton South and Farrington Gurney South which will cumulatively deliver 3,630 new homes. Based on the standard of 1,800 people per one full-time GP an equivalent of 760 homes per one full-time GP is derived based on the national average household size. With this rough estimate in mind, the proposed strategic allocations in the Somer Valley alone generate the need for an additional 5 full-time GPs. Where new provisions could be best located to meet these needs is another consideration and arguably, increasing capacity at existing facilities (where possible) may better disperse the new provisions across the different settlement areas to provide all round better access. It will be important therefore, to ensure that the strategic sites being progressed contribute to increasing healthcare capacity locally to avoid negative effects arising.
- 3.3.3 The next consideration is therefore whether boosting housing supply through Options 2, 3, 4, and 5, would increase these pressures further or provide any significant opportunities to address capacity issues. None of the sites under consideration in the alternatives to the preferred approach provide any significant opportunities to improve healthcare access – particularly within the Somer Valley. There is no evidence to support an assumption that new facilities could or would be delivered at any of these sites, except for Option 5 perhaps based on the scale of development that could be proposed here. The assumption is therefore that Options 2, 3, and 4 are likely to increase pressures on capacity at existing facilities. The progression of larger sites within Option 2 has better chance of securing appropriate development contributions to mitigate this. Of note, this issue could be of more significance under Option 4, given that the sites are smaller and as residents of lower tier settlements in more rural areas are already likely to need to travel further to access existing healthcare facilities.
- 3.3.4 Access to healthcare is the forefront issue when seeking to differentiate options. Whilst promoting active and healthy lifestyles is a big factor, it is considered that all options have an equally good chance to design and deliver schemes that maximise opportunities for active travel and connect with the surrounding network of footpaths, open spaces, countryside, and recreational opportunities. With this said, there are perhaps still a few points to note. Development in more rural areas (i.e., lower tier settlements – Option 4), in general, has reduced opportunities for active travel, particularly for key local journeys such as school runs and local shops. Residents generally need to travel further to access a wider range of services and facilities, including sports and recreational facilities, which in turn increases reliance on different modes of transport. This ultimately is a factor to

consider when trying to achieve a healthy balance of rural development and is a key consideration for progression of Option 4.

- 3.3.5 Overall, Options 1, 2, and 5 are considered to be best performing in relation to this topic, given that they include enough strategic allocations to assume that development contributions can be secured to mitigate the likely impacts on healthcare capacity. Option 4 performs least favourably due to a lower likelihood of being able to secure development contributions to mitigate the impacts of additional growth on healthcare capacity, leaving Option 3 as ranking middle ground. Most options are considered likely to avoid negative effects arising with mitigation in place and provide ample opportunity for **minor positive effects** overall by additional contributions, such as green infrastructure development, that will support more positive health outcomes. Given the lower likelihood that effective mitigation could be achieved under Option 4 **uncertainty** is noted for this option.

3.4 Housing

- 3.4.1 Looking solely at housing land supply, the preferred approach (Option 1) is least advantageous with its lower contribution to LHN compared to the alternatives. This also likely means that Option 1 would deliver the least amount of new affordable housing, and potentially less specialist housing types (although the needs of Gypsies and Travellers are likely to still be met).
- 3.4.2 The distribution of housing remains broadly the same under the options, except for additional (Tier 3 settlement) rural development under Option 4. Arguably this option performs better by meeting the needs of more communities across the district, potentially delivering more affordable housing in these additional locations too. However, in terms of place-making, these would be less accessible homes. Viability work has also identified that lower levels of affordable housing delivery in these areas is more likely to be viable.
- 3.4.3 The repurposing of employment land (Option 3) could see more accessible homes delivered in more areas of the district; however, it is noted that these opportunities are limited and the potential contribution to meeting LHN is minimal.
- 3.4.4 The West of Bath site under Option 5 is notable not only for its potential additional housing land supply, but also for its location in Bath providing the opportunity to deliver new affordable housing in an area where this need is most concentrated. Affordable housing delivery is also more viable in this area of the district.
- 3.4.5 Overall, all options are considered likely to lead to **significant positive effects** with their contributions to meeting housing needs. However, for all options there is a longer-term need to revisit and increase land supply to avoid under-delivery issues arising. The options are ranked according to their total contribution, with the highest growth option (Option 5) ranking first and the preferred (lowest growth) option (Option 1) ranking last.

3.5 Communities

- 3.5.1 As touched upon in the housing topic above, a key issue is delivering against the forecasted needs of local communities. Under this topic, this also includes delivering the necessary supporting infrastructure development to deliver against place-making aims, including aims for connected and accessible development.
- 3.5.2 With regards to the preferred option (Option 1), most development is proposed in the most accessible locations of the district – Bath, the Bristol to Bath Corridor, and (to a lesser extent given the absence of rail connections) the Somer Valley. A smaller proportion of development is proposed in rural areas, seeking to meet local needs at opportunity sites, whilst avoiding significant growth in the least accessible areas of the district.
- 3.5.3 With a variety of strategic development sites (of 500+ homes) proposed in the more accessible areas of the district, there is good potential to deliver accessible new community infrastructure such as local centres, green spaces, educational facilities and new active travel connections.
- 3.5.4 However, Option 1 delivers the lowest number of homes overall, falling 19% shy of meeting LHN. This has knock-on effects, particularly for planning the delivery of affordable housing and funding for infrastructure from development contributions.
- 3.5.5 When comparing this position to the alternatives, all alternative options seek to boost housing supply but still do not meet LHN in full, contributing at most, an additional 8% (Option 5). Options 2, 3, and 5 seek to progress larger scale sites in accessible locations that have good potential to deliver community benefits. But this potential reduces under Option 4 given the smaller sites under consideration in less accessible locations. Notably, the highest concentration of affordable housing need is within Bath, as well as some of the most deprived areas. On this basis, Option 5 has good potential to enhance positive effects with additional housing and community infrastructure development at the West of Bath site.
- 3.5.6 The preferred option (Option 1) places weight on Green Belt boundary adjustments being made through the plan, which require clear justification through the plan process. Most notably, some of the most accessible areas of the district are constrained by the Green Belt, and with a plan approach that places great emphasis on connectivity, the erosion of the Green Belt becomes inevitable. The increased development along the corridor between Bristol and Bath inevitably reduces the space between the two cities and the settlements within the corridor, and in this respect, erodes settlement identity. These negative effects are exacerbated under Options 2, 3, and 5, which increase the level of development within the corridor, or indeed west of Bath which is judged in the GBA to perform strongly against most Green Belt purposes.
- 3.5.7 Overall, Option 1 (the preferred options) is ranked first, given it seeks to maximise opportunities for accessible development whilst minimising the erosion of the Green Belt and countryside between Bristol and Bath. This is followed by Option 5 as whilst this option progresses additional Green Belt development, it could provide new housing (particularly affordable housing) in and around areas of higher deprivation. Option 3 ranks next and

marginally better than Option 2 as whilst it progresses additional Green Belt development, it is of a lesser scale than under Option 2. Option 4 ranks last as whilst it avoids additional development within the Bristol to Bath corridor, it progresses additional development in less accessible areas of the district. Whilst distinctions are drawn between the options to rank them, all options are considered likely to support **significant positive effects** overall with the delivery of accessible new homes, jobs, and community infrastructure.

3.6 Economy

- 3.6.1 With regards to the options, there is only one approach – the repurposing of employment land under Option 3 – that has much bearing on employment land supply. However, given the limited opportunities, the negative effects under this option are considered likely to be moderate rather than significant.
- 3.6.2 The preferred approach seeks to deliver employment development commensurate with the level of housing development and in mostly accessible locations – predominantly at existing employment areas but also as part of mixed-use development within Bath City boundaries. Additional employment development in rural areas is also proposed (at Box Road and Westway Farm Extension), but at a smaller scale and seeking to meet the needs of the rural economy. This balance is considered likely to support significant positive effects.
- 3.6.3 The increased housing supply under the remaining alternative options (Options 2, 3, 4, and 5) does not provide for additional employment development as well. In this respect these options could tilt the balance of housing and employment growth with more homes and more people locally competing for the new job opportunities – and potentially needing to travel to work from less accessible areas (i.e. Tier 3 settlements under Option 4). Whilst positive effects are still considered likely, this issue is reflected in the ranking of options. Development at West of Bath could be the exception to this (under Option 5), as the large site provides more opportunities for mixed-use development that could maintain that balance of people and job opportunities. On this basis, it potentially ranks marginally better than the preferred approach by providing more job opportunities as a whole.
- 3.6.4 Another consideration is the impact of the options in relation to the retail economy. Options 2, 3, and 5 potentially provide additional footfall in key retail areas with associated positive effects. Option 4 stands out as potentially less favourable, as whilst this option has good chance to support local retail facilities that serve rural communities, it is likely that many of the additional new residents would need to travel longer distances to access these.
- 3.6.5 A final consideration is the impact of options in relation to the rural economy. No additional rural employment development is proposed as part of the alternative options, which relate solely to additional housing growth. Option 4 disperses more development within rural areas that could support the rural economy and provide increased demand for rural broadband improvements that could serve to benefit rural businesses, but there is no evidence to suggest that such benefits would be 1) realised or 2) of significance for the rural economy.

- 3.6.6 Overall, all options would deliver economic growth that is likely to result in **significant positive effects**. Option 5 is ranked first, reflecting the opportunity to deliver more mixed-use development in a highly accessible area close to Bath City Centre, supporting the creation of more accessible new jobs and additional footfall in a key retail location. Option 1 ranks next, as it seeks to balance the level of housing and employment growth to achieve a positive outcome for economic development. Options 2, 3, and 4 rank less favourably as they begin to tilt this balance in favour of housing. Option 3 ranks last given the repurposing of employment land that reduces this land supply.

3.7 Transportation

- 3.7.1 The preferred option seeks to direct most growth to the most accessible areas of the district. This includes strategic growth within Bath, the Bristol to Bath Corridor, and Somer Valley.
- 3.7.2 Despite this, there will inevitably be an increase in vehicular traffic on the local and strategic road network that has particular implications for roads running near, at, or over capacity. Failing to address this impact of growth could result in increased traffic and congestion, more road traffic accidents and reduced road safety, and reduced air quality. The evidence suggests that development contributions and secured investments will struggle to address the full scale of the infrastructure improvements required in the district to support the proposed growth. However, the preferred sites have been assessed in detail through transport modelling work to assist in identifying infrastructure priorities, and all sites progressed are not considered to have any insurmountable access issues. Of note, a proportion of the sites are strategic scale (over 500 homes) which can assist by improving viability.
- 3.7.3 As all other options seek to increase the level of development, the general assumption is that that they will also increase the pressures on road capacity and traffic, with the highest growth option (Option 5) likely having the greatest effect. However, Option 5 proposes a single strategic site (West of Bath) that would deliver development in one of the most accessible areas of the district. Similarly, Options 2 and 3 propose additional development in well-connected areas which could contribute to mitigating the impacts and provide additional opportunities to improve active travel networks and sustainable transport connections. Option 4 is the option of greatest concern, given it proposes additional development in less well-connected areas of the district, particularly in terms of sustainable transport access. Furthermore, the additional development is predominantly formed of small-scale development opportunities that are less likely to significantly contribute to improving road infrastructure and network connectivity with reduced viability.
- 3.7.4 Overall, all options are considered likely to lead to **minor to moderate negative effects** by increasing road traffic in the district. Significant negative effects are likely to be avoided given the spatial strategy under all options places most development within the most accessible areas of the district and is likely to deliver additional mitigation such as new connected active travel opportunities. In terms of ranking, Option 1 (the preferred approach) is ranked first as it proposes the lowest level of growth and focuses on accessible locations. Option 5 ranks next as whilst it proposes

the highest level of growth, the additional single strategic site is in a highly accessible location and benefits from economies of scale (improving viability). Option 3 is ranked next, followed by Option 2, again given that these options seek to promote more development in well-connected areas, and because Option 2 proposes more development than Option 3. Option 4 ranks last due to the dispersal of more development in less well-connected areas.

3.8 Landscape

- 3.8.1 Of key concern for landscapes in the district is the progression of development within the settings of nationally designated landscapes (Cotswolds and Mendip Hills National Landscapes). This includes development within and surrounding the settlements of Bath, Saltford, Keynsham, Peasedown St John, Bishop Sutton, Chew Stoke and potentially additional settlement along the A37 such as Clutton and Temple Cloud. All of which are proposed for development as part of the preferred approach. Both National Landscapes are associated with areas of higher topography whilst most of the settlements, except for Peasedown St John, sit at lower elevations with significant potential for development to impact upon views from the designated areas. Negative effects in this respect would predominantly be managed through development design, massing and layout and additional on-site measures such as screening, planting and landscape buffers.
- 3.8.2 With regards to the alternative options, Option 5 is likely to lead to particular impacts, as the large West of Bath site lies on the edge of the Cotswolds National Landscape. Option 2 proposes additional growth at both Saltford and Chew Magna, which has the potential to affect the settings of both the Cotswolds and Mendip Hills respectively. Similarly, additional development north of Keynsham under Option 3 has the potential to affect the setting of the Cotswolds. Finally under Option 4 additional growth would be directed towards Chew Stoke, Corston, and Temple Cloud again potentially affecting the settings of National Landscapes.
- 3.8.3 An additional consideration is the landscape between Bristol and Bath that lies within the Green Belt and provides separation between the two cities. Development within the Bristol to Bath Corridor is likely to affect the openness of this area. Alternative options 2, 3, and 5 would deliver higher levels of growth within the corridor and increase the extent and significance of effects in this respect.
- 3.8.4 For all options, the resultant effects will largely be linked to site design, layout and massing, and on-site measures to reduce landscape impacts and protect key views. At this stage, it is therefore appropriate to flag the potential for **significant negative effects** under all options. In terms of ranking, the options are all ranked according to the level of development proposed – given all options propose development within sensitive settings. Option 1 therefore ranks first as the lowest growth option, whilst Option 5 ranks last.

3.9 Historic environment

- 3.9.1 The most significant difference between the options under consideration would be the progression of the West of Bath site under Option 5 – which

has key implications for the historic environment. The preferred approach under Option 1 already directs a significant proportion of growth to Bath with the potential to affect the significance of the World Heritage Site inscriptions. The additional strategic site under Option 5 has been flagged through supporting heritage impact assessments for its potential to undermine the inscriptions and if allocated, runs the risk of seeing these revoked by UNESCO.

- 3.9.2 The north of the district is significantly more constrained by Scheduled Monuments (e.g., Maes Knoll), other archaeological considerations, and significant clusters of listed buildings found in most settlements here. The additional growth proposed in the north under Option 2 and 3 could therefore lead to effects of greater significance, particularly at Whitchurch under Option 2.
- 3.9.3 The south of the district, whilst less constrained than the north, still contains assets of significance that could be affected by additional growth at settlements under Option 4.
- 3.9.4 It is clear that all options would need careful consideration in terms of appropriate mitigation at the site level (particularly through design and screening). It is broadly assumed that mitigation is more likely to be effective under the lowest growth option, which makes this option (Option 1) rank first (with options ranked according to scale of overall delivery). The potential for **significant negative effects** is identified at this stage for all options, recognising the significant need for effective mitigation in the progression of any potential spatial strategy.

3.10 Biodiversity

- 3.10.1 There are internationally and nationally designated sites for biodiversity within the district which are a key consideration for future growth. An accompanying HRA has assessed the likely effects of the preferred approach on European designated sites and identifies the necessary mitigation measures required to ensure no significant negative effects arise.
- 3.10.2 Additionally, Sites of Special Scientific Interest (SSSIs) are concentrated in the east and west of the district, whilst Ancient Woodland is more widely distributed. The preferred option has the potential to affect the local biodiversity network, both positively and negatively. On-site mitigation such as nature-based drainage solutions and retention of key features will assist in avoiding negative effects arising, whilst the premise for biodiversity net gain will provide opportunities for betterment.
- 3.10.3 With regards to the alternative options, none of the omission sites under consideration (under Options 2, 4, and 5) have significant biodiversity constraints, though it is likely that additional localised mitigation measures would be required. There is the need to balance this however with the increased opportunity for biodiversity net gain across more areas of the district.
- 3.10.4 The options are ranked according to the quantum of growth they deliver recognising that more development in more areas has greater potential to affect local biodiversity networks and requires additional mitigation. It is considered likely that mitigation could be utilised to avoid negative effects

arising, which alongside the requirement for net gain in development, should result in **minor positive effects** being realised overall.

3.11 Natural resources

- 3.11.1 There are three AQMAs in B&NES, which are located in Bath, Temple Cloud, and Farrington Gurney – all of which have growth proposed in the preferred approach. These were all declared due to high levels of nitrogen dioxide (NO₂). Whilst growth in these locations has the potential to exacerbate air quality issues by increasing the number of private cars on local roads, it is also recognised that strategic growth has the potential to deliver transport interventions, particularly through the WECA Bristol to Bath Corridor and Somer Valley Links projects, that could minimise impacts. With regards to the alternatives, the additional growth is considered likely to exacerbate these effects, particularly under Option 5 which includes additional growth at Bath and Option 4 which includes additional growth at Temple Cloud.
- 3.11.2 Another consideration under this topic is the effect of options in relation to soil resources – namely agricultural land. It will be important to avoid unnecessary loss of the highest quality ‘Best and Most Versatile’ agricultural land in the district, even though greenfield development is inevitable considering the lack of alternative brownfield opportunities. The latest predictive Agricultural Land Classification (ALC) data shows the highest grade agricultural land (Grades 1 and 2) lies predominantly in the west of the district, particularly around Chew Stoke and Chew Magna, and between Farrington Gurney and Hallatrow. With areas adjoining the settlements of Chew Stoke, Farrington Gurney and Hallatrow have been allocated in the preferred approach, negative effects are likely. With additional development proposed in these locations under Option 4 – the effects could be of more significance under this option.
- 3.11.3 In terms of water resources and quality, Wessex Water is likely to maintain adequate water services over the plan period, therefore, it will be important for new development to avoid negative impacts on water quality and contribute to reducing consumption and improving efficiency. Policy development in this respect will likely be informed by emerging evidence, ensuring that proposals are supported by appropriate infrastructure and encourages sustainable drainage.
- 3.11.4 The northeastern part of the district, around Bath and Keynsham, falls within the Avon Bristol Urban Operational Catchment. The rest of the district falls within the Avon Bristol Rural Operational Catchment. Notable waterbodies that pass through the district are the River Avon, which passes through Bath and Keynsham, and its tributaries and the Chew Valley Lake, in the west of the district. Again, it is considered likely that policy provisions would be utilised to ensure negative effects are avoided under any given option.
- 3.11.5 It is considered that there is scope for the Local Plan to implement an appropriate approach to development within minerals safeguarding areas, with all options seeking development within or adjacent to existing settlement areas.
- 3.11.6 Overall, there will inevitably be a loss of greenfield and agricultural land as part of any given spatial strategy that seeks to meet development needs. All options are therefore considered to lead to **minor to moderate negative**

effects. Significant negative effects are likely to be avoided given that most development is directed to the north (away from the highest quality agricultural land) and all development is expected to be within or adjoining existing settlement areas. With additional rural development proposed, Option 4 is ranked least favourably given an estimated greater potential to affect agricultural land resources, and the small-scale development sites that have less potential (by way of location and reduced viability) to support air quality objectives. Option 1 ranks first as it proposes the lowest level of growth. The remaining options are considered likely to perform broadly on par, with any differences likely to be relatively marginal.

3.12 Climate change

- 3.12.1 There are no significant differences between the options when it comes to flood risk considerations. Whilst more problematic sites would be progressed under Options 2 and 4, none of these sites have insurmountable issues that cannot be mitigated. All options are also considered to have equal potential to support green infrastructure aims and build climate resilience. Attention is therefore paid to climate change mitigation, and most prominently, the accessibility of development and potential to support modal shift.
- 3.12.2 The preferred option performs well in this respect by locating the greatest proportion of development in the most accessible areas of the district. Increasing levels of rural growth under Option 4 has greater potential to increase reliance on the private vehicle in comparison to other options, given the lack of sustainable transport connections at many of the Tier 3 settlements.
- 3.12.3 Despite this, all options have good potential to secure high levels of resource efficiency and plan for sequestration.
- 3.12.4 Overall, there are minimal differences between the options with regards to building climate resilience and **broadly neutral to minor positive effects** are considered most likely overall. In terms of ranking, Option 1 ranks first given the lower level of development and predominant focus on development within the most accessible areas of the district. Option 4 ranks last given the wider distribution of development in less accessible areas. No meaningful differences are drawn between the remaining options which perform broadly on par with each other in middle ground.

3.13 Waste

- 3.13.1 All options provide similar opportunities for promoting waste management in accordance with the waste hierarchy and connect with existing waste routes and recycling facilities locally.
- 3.13.2 Whilst higher growth levels are likely to result in an overall increase in the amount of waste produced, the alternatives do not propose any significantly higher levels of development. The most substantial increase in housing supply would be expected by inclusion of development at the West of Bath (Option 5), however, the longer lead in time associated with the large site would ensure ample time to facilitate the growth in terms of waste management.

3.13.3 Overall, **no significant effects** are anticipated in relation to the options under consideration, and no meaningful differences can be made between them in relation to waste. The overall increase in waste production, during construction and operation phases, is considered likely to result in **minor to moderate negative effects**.

3.14 Conclusions

3.14.1 Table 3.1 provides a summary of the likely effects and ranking of options in relation to each SA topic (see methodology at start of this chapter for a detailed explanation of how to interpret the summary table).

Table 3.1: Summary of likely effects and ranking of options

	Option 1 (preferred approach)	Option 2 (well-connected omission sites)	Option 3 (repurposed employment land)	Option 4 (less well-connected omission sites)	Option 5 (WoB)
Health and wellbeing	1	1	2	3	1
Housing	5	2	4	3	1
Communities	1	4	3	5	2
Economy	2	4	5	3	1
Transportation	1	4	3	5	2
Landscape	1	4	2	3	5
Historic environment	1	4	2	3	5
Biodiversity	1	4	2	3	5
Natural resources	1	2	2	3	2
Climate change	1	2	2	3	2
Waste	=	=	=	=	=

4. The Council's preferred approach

- 4.1.1 The Council considers the preferred approach (Option 1) represents a proportionate and appropriate response to the standard method figure of housing need given the constraints and opportunities within the District. Specifically, the presence of the double-inscribed World Heritage Site of Bath, parts of two National Landscapes, numerous other important heritage and landscape assets and nearly 70% of the District being designated Green Belt. The housing requirement set out in the Local Plan meets over 80% of the standard method figure of need, represents a significant uplift or step-change in housing delivery and enables a substantial element of the need for affordable housing to be met. Existing need and much of the projected future need over the plan-period would be met.
- 4.1.2 The preferred approach or strategy also enables most development to be focussed on settlements and locations that are relatively well connected by sustainable modes of transport, although some development is still directed to some smaller, less well-connected villages. The proposed strategy also seeks to protect existing employment space and provide sufficient new employment space to enable the existing balance between resident workers and jobs resulting from the 22,000 housing requirement to be maintained. The proposed strategy or approach also seeks to appropriately balance harm to the landscape and heritage assets (and mitigate that harm) against meeting housing and employment space need.
- 4.1.3 It should be noted that in planning for a housing requirement that meets around 80% of the standard method figure of need still requires significant releases of land from the Green Belt. The Council considers the 'exceptional circumstances' required to justify removing land from the Green Belt exist. As such Green Belt has not been a particularly strong factor in determining the housing requirement or spatial strategy which is focussed on prioritising development at sustainable and well-connected locations.
- 4.1.4 Option 2 (well-connected omission sites) was rejected because on balance many of the omission sites were considered to result in harm to environmental assets, including landscape character, that outweighed the limited benefits of a relatively modest increase in housing supply.
- 4.1.5 Re-purposing employment land as tested through option 3 is not favoured because the Local Plan needs to help sustain local economic prosperity and maintain a housing/employment balance through not only protecting existing employment sites and premises but also planning for new space. Pursuing a strategy that provides for significantly less employment space and additional housing is likely to result in increased out-commuting from B&NES and within B&NES due to local imbalances and undermine long term economic prosperity.
- 4.1.6 Whilst the Council has considered a range of less well-connected omission sites these are generally of a small, non-strategic scale. Most of the available and deliverable strategic opportunities promoted and assessed have been allocated. A strategy that allocates a range of smaller, non-strategic sites in relatively isolated, unsustainable and car-dependent locations would result in increased travel distances and greater use of the private car, in short highly unsustainable travel patterns. This is contrary to

national policy and the council's declared climate emergency. On balance the relatively limited increase in housing supply is not considered to outweigh the harm arising from substantially increased car travel and its associated impacts.

- 4.1.7 Finally, pursuing strategic growth to the West of Bath has not been pursued at this time due to the comprehensive and thorough assessment which shows that development in this location would cause substantial harm to the World Heritage Site and that this harm is intrinsic and unavoidable. It is considered that pursuing, in this Local Plan, growth to the West of Bath given the World Heritage Outstanding Universal Values and associated attributes and the assessment evidence referred to above would be contrary to national policy i.e. the Council would not be able to demonstrate public benefits that are site specific and so significant as to outweigh the substantial harm. However, the Council is of the view that the potential for longer-term growth in this location should continue to be explored through the preparation of the WECA Spatial Development Strategy (SDS).
- 4.1.8 As a general point it is also important to note that whilst proposing a housing requirement and spatial strategy that meets around 80% of the standard method need figure in this Local Plan (for the reasons outlined above), the Local Plan will be reviewed within 5-years in response to the WECA SDS. Work on the WECA SDS has commenced and once it has progressed B&NES will prepare a new-style Local Plan that conforms with it. Preparation of the SDS is an appropriate mechanism through which to consider the best solutions to meeting future housing need strategically and sub-regionally.

5. Appraisal of the Local Plan consultation document

5.1 Chapter overview

- 5.1.1 The aim of this chapter is to present an appraisal of the Local Plan, as currently published under Regulation 19 of the Planning Regulations.

5.2 Methodology

- 5.2.1 The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the SA objectives identified through scoping (see Table 1.1) as a methodological framework.
- 5.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the plan in more general terms.
- 5.2.3 Within the appraisal narrative below specific policies are referred to only as necessary and relevant to each SA topic (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).
- 5.2.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

5.3 Plan contents overview

- 5.3.1 Most of the plan is about defining the spatial strategy for new housing and employment development, underpinned by a package of site allocation policies grouped under four broad locations: Bath, the Bristol to Bath Corridor, Somer Valley, and the Rural Areas. Alongside this, a suite of Development Management (DM) policies is provided to support place-making and sustainable development. Alongside guiding the right types of housing and employment development, the DM policies have a large focus on building climate resilience and supporting community infrastructure development. As appropriate, and particularly within Bath, the site allocation policies also provide design principles to ensure that development compliments the rich and varied landscapes and built environment.

- 5.3.2 At Bath, Milsom Quarter will deliver a range of mixed-use development and regeneration schemes, which are largely economic led but include new homes as well. There are 500 new homes provided for at Sydenham Park. The riverside will also continue to be a focus for new development with 1,750 new homes at the Bath Riverside site, amongst more mixed-use and employment development along Bath and Twerton Riverside sites. At the edge of Bath, the 'Land Adjoining Odd Down' site is expected to deliver an additional 300 new homes, and multiple small and medium sized sites are allocated across Bath's neighbourhoods.
- 5.3.3 Alongside growth at Bath, some key larger-scale development sites are being progressed at Keynsham, Saltford, Hicks Gate and Whitchurch (as part of the Bristol to Bath Corridor) and at Peasedown, Radstock, Writhlington, Paulton, and Farrington Gurney (as part of the Somer Valley). At rural areas, some small and medium allocation sites are progressed, the largest of which will deliver 300 new homes at Clutton.
- 5.3.4 Despite the significant number of allocations, the land supply outlined by the plan still fails to deliver against LHN as calculated using the NPPF Standard Method, falling near 20% short of the calculated figure. Whilst this would imply that unmet needs are being generated, it is not the intention of B&NES Council to export any unmet needs or increase development pressures on surrounding authorities in this respect. Rather, the Council's intention is to pursue an early plan review, and progress work on the WECA SDS to identify long-term opportunities to boost housing supply in the district – including by exploring the potential for significant urban extensions at either West of Bath or North of Midsomer Norton (or indeed at both locations).

5.4 Health and wellbeing

- 5.4.1 There is a need to plan for development that can reduce inequalities and deprivation, particularly by providing good access to decent and affordable homes, in locations that provide access to improved healthcare facilities, active travel connections, sport and recreational opportunities, and nature and green spaces. Dedicated policy stipulations for future growth will embed key health considerations and design principles that will deliver against the overarching objectives for the Plan.
- 5.4.2 Healthcare capacity in the district is a key concern, and the Infrastructure Delivery Plan (IDP) identifies that the infrastructure needs to meet population growth cannot be met from existing estate which is in deficit. The IDP identifies a clear methodology for calculating primary care infrastructure needs but at present *“neither the NHS or local partners have completed the work necessary to fully understand what existing assets may be available across neighbourhoods and how these contribute towards future service delivery”*. Whilst no key projects are currently identified the IDP notes that *“the Council will continue to engage with the NHS ICB on addressing the infrastructure requirements for the district.”*
- 5.4.3 Overall, **mixed effects** are likely. In the absence of clear healthcare infrastructure delivery priorities to address the impacts of growth, **minor negative effects** are considered likely (given the additional pressure that is likely to be placed on existing services in the short-term). The wider provisions to support active travel uptake, improve access to nature and

open spaces, and deliver high-quality design are likely to lead to **minor positive effects**.

5.5 Housing

- 5.5.1 The Plan provides a strong and comprehensive framework for housing provision, addressing the delivery of sufficient, high-quality, affordable and inclusive housing, supported by infrastructure and aligned with wider sustainability objectives. The policy framework (see Policy 6.14 to 6.21) aims to deliver a mix of housing types and tenures across the district, including affordable homes, adaptable homes, self-build and purpose-built accommodation, and built to rent. Delivering both strategic and non-strategic site allocations will support a diverse housing mix across the district and ensure sufficient supply during the plan period (in line with the proposed stepped trajectory). **Significant long-term positive effects** are expected under the Housing SA topic. Whilst the preferred approach will deliver approximately 81% of LHN, the Council has left no stone unturned with respect to the identification of site allocations and have not wanted to prejudice or preclude potential longer-term opportunities for strategic-scale growth via the West of England Spatial Development Strategy (SDS). Importantly, the unmet needs are not expected to be exported.

5.6 Communities

The Plan sets out a comprehensive framework for supporting healthy and vital communities, drawing together policies relating to health and wellbeing, housing, infrastructure, movement and recreational needs, green infrastructure and design. Taken together, the policy framework promotes environments that support physical health, mental wellbeing, social interaction and access to services, while seeking to ensure that communities are well-served and sustainable over the long term. Green Belt releases are expected to equate to a 2% loss of Green Belt land, and the GBA concludes that *“this scale of loss is not likely to fundamentally undermine the purposes (taken together) of the remaining Green Belt.”* **Significant long-term positive effects** are expected under the Communities SA topic.

5.7 Economy

- 5.7.1 The Plan sets out a positive approach to supporting economic growth and employment through a number of saved and new policy provisions (see Policy 6.23 to Policy 6.28). This includes via town centre rejuvenation, protection of key economic assets and locations (e.g., the Bath to Bristol corridor, and Somer Valley Enterprise Zone), provision of employment land, supporting important and emerging sectors of the economy (e.g., tourism, cultural and creative industries) and maintaining a buoyant rural economy. Importantly, economic development is planned at a commensurate level with housing growth. Alongside the delivery of new housing and infrastructure through new development areas, the provisions will support the Plan’s ambition to build strong and vibrant communities, enhancing their longer-term sustainability and viability. **Significant long-term positive effects** are expected under the Economy SA topic.

5.8 Transportation

- 5.8.1 B&NES can be broadly divided into four main areas: Bath, the Bristol to Bath Corridor and South East Edge of Bristol; the Somer Valley; and the rural areas. The Bath to Bristol Corridor is defined by the A4 and is the best-connected part of the district in terms of sustainable transport, with two railway stations located in Bath and one in Keynsham. Bath is a regional hub for transport and economic activity; however, traffic congestion is a significant issue both here and across the Bristol to Bath Corridor, especially during peak times. The South East Edge of Bristol contains Whitchurch, which is well connected to Bristol despite being a separate settlement. The Somer Valley is connected to Bath and Bristol via the A367 and A37 respectively and is relatively well served by public transport (only buses). However, due to its distance from these cities, it is not considered as well connected as the Bath to Bristol Corridor and South East Edge of Bristol. The rural areas make up the remainder of the district; here public transport is variable to poor depending on the village. In both the rural areas and the Somer Valley, a greater proportion of people travel to work by car and travel a greater distance.
- 5.8.2 In the context of the above, the policy framework within the Plan has a strong focus on directing growth to well-connected locations with established public transport networks, whilst also aiming to improve accessibility and links to the more rural areas of the district. Sustainable and active transport interventions are outlined through Policy 6.29 and Policy 6.30, and saved policies ST1-ST8, with an overarching objective to continue to reduce car dependency and make walking, cycling and the use of public transport the more attractive and convenient options for travel. A mix of **minor long-term positive and negative effects** are expected under the Transportation topic, as whilst the policy provisions will support a modal shift towards sustainable and active travel, increases in traffic and congestion along key routes is inevitable due to the level of growth coming forward during the plan period.

5.9 Landscape

- 5.9.1 The Local Plan is being developed in the context of the district's highly sensitive landscape context, with areas of the district falling within the Cotswolds National Landscape and Mendip Hills National Landscape. This places significant emphasis on the need to conserve and enhance landscape character, scenic quality and sense of place. Additionally, whilst not a specific landscape designation, much of the district is designated as Green Belt land which seeks to prevent urban sprawl and ensure that the key characteristics of places that help to maintain community and settlement identities are not lost.
- 5.9.2 Along with Green Belt Policy 6.13, the saved Landscape and High-Quality Design policies within the Plan (including NE2A-NE2B, and D1-D10) seek to conserve landscape character and quality, retain settlement sense of place and identity, and safeguard locally important built features and views. More broadly, the integration of green infrastructure networks, habitat corridors, and environmental assets can strengthen natural connections and facilitate public realm enhancements, reinforcing settlement identity and distinctiveness. Key policies include Policy 6.11 and Policy 6.12.

- 5.9.3 On this basis, **mixed minor effects (i.e., both positive and negative effects)** are expected under the Landscape SA topic. The significance of the effects are dependent on the extent to which new development areas integrate the provisions outlined through the policy framework and respect the relationship between the built-environment and surrounding countryside.

5.10 Historic environment

- 5.10.1 The Plan provides a robust framework for the conservation and enhancement of the historic environment, supported by a combination of heritage policies and cross-cutting design and infrastructure policies (both new and saved). These collectively seek to ensure that development respects, protects and where possible enhances heritage assets and their settings, while enabling appropriate and sensitive change. Nonetheless, it is recognised that many of the district's key settlements contain designated heritage assets and areas that will likely be affected by growth, including impacts to their fabric, setting, and significance. For example, the City of Bath is internationally recognised for its heritage value that significantly reduces the potential for strategic growth or settlement expansion. Additionally archaeological assets at Whitchurch (Maes Knoll) may be disturbed by settlement expansion. On this basis, **mixed effects (i.e., both positive and negative effects)** are expected under the Historic Environment SA topic. The significance of the effects are dependent on the extent to which new development areas integrate the provisions outlined through the policy framework and facilitate enhancements to the public realm and wider built environment.

5.11 Biodiversity

- 5.11.1 The Plan provides a strong and integrated framework for the conservation and enhancement of biodiversity, supported by a suite of saved policies and new policies (see Policy 6.9 to Policy 6.12) covering nature conservation, designated sites, species protection, habitat networks, green infrastructure enhancements, and biodiversity net gain. Alongside the Council's guidance for international sites and the site-specific mitigation measures, the policies move beyond a largely design-led approach and establish a more complete and robust basis for managing biodiversity impacts across the district informed by the Habitat Regulations Assessment. On this basis, **minor long-term positive effects** are anticipated for the Biodiversity SA topic. The significance of the effects are dependent on the extent to which new development areas incorporate the provisions outlined through the policy provisions.

5.12 Natural resources

- 5.12.1 The Plan provides a generally positive framework for the sustainable management natural resources, within the constraints of the district. It achieves this by promoting efficient use of land and the regeneration of previously developed land (where possible), protection of water environments and ensuring that environmental quality indicators (i.e. air and noise pollution) are within the nationally set limits. The integration of resource efficiency and water management within climate policy is a key strength of the Plan, alongside the application of circular economy principles.

Key policies in this respect include saved policies CP6 and PSC1-8, and new policies 6.1 to 6.7.

- 5.12.2 On this basis, **minor long-term positive effects** are anticipated under the Natural Resources SA topic. However, it is recognised that there is potential for some localised negative effects associated with the trade-off between development pressure and the irreversible loss of 'best and most versatile' agricultural land.

5.13 Climate change

- 5.13.1 Policy 6.1 to Policy 6.7 outline a suite of provisions which support climate resilience across the district and contribute to net zero ambitions. Taken together, these policies establish a consistent expectation that development will be designed to mitigate and adapt to current and future climate impacts. **Minor long-term positive effects** are anticipated under the Climate Change SA topic. The significance of the effects are dependent on the extent to which new development areas incorporate the provisions outlined through the policy framework.

5.14 Waste

- 5.14.1 The Plan provides a generally positive framework for sustainable waste management, including Policy 6.31 and Policy 6.32. The Council already supports waste minimisation and recycling in its Corporate Plan and the Council's Towards Zero Waste 2030 Strategy proposes to adopt and exceed the national target of 65% recycling by five years, to be achieved by 2030 instead of 2035. The policy framework outlines specific criteria for proposals for residual waste treatment and recovery facilities and also safeguards existing waste management sites. In light of this, and given the proposed criteria-based framework for the management of residual waste reflects current national policy, **broadly neutral effects** are concluded for the Waste SA topic.

5.15 Cumulative effects

- 5.15.1 Whilst the plan generates unmet housing needs in the latter part of the plan period, these needs are not expected to be exported. Instead, it is the Council's intention to produce an early plan review, alongside progression of the WECA SDS which will seek to identify a suitable land supply for the later years of the plan period. No negative cumulative effects are therefore anticipated in relation to housing.
- 5.15.2 The cumulative effects of cross-boundary developments (at Hicks Gate and Writhlington) alongside the delivery of new infrastructure such as a new school at Whitchurch are likely to be positive and support the surrounding local communities, particularly within Bristol.

5.17 Conclusions and recommendations

5.17.1 The following likely effects are identified under each SA topic:

Table 5.1: Summary of likely effects

SA topic	Likely effect
Health and wellbeing	Mixed minor effects – both minor positive and minor negative
Housing	Significant positive
Communities	Significant positive
Economy	Significant positive
Transportation	Mixed minor effects – both minor positive and minor negative
Landscape	Mixed minor effects – both minor positive and minor negative
Historic environment	Mixed minor effects – both minor positive and minor negative
Biodiversity	Minor positive effects
Natural resources	Minor positive effects
Climate change	Minor positive effects
Waste	Neutral effects

- 5.17.2 No significant negative effects are anticipated in implantation of the plan. Significant positive effects predominantly relate to the delivery of new housing, employment land and infrastructure development that will support both existing and new residents. With most development directed towards the most accessible locations in the district, minor positive effects are also considered likely in relation to climate change and transportation. The protection of key environmental assets, and measures to improve and extend green infrastructure are also considered likely to positively affect biodiversity and natural resources. Design principles will also positively support development proposals and minimise landscape and historic environment impacts.
- 5.17.3 The predicted negative effects are minor in nature and predominantly relate to inevitable increases in road users, the development of greenfield and Green Belt land, and changes affecting the historic environment – particularly sensitive archaeological assets at Whitchurch (e.g. Maes Knoll).

6. Next steps

6.1 Plan-making and SA

- 6.1.1 Once the period for representations on the Regulation 19 version of the Local Plan / SA Report has finished, the main issues raised will be identified and summarised by B&NES Council, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination (Regulation 22), alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it. This is anticipated to take place towards the end of the year.
- 6.1.2 At Examination, the Inspector will consider representations (alongside the SA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (and undergo SA) and will then be subject to consultation (with an SA Report Addendum published alongside).
- 6.1.3 Once found to be 'sound', the Local Plan will be formally adopted by B&NES Council. At the time of adoption, an SA 'Statement' must be published that sets out (amongst other elements) 'the measures decided concerning monitoring the Plan'.

6.2 Monitoring

- 6.2.1 In line with the regulations, there is a need to highlight measures to monitor the likely significant effects of the plan. **Table 6.1** outlines potential monitoring measures.

Table 6.1: Proposed monitoring measures

SA topic	Proposed monitoring measure
Health and wellbeing	• Number of Health Impact Assessments submitted. • Area of new public open space delivered through new development areas. • Number of recreational facilities delivered through new development areas. • Status of AQMAs and air quality more generally. • Capacity of GP surgeries.
Housing	• Net additional dwellings completed. • Five-year housing supply. • Affordable housing completions. • Number of accessible and adaptable and other specialist homes delivered. • Number of student accommodation units delivered. • Number of traveller pitches delivered.
Communities	• Developer contributions secured and spent on community infrastructure.
Economy	• Area of employment floorspace completed. • Cumulative additional jobs created. • Percentage of working age population in employment.

SA topic	Proposed monitoring measure
Transportation	• Mode share of journeys to / from work. • Length of new walking and cycling routes delivered through new development areas. • Public transport uptake. • Number of major developments delivering active travel infrastructure. • Number of new homes within walking distance (<800m) of public transport nodes. • Number of EV charging points delivered through new development areas. • Delivery of strategic transport schemes.
Landscape	• Condition of the Cotswold and Mendip Hills National Landscapes as reported through their management plans. • Areas of previously developed land regenerated through development.
Historic environment	• Condition of the Bath World Heritage Site as reported by UNESCO. • Number of heritage assets on the 'at risk' register. • Number of listed building consent applications that are approved / refused. • Numbers of measures to enhance heritage assets delivered through development proposals.
Biodiversity	• Number of BNG consents and contributions. • Condition of European, national and local sites. • Changes in areas of biodiversity importance. • Contribution towards opportunities identified in the West of England Local Nature Recovery Strategy.
Natural resources	• Ecological status of waterbodies. • Development of Grade 1, 2 and 3a agricultural land. • Development of brownfield sites. • Development of mineral safeguarding areas.
Climate change	• Total greenhouse gas emissions. • Number of major developments incorporating renewable / low carbon energy. • Number of planning applications permitted including the use of solar panels. • Number of planning permissions within flood zones. • Number of developments delivering natural flood management or blue and green infrastructure. • Mode share of journeys to / from new development areas.
Waste	• Percentage of waste recycled.

Appendix A – Scoping information

As discussed in **Chapter 2**, the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline'. Analysis of key issues, and consultation. The detailed scoping information was presented in a scoping report sent to statutory consultees in April 2023, with an update provided in the Interim SA Report in October 2025.

This appendix presents a summary of scoping key issues and provides an update where new evidence has emerged since October 2025. The aim is to ensure that the information required under Schedule 2 of the SEA Regulations is provided. Wider policy context, including local plans and programmes, can be found in the [March 2023 Scoping Report](#).

There has been a number of updates since the completion of the Interim SA Report in October of 2025. Most notably, the new plan-making system, which covers plans prepared and adopted under the Planning and Compulsory Purchase Act 2004, as amended by the Levelling-Up and Regeneration Act 2023.

A package of regulations to implement the new system was put to Parliament in early March 2026. This package includes the new Town and Country Planning (Local Planning) (England) Regulations 2026, which came into force on 25 March 2026, and will replace the existing 2012 plan-making regulations⁴. Further details can be found at [create or update a local plan using the new system](#) and [plan-making regulations explainer](#).

Under the new plan-making system, local authorities must prepare a single local plan and should adopt it within 30 months (see [30-month local plan process - an overview](#)). The new plan-making system has a clear sequencing of tasks which are organised under a series of 'Gateways'. Before the 30-month process starts (i.e., before passing through Gateway 1), the following tasks must be completed:

- Local authority publishes their local plan timetable and gives at least four-months' notice of their intention to commence plan-making.
- Confirm requirement for SEA and gather baseline information, knowledge and understanding about the local plan area. The new plan-making system expects that all local plans will need to carry out SEA.
- Run a scoping consultation to engage with the public, statutory bodies and other stakeholders to invite feedback on the plan-making process and what the emerging plan should contain.
- Complete and publish a self-assessment and pass through Gateway 1, commencing the 30-month process.

Other changes of note are:

Consultation on the [proposed reforms to the NPPF](#) and other changes to the planning system closed on 10th March 2026, with a final revised version of the NPPF expected to be published later in 2026. It is anticipated that the emerging BaNES LP will be prepared and examined in accordance with this updated version. The NPPF is clear on the need for local authorities to prioritise local plan making as the central

⁴ MHCLG (March 2026): [Planning Newsletter: The New Plan-Making System](#)

pillar of England's plan-led system, with a motivation to avoid a "permanent presumption in favour of suitably located development"

The [UK Government's Design and Placemaking Planning Practice Guidance](#) aims to improve the quality of design in new development by supporting the implementation of the NPPF. The guidance consolidates several existing national design documents into a single resource to make design principles clearer and easier to apply in planning decisions. It promotes the creation of well-designed, attractive, sustainable and climate resilient places that support healthy communities, respect local character and heritage, and provide access to green spaces and services.

The [Environmental Improvement Plan 2025](#) (EIP) sets out long-term goals for improving England's natural environment and delivering the legally binding targets established under the Environment Act 2021. The plan focuses on restoring nature, improving environmental quality, promoting circular economy, strengthening environmental security and increasing public access to nature. It includes a range of commitments including those to protect 30 per cent of land and sea for nature by 2030 and reducing population exposure to the most harmful air pollutants by 30% by 2030. Natural England is taking a leading role in supporting the delivery and implementation of environmental improvement plans. Furthermore, the EIP and associated monitoring reports link to the 25-Year Environment Plan policy paper (2018).

The [Planning and Infrastructure Act 2025](#) is designed to speed up planning approvals and infrastructure delivery, particularly for housing and transport projects. It includes provisions to encourage brownfield redevelopment and to ensure that new housing developments are supported by necessary infrastructure, such as roads, schools, and healthcare facilities; It also introduces the use of spatial development strategies to support strategic planning across larger geographies to better coordinate growth and infrastructure provision;

In terms of the sub-regional policy context, the development of key plans, strategies and programmes that had not been published at the release of the 2025 Interim SA Report are shown below.

Table AB.1 Latest sub-regional policy context

Strategy/ delivery plan	Status	Owner
Climate and Nature Strategy	In development	B&NES
West of England local Growth Strategy	Adopted	West of England Mayoral Combined Authority
Business and Skills Plan	Adopted	B&NES
Greener Places Plan (incorporating Green Infrastructure Strategy)	Adopted	B&NES
Health Improvement Framework	Adopted	B&NES
Cultural Development Plan	Adopted	B&NES

Strategy/ delivery plan	Status	Owner
West of England Transport Vision	Adopted	West of England Mayoral Combined Authority
Movement Strategy for Bath	Adopted	B&NES
Air Quality Strategy	Adopted	B&NES

Since the publication of the Interim SA Report in 2025, it is acknowledged that several evidence base documents have been prepared which have informed the development of the plan. This additional evidence (alongside what is presented in the full Scoping Report) is presented below.

Indices of Multiple Deprivation (IMD)

The IMD was updated in 2025⁵. Key findings include:

At a local authority level, Bath and North East Somerset is ranked 252rd out of 296 lower tier local authorities (LTLAs) (where 1st is the most deprived) for overall deprivation. 20.3% of LSOAs within Bath and North East Somerset fall within the top 10% least deprived neighbourhoods in the country. Notably, 55.9% of LSOAs within Bath and North East Somerset fall within the top 30% least deprived neighbourhoods. The district is therefore not considered to be deprived as a whole.

Just 2.5% of LSOAs within Bath and North East Somerset fall within the top 10% most deprived neighbourhoods in the country. The three LSOAs identified as most deprived are 011C, 015D and 018D. Just 6.7% of LSOAs in Bath and North East Somerset fall within the 30% most deprived. **Figure AB-1** shows the IMD rankings for LSOAs across Bath and North East Somerset.

Predictive Agricultural Land Classification (ALC)

A new PALC map for England was published by Defra in 2026. The updated ALC map replaces the outdated provisional ALC map and uses improved soil, climate and environmental datasets to provide a more accurate national assessment of agricultural land quality. Importantly, the map distinguishes between Grades 3a and 3b, enabling a more precise identification of Best and Most Versatile (BMV) agricultural land for planning.

Figure AB-2 displays the predictive ALC for Bath and North East Somerset. The majority of the district is comprised of Grade 3a, Grade 3b and Grade 4 agricultural land. Higher quality agricultural land (Grades 1 and 2) is primarily concentrated around the Chew Valley and Farrington Gurney, while the poorest quality agricultural land, Grade 5, is uncommon throughout the plan

Key issues

Key issues are presented under each of the SA framework headings. As set out in the Scoping Report. Following a review of the scoping information, the key issues remain the same as presented below.

⁵ [English indices of deprivation 2025 - GOV.UK](#)

Health and wellbeing

- There are significant levels of obesity amongst both children and adults in the district meaning that whilst obesity is below the national average more adults in the district are overweight than not.
- Large numbers of both children and adults are not physically active. In relation to cardiovascular and respiratory health, Bath and North East Somerset has high numbers of residents with hypertension and asthma.
- Residents also self-report higher rates of anxiety and loneliness compared to the England average. In addition, the rate of hospital admissions in those under 18 years for mental health conditions is significantly higher in Bath and North East Somerset than nationally.
- See further key issues identified under 'communities' below.

Housing

- The Local Plan must provide homes to meet identified needs, guided by a growth strategy for the area taking into account affordable housing needs and economic growth objectives
- Respond to housing shortages including affordable housing and bring forward a suitable mix of housing types and sizes to meet the range of needs, including from an ageing population, in a timely manner.
- Need to consider accessibility standards to support independence
- Delivering affordable housing which is appropriate to the local housing market and income profile
- Ensure appropriate types of accommodation are provided to address student and other needs and contribute towards reducing the pressure on HMOs.
- Review of Policy H4 to enable self/custom-build

Communities

- Need to prioritise active travel (cycling, walking and use of public transport) to increase physical activity levels and improve physical and mental wellbeing.
- B&NES Council remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation. However, there are inequalities within the district, communities that experience deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally) and patterns of rural poverty are growing.
- Life expectancy is 9 years lower for men and 5 years lower for women in the most deprived areas of the District than in the least deprived areas.
- An estimated 19% of children and young people (equating to 7,167 residents aged 0-15) in B&NES live in relative poverty. With the cost of living set to continue to rise, it's estimated 4,000 people will fall into absolute poverty in 2022-23.
- This will exacerbate existing needs including fuel poverty (11% of households live in fuel poverty in the district) and food insecurity
- Need to ensure streets and the public realm are safe, attractive, and accessible for all ages.

- The 65+ population is projected to increase by 15% from 2018 to 2028
- The percentage of B&NES residents who were identified as 'Not disabled', 83.6%, is higher than the percentage across England and Wales (82.5%).
- In the 2021 Census, the percentage of people identifying their ethnic background within the White British category decreased by 4.5% compared with 2011 figures. However, at 85.6%, this is considerably higher than across the whole of England and Wales in 2021 (74.4%).
- In the 2021 Census, for the first time since 2001 'No religion' (47.9% (92,567)) was the highest response in Bath and North East Somerset followed by 'Christian' (42.2% (81,553)). This is higher than the overall percentage across the South West (44.1%) and across England and Wales (37.2%).
- In B&NES, 4.0% identified with an LGB+ orientation ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"), and 2.0% identified as Bisexual; both higher than England & Wales (3.2% and 1.3% respectively).
- The percentage of children and young people in B&NES estimated to be living in relative poverty has decreased since 2019/2020, however levels are still significant at 9% (2020/21). It is considered that the current cost of living crisis is likely to force more people into poverty.
- The ten areas with the highest food insecurity risk ranks in B&NES are: Whiteway, Whiteway West, Twerton West, Twerton, Fox Hill North, Westfield North, Clandown, South Paulton, Midsomer Norton West & Keynsham Wellsway.
- The number of pregnant women smoking at time of delivery in B&NES has increased in 2020/21 (estimated to stand at 8.5% of mothers).
- Resident community safety survey results (2021) indicate a considerable proportion of B&NES residents (23%) felt not very safe or safe at all during the night.
- The percentage of those satisfied with their local area as a place to live has decreased from 84% in 2022 to 81% in 2023. This is higher than the national rate reported of 75% in 2022. The level of satisfaction has been broadly stable since 2017, with a slight increase in 2020 (87%).

Economy

- While B&NES district is not among the most deprived in England, there are pockets of deprivation.
- The main indicator of the overall competitiveness of the B&NES economy and its businesses is productivity. B&NES' has lower productivity as it has relatively large concentrations of employment in sectors such as retail and tourism. This is further exacerbated by above average part-time employment.
- There is a need for a shift to a more environmentally sustainable economy with clean economic growth.
- The economy needs to be more diverse, productive and resilient facilitated by an increase in innovative technology related jobs
- There is a need to enable increased local employment, with less overall commuting.
- There is a need for improved accessibility to jobs, particularly from and to the Somer Valley.

- There is need to develop education and skills of workforce to support increased productivity
- Despite strong demand for flexible modern office accommodation, Bath's inability to deliver an adequate supply of office floorspace has constrained the city's capacity for employment growth and to retain occupiers
- There is a requirement to protect employment and business space, however the changes in planning legislation to the use classes order and permitted development rights limit the control that the Plan has to protect employment space.
- Due to lack of existing affordable city centre workspace in Bath, smaller town centres are becoming more important in compensating for this lack of space. There is therefore potential for Keynsham and the Somer Valley.
- There is a need to bring forward new employment locations to enable future local economic growth.
- Changes to the Use Class Order and affect the role of town centres.
- There is need to ensure policy protects the vitality and viability of town centres.
- Maintaining Bath's role as a successful and sustainable international visitor destination.
- Ensuring the delivery of the employment objectives of the Economic Strategy review are achieved where possible, including delivering more Higher Value Added jobs.
- There is a need to diversify the employment base.
- The Local Plan must ensure the Market Towns retain their role as sustainable local service and employment centres.
- There is a specific need to diversify the employment base in the Midsomer Norton and Radstock area as 20% of local jobs are accounted for in manufacturing, a declining sector.
- Infrastructure, including gigabit capable broadband, is key to encouraging investment in business, in areas where there is an imbalance between housing and jobs.
- There is a need to ensure the vitality and viability of town centres (including Bath city Centre district and local centres) is enhanced and that town centres can adapt to the changes as retail (sales of goods) and some functional needs e.g. e-banking are increasingly met online, and large chain stores are closing. Town centre businesses focused on the person (e.g. beauty, leisure facilities, and hospitality venues) and multi-use spaces offer a chance for high streets and town centres to become more explicitly community focused – offering multiple uses beyond the purely commercial. This will require measures including improving public realm, utilities, space for events and markets.
- Rising localism, with people working from home and not commuting to larger commercial centres, offers opportunities for district and local centres to benefit but they will need to adapt.
- Pedestrianising high streets can help turn town centres into broader attractions – adding community and leisure spaces to areas currently associated with commercial shopping however there are drawbacks of pedestrianisation (especially around public transport provision).

Transportation

- Notwithstanding achievements to date, the B&NES highway network remains heavily trafficked with a high dependency on car travel, highlighting the need to fundamentally change the way we travel, with a strong focus on mode shift away from the private car usage.
- Large areas of the District suffer from traffic congestion. Congestion and journey time delays affect rural communities as well as urban areas.
- There are still high levels of out-commuting from Midsomer Norton and Radstock. It is envisaged that the introduction of the Somer Valley Enterprise Zone will reduce the levels of out commuting within the Somer Valley.
- Managing parking provision within the city. The Draft Transport and Development Supplementary Planning Document will set revised parking standards for all uses.
- The B&NES highway network remains heavily trafficked, highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement particularly in areas of historic significance.
- The need for new development is balanced with minimising traffic congestion and making places more accessible by sustainable modes of transport.

Landscape

- The district has a richly varied landscape and increasing pressures for new development as urban extensions into the countryside or as entirely new settlements have inevitable impacts on this varied landscape and its character. New development should respect, complement and where possible enhance both its immediate landscape setting and the landscapes which overlook or are impacted by it including making a positive contribution to the landscape setting at new settlement edges.
- In relation to development in and around the City of Bath, there are both national and international landscape and heritage designations which surround the city. The setting of the City of Bath WHS, which is largely a landscape setting, including landscape views, has equivalent protection in law to the WHS itself. Similarly, the Cotwolds National Landscape (previously AONB) wraps around three sides of Bath, and the remaining excluded area is potentially included in the setting of the AONB depending on the nature and location of individual proposals. Protections relating to these designations are very strong Ref para 176 of NPPF. Responding to the climate and ecological emergencies is like to increase pressures for renewables developments on greenfield sites within the rural landscapes of B&NES and for new woodland creation. The landscape sensitivity assessments for these including the woodland opportunity mapping should be used to guide development to the most suitable locations.
- There is continuing evidence that completed development projects and in particular residential developments do not reach the expectations of high-quality design especially in relation to urban design, external works hard and soft, GI provision, quality of SuDS in relation to nature and landscape, high quality response to landscape setting.

Historic environment

- The Local Plan must recognise that heritage assets are an irreplaceable resource and need to be conserved in a manner appropriate to their significance. There are threats to the character of the district from the cumulative impact of development proposals and associated infrastructure requirements.
- Ensure development in or adjacent to conservation areas or listed buildings (and their settings) respects the character and context and enhances the quality of the built environment.
- In relation to development in and around the City of Bath, there are both national and international landscape and heritage designations which surround the city. The setting of the City of Bath WHS, which is largely a landscape setting, including landscape views, has equivalent protection in law to the WHS itself

Biodiversity

- The Environment Bill sets out the Government's approach to some of the key issues raised around climate change, loss of biodiversity and environmental risks to public health. There will be new opportunities and obligations to the Council. One of the key requirements will be to achieve a 10% biodiversity net gain from new development, with 30 years positive habitat management. This will require appropriate planning policy. In addition, there is the requirement to produce and report on a B&NES Local Nature Recovery Strategy.
- There is a government toolkit and calculation metric to calculate net gain within development proposals. The approach demands adoption of the mitigation hierarchy to ensure impacts are first avoided and then minimised before residual habitat losses and gains are calculated. Policy will need to be reviewed to ensure use of the mitigation hierarchy, and the government metric is used in all major and minor developments.
- Statutory and non-statutory sites need to be protected and enhanced.
- Where possible sites should be enlarged and buffered with supporting habitat, and habitat connections and networks should be enhanced.
- There is a need to safeguard protected species and to restore priority habitats.
- Use of agreed habitat buffers around key habitat features retained by or adjacent to new developments should be adopted as best practice so that those features can continue to function for wildlife.
- External lighting of buildings and the impact of light spill from new developments on light sensitive species including bats needs to be addressed local policy and site allocations.
- Policies should promote the maintenance and increase of populations of key species in the South West in line with UK Species Action Plan targets.
- There are a number of priority habitats and species many of which are considered to be in decline, though data is often poor. Monitoring has not been sufficient to determine recent trends but as part of the need to deliver BNG, baseline habitat data has been updated from desk top resources.
- The 25yr Environment Plan and Environment Act require the identification, protection and restoration of Nature Recovery Networks, and the development of Local Nature Recovery Strategies. The WENP has mapped a Nature Recovery Network for the WoE, and this will form the starting point for the development of

the WoE LNRS. Measures will be required to protect, restore and enhance these networks.

- Up to habitat mapping, including irreplaceable habitat and priority habitat will be needed to be included within Local Plan.

Natural resources

- The Council declared a Climate Emergency in March 2019 and pledged to provide the leadership to enable carbon neutrality in the district by 2030.
- There are five AQMAs identified in the plan area. The need to avoid further deterioration in these areas is an essential consideration for new development, with the particular importance of considering cumulative effects.
- The Local Plan should help to address air and noise pollution issues through sensitive site selection and good site design to ensure problems do not get worse. The plan should also aim to reduce car traffic and encourage sustainable transport where possible.
- There remain data gaps in relation to noise data.
- There is the potential for adverse impacts on health and wellbeing if inappropriate new development is located near a major source of noise, for example new roads or locations of high traffic flow and/or congestion.
- Consideration should be given to construction impacts such as exposure to land contamination, deterioration in air quality from noise, dust, and vibration. Use of construction management plans can lessen these impacts, particularly hours of working and construction traffic movements.
- There are 53 wet-spots' (key flooding locations) were identified in the 2015 B&NES regional Surface Water Management Plan.
- According to the Environment Agency there are approximately 5,255 properties within Bath and North East Somerset at risk of fluvial (river) flooding, 21% at high risk, 19% at medium risk, and 60% at low risk.
- The Plan should prioritise the remediation of and redevelopment of previously developed land.
- Urban creep throughout the District (urban creep is the conversion of permeable surfaces to impermeable surfaces).
- Urbanisation and climate change have the potential to significantly impact surface water flood risk within the B&NES area.
- Climate change is likely to increase surface water flood risk throughout the B&NES area, particularly in those areas that are already at risk and identified as flooding wet-spots.
- Future development also has the potential to increase flood risk. It is therefore important that surface water flood mitigation measures are included in any development plans, following B&NES Sustainable urban drainage systems policy.
- Appropriate development management policies are already in place to minimise the potential impact of urbanisation and climate change, and it will be important for these to continue to be implemented for all new developments within the B&NES area.

- Sub catchments heavily modified due to flood protection and urbanisation – need more natural solutions to avoid impact further downstream, impact on ecology (barriers to fish passage, fisheries and pollution) and sense of place.

Climate change

- Carbon emissions have been in decline in B&NES but are still higher than target.
- Significant under achievement of the renewable energy targets.
- Transport emissions remain challenging to reduce.
- The plan should help to address climate and energy issues through limiting energy use and banning fossil fuels in new buildings, reduce existing buildings' energy use, use renewable and low carbon technologies, whilst simultaneously improving resilience and increase uptake of adaptation measures.
- The need to establish and growth of the environmental & low carbon business sector as a business sector in its own right which can in turn help to facilitate:
 - The opportunity to encourage businesses and business supply chains to adopt efficiency measures which will use fewer resources and boost profits through associated cost savings.
 - The opportunity to encourage businesses to explore their exposure and risk to problems associated with climate change, and to undertake appropriate mitigation and adaptation It is important to consider the influence that the Local Plan can have on the issues.

Waste

- Ensure new development incorporates space for waste sorting and storage to aid recycling.
- Encourage sustainable construction making use of recycled and recyclable building materials.
- Promote development of more sustainable waste treatment facilities, including sorting, recycling and reuse.
- The development of sustainable markets in the local region for materials currently not recycled e.g. carpets, plastic film.
- There is a need to reduce waste generation and to continue with increases in recycling and composting.
- The Local Plan should help to address waste issues through ensuring appropriate provision of waste management services, for example space for recycling and through encouraging good design that minimises waste.

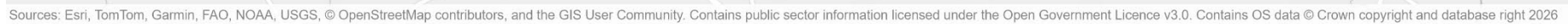
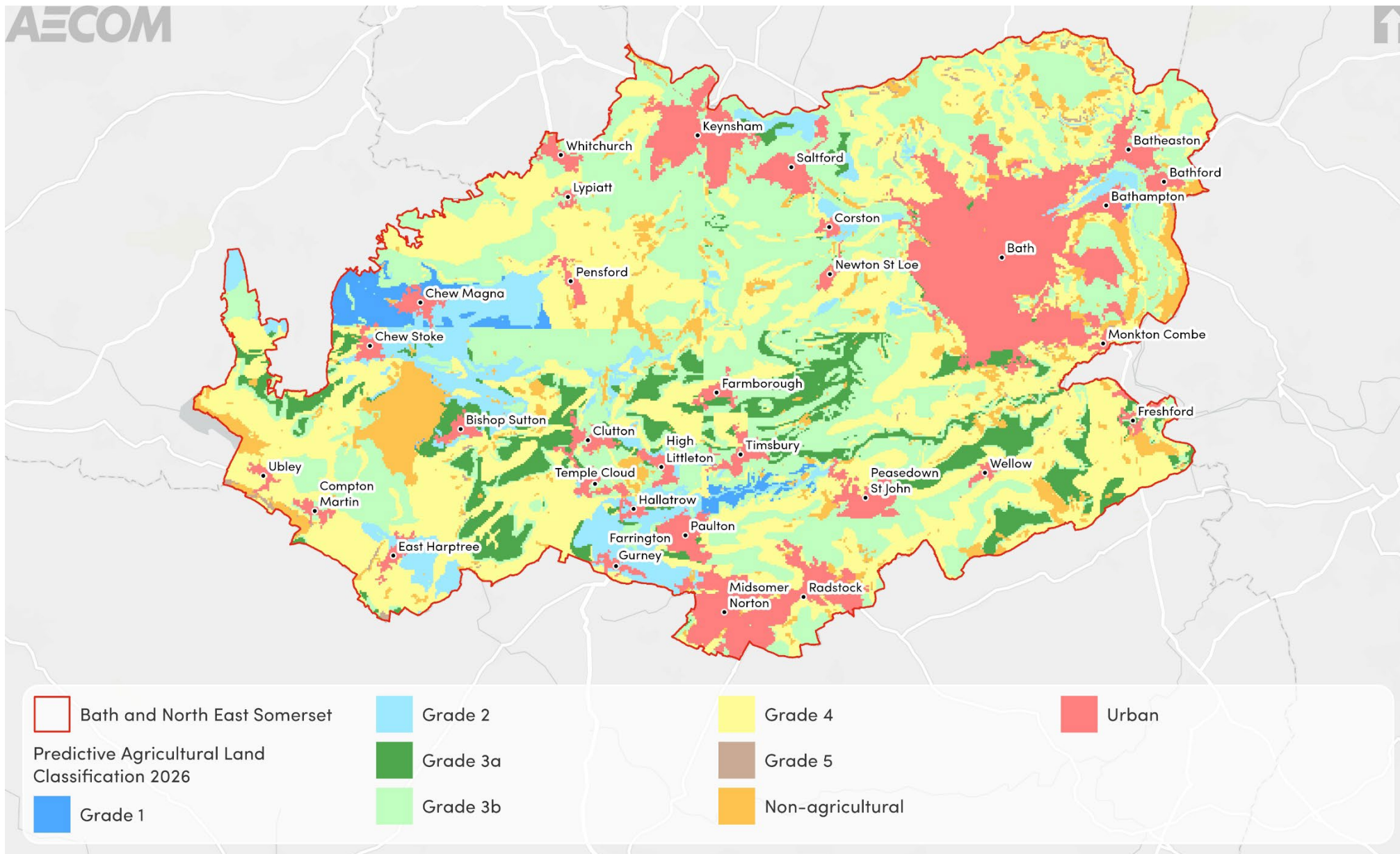


Figure AB-1: Indices of Multiple Deprivation – Overall Deprivation Decile in Bath and North East Somerset



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community. © Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right 2026

Figure AB-2: Predictive Agricultural Land Classification

SA framework

SA topic	SA objective	Appraisal questions
Health and wellbeing	Improve the health and well-being of all communities and create healthy places	• Make it easy to reach everyday destinations including essential services (e.g. schools, workplaces, homes, shops, community facilities) by “active” travel e.g. through high quality cycling, wheeling, and walking infrastructure? • Create opportunities to engage in structured sport, play, leisure, and informal recreation? • Create a healthy and sustainable food environment, including the provision of allotments and community gardening? • Maintain or increase access to existing open/green/blue space, improve existing natural spaces, and in areas of deficiency, provide new green spaces? • Promote inclusive design which supports social interaction for all ages, including the needs of those with sensory and mobility impairments? • Consider possible suicide prevention measures (Preventing Suicide in England example)? • Provide adequate supporting health services and improved access to healthcare including through sustainable transport provision?
Housing	Meet identified needs for sufficient, high-quality housing including affordable housing	• Provide viable and deliverable good quality housing and affordable housing to meet the full objectively assessed housing needs? • Help to significantly boost the supply of housing? • Mixed size, type, and tenure development? • Address housing needs of older people i.e. sheltered housing, assisted living, lifetime homes and wheelchair accessible homes? • Delivery of housing that meets local needs, including wheelchair accessible housing, and elderly persons housing?

SA topic	SA objective	Appraisal questions
Communities	Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services.	• Connection with existing communities? Prevention of community severance e.g. new road or development dividing a community in two? • Streets and the public realm are safe, attractive, and accessible for all ages and levels of disabilities, promoting use and enhancing safety? • Range of sports and leisure facilities and pitches designed and maintained for use by the whole community? • Provision of a range of appropriate and accessible community, social and cultural facilities? • Amenities and facilities are accessible for all e.g. people with mobility problems or a disability, parents with young children, older people? • Design out crime and promote a feeling of security through better design e.g. well-lit spaces, natural surveillance, limit non-overlooked areas? • Promotion of public spaces that might support civic, cultural, recreational and community functions? • Design of the public realm which maximises opportunities for social interaction and connections within and between neighbourhoods? • Lead to co-created spaces with local people, particularly groups who are seldom heard? • Lead to direct or indirect benefits for groups with protected characteristics? • Reduce barriers to access to housing services and facilities? • Ensure that decisions are inclusive? • Improve the quality of the living environment, particularly within areas of higher deprivation? • Ensure that areas and communities which require greater attention and need of services are accommodated? • Support and promote social inclusion and social cohesion? • Encourage local participation and active engagement?

SA topic	SA objective	Appraisal questions
Economy	Build a strong, prosperous and fairer economy and enable local businesses to prosper	• Enhance educational and training opportunities / skills? • Support inclusive development that enables access to economic opportunities for all? And opportunities to meet the district's employment needs? • Retain business and space and commercial land? • Provide an adequate increase in supply of land and diverse range of employment opportunities? • Support the expansion and diversification of business? • Correct imbalances between residential and employment development to reduce in / out commuting? • Support the prosperity and diversification of the district's rural economy? • Support the visitor economy, arts and culture and further develop civic pride and pride in the community? • Contribute to the regions' ambition to be a driving force for clean and inclusive growth? • Increase energy efficiency in businesses and provide for innovative energy production? • Enable town centres to enhance vitality and viability, by promoting mixed-use spaces; and providing public realm and utility improvements? • Improve digital connectivity?

SA topic	SA objective	Appraisal questions
Transportation	Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure	• Reduce the need to travel by car and prioritise access to good public transport and safe walking and cycling infrastructure (including segregated cycle lanes, secure bike storage and parking), over facilities for private cars? • Ensure new cycle and pedestrian paths are linked with existing / wider networks to ensure connectivity? • Deliver traffic management and calming measures to help people feel safe & confident to walk & cycle, whilst helping to reduce and minimise road injuries? • Incorporate electric vehicle charging points into new developments or ensure they can be retrofitted? • Provide access to major employment areas by active travel or public transport? • Prioritise modes of transport in the below order: ○ Walking ○ Cycling ○ Public transport ○ Private cars • Provide access to healthcare services by active travel or public transport?

SA topic	SA objective	Appraisal questions
Landscape	Protect and enhance local environmental distinctiveness and the character and appearance of landscapes	• Protect areas of landscape and townscape character and distinctiveness? • Avoid harmful impacts on all landscapes? • Ensure that great weight is attached to conserving and enhancing the landscape and scenic beauty of designated National Landscapes (formerly AONBs) with reference to their special qualities? • Include the Setting of City of Bath WHS in relation to protection of the OUVs and their attributes especially those relating to landscape? • Deliver development which values and protects diversity and local distinctiveness including cultural distinctiveness such as rural ways of life and local history and traditions? • Deliver well-designed development and places that are well related and provide physical connection to the surrounding townscape/landscape? • Deliver well-designed places and new development which creates high-quality townscapes and landscapes, including within streets, and includes GI, SUDs, and open spaces? • Ensure that soils within new developments are protected and managed as a vital living natural capital resource which will underpin the delivery of high-quality landscapes?

SA topic	SA objective	Appraisal questions
Historic environment	To conserve and enhance the historic environment, heritage/ cultural assets and their settings	• (For listed buildings) Have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it proposes? • (For Conservation Areas) Pay special attention to the preservation or enhancement of the character of the surrounding conservation area? • Conserve and/or enhance heritage assets, or better reveal their significance, their setting, and the wider historic environment (including World Heritage Site designations, Scheduled Monuments, and Historic Parks and Gardens)? • Ensure heritage assets have viable uses consistent with their conservation? • Give great weight to a heritage asset's conservation (and the more important the asset, the greater weight)? • Avoid any harm to or loss of the significance of a designated heritage asset, unless clear and convincing justification is provided? • Consider the effect of development on the significance of non-designated heritage assets including locally listed heritage assets and assets identified on the Historic Environment Record?

SA topic	SA objective	Appraisal questions
Biodiversity	Conserve and enhance the condition and extent of Biodiversity in the district	• Has the mitigation hierarchy been used to avoid and minimise impacts? • Does development deliver biodiversity net gains at least 10%? • Avoid potential impacts on designated sites (international, national, local)? • Avoid potential impacts for or loss of ancient woodland and aged or veteran trees? • Avoid any net loss, damage to, or fragmentation and positive enhancement of designated and undesignated wildlife sites protected species and priority species? • Conserve, restore and/ or re-create priority habitats? • Incorporate biodiversity into the design e.g. street trees, green corridors, linking open space etc? • Ensure current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced? • Enhance and extend the Green Infrastructure and make a positive contribution to the nature recovery network? • Incorporate spaces for protected species that are reliant on buildings for nesting sites, including swifts, swallows, and martins? • Maximise the use of native species with wildlife value in planting? • Ensure new lighting will not impact on biodiversity?

SA topic	SA objective	Appraisal questions
Natural resources	Reduce land, water, air, light, and noise pollution	• Minimise increase in traffic congestion? • Deliver development that minimises exposure to poor air quality and noise pollution? • Contribute to measures identified in the Air Quality Management Plans? • Remediate contaminated sites? • Avoid locating development of potentially noisy activities in areas that are sensitive to noise, including areas of tranquillity? • Locate development where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available? • Minimise increase in light pollution? • Protect the natural thermal spring under County of Avon Act 1982? • Conserve, protect, and enhance water resources? • Encourage the effective use of brownfield land if it is not of high environmental value? • Protect grades 1- 3a agricultural land from development?

SA topic	SA objective	Appraisal questions
Climate change	Reduce vulnerability to, and manage flood risk (taking account of climate change)	• Deliver development which supports and corresponds with appropriate flood risk management guidance including applying natural solutions and a sequential approach and policies for any form of flooding including surface water flooding? • Avoids development in areas vulnerable to the impacts of climate change (e.g. flood plains)? • Promote best practice for SuDs?
	Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change	• Reduce greenhouse gas emissions and eliminate fossil fuel use in new development? • Deliver development designed to be resilient to a future climate of increased extremes of heat, cold and rainfall in line with latest guidance, e.g. use of green infrastructure to include cooling measures such as deciduous trees, green space and blue infrastructure? • Facilitate the supply of local food and increase provision of food growing spaces, i.e., allotments, community farms, and farmers markets? • Improve existing building energy efficiency? • Encourage and enable community resilience and preparedness to extreme events (e.g. community heat refuges)?
	Encourage careful, efficient use of natural resources including energy and encourage sustainable construction	• Limit embodied carbon emissions? • Increase renewable energy generation? • Deliver water efficient design and reduce water consumption, including rainwater harvesting? • Deliver development that demonstrates sustainable design and construction including efficient use of materials? • Deliver development that maximises energy efficiency? • Facilitate low carbon community infrastructure such as district heating?

SA topic	SA objective	Appraisal questions
Waste	Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	• Facilitate and enable the shift to a low-carbon and circular economy principles: ○ Designing out waste and pollution ○ Keeping products and materials in use ○ Regenerating natural systems • Promote sustainable markets for recycling of materials? • Provide adequate provision of waste management facilities and where possible include measures to help to reduce the amount of waste generated by development? • Provide facilities to recover and repair existing materials and products? • Deliver housing developments designed with adequate space provision for recycling & waste containers?

