Bath & North East Somerset Council

Council

Date: Thursday, 9th November, 2017
Time: 6.30 pm
Venue: Council Chamber - Guildhall, Bath

To: All Members of the Council

Dear Member

You are invited to attend a meeting of the ***Council*** on ***Thursday, 9th November, 2017*** in ***Council Chamber - Guildhall, Bath.***

The agenda is set out overleaf.

Refreshments will be available for Councillors from 5pm in the Aix-en-Provence Room (next to the Banqueting Room) on Floor 1.

Yours sincerely

Jo Morrison
Democratic Services Manager
for Chief Executive

Please note the following arrangements for pre-group meetings:

Conservative	Brunswick Room, Ground Floor
Liberal Democrat	Kaposvar Room, Floor 1
Labour	Labour Group Room, Floor 2
Independent	Independent Group room

Jo Morrison
Democratic Services
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Telephone: 01225 39 4435
Web-site - http://www.bathnes.gov.uk
E-mail: Democratic_Services@bathnes.gov.uk

NOTES:
1. **Inspection of Papers:** Papers are available for inspection as follows:

Council's website: https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1

Paper copies are available for inspection at the **Public Access points:-** Reception: Civic Centre - Keynsham, Guildhall - Bath, The Hollies - Midsomer Norton. Bath Central and Midsomer Norton public libraries.

2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

3. **Recording at Meetings**:-

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control.

Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators.

To comply with the Data Protection Act 1998, we require the consent of parents or guardians before filming children or young people. For more information, please speak to the camera operator.

The Council will broadcast the images and sound live via the internet www.bathnes.gov.uk/webcast The Council may also use the images/sound recordings on its social media site or share with other organisations, such as broadcasters.

4. **Public Speaking at Meetings**

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group. They may also ask a question to which a written answer will be given. **Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.** The Council now has a maximum time limit for this, so any requests to speak cannot be guaranteed if the list is full. Further details of the scheme:
https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942

5. Emergency Evacuation Procedure

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are signposted. Arrangements are in place for the safe evacuation of disabled people.

6. Supplementary information for meetings

Additional information and Protocols and procedures relating to meetings
https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505

Council - Thursday, 9th November, 2017

at 6.30 pm in the Council Chamber - Guildhall, Bath

A G E N D A

1. EMERGENCY EVACUATION PROCEDURE

   The Chairman will draw attention to the emergency evacuation procedure as set out under Note 8.

2. APOLOGIES FOR ABSENCE

3. DECLARATIONS OF INTEREST

   At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to complete the green interest forms circulated to groups in their pre-meetings (which will be announced at the Council Meeting) to indicate:

   (a) The agenda item number in which they have an interest to declare.

   (b) The nature of their interest.

   (c) Whether their interest is **a disclosable pecuniary interest** *or* an **other interest**, (as defined in Part 2, A and B of the Code of Conduct and Rules for Registration of Interests)

   Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

4. MINUTES - 14TH SEPTEMBER 2017 (Pages 7 - 20)

   To be confirmed as a correct record and signed by the Chair(man)

5. ANNOUNCEMENTS FROM THE CHAIRMAN OF THE COUNCIL OR FROM THE CHIEF EXECUTIVE

   These are matters of information for Members of the Council. No decisions will be required arising from the announcements.

6. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

   If there is any urgent business arising since the formal agenda was published, the Chairman will announce this and give reasons why he has agreed to consider it at this

meeting. In making his decision, the Chairman will, where practicable, have consulted with the Leaders of the Political Groups. Any documentation on urgent business will be circulated at the meeting, if not made available previously.

7. QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM THE PUBLIC

The Democratic Services Manager will announce any submissions received. The Council will be invited to decide what action it wishes to take, if any, on the matters raised in these submissions. As the questions received and the answers given will be circulated in written form there is no requirement for them to be read out at the meeting. The questions and answers will be published with the draft minutes.

8. WEST OF ENGLAND DRAFT JOINT SPATIAL PLAN PUBLICATION (Pages 21 - 398)

Following an extensive period of community engagement, the West of England Draft Joint Spatial Plan (JSP) is now ready for publication. This reports seeks authorisation to publish the JSP for public representations and subsequently, if the plan is ready, to submit it to the Secretary of State for public examination.

[Appendices B – G are included in the full **electronic** agenda pack, but **not** attached to printed copies – please refer online.]

9. B&NES LOCAL PLAN 2016 - 2036 OPTIONS DOCUMENT (Pages 399 - 438)

In order to facilitate delivery of the West of England Joint Spatial Plan (JSP), and to ensure an up-to-date planning policy framework for B&NES, the Council needs to prepare a new Local Plan. The Local Plan will:

- review the adopted Core Strategy; and
- provide an opportunity to formally combine the adopted Core Strategy and Placemaking Plan.

The Local Plan will cover the period from 2016 – 2036. The first stage of preparing the new Local Plan is the options stage. This report seeks approval to publicise an options document for consultation.

[The appendix will be despatched under separate cover.]

10. EFFICIENCY STRATEGY (Pages 439 - 446)

The Efficiency Strategy was presented to Cabinet on the 11th October 2017 as part of the Medium Term Financial Strategy. The Efficiency Strategy is a key component in the delivery of that overall strategy and requires Council approval.

11. TREASURY MANAGEMENT MONITORING REPORT TO 30TH SEPTEMBER 2017 (Pages 447 - 462)

In February 2012 the Council adopted the 2011 edition of the CIPFA Treasury Management in the Public Services: Code of Practice, which requires the Council to approve a Treasury Management Strategy before the start of each financial year, review performance during the year, and approve an annual report after the end of each financial year.

This report gives details of performance against the Council's Treasury Management Strategy and Annual Investment Plan 2017/18 for the first six months of 2017/18.

12. AVON PENSION FUND COMMITTEE ANNUAL REPORT (Pages 463 - 492)

The Committee reports annually to Council on the work it has undertaken in the previous twelve months and reference is also made in the report to the future work programme. This report is for the 12 months to 31 March 2017.

13. REPORT ON OUTCOME OF REGULATORY INVESTIGATIONS POWERS ACT (RIPA) INSPECTION AND UPDATE TO POLICY (Pages 493 - 512)

This report updates Council on the Office of Surveillance Commissioner Inspection of the Council's Regulation of Investigatory Powers policies and procedures in June 2017.

14. APPOINTMENT OF CHIEF EXECUTIVE AND HEAD OF PAID SERVICE (Pages 513 - 516)

This report seeks Council's approval of the appointment for a fixed term to 30 May 2020 of the Chief Executive and the designation of the post holder as Head of Paid Service.

15. PROPOSED AMENDMENTS TO THE CONSTITUTION (Pages 517 - 522)

This report sets out various proposed amendments to the Constitution, which have been agreed with the Constitution Working Group.

16. MOTION FROM THE LIBERAL DEMOCRAT GROUP - VIRGIN CARE: PATIENT SAFETY (Pages 523 - 524)

17. MOTION FROM THE LIBERAL DEMOCRAT GROUP - REFUGEES (Pages 525 - 526)

18. MOTION FROM THE LIBERAL DEMOCRAT GROUP - RECYCLING (Pages 527 - 528)

19. MOTION FROM THE LABOUR GROUP - UNIVERSITY OF BATH (Pages 529 - 530)

20. MOTION FROM THE LABOUR GROUP - UNIVERSAL CREDIT (Pages 531 - 532)

21. MOTION FROM THE LABOUR GROUP - SOCIAL CARE (Pages 533 - 546)

22. QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM COUNCILLORS

    The Democratic Services Manager will announce any submissions received. The Council will be invited to decide what action it wishes to take, if any, on the matters raised in these submissions. As the questions received and the answers given will be circulated in written form there is no requirement for them to be read out at the meeting. The questions and answers will be published with the draft minutes.

The Committee Administrator for this meeting is Jo Morrison who can be contacted on 01225 394358.

BATH AND NORTH EAST SOMERSET COUNCIL

MINUTES OF COUNCIL MEETING

Thursday, 14th September, 2017

Present:- **Councillors** Cherry Beath, Patrick Anketell-Jones, Rob Appleyard, Tim Ball, Colin Barrett, Jasper Becker, Sarah Bevan, Colin Blackburn, John Bull, Neil Butters, Anthony Clarke, Paul Crossley, Chris Dando, Fiona Darey, Matthew Davies, Sally Davis, Douglas Deacon, Emma Dixon, Michael Evans, Andrew Furse, Charles Gerrish, Ian Gilchrist, Bob Goodman, Francine Haeberling, Alan Hale, Liz Hardman, Deirdre Horstmann, Eleanor Jackson, Steve Jeffries, Les Kew, Marie Longstaff, Paul May, Alison Millar, Robin Moss, Paul Myers, Michael Norton, Lisa O'Brien, Michelle O'Doherty, Lin Patterson, June Player, Vic Pritchard, Joe Rayment, Liz Richardson, Caroline Roberts, Nigel Roberts, Dine Romero, Richard Samuel, Will Sandry, Mark Shelford, Brian Simmons, Peter Turner, David Veale, Martin Veal, Karen Walker, Geoff Ward, Tim Warren, Karen Warrington and Chris Watt

Apologies for absence: **Councillors** Matt Cochrane, Lizzie Gladwyn, Steve Hedges, Barry Macrae, Shaun Stephenson-McGall, Bryan Organ and Christopher Pearce

29 EMERGENCY EVACUATION PROCEDURE

The Chair drew attention to the emergency evacuation procedure, as set out on the agenda.

30 DECLARATIONS OF INTEREST

Councillor Richard Samuel declared an ‘other’ interest in item 8 “Save Bath Library petition” as a Trustee of the Citizens Advice Bureau.

Councillor Joe Rayment declared an ‘other’ interest in item 8 “Save Bath Library petition” as an employee of DHI who work through the One Stop Shop, and a member of one of the unions in dispute.

Councillor Rob Appleyard declared an ‘other’ interest in item 8 “Save Bath Library petition” as a Trustee of the Citizens Advice Bureau.

Councillor Charles Gerrish declared an ‘other’ interest in item 9 “Council Company Governance Arrangements and Annual Reports” as a Director of ADL.

Councillor Les Kew declared an ‘other’ interest in item 9 “Council Company Governance Arrangements and Annual Reports” as a Director of ADL.

Maria Lucas, Monitoring Officer, granted a dispensation to all Councillors on the Communities, Transport & Environment Policy Development & Scrutiny Panel, and the Cabinet, for item 8 “Save Bath Library petition” as the item is to be discussed by these bodies.

Maria Lucas, Monitoring Officer, granted a general dispensation to all Councillors with regard to item 9 “Council Company Governance Arrangements and Annual Reports” as the Council is a shareholder of the companies referred to.

Maria Lucas, Monitoring Officer, granted a dispensation to Councillor Tim Ball with regard to item 13 “Care Leavers and Council Tax”.

31 MINUTES - 13TH JULY 2017

On a motion from Councillor Tim Warren, seconded by Councillor Dine Romero, it was

RESOLVED that the minutes of the Council meeting of 13th July 2017 be confirmed as a correct record and signed by the Chair.

32 ANNOUNCEMENTS FROM THE CHAIRMAN OF THE COUNCIL OR FROM THE CHIEF EXECUTIVE

The Chair made the customary announcements concerning mobile phones and webcasting the meeting.

33 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

There were no items of urgent business.

34 QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM THE PUBLIC

Statements were made by the following people;

Bob Hollingdale made a statement updating Councillors on the situation with Uber in London where a cross section of MPs were calling on Uber to lose their licence, as had already happened in a number of cities around the world. He highlighted various examples of attacks on passengers which Uber were not reporting and stressed that the safety of passengers should be at the forefront of any decision making. In response to a question from Councillor Paul Crossley about what checks were made on the quality and accessibility of cars, Bob explained that only the Local Authority did checks and that some of the Uber cars were over 10 years old and in a poor condition.

Paul Roles made a statement explaining that they were moving forward on working with officers and Cabinet Members. He highlighted an article concerning problems with DBS checks being carried out and the need for measures to be put in place to stop TFL drivers working in Bath, at least until their DBS checks were sorted out. Councillor Paul Crossley asked Paul if it was true that the Mayor of London had banned his teenage daughters from using Uber, to which Paul responded that this question had been put to the Mayor on the radio and he’d responded that he categorically would not allow them to use Uber.

Following the above two statements, Councillor Paul Crossley sought the agreement from the Leaders of the Groups with at least 20% of Council seats, in accordance

with rule 4A, 34 of the Constitution to allow a 10 minute debate on Uber. This was agreed – the minute of the debate follows this item.

David Redgewell made a statement calling on the Council to work with the West of England Combined Authority to press for Government funds for the 2019 – 2024 period. He also stressed the need for a bus strategy for the West of England area. In response to a question from Councillor Neil Butters about David's view of whether the Tram Forward initiative provided a solution, David responded that there was a place for it and it was worthy of a further look.

Robin Kerr, Chairman of the Lansdown Crescent Association, made a statement raising concerns about safety aspects of the hoardings in front of Hope House which were causing traffic problems, and called on the Council to take action to prevent a more serious accident taking place. Further details can be read in the full statement which is attached to the online minutes. In a response to a query from Councillor Dine Romero as to whether they had already raised this concern with any other parties, Robin explained they were exasperated with repeatedly doing so. That morning, he had spoken to the Managing Director of Acorn, the company responsible for the hoardings, who claimed to be surprised at the concerns, although they had been raised 4 months previously.

Betsi Ifans, a pupil at Ralph Allen school, made a statement on behalf of the Save Bath Libraries campaign, calling on the Council to explore more creative ways of securing funding and gave some examples of successful Council projects via the Libraries Innovation Fund. Further details can be read in the full statement which is attached to the online minutes. In response to a query from Councillor Richard Samuel as to whether the campaign knew why the Council had not put in a bid to the Libraries Innovation Fund, Betsi replied that they did not.

Dionne Pemberton made a statement highlighting the necessary steps the campaign group felt had not been taken before any decision on co-location was taken, including an understanding of user needs, detailed operational plans and impact assessments, meaningful consultation etc. Further details can be read in Dionne's full statement which is attached to the online minutes. Councillor Tim Warren asked Dionne if she would like to see the library put on a long-term stable footing, to which she responded that of course she would. Councillor Richard Samuel asked, with regard to Dionne's points in her statement, whether she felt that a major user survey should be carried out before or after consultation. Dionne responded that it should definitely be beforehand and outlined the very different needs of a library and a one stop shop. Councillor Eleanor Jackson asked if Dionne considered that the principle of a sound evidence base being needed before deciding on co-location applied only to Bath, and Dionne responded that it appeared not.

Andy Halliday addressed the Council raising concerns about the stress and pressure on library staff from the staffing proposals in the Modern Libraries programme. Further details can be read in Andrew's full statement which is attached to the online minutes. Councillor Richard Samuel asked for Andy's view on the appropriate level of professional library staff for Bath Central Library, and how many there were currently. Andy responded that there were 4 full-time librarians and that when he had started working there in 2003, there had been 16. Councillor Liz Hardman asked whether there was now more dependence on volunteers and whether this was

a good thing; to which Andy responded that volunteers weren't able to do the job of front line staff, but they were helpful in peripheral services such as deliveries to the housebound.

Paul Stansall addressed the meeting urging them not to proceed with a Lewis House conversion and change of use, setting out a number of concerns which can be read in full in Paul's statement which is attached to the online minutes. Councillor Tim Warren asked was it not better to have a library rather than closure, as some cities had been forced to do, to which Paul responded that he considered that a false argument. Councillor Richard Samuel asked for Paul's view of the deficiencies of Lewis House for this proposed use, to which Paul responded that he had visited and the staircases were too deep and didn't meet building regulations. Conversion of these alone would be costly and technically demanding. Councillor John Bull referred to Paul's point about appointing a champion and wondered if he had similar concerns for branch libraries, to which Paul responded that he was a Bath resident so needed to choose his battles! Councillor Sarah Bevan asked Paul to explain his concerns about 'design-and-build' mentioned in his statement, to which he responded that this worked for simple problems such as warehouses and sheds, but this was a complex problem.

Luke Emmett addressed the Council and referred to the DCMS Library Task Force set of guidelines for any library move. He outlined his view that the Council had failed to meet any of these 7 requirements and urged an evidence based decision. Further details can be read in Luke's full statement which is attached to the online minutes. Councillor Tim Warren referred to Luke's numbers and asked if he agreed that, based on population, it would appear that a higher percentage of people used the library in Keynsham than in Bath, to which Luke responded that it appeared so. Councillor Richard Samuel asked what the 'Libraries Deliver' document was asking the Council to do, to which Luke responded that it asked for evidence based decisions and proper consultation with communities.

Angie Morgan addressed the Council and asked why they were proceeding with the plans to move the library in the face of such opposition. She queried how the plans would meet the needs of the diverse range of library users and deliver the expected savings. Further details can be read in Angie's full statement which is attached to the online minutes. Councillor Tim Warren asked if Angie was aware that the consultation asked about keeping the library at the Podium, to which she responded that she was.

The Chair thanked all the speakers for their contributions.

The Chair made reference to the Q&A document which had been circulated.

35 TAXI LICENSING - 10 MINUTE DEBATE

Following agreement from Leaders of the Conservative and Liberal Democrat Groups, a 10 minute debate was held arising from the public statements on Taxi Licensing/Uber issues.

On a motion from Councillor Paul Crossley, seconded by Councillor Dine Romero, it was

RESOLVED that

In view of the:

- recently highlighted revoking of DBS clearance from TfL taxi drivers;
- the statement by the Mayor of London that he won't let his children use Uber Taxis;
- and the inability of our licence authorities to ensure that all taxi operators use cars that meet our minimum criteria for quality and accessibility

Will the Leader of the Council write to our 2 MPs calling on them:-

1. To get the law amended so that licence authorities can insist on their standards being adhered to by all taxi and private hire operators in the authority area.
2. And further, that authorities should be able to insist that DBS is cleared through the authority clearance process and not someone else's;
3. And enable the Council to prevent drivers operating in B&NES without a full DBS clearance having been achieved.
4. To repeal the cross border hiring so that our license authority is paramount in our licensing area.

[Notes:

1. *This debate took place within the Public Statements item.*

2. *The resolution above was carried with 54 Councillors voting in favour, 2 against and 2 abstentions.]*

36 PETITION FOR DEBATE - SAVE BATH LIBRARY

The Council considered an item which had been brought forward, following receipt of a petition entitled "Save Bath Library" containing approximately 5000 signatures.

Caroline Ambrose made a statement introducing the petition and formally opening the debate. A copy of Caroline's statement has been added to the online minutes.

On a motion from Councillor Karen Warrington, seconded by Councillor Jasper Becker, it was

RESOLVED that

Council notes:

- That the Council is currently undertaking a consultation on proposals for an integrated library and customer service (One Stop Shop) in Bath, which runs until the 15th September.

- That this consultation includes two options: to keep the library in its current location in the Podium with combined One Stop Shop services, or to move the library to the current One Stop Shop location in Lewis House.

- That business cases for these two options are available alongside the consultation for the public to access and view, along with a needs assessment, equality impact assessment, site assessments and design principles.

- That following this stage of consultation and once a preferred location has been chosen, further engagement will take place with service users and residents on the design and layout of the new Library/One Stop Shop, including consideration of matters such as accessibility.

- That combining library and customer services in one location is a model that has proven successful elsewhere, both in other authorities and in other locations within B&NES, including the Keynsham Library/One Stop Shop - where library usage has increased, bucking the national trend.

- That combining the library and One Stop Shop in Bath would save up to £400,000 a year towards an overall £800,000 p.a. saving from the Modern Libraries project, whilst at the same time protecting both our library and customer services and making them sustainable for the long-term.

- That, as well as making our library service sustainable for the future, the Council's Modern Libraries programme is seeking to ensure that our libraries meet the needs of current and future library users through access to books, information, events, face-to-face support, and up-to-date digital technology, together with improved family facilities.

- That, whilst B&NES is seeking innovative ways to protect and enhance our library service, other Councils – including neighbouring authorities - are proposing significant library closures.

Council resolves:

1. To note the points above, and for any comments and contributions made as part of the debate to be recorded and included within the formal consultation.

[Notes:

1. *During debate, an unsuccessful motion was moved by Councillor Richard Samuel, and seconded by Councillor Dine Romero, to acknowledge public concerns, withdraw the project in its current form and to ask Cabinet to amend the budget so that savings could be identified from elsewhere. This was lost on a named vote;*
   Councillors voting in favour (15) – Councillors Rob Appleyard, Tim Ball, Cherry Beath, Neil Butters, Paul Crossley, Andy Furse, Ian Gilchrist, Alison Millar, Michelle O'Doherty, Lin Patterson, Caroline Roberts, Nigel Roberts, Dine Romero, Richard Samuel, Will Sandry.
   Councillors voting against (37) – Councillors Patrick Anketell-Jones, Colin Barrett, Jasper Becker, Sarah Bevan, Colin Blackburn, Anthony Clarke, Fiona Darey, Matthew Davies, Sally Davis, Doug Deacon, Emma Dixon, Michael Evans, Charles Gerrish, Bob Goodman, Francine Haeberling, Alan Hale, Deirdre Horstmann, Steve Jeffries, Les Kew, Marie Longstaff, Paul May, Paul Myers, Michael Norton, Lisa O'Brien, June Player, Vic Pritchard, Liz Richardson, Mark Shelford, Brian Simmons, Peter Turner, Martin Veal, David Veale, Karen Walker, Geoff Ward, Tim Warren, Karen Warrington, Chris Watt.
   Councillors abstaining (6) – Councillors John Bull, Chris Dando, Liz Hardman, Eleanor Jackson, Robin Moss, Joe Rayment.

2. *During debate, an unsuccessful amendment was moved by Councillor Joe Rayment, and seconded by Councillor Robin Moss, to acknowledge that the library and the One Stop Shop would be diminished by the moves, and calling for an urgent update about the future of branch libraries. This was lost with 9 Councillors voting in favour, 34 Councillors voting against and 15 Councillors abstaining.*
3. *The successful motion was carried with 34 Councillors voting in favour, 20 Councillors voting against and 2 abstentions*
4. *Councillor Nigel Roberts asked that his vote against the substantive motion be recorded].*

37 COUNCIL COMPANY GOVERNANCE ARRANGEMENTS AND ANNUAL REPORTS

The Council considered a report regarding the appropriate governance arrangements for its interests in Local Authorities companies and their annual accounts.

On a motion from Councillor Charles Gerrish, seconded by Councillor Tim Warren, it was

RESOLVED

1. To note the recommendations of the EY corporate structure review report (Appendix A);

2. To agree the principles and structures for governance arrangements of Council companies as set out in the proposed Protocol (Appendix B);

3. To delegate the implementation of the group structure and required streamlining to the Chief Executive, in consultation with the Leader and Portfolio Holder for Finance; section 151 Officer and Monitoring Officer;

4. To note the ADL 2016/17 year end draft audited accounts (Appendix C) recognising that they have been presented to Resources PDS;

5. To note the BTP 2016/17 year end draft audited accounts (Appendix D) and recommend that they should be presented to the Planning, Housing & Economic Development Policy Development & Scrutiny Panel;

6. To approve the addition of a new scheme of £300k loan into the Capital Programme entitled BTP transitional funding;

7. To delegate authority to authorise the loan to BTP to the Strategic Director of Resources (s151 Officer), in consultation with the Cabinet Member for Finance and Efficiency, once satisfied that due diligence has been completed and subject to the relevant terms and conditions;

8. To note that as a loan condition, a detailed review of the BTP business plan is required in advance with the future years plan from 2018/19 to be presented to the Council Shareholder for approval, and which also demonstrates concern for the tourism needs and potential of North East Somerset;

9. To request that Cabinet incorporate the following recommendations, made by the Resources PDS panel on 13th September 2017 into the proposed governance structure;

    a. That regular performance reports be brought to the relevant Scrutiny Panel or Committee on a 6 monthly basis on all commercial activity;

    b. That the principle of a clear distinction between the role of Cabinet and the role of the board/company be established within a reasonable period of time; and

    c. That legal advice as to how and when a greater scrutiny mechanism can be achieved for decisions made by, or in consultation with, the Leader in his or her role as shareholder is obtained.

[Notes:

1. *The wording in resolution 9 above was proposed by Councillor Andrew Furse and accepted into the substantive motion by the mover and seconder of the motion.*
2. *The underlined wording in resolution 8 above was proposed by Councillor John Bull and accepted into the substantive motion by the mover and seconder of the motion.*
3. *The successful resolution was carried with 54 Councillors voting in favour and 1 abstention.]*

38 YORK STREET INFRASTRUCTURE WORKS

The Council considered a report regarding funding for urgent works on the underground vaults under York Street.

On a motion from Councillor Mark Shelford, seconded by Councillor Tim Warren, it was unanimously

RESOLVED

1. to accept the addition of a new scheme into the Capital Programme entitled York Street Infrastructure works;

2. to re-direct funding of up to £539k from the provisional capital schemes (identified in section 3.1 of the report) to the proposed York Street Infrastructure works scheme, delegated to the Strategic Director of Place, in consultation with the relevant Cabinet Member;

3. to approve the use of the Capital Contingency allocating £50k to the proposed scheme;

4. to approve the two phase approach to the repairs outlined in the report; and

5. to note the risks associated with repairing the structure before the Christmas market takes place.

39 ANNUAL REPORT - CORPORATE AUDIT COMMITTEE

The Council considered the Annual report of the Corporate Audit Committee which details its work over the last year.

On a motion from Councillor Brian Simmons, seconded by Councillor Andy Furse, it was unanimously

RESOLVED to note the Annual report.

40 OUTSIDE BODIES REVIEW

The Council considered a report concerning its arrangements for councillor representation on outside bodies.

On a motion from Councillor Tim Warren, seconded by Councillor Robin Moss, it was

RESOLVED unanimously

1. To note the list of current representatives and any necessary amendments raised;

2. To adopt a half-yearly report back process as described in the report; and

3. To approve the Outside Body Policy, attached at Appendix 2.

41 MOTION FROM THE LABOUR GROUP - CARE LEAVERS AND COUNCIL TAX: A FAIRER START FOR CARE LEAVERS

The Council considered an agenda motion from Councillor Joe Rayment, seconded by Councillor Liz Hardman, which was

RESOLVED unanimously that

Council notes that:

1. Under the Children and Social Work Act 2017 this Council has a statutory duty to support care leavers under the age of 25.

2. The recent Ofsted report on B&NES Children's Services identified the experiences and progress of care leavers as requiring improvement and recommended proactive support.

3. A large number of local authorities across the country have introduced measures to exempt care leavers from Council Tax, following publication of The Children's Society's 'Wolf at the Door' report 2015, which showed care leavers to be a group who are particularly vulnerable to falling into Council Tax debt when moving into independent accommodation for the first time.

4. Research from The Centre for Social Justice found that over half (57%) of young people leaving care have difficulty managing their money and avoiding debt.

5. The 2016 Government Report Keep on Caring: Supporting Young People from Care to Independence encourages local authorities to think creatively about how they can support care leavers in ways that reasonable parents would and to consider how they can support care leavers financially through, for example, Council Tax exemption.

This Council believes that:

1. Care leavers need support to make their transition from care to adult life as smooth as possible and to reduce the chance of falling into debt as they begin to manage their own finances.

2. Care leavers are a particularly vulnerable group for Council Tax debt.

3. **We should also continue to support fostering within Bath & North East Somerset as a positive choice for local families.**

4. **It is ideal for looked after children to stay as locally as possible and maintain school, health and family networks as well as being most cost-effective solution for the Council.**

Council agrees therefore:

1. To ask the Cabinet to:

   a. investigate options to exempt care leavers from Council Tax until they are 25;

   b. investigate options to provide a discount on Council Tax for B&NES-supported foster carers;

   c. report back to Council in time for budget setting for 2018/19.

[Notes:

1. Wording in 3 and 4, and b. indicated in bold above was proposed by Councillor Chris Watt and accepted into the substantive motion by the mover and seconder.]

42 MOTION FROM THE LABOUR GROUP - TACKLING HATE CRIME

The Council considered an agenda motion from Councillor Robin Moss, seconded by Councillor Charles Gerrish which was then

RESOLVED unanimously that

This Council:

1. Notes:

   a. The Association of Chief Police Officers and the CPS have agreed a common definition of hate crime: "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility

or prejudice based on a person's race or perceived race; religion or perceived religion; sexual orientation or perceived sexual orientation; disability or perceived disability and any crime motivated by hostility or prejudice against a person who is transgender or perceived to be transgender".

b. that figures show a 20% rise in all forms of hate crime reported to the police in the first quarter of this year but that hate crime is also believed to be significantly under-reported;

c. that under new guidance, the Crown Prosecution Service will treat online hate crimes as seriously as offences committed face to face;

d. the excellent work that SARI undertakes in schools in B&NES to raise awareness of these crimes; and

e. the work done by the B&NES Hate Crime and Community Cohesion Partnership (BHCCCP).

2. Agrees that it has it has a role as a community leader to take a lead in challenging hate crime in whatever form it may take and that division and intolerance have no place in society.

3. Urges everybody, including elected members, to report hate crime to the police if they experience or witness it.

4. Resolves to adopt the International Holocaust Remembrance Alliance working definition of antisemitism as recommended by the Secretary of State for Communities and Local Government. This definition states that Anti-Semitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of anti-Semitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.

5. Asks the Leader of Council to:

   a. Invite the Police and Crime Commissioner for Avon and Somerset to provide an update on the measures being taken to tackle hate crime, including overcoming possible barriers to reporting; and

   b. Work with local organisations to raise awareness of hate crime and how to report it, noting that Oxford City Council have recently worked in partnership with the police and other organisations to implement a poster campaign encouraging people to report these crimes.

[Notes:

1. *During debate, Councillor Tim Warren moved a motion, duly seconded, that in accordance with Council rule 4A, 48, the Council meeting continue until 10:20pm so that it could conclude its business. This was agreed by a majority.]*

43 MOTION FROM THE LABOUR GROUP - PUBLIC SECTOR PAY CAP

The Council considered a motion from the Labour group regarding the public sector pay cap.

On a motion from Councillor Charles Gerrish, seconded by Councillor Paul May, it was

RESOLVED

Council notes that:

1. In 2010 the Coalition Government inherited the largest peace-time budget deficit in this country's history.

2. In order to reduce this budget deficit and restore our public finances, difficult decisions over public spending and public sector pay have had to be taken by both the current Conservative Government and previous Coalition Government.

3. As part the current and previous Governments' measures to reduce the budget deficit and restore our public finances, local government employees have had a pay freeze from 2010-2012, with annual pay rises of 1% since this time (excluding pay increments and increases resulting from minimum wage/living wage changes).

4. The Office for Budget Responsibility estimates that 200,000 public sector jobs have been protected as a result of the Government's pay policy.

5. Despite the significant financial challenge faced by the current and previous Government, 4 million of the lowest paid workers have been taken out of paying Income Tax altogether and 13 million workers have had their Income Tax reduced, benefiting all workers including those in the public sector.

6. The introduction by the Conservative Government of the National Living Wage has resulted in a pay uplift for Council employees on lower pay bands, and that the Government is committed to continue increasing the National Living Wage to 60% of median earnings by 2020.

7. The Local Government Employers organisation has calculated that the NJC pay claim as submitted by GMB, Unison and Unite would cost £559 million nationally, and that a 5% pay increase – as proposed by the NJC - would cost around £3 million to B&NES.

8. The Government is currently considering the recommendations of various independent public sector pay review bodies, with the Government responding to the first of these - relating to police and prison staff – earlier this week.

This Council believes that:

1. It has been right for the Government to take the necessary steps to reduce the budget deficit and restore our public finances, and recognises the significant contribution and sacrifices that public sector workers have made to these national efforts.

2. Whilst pay policy will continue to have a role to play in the Government's efforts to reduce the deficit and protect our economy, some greater flexibility is needed in relation to public sector pay going forward, particularly recognising recent increases in inflation.

Council resolves therefore to:

1. Continue to work through the Local Government Employers association to reach agreement on a pay settlement for 2018/19 onwards, a national process which will include consideration of the NJC proposals.

2. Ask that the Government listen carefully to the recommendations of the public sector pay reviews currently being undertaken by independent review bodies nationally, and that through the LGA the Council lobby Government that any uplift in public sector pay nationally is also reflected within the 2018/19 local government grant settlement.

[Notes:
1. *The resolution above was a successful amendment to the original Labour motion and was carried with 32 Councillors voting in favour and 22 Councillors voting against.*
2. *This then became the substantive motion which was carried with 32 Councillors voting in favour and 22 Councillors voting against.]*

44 QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM COUNCILLORS

Councillor Robin Moss had registered to make a statement but this was deferred until the next meeting.

The meeting ended at 10.20 pm

Chairman .....

Date Confirmed and Signed .....

Prepared by Democratic Services

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Bath & North East Somerset Council	
MEETING	**Council**
MEETING DATE	**9th November 2017**
TITLE:	**WEST OF ENGLAND DRAFT JOINT SPATIAL PLAN: PUBLICATION**
WARD:	All
AN OPEN PUBLIC ITEM	

List of attachments to this report:

Appendix A: West of England Draft Joint Spatial Plan Publication Draft

Following documents available online – not attached to hard copy agendas:

Appendix B: Strategic Development Location Templates.

Appendix C: Draft Sustainability Appraisal (summary).

Appendix D: Habitats Regulation Assessment update paper.

Appendix E: Report on Engagement and main issues raised.

Appendix F: Topic Paper 1: The Housing Requirement.

Appendix G: B&NES submission Policies Map amendment.

1 THE ISSUE

1.1 Following an extensive period of community engagement, the West of England Draft Joint Spatial Plan (JSP) is now ready for publication. This reports seeks authorisation to publish the JSP for public representations and subsequently, if the plan is ready, to submit it to the Secretary of State for public examination.

2 RECOMMENDATION

2.1 That Council agrees that:

a. the draft West of England Joint Spatial Plan in Appendix A to this report is published for consultation under regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012;

b. if the JSP is ready for independent examination, it shall submitted to the Secretary of State before the end of March 2018 under regulation 22 of the Regulations along with the other submission documents required by the Regulations; and,

c. the Strategic Director Place is delegated the authority, in consultation with the Council Leader and in co-ordination with Bristol City, North Somerset and South Gloucestershire Councils, to;

i. make modifications to the JSP if needed, either prior to publication or prior to submission, and

ii. respond to issues arising during the examination, including making modifications to the JSP

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 Preparation of the JSP has been funded equally by all four of the West of England Authorities, including officer time, consultancy support and public engagement.

3.2 Forthcoming costs for 2018/19 include the Examination in Public (EiP), responding to the Inspector's Report and adoption. These costs are included within existing budget arrangements. Any suspension during the EiP will lead to increased costs.

3.3 The JSP will necessitate a review and potential amendment to CIL and S.106 contributions which will be needed to support the delivery of development.

3.4 The JSP sets out clear shared priorities that will provide the basis to secure investment into the West of England and assist as a framework for bidding for Government funds to facilitate delivery.

3.2 When adopted the JSP will provide the strategic planning policy framework to guide the management and use of land in the public interest. The JSP will set the overall quantum of housing and employment required up to 2036 and will identify broad locations where development will be supported to be brought forward through the authorities Local Plans.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The JSP is being prepared as a statutory Development Plan Document. Its preparation is therefore regulated by statute. The next steps entail public consultation, submission and Examination into the 'soundness' of the Plan.

4.2 The Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The JSP provides the spatial framework for the review of the B&NES Local Plan.

5 THE REPORT

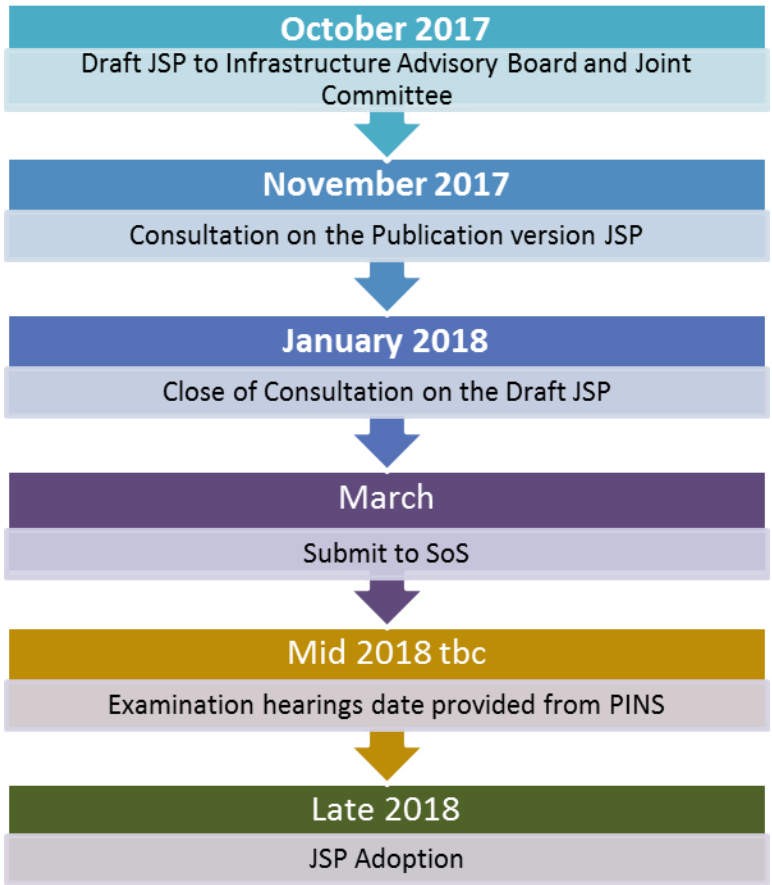
Background

5.1 The West of England faces significant strategic challenges; to accommodate and deliver much needed new homes and jobs properly supported by infrastructure, to create attractive places while maintaining the environmental assets and quality of life unique to our area.

5.2 The JSP will address these challenges in a coordinated approach, outlining the housing and employment requirement of the West of England for the period 2016-2036. The document will provide the joint framework to ensure that development requirements are brought forward consistently across the West of England authorities.

5.3 This coordination on strategic planning matters is complemented by the approach to addressing strategic transport issues through the Joint Transport Study (JTS). The JTS has informed the JSP by outlining future strategic transport proposals for delivery up to 2036 that address current challenges on the transport network and inform future development proposals.

5.4 The preparation stages of the JSP are set out in the diagram below. This has entailed consultation under regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, through the 'Issues and Options' and 'Towards the Emerging Spatial Plan' consultation stages. These consultation documents and supporting technical information are available for public viewing on www.jointplanningwofe.org.uk



5.5 The next engagement on the JSP will be notification of the Publication Plan under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. The Publication version of the JSP is attached at Appendix A.

5.6 The proposed engagement period will be from the 22nd November 2017 to the 10th January 2018. Following consideration of the representations received,if the plan is ready, and subject to any minor modifications, the Plan will then be submitted to the Secretary of State under regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012, in March 2018 for a proposed EiP mid-2018. Following the EiP and consideration of the Inspector's report, the plan will be adopted by the four Authorities. Once adopted, the JSP will become a statutory Development Plan Document and will guide the four Councils in the development of their Local Plans.

5.7 Members of the West of England Scrutiny Committee received an update on the JSP and the key issues it will need to address at its meeting on 27th September and considered the Publication Plan at their meeting on 24th October. The Infrastructure Advisory Board, considered the Publication Plan document on 23rd October 2017. Their views will be summarised to the Joint Committee at their meeting on 30th October 2017.

The Joint Spatial Plan:

5.8 The publication version of the JSP and appropriate supporting documents are appended to this report. Further technical documents will be produced and made available during the consultation stage to support this document.

Scope

5.9 The JSP is a strategic level Development Plan Document that will form the strategic policy context for individual Local Plans prepared by the four authorities in the West of England. The JSP will be a statutory document and will therefore need to be prepared in accordance with statute, local plan regulations and national policy to ensure it is a 'sound' document supported by technical evidence.

5.9 The scope of the JSP, with its supporting evidence base, is focused on: identifying the number of new market and affordable homes and amount of employment land needed across the West of England from 2016-2036; identifying the most appropriate spatial strategy and strategic locations for growth; and, outlining the strategic transport and other infrastructure required to support sustainable growth.

Key Issues

5.10 Previous stages of the Plan's preparation included public consultation on the key issues and challenges that should be addressed. The comments received have been considered and used to inform the draft Plan's critical issues and strategic priorities. Key issues of which the JSP has needed to address include:

- Identifying housing and employment need.
- Affordable housing delivery.
- Quality of homes and place and communities.
- Infrastructure to support growth.

5.11 In addressing these key issues, the draft Plan document outlines the following critical issues and strategic priorities:

Critical Issue	**Strategic Priority**
There is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area.	1. To meet the sub-region's identified housing needs, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.
Economic prosperity has brought substantial benefits to residents, communities & the environment. However, prosperity has not been shared equally by all communities as there are pockets of deprivation within the sub region.	2. To pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan. Particularly to: • promote the growth of existing employment centres such as the Enterprise Zones and Enterprise Areas • ensure more inclusive growth and life chances for all, across the West of England, and improve accessibility to jobs.
The form and function of development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car. This inhibits wealth creation and productivity and contributes to climate change and poor health.	3. To deliver a spatial strategy which; • focuses on three primary centres of Bristol, Bath and Weston-super-Mare and recognises the complementary role of market towns to achieve sustainable growth. • ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel. • through a place making approach promotes places of density and scale with a range of facilities and which encourages health lifestyles and cultural wellbeing. • integrates high quality, multi-functional green infrastructure. Reduces greenhouse gas emissions and ensure resilience to the impacts of climate change.
The sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses.	4. To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity. To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt.

The Policies

5.12 The Policy framework in the JSP addresses the critical issues and strategic priorities. In summary the policy framework is as follows:

5.13 Policy 1: Housing Requirement: The JSP sets out the housing need for the period of 2016-2036. The overall housing need for the plan area up to 2036 is 102,200. The housing provision set for the JSP is 105,500 new dwellings which includes a flexibility in supply to ensure the delivery of the housing need. A contingency of around 3,000 dwellings is also identified for consideration as part of plan review should further capacity be required in the future. The mechanism to release any contingency is a plan review at the five year review period. The policy establishes the distribution between the unitary authority areas based on the spatial strategy (outlined within Policy 2).

5.14 Policy 2: Spatial Strategy: This policy sets out the spatial strategy and the justification underlying the choice of locations for identifying how the JSP housing and job requirements will be delivered across the West of England. The strategy is depicted on the Key Diagram in Appendix A. The reasoned justification to this Policy provides the basis by which the JSP has established the exceptional circumstances to some proposed amendments to the general extent of the Bristol and Bath Green Belt to sustainably accommodate the growth required over the plan period.

5.15 The following sequential approach for housing growth has been applied to achieve the Plan's strategic aims:-

- Reviewing existing commitments,
- Maximising urban capacity & optimising density,
- Allowing for small windfalls beyond that included in Local Plans,
- Allowing for 'non-strategic' growth,
- Assessing potential strategic locations, and
- Assessing other sources e.g. empty homes, specialised housing such as Students & residential care homes etc

5.16 Policy 3: Affordable Housing Target: There is a critical need to deliver the affordable housing needs for the West of England. The Policy sets the Affordable Housing Target and the framework to boost the delivery of Affordable Housing across the West of England from 2016-2036.

5.17 Policy 4: Employment land requirement: This policy sets out the overall West of England jobs requirement and identifies key strategic employment locations including:

- Existing primary centres
- Enterprise Zones and Areas
- Key strategic employment locations
- Additional employment land (floor space and ha) provision will also be identified at strategic development locations.

5.18 Policy 5: Place making principles: This policy sets out the strategic principles to ensure the delivery of high quality and sustainable new development incorporating multi-functional place making principles. These principles will be taken forward and refined through Local Plans and supporting Supplementary Planning Documents.

5.19 Policy 6: Strategic Infrastructure: The delivery of new homes through the JSP has an impact on the strategic infrastructure requirements for the West of England. The growth provided through the JSP will add to historic pressures on infrastructure namely transport. The JSP will ensure new development is properly aligned with infrastructure. This policy identifies the strategic infrastructure required to deliver the JSP growth elements. This will reflect the JSP Key Diagram and the supporting Infrastructure Delivery Programme.

5.20 Policy 7: Strategic Development Locations (SDL): This policy sets out the specific policy requirements for each of the proposed SDLs. These locations will not be allocated through the JSP. It will be the role of the new Local Plans prepared by individual authorities to make the allocations for the SDLs and provide delivery guidance.

Duty to Cooperate

5.21 The 4 authorities of the West of England; Bath & North East Somerset Council, Bristol City Council, North Somerset Council, South Gloucestershire Council and the West of England Combined Authority are committed to work collaboratively through a plan-led approach. Engagement with neighbouring authorities has been ongoing. This is consistent with the Government's core planning principles and the Duty to Cooperate (DtC). By preparing the JSP the 4 authorities are ensuring compliance with the DtC.

6 RATIONALE

6.1 The four Unitary Authorities (UAs) have sought to ensure that the JSP is "sound" under the National Planning Policy Framework – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development

6.2 The reasoned justification included after the policies in the Plan, along with the supporting attachments to this report, explains the rationale for the preferred spatial strategy and why the UAs think that this accords with the requirements for soundness.

7 OTHER OPTIONS CONSIDERED

7.1 In seeking to formulate the most appropriate strategy (see para 6.1 above), the four UAs have been obliged to consider the reasonable alternatives. Alternative approaches considered are included in;

- The reasoned justification to the Polices in the JSP publication document
- Appendix C: Draft Sustainability Appraisal (summary).
- Appendix D: Habitats Regulation Assessment update paper.
- Appendix E: Report on Engagement and main issues raised.
- Appendix F: Topic Paper 1: The Housing Requirement.

8 CONSULTATION

8.1 The preparation of the JSP has entailed extensive internal liaison across services within B&NES and between the four UAs. It also reflects legal advice at keys points in its preparation. This report has had Monitoring Officer and section 151 officer input.

8.2 As required by the statute and regulations, preparation of the JSP has entailed extensive community engagement. The Plan now enters a more regulated stage with notification of its publication under Reg 19 and the opportunity for respondents to appear at the forthcoming exam.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

9.2 There are the following risks associated with this project:

- **Risk:** That the Plan is not found sound.
- **Mitigation:** The plan has been prepared following guidelines and planning regulations, with extensive public consultation. Professional advice has been sought where needed to inform the drafting of the plan.

- **Risk:** That there is a significant issue raised during the consultation which will delay the submission.
- **Mitigation:** as above the plan has been subject to previous consultation to ensure early sight of critical issues to address.

Contact person	*Louise Fradd, 0122 5395385*
Background papers	*National Planning Policy Framework 2012* *National Planning Practice Guidance* *The Town and Country Planning (Local Planning) (England) Regulations 2012* *Planning & Compulsory Purchase Act 2004 (amended)* *B&NES Core Strategy 2014* *B&NES Placemaking Plan 2017* *LEP Strategic Economic Plan* *Joint Transport Study 2017*
Please contact the report author if you need to access this report in an alternative format	

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WEST OF ENGLAND JOINT SPATIAL PLAN - October 2017

Foreword

The West of England (WoE) currently faces a key challenge; how to accommodate and deliver much needed new homes, jobs and infrastructure alongside protecting and enhancing our unique and high quality built and natural environment. It is this combination that will create viable, healthy and attractive places. This is key to the ongoing success of the West of England which contributes to its appeal and its high quality of life.

Many people feel passionately about where they live and the impact new growth might have on their local communities. They value their local environment, landscape and biodiversity in terms of how it enhances the character and identity of places, and the well-being of residents. This plan, aims to build a common understanding of the need for new housing and the benefits that new development will bring including transport improvements, and the opportunity to improve the links for all our communities with homes and jobs.

This is not just a local issue. The UK is struggling to meet growing demand for new homes. The national economic prosperity relies on areas of growth such as the West of England to increase productivity. It is important that the housing market enables a flexible labour market to support a productive economy. A range of suitable housing options is needed to meet the needs of our ageing population, increase community involvement and improve wellbeing.

We have to address key economic and social imbalances within our city region and support inclusive growth. In the WoE, we need to take steps to ensure more homes are built of the right type and mix, and in locations that people and businesses need. Businesses should be able to locate where they can be most efficient and create jobs, enabling people to live, rent and own homes in places which are accessible to where they work. Transport and infrastructure provision needs to be in place up front or to keep pace with development to support sustainable growth.

The challenges involved and the scale of the issues to be addressed requires a strategic approach and a new strategic direction.

We have joined forces to prepare a different type of plan to tackle this challenge. The **Joint Spatial Plan** (JSP) is a strategic Development Plan Document that will provide the strategic overarching development framework to guide housing, employment and infrastructure requirements to 2036.

We are committed to this plan led approach to provide certainty to our communities and investors, in order to secure high quality, sustainable growth for the West of England.

INSERT SIGNATURES

CHAPTER 1: INTRODUCTION

A plan for sustainable growth

1. The West of England (WoE) currently faces a key challenge: how to accommodate and deliver much needed new homes and jobs properly supported by infrastructure to create attractive places, while maintaining the environmental assets and quality of life unique to our area. The scale of the issue to be addressed requires an ambitious strategic response.

2. The local authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council have joined forces to prepare the Joint Spatial Plan (JSP). The JSP is a statutory Development Plan Document that will provide the strategic overarching development framework for the West of England to 2036. Joint working on this plan is part of the authorities ongoing commitment to meeting the duty to cooperate.

3. In tandem with the JSP, a Joint Transport Study (JTS) has been prepared. The JTS has identified potential future strategic transport proposals for delivery up to 2036 that address current challenges on the network and to inform future development proposals in this plan. The JTS sets out the following Transport Vision:

   "Transport in the West of England will be transformed over the next 20 years through a programme of complementary measures designed to address underlying challenges and to enable the sustainable delivery of new housing and employment growth."

4. The JTS has informed, and has been informed by, the JSP. This joint approach to planning and transport will ensure that future growth decisions are made with an understanding of the necessary transport investment needed to achieve sustainable communities.

Purpose of the Joint Spatial Plan

5. The four authorities are committed to a positive plan-led approach to steer the nature and location of future development and secure funding for essential infrastructure. This is consistent with the Government's core planning principles and the Duty to Cooperate. The JSP will form the strategic policy for individual Local Plans prepared by the four authorities. The scope of the JSP, with its supporting evidence base, is focused on addressing the following critical issues:

   - identifying the number of new market and affordable homes and amount of employment land that is needed across the West of England 2016-2036.

   - identifying the most appropriate spatial strategy and strategic locations for this growth.

   - outlining the strategic transport and other infrastructure that needs to be provided in the right place and at the right time to support sustainable growth and to provide certainty for our communities and those that want to invest in our area.

Relationship of the Joint Spatial Plan to Local Plans

6. The JSP is a strategic statutory development plan document (DPD) for the West of England. It is being prepared jointly by and will cover the 4 Unitary Authorities of Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire.

7. On adoption as a Development Plan document it will carry full weight in the planning system and provide the higher level strategic planning policy framework for each authority's new Local Plan for the period 2016 to 2036. Whilst the JSP will not allocate new sites, it does identify new strategic development locations (SDL's), which are shown on the Key diagram. These will be brought forward as allocations through each authority's new Local Plan New site specific allocations and policy designations in Local Plans will need to be in conformity with the JSP.

8. The JSP is not a qualifying document for establishing planning permission in principle under the Housing and Planning Act 2016.

9. In March 2017 the West of England Combined Authority (WECA) was established. The Combined Authority comprises Bath and North East Somerset, Bristol and South Gloucestershire Councils. The Combined Authority has a Mayor who has devolved powers including strategic planning, and a duty to prepare a Mayoral Spatial Strategy. This duty takes effect from May 2018. The Mayoral Spatial Strategy will relate to the areas covered by the Combined Authority. The Joint Spatial Plan which is being prepared by the 4 West of England authorities will provide a firm foundation to inform its preparation.

Sustainability Appraisal and Evidence Base.

10. The Joint Spatial Plan has been subject to a Sustainability Appraisal as an integral part of its production to help formulate the strategy. A scoping report was published alongside the Issues and Options document in November 2015. An appraisal of the Emerging Spatial Strategy draft plan was published in September 2016. A Sustainability Appraisal for this final draft Joint Spatial Plan has been published alongside the plan.

11. A substantial evidence base has been prepared to support and inform the preparation for this plan. Full details are available at: www.jointplanningwofe.org.uk

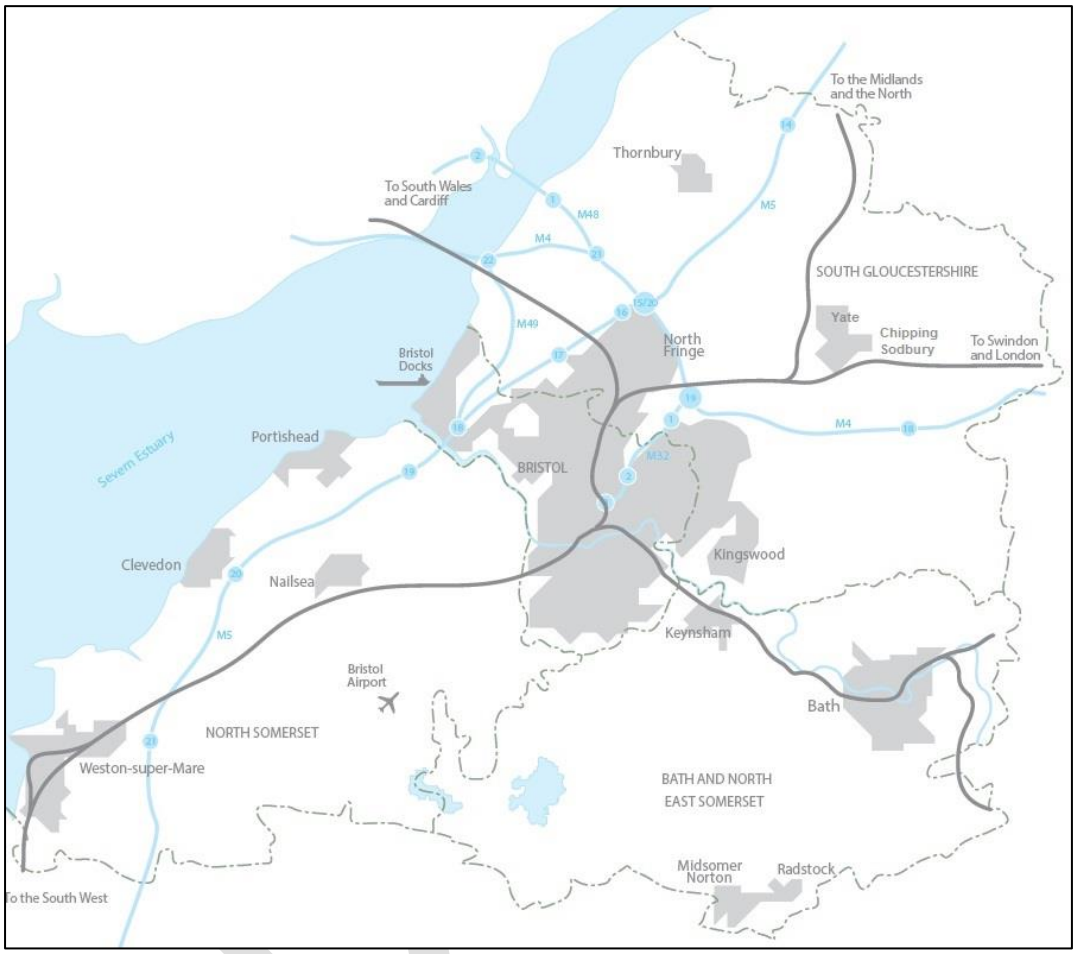
12. The Plan has been prepared working closely with key stakeholders including;
    - Government agencies: Homes and Communities Agency, Environment Agency, Natural England, Historic England, Highways England, Network Rail
    - Neighbouring Authorities
    - Public Health
    - Infrastructure Providers, and in
    - consultation with delivery partners.

CHAPTER 2: VISION, CRITICAL ISSUES & STRATEGIC PRIORITIES

The Plan area

1. The West of England (WoE) covers the four Unitary Authorities (UAs) of Bath and North East Somerset (B&NES), Bristol, North Somerset and South Gloucestershire. This is the **Plan area** for the JSP as shown in Figure 1.

Figure 1: West of England Plan area.



Housing Market Areas

2. The National Planning Policy Framework (NPPF) requires local plans to be informed by a Strategic Housing Market Assessment (SHMA) in order that there is a clear understanding of the needs of their area. The first required step is to establish the Housing Market Area (HMA).

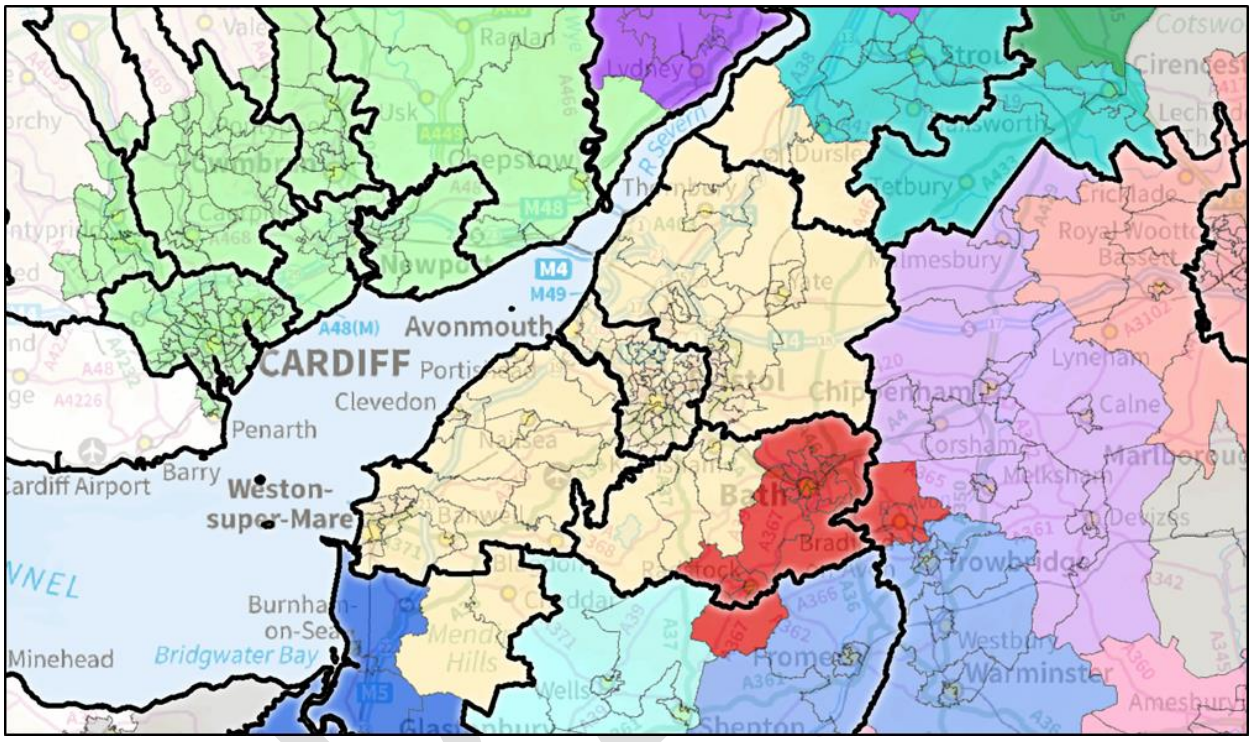
3. The SHMA identifies two separate Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-super-Mare as a sub housing market area, and the other focussed on Bath.

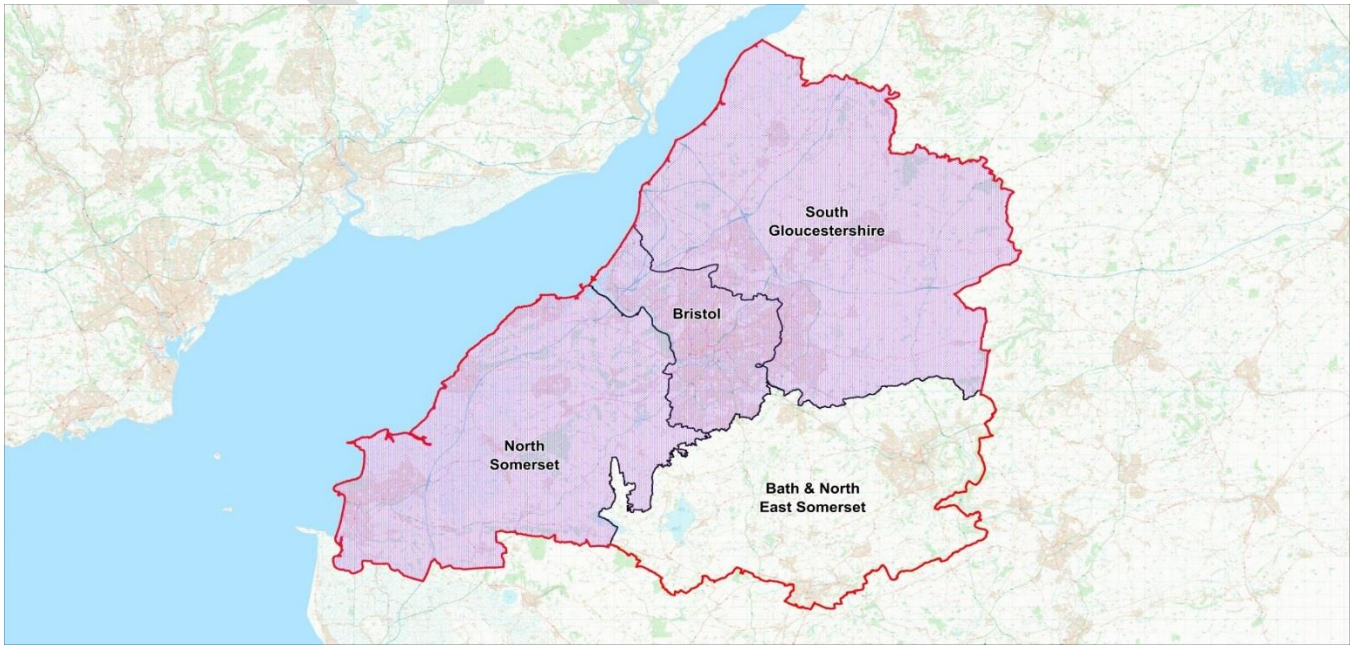
4. The JSP sets out the housing target across the whole plan area (encompassing all four Unitary Authorities) based upon meeting the needs of both the wider Bristol

HMA and the Bath HMA. Further information on housing need is set out in Chapter 4 alongside Policy 2.

5. The diagrams below show both the technical HMAs and the functional HMAs in the West of England.

Figure 2: Technical and functional Housing Market Areas.





Functional Economic Market Areas

6. The Economic Development Needs Assessment (EDNA) has defined the West of England (encompassing all four Unitary Authorities) as a Functional Economic Market Area (FEMA). This is because there is a high level of people, almost 90%, who live in the area and also work in the area.

7. The JSP sets out the current and future strategic employment locations 2016-2036 that are needed to support the job forecasts which underpin the West of England's economic aspirations. Furthermore detailed work will be undertaken in local plans to ensure local needs are met in the context of local market conditions. This will include identification of economic priorities and options for the distribution of employment land supply. Both the HMA and FEMA evidence show a high level of functional containment within the WoE geographical area. The WoE therefore performs strongly as a geographical unit and this provides an effective basis to plan for a sustainable spatial strategy for the Bristol City Region.

8. The WoE is a generally prosperous area with an excellent quality of life and a growing national and international profile.

DRAFT

West of England Key facts and figures

- The WoE covers an area of 1,343 km2. It has a growing population which currently stands at 1.1 million people, around 90% of which live in urban areas. The three principal urban areas are Bristol (617,280 pop), Bath (94,782 pop) and Weston-super-Mare (84,452 pop)[1].
- Its economy is worth £31bn a year and makes a net contribution to the UK Treasury.
- 22% of employment is within the high-tech economy above the national average.
- 44% of the population has higher level skills Level 4 or above. There are skill gaps in the workforce at entry level and Level 2 qualifications.
- There is good connectivity including accessibility to London, South Wales the Midlands and the South West, a major airport and port, rail and strategic road network, all of which enables access to global mass markets.
- The WoE has an outstanding physical environment with two Areas of Outstanding Natural Beauty, the only UK 'whole city' World Heritage Site, coast, areas of international ecological importance and a diverse countryside with attractive market towns and villages.
- Between 2006/7 and 2015/6 26% of new homes built, were Affordable Homes in the WoE.
- Affordability ratios (average earnings to average house prices vary across the sub region), UA averages are: B&NES 10.5, Bristol 9.2, N.Som 8.0, and S.Glos 8.4. Compared to the National average of 7.9[2].
- The WoE has a number of areas which fall within the 10% most deprived nationally equating to some 83,916 people or 7.8% of the WoE population. These areas are focused primarily in Bristol and Weston-super-Mare.
- The 2011 census shows that across the West of England around 14 % of commuters walk to work and 5% cycle, which are above the national average of 11%and 3% respectively.
- Bus patronage has increased by 17% since 2008/09, which is against the national trend of decline, although the number of bus journeys per head of population are still below other core English cities.
- Approximately 2% of commuting journeys are by train.
- Car based travel still accounts for around two-thirds of commuting journeys in the West of England.

[1] Source 2011 Census, based on the usual residents by built up area

[2] Source: Land Registry; Annual Survey of Hours and Earnings, Office for National Statistics.

Critical issues

9. Previous stages of the plan's preparation included public consultation on the key issues and challenges that should be addressed. The comments received have been taken into account and used to inform the Plan's critical issues and strategic priorities. The table below demonstrates what we consider are the critical issues facing the West of England and how these relate to the Plan's spatial objectives and overarching strategic priorities.

Figure 3 Critical issues and strategic priorities.

Critical Issue	Strategic Priority	Policy framework	Outcome
There is a critical need to substantially boost the housing supply, particularly affordable housing of which the need is acute across the Plan area.	1. To meet the sub-region's identified housing needs, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.	1, 2, 3, 7	Delivery of the Plan's housing requirement and affordable housing target (as set out at Policy 1 and Policy 3 in accordance with the Plan's spatial strategy at Policy 2).
Economic prosperity has brought substantial benefits to residents, communities & the environment. However, prosperity has not been shared equally by all communities as there are pockets of deprivation within the sub region.	2. To pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan. Particularly to: • promote the growth of existing employment centres such as the Enterprise Zones and Enterprise Areas • ensure more inclusive growth and life chances for all, across the West of England, and improve accessibility to jobs.	4	Delivery of the Plan's employment land requirement (as set out at Policy 4 in accordance with the Plan's spatial strategy at Policy 2).
The form and function of development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car.	3. To deliver a spatial strategy which; • focuses on three primary centres of Bristol, Bath and Weston-super-Mare and recognises the complementary role of market towns to achieve sustainable growth.	2,5,6,7	Sustainable growth of homes and jobs, supported by necessary infrastructure. Reduction in car dependency and improved public transport access to opportunity, jobs and

This inhibits wealth creation and productivity and contributes to climate change and poor health.	• ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel. • through a place making approach promotes places of density and scale with a range of facilities and which encourages healthy lifestyles and cultural wellbeing. • integrates high quality, multi-functional green infrastructure. Reduces greenhouse gas emissions and ensure resilience to the impacts of climate change.		services. Contribution to mitigating impacts of climate change. Delivery of Communities in which people want to live and work and; Improved health and well being outcomes.
The sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes significantly to the quality of life of residents, visitors and businesses.	4. To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity. To prioritise development on brown field locations, optimise densities and retain the overall function of the Bristol and Bath Green Belt.		Enhanced quality of the natural, built and historic environment. Biodiversity gains.

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Vision and Strategic Priorities

10. The West of England Joint Spatial Plan vision is consistent with national policy, and stems from the critical issues identified in the Issues and Options document, and the WoE LEP Strategic Economic Plan (SEP) economic vision for the sub-region to 2036. The economic vision has been augmented to reflect social and environmental aspirations. The proposed vision for the JSP has public support as demonstrated by 71% of respondents to the public consultation at the end of 2015.

Proposed Vision for the West of England Joint Spatial Plan
By 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all. The rich and diverse environmental character will be integral to health and economic prosperity. Patterns of development and transport will facilitate healthy and sustainable lifestyles. Provision of a range of housing types, will be of high quality and more affordable. Existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. New development will be designed to be resilient to, and reduce the impacts of climate change.

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CHAPTER 3: FORMULATING THE SPATIAL STRATEGY

1. The role of the JSP is to provide the broad spatial strategy that will:
   - deliver the Plan Vision and strategic priorities in order to address the critical issues identified in chapter 2, and
   - secure the delivery of the identified needs of development.

2. The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. It identifies an overall supply of 105,500 new homes to enable flexibility.

3. The Spatial Strategy supports the delivery of 82,500 jobs. The employment aspects of the strategy are described under Policy 4.

4. It is the role of the individual UAs, to provide the more detailed local policies, including how the different components of housing need are met such as the needs of the travelling community, students, older people and the range of dwelling types and size needed.

Building the spatial strategy:

5. Topic Paper x sets out how the spatial strategy was formulated and this is outlined in the reasoned justification to Policy 2.

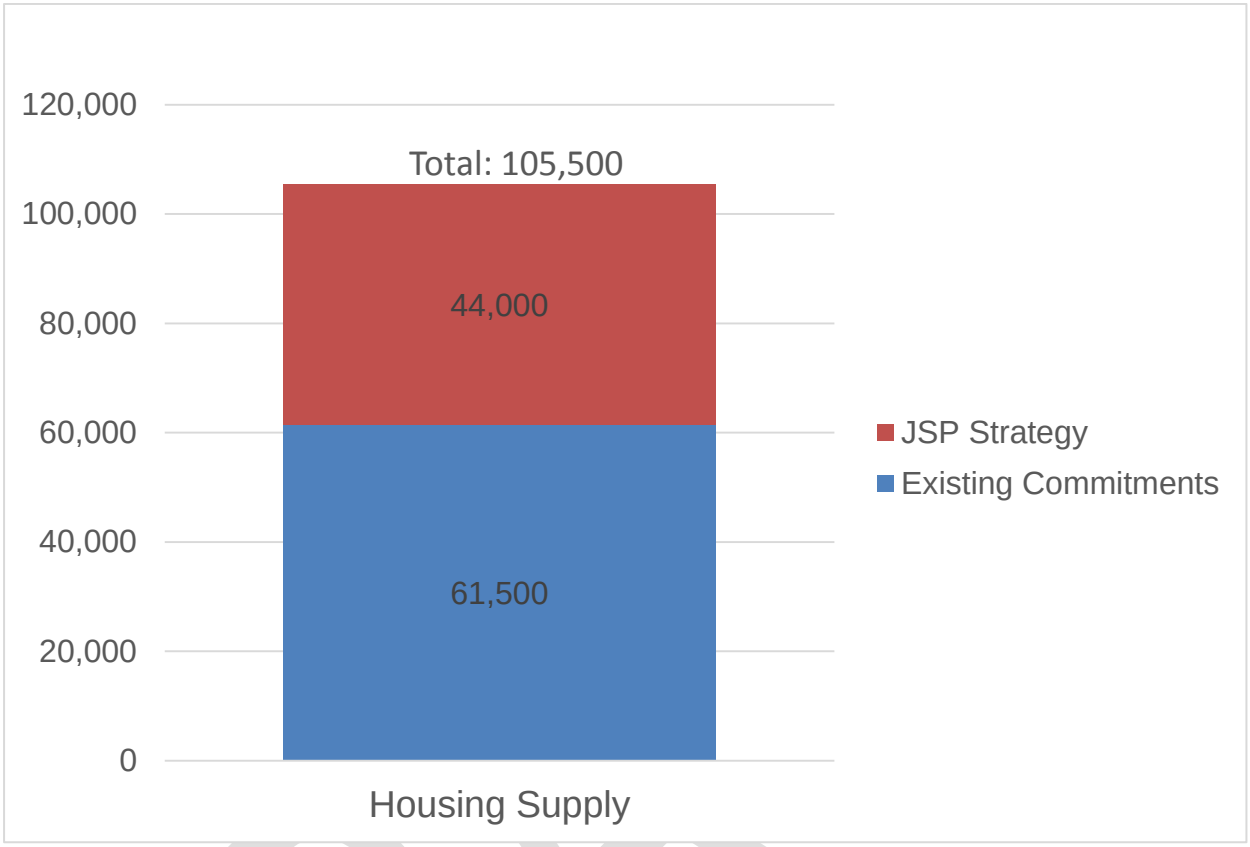
6. In summary, when formulating the spatial strategy, the potential supply from a variety of sources and the reasonable alternatives have been assessed, primarily:

   - reviewing existing commitments,
   - maximising urban capacity & optimising density,
   - allowing for small windfalls beyond that included in Local Plans,
   - allowing for 'non-strategic' growth,
   - assessing potential strategic locations, and
   - assessing other sources e.g. empty homes, specialised housing such as Students & C2.

Existing commitments

7. The four authorities' existing Local Plans make provision for around 61,500 new dwellings at April 2016. This is predominantly on previously developed land (60.23%). There is supporting growth at towns, and villages and also several greenfield strategic locations in existing local plans. When compared to the housing supply figure identified (105,500) there are **up to 44,000 additional dwellings to 2036, that need to be planned for through the JSP spatial strategy.**

Figure 4: Housing Supply against existing commitments at April 2016.



Urban Living -optimising the potential of urban areas

8. Urban Living is a central plank of the Spatial Strategy which commands a high degree of public support and is a highly sustainable element of the strategy. The four UAs have assessed the potential of existing urban areas to deliver land to meet development needs. In recent years a high proportion of new homes have been delivered on brownfield land in urban areas. Bristol has delivered 45% of the new housing provision across the JSP plan area since 2006, much of it on previously developed land. This process has been aided by new approaches to urban density to optimise quality urban living. This has developed new thinking about the nature of liveable cities and towns and the trends in the type of accommodation we seek. It is recognised that the success will rely on the ability to plan effectively the use of all public services as part of this concept.

9. Evidence has identified that through optimising opportunities for development in urban areas, there is the potential for a further 16,200 new homes to be delivered across the plan area. Opportunities for maximising the potential of existing land in urban areas will result from:

- The change of use of non-residential brown field land to residential – where the previous use is no longer required or residential use would result in the more efficient use for the land.
- Identifying land which is currently underused and has potential for residential development or mixed use development.
- Identification of mechanisms to ensure more certainty over the delivery of large windfall sites.
- Increasing the density of development on allocated or existing sites by reappraising and increasing their development potential in line with new thinking on urban living.

Small windfalls

10. The existing commitments make an allowance for small windfall sites (ie 9 dwellings or below). The JSP also makes an allowance for this component of growth to continue to the end of the Plan period. This contributes around 6,860 dwellings to the JSP strategy.

Non-Strategic Growth

11. An allowance is proposed to be made for 'non-strategic growth' in sustainable locations to accommodate smaller scale development in villages and towns which is needed to enable local communities to thrive. Detailed proposals will be brought forward through each Authority's local plan. This contributes 3,400 new dwellings to the JSP strategy.

Strategic Development Locations

12. Against the supply described above, there is the need to identify land for another 17,600 dwellings in order to meet the housing requirement with sufficient flexibility.

13. Locations which are currently, and are anticipated to be, significant generators of trips include central Bristol, parts of the Bristol North Fringe, central Bath/Bath Enterprise Zone and Weston-super-Mare. However, an approach which focusses on increasing existing urban development opportunities and expansion will not be sufficient to meet the homes and job needs of the Region over the next 20 years. Additional new sustainable locations will be needed which may include new innovative solutions such as garden villages or extensions.

14. The Strategic Development Locations are identified which are capable of delivering large scale development (500 dwellings+) over the plan period in locations which support the spatial strategy. This approach recognises all aspects of sustainability including growth well related to the central areas and other parts of urban areas where people seek to travel for work, shopping and recreational needs.

15. Sustainability is closely related to proximity and accessibility to services and facilities, particularly in Bristol, Bath and Weston super-Mare and the potential to use existing and new transport corridor opportunities. Other sustainability factors to meet the priorities of the Plan have also been considered including rebalancing

economic growth, maintaining and enhancing the environment and retaining the overall function of the Green Belt.

16. There is the need to avoid the unsustainable expansion of the north and east fringes of the Bristol urban area beyond the substantial existing commitments that are identified to be delivered in adopted Local Plans. Evidence also shows that due to significant environmental constraints there is no scope to further expand Bath outwards.

17. Alongside this, it is also recognised that existing towns and larger villages have a role to play in supporting sustainable economic growth. Strategic opportunities have been identified where investment in high profile public transport will assist in delivering sustainable growth.

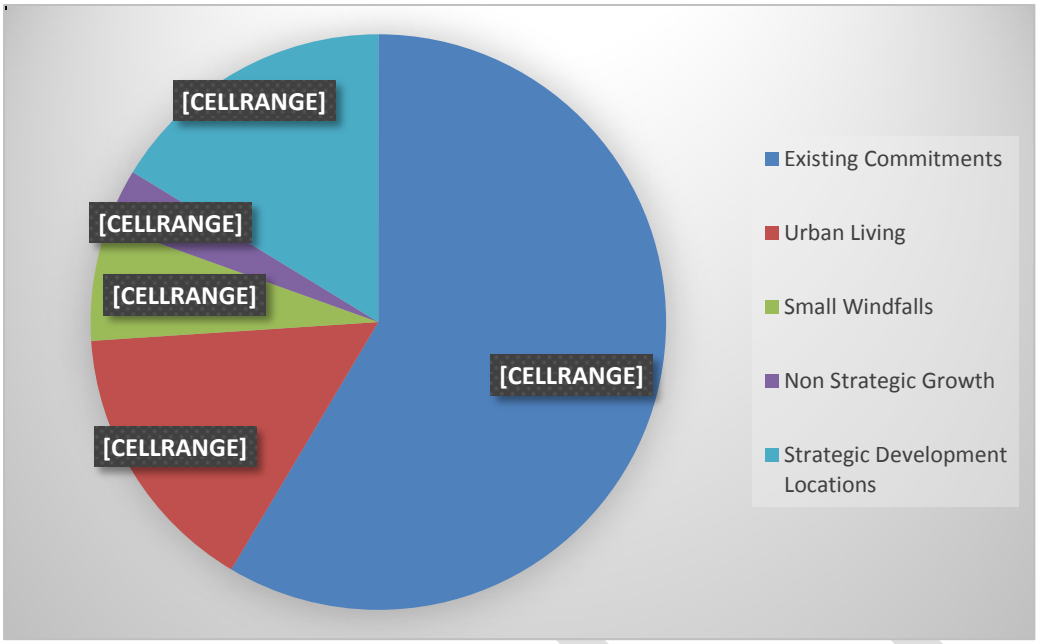
18. A sizeable proportion (48%) of the West of England area is within the Bristol-Bath Green Belt. This has significant implications for the Spatial Strategy, particularly reflecting the strategic priority to retain the overall function of the Green Belt. The advice in NPPF para 83 is "*Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*."

19. Technical work and transport modelling have shown that it is not possible to sustainably accommodate all the identified growth needs entirely outside the Green Belt. The transport impacts cannot be fully mitigated even with substantial investment. Such a strategy would be dependent on some highly unsustainable locations that are very difficult and expensive to mitigate with only sub-optimal solutions. It would also put pressure to locate development in the flood risk areas. These issues would impact on delivery of such a strategy.

20. In response to concerns express through public consultation, the spatial strategy aims to minimise the impact on the Bristol and Bath Green Belt. However, due to the scale of provision required and the extensive nature of the Green Belt, the Plan does include some Strategic Development Locations currently with Green Belt designation as explained in the Spatial Strategy Topic paper. Finally, the opportunity for new free standing garden village settlements forms part of the strategy.

21. A summary of the components of supply in the Spatial Strategy is set out at figure 5.

Figure 5: Components of supply in the Spatial Strategy



Demonstrating Flexibility and Contingency

22. The housing trajectory which sets out the phasing of the supply to meet the identified target is set out at Appendix 1 to the Housing Topic Paper. This shows that the plan has a sufficient flexibility to deliver identified needs across the plan period as well as addressing the requirement to demonstrate a five year land supply. The Plan also has flexibility to assist the market in delivering the identified employment land.

23. To enable delivery and implementation of the identified Objectively Assessed Need of 97,800 dwellings and the housing requirement of 102,200, the authorities have identified a supply of 105,500 dwellings. This is between 5% and 10% over the OAN, thus providing some flexibility should any issues of non-delivery arise. In addition, the JSP identifies a contingency supply (of around 3,000 homes). Release of the contingency will be considered should development not come forward as anticipated. A plan review would be the mechanism to undertake the release of the contingency informed by monitoring of delivery. It is emerging national policy guidance that plans be reviewed after 5 years. This gives an overall potential housing supply within the JSP Plan period of 108,000 new homes (including contingency).

Mitigations and infrastructure required to support the Spatial Strategy

24. It is recognised that provision of necessary infrastructure up front or phased to support development is critical to the successful delivery of the spatial strategy. Strategic infrastructure that will be required to deliver the Spatial Strategy is included in the Key Diagram at Appendix A.

25. Our transport network has to accommodate an increasing volume of travel and complex travel patterns. Increasing demand has contributed to a network that is often at capacity at peak times, with increased journey times and congestion. These impacts have been perceived as a barrier to securing sustainable economic growth. This threatens not only the productivity of our businesses and workforce but also our ability to meet wider sustainable objectives such as reducing carbon emissions and improving air quality in our urban areas.

26. Transport investment can be a major influence on where development is located and how to create high quality places in which people want to live and work. Influencing the location of development will not of itself be sufficient to address the issue.

27. Integrating housing and employment development with investment in reliable, high quality transport choices will:

- reduce the length and number of journeys to work, and other services and facilities.
- encourage more sustainable travel modes such as cycling, walking and public transport.
- reduce the reliance on car based journeys.

28. In response to the spatial strategy, transport infrastructure provision to support the additional development required seeks to:

- maximise the effectiveness of sustainable travel choices and encourage mode shift (to rail, MetroBus, Park & Ride, bus, cycling, walking) across the plan area.
- maximise the effectiveness of non-car mode choices for both urban living and new development outside existing urban areas; and then
- mitigate impacts of additional traffic, including investigation of junction capacity improvements, upgrades, new highway connections and traffic restrictions.

Encouraging sustainable travel choices across the plan area

29. **MetroBus** (Bus Rapid Transit) will be central to delivering the shift from a reliance on the car to a public transport mode of transport. Particularly at strategic development locations, and along key corridors with a number of locations outside of walking/cycling distance from key destinations and less-well served by the conventional bus and rail networks;

30. **A network of new Park & Ride and interchange schemes** will help to intercept trips on the edge of Bristol, Bath and Weston urban areas, reduce traffic in these areas and improve conditions for walking, cycling and public transport;

31. **Conventional local bus services and in particular improving existing bus services** will be an important part of promoting sustainable travel on several corridors;

32. **Rail** will play an important role for access to urban centres, but improvements will be needed (capacity, access to stations, parking, station environment, interchanges). Despite impressive levels of passenger growth in recent years rail currently has a modest modal share and is therefore part of a wider package of transport measures. Some locations will remain difficult to serve by rail.

33. **Walking and cycling** must take a central role for shorter trips –creating environments where active travel choices are the first choice, with better links to surrounding walking and cycling networks.

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CHAPTER 4: POLICY FRAMEWORK

POLICY 1 – THE HOUSING REQUIREMENT

In order to deliver the housing requirement for the West of England of 102,200 homes between 2016 and 2036, the Joint Spatial Plan (JSP) makes provision for the supply of at least 105,500 new homes.

Based on the spatial strategy in Policy 2, the supply will be distributed between the unitary authorities as follows:

- **Bath and North East Somerset 14,500 dwellings**
- **Bristol City 33,500 dwellings**
- **North Somerset 25,000 dwellings**
- **South Gloucestershire 32,500 dwellings**

The Plan also makes provision for contingency supply which, if required would take the total housing supply available over the Plan period to 108,000 as set out in Policy 2.

The 5 year Housing Land Supply assessment will be based on the Housing Requirement of 102,200 and will be set out in the UAs Local Plans.

Reasoned Justification for Policy 1.

1. **Housing Requirement:** The Strategic Housing Market Assessments (SHMA) prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings (dwellings) for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) and 12,800 dwellings for the Bath HMA).

2. This takes account of changes to net migration, the need to align future jobs and workers, in response to market signals, and to support the delivery of affordable housing. To take account of the needs of older people, the Housing Requirement is 102,200 dwellings for the Plan period as set out in the SHMA update. To allow some flexibility, the JSP makes provision for 105,500 dwellings by 2036.

3. **District distribution:** Policy 1 sets out the broad distribution of the Housing Requirement between the four districts. This is derived from the JSP spatial strategy and the location of committed and proposed housing growth over the plan period. Detailed delivery of the district distribution will be through local plans.

4. In the event that development does not come forward as anticipated, an additional contingency supply of around 3,000 dwellings has been identified as set out in Policy 2.

5. **The 5 year Housing Land Supply** assessment is based on the Housing Requirement of 102,200 dwellings and this will be established for each District through the respective UA Local Plans.

POLICY 2 – THE SPATIAL STRATEGY

The Joint Spatial Plan housing and job requirements will be achieved through:

1. **The delivery of existing Local Plan commitments,**
2. **Maximising the sustainable development of previously developed land and other appropriate opportunities within existing urban areas,**
3. **Enabling non-strategic sustainable development at locations identified and brought forward through local plans to meet the UA housing and employment requirements.**
4. **The allocation in Local Plans of the following Strategic Development Locations:**

- **Bath & North East Somerset: North Keynsham, Whitchurch.**
- **Bristol: Land at Bath Road Brislington**
- **North Somerset: Backwell, Banwell, Churchill, Nailsea.**
- **South Gloucestershire: Buckover, Charfield, Coalpit Heath, Thornbury, Yate.**

The strategic policy requirements for each of the strategic development locations are set out in Policy 7.

The spatial strategy is illustrated on the Key Diagram.

The general extent of the Green Belt is maintained except where it is required to be amended through local plans to enable the delivery of the strategic development locations at Coalpit Heath, North Keynsham, Yate, Bath Road, Brislington and Whitchurch.

Contingency/Review:

The Plan will be reviewed every 5 years following adoption. If monitoring demonstrates that the planned housing provision, is not being delivered at the levels being planned for and there would be no reasonable prospect of the planned delivery being met, the identified contingency will be considered for release through plan review.

Reasoned Justification for Policy 2

6. Policy 2 sets out the Plan's spatial strategy. The Plan promotes a pattern of development across both Housing Market Areas which most appropriately delivers the Plan's Vision and Strategic Priorities. In particular, it seeks to meet the need for new homes and economic growth supported by the necessary infrastructure. Chapter 3 and Topic Paper x sets out in more detail how the spatial strategy was developed.

7. Development of the strategy has been informed by the Sustainability Appraisal and a broad evidence base.

8. Provision is made to deliver 105,500 new dwellings and 82,500 jobs by 2036. Of this, a significant proportion, around 61,500 new homes are already identified in existing adopted plans. A principal element of the strategy is to maximise development opportunities in urban areas, whilst securing a high quality environment for existing and future residents. This approach helps to ensure new development is well related to facilities and benefits from existing infrastructure and yields about an additional 16,200 dgs. In recognising the role of the network of smaller towns and settlements provision is also made for 'non-strategic' growth (3,400 dwellings), and small site windfall development (6,800) with locations to be identified in UA Local Plans.

9. The above provision leaves nearly 17,600 dwellings to be accommodated. Whilst all brownfield options have been considered the identification of strategic, greenfield locations (500 or more dwellings for the purposes of the JSP) is warranted. Topic Paper x describes in more detail how the potential Strategic Development Locations (SDLs) have been identified.

10. A number of spatial scenarios were tested in order to establish the most appropriate strategy and help select the strategic locations which would effectively deliver the Plan's priorities. The preferred approach is to achieve a balanced portfolio, which in combination focusses development at locations: well related to existing urban areas; which are served by existing sustainable transport routes; or those with the potential to be sustainable, as a result of the type and form of development proposed. This reduces the need for travel to facilities and employment and where travel is needed, to do it more sustainably. In particular it facilitates the priority of economic rebalancing, thereby helping to address the pockets of deprivation within the sub-region. The preferred locations have also take account of the need for the spatial rebalancing of the Bristol city region in response to the extensive past growth and build out of the existing commitments which remain (of some 13,000 homes) at the north and east fringes of Bristol over the next 10 to 15 years.

11. A substantial part of the sub-region (around 48%) lies with the Bristol- Bath Green Belt. This creates a tension as some of the most sustainable (or potentially sustainable) locations in terms of their proximity to the Bristol urban area are within the Green Belt. The UAs assessed the scope to meet the need for development by avoiding Green Belt locations, including options in adjoining Authorities. However, the avoidance of the Green Belt resulted in a strategy which would entail highly unsustainable patterns of development, would have significant delivery issues and would severely compromise the Plan's objectives.

12. Having examined the other reasonable options for meeting the identified development requirements, the UAs have concluded that there are exceptional circumstances to justify the release of certain locations from the Green Belt. In

doing so, the UAs have sought to minimize the impact on the Green Belt and its general extent remains unchanged, with 0.65% proposed to be removed.

13. The JSP provides the basis for the UAs to formally allocate the SDLs in their individual Local Plans. Local Plans will set out the detailed site requirements, delivery arrangements and facilitate mitigation and/or enhancements both on site and off site. Local Plan preparation will provide the mechanism to amend local Green Belt boundaries. In the meantime, these locations will remain as part of the Green Belt. Opportunities to extend Green belt will be explored through local plans such as at Thornbury/ Buckover and Nailsea/Backwell.

14. The strategy provides a robust supply of deliverable land for housing for the Plan period with a choice of locations and flexibility to respond to changing circumstances. The strategy provides a firm basis for the UAs to demonstrate a 5 year housing land supply in each UA Local Plan, based on the identified Housing Requirement.

15. The plan will be reviewed at 5 year intervals to ensure that the strategy is being delivered and to take into account new evidence. In the event that housing was not being delivered at the levels being planned for and if there would be no reasonable prospect of the planned delivery being recovered, the Plan identifies some contingency locations to be considered for release through Plan review. This contingency comprises;
    - Land south of Chipping Sodbury, (around 1,500 dwellings with up to 775 deliverable within the Plan period) and an additional 225 dwellings at North West Yate, South Gloucestershire.
    - Land at east Clevedon, North Somerset (around 1,500 dwellings)
    - Increased non-strategic growth in South Gloucestershire (around 500 dwellings) and in B&NES (100 dwellings)

16. The spatial strategy, as shown in the Key Diagram below, enables the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure and with flexibility. It enables the retention and enhancement of the sub-region's high quality environment, provides benefits to existing communities and it facilitates the development of exemplar, sustainable new places. This is the most appropriate strategy for the West of England as evidenced through Sustainability Appraisal (SA) testing and in effectively delivering the Plan's spatial priorities.

POLICY 3 – THE AFFORDABLE HOUSING TARGET

1. **The Affordable Housing Target for the West of England for 2016-2036 is 24,500 net new affordable dwellings. Delivery of Affordable Housing, in a range of tenure and unit types, is a significant priority in all residential development.**

2. **Affordable Housing is defined as social rented, affordable rented and intermediate housing provided to households whose needs are not met by the market with regard to local incomes, house prices and rents.**

3. **On residential developments delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower, a minimum target of 35% Affordable Housing to be delivered on site is required. This applies to both C3 and self-contained C2 residential developments, including older persons and student accommodation.**

4. **Every opportunity will be taken to maximise the delivery of affordable housing within Bristol. The provision of Affordable Housing on the SDLs, and other strategic locations within or well related to the Bristol urban area, must contribute to the Affordable Housing need of Bristol through on site provision, with the option for off-site contributions in locations less well related to Bristol. Offsite contributions will be retained for the delivery of Affordable Housing for Bristol for a maximum of ten years or to the end of the JSP period whichever is the later.**

5. **Where it is demonstrated that viability prevents the delivery of Affordable Housing policy requirement without public subsidy, the agreed quantum of Affordable Homes to be delivered without subsidy will be stipulated in the planning agreement. In these circumstances any reduced provision of Affordable Housing must still contribute to the affordable housing need of Bristol as set out in paragraph 4. Further mechanisms will be used to require the applicant to engage actively with the local authority to identify alternative forms of investment or public subsidy to deliver Affordable Homes above this base provision up to policy compliant, target levels.**

6. **All Affordable Housing tenures should include provision to remain at an affordable price in perpetuity for future eligible households (based on local incomes and house prices) or for the subsidy to be recycled for alternative affordable provision.**

Reasoned Justification for Policy 3

17. The Wider Bristol and Bath SHMAs identified an Affordable Housing need of 32,200 net new dwellings. Based on the Affordable Housing supply, available funding and other interventions an additional 24,500 (76%) Affordable Homes is set as the strategic target of this plan.

18. Affordable Housing is given a significant priority in the plan because of the scale of the need and historic low delivery rates. The target reflects the commitment by the Unitary Authorities to maximise Affordable Housing delivery across the West of England.

19. It will achieve this by:

- Requiring a minimum of 35% Affordable Housing on all sites delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower. This is justified by the high level of need and the shortfall in past delivery, and the consequent need to maximise delivery from all possible routes.
- Maximising delivery via planning policy on site at nil public subsidy.
- Maximising delivery via planning policy at nil public subsidy on the Strategic Development Locations (see Policy 7) as a specific priority.
- Requiring policy compliance with the expectation that where it is unviable to provide the full policy requirement at nil public subsidy, public subsidy or other forms of investment will be sought and secured to make up the shortfall in order to demonstrate that every effort has been made to deliver full policy compliance.
- Maximising use of HCA funding, other public subsidy and other forms of investment.
- Requiring AH to be provided that meets the needs as evidenced by the Wider Bristol and B&NES Strategic Housing Market Assessments 2016 update or further updated evidence, in the full range of AH tenure types and unit mixes.
- Maximising delivery through higher densities in urban locations.
- Maximising delivery by reviewing and where appropriate, bringing forward sites for affordable housing that are currently allocated for other uses.
- Requiring AH to be provided on self-contained C2 residential accommodation, including older persons housing and student accommodation, justified by the high level of need and the shortfall in past delivery, and the consequent need to maximise delivery from all possible routes.
- Requiring on-site delivery of Affordable Housing. In exceptional circumstances, where it can be robustly justified, off-site provision or an equivalent financial contribution in lieu of on-site provision may be acceptable, for the provision of affordable housing.

20. In light of the particularly substantial need for Affordable Housing in Bristol, the provision of AH on the SDLs and other strategic locations within or well-related to the Bristol urban area must contribute to the affordable housing needs of Bristol via on-site provision with the option of off-site contributions in locations less-well

related to Bristol. Delivery mechanisms will be determined through a Joint Supplementary Planning Document options to be explored will include:

- nomination rights.
- financial contribution to be held in a West of England Housing central fund and which can be retained for a maximum of ten years or to the end of the JSP period, whichever is the later, in order to maximise the opportunity to spend.

21. The 4 UAs have sought to maximise the provision of AH as far as possible, making it a priority in the formulation of the spatial strategy and increasing the overall supply of housing in order to increase AH supply. Whilst the identified needs for AH will not be fully met, this strategy will entail a substantial boost in the supply of Affordable Housing for the sub-region and will result in a step change in provision.

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POLICY 4: THE EMPLOYMENT LAND REQUIREMENT

The Joint Spatial Plan (JSP) supports the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. The Plan seeks to enable access to employment opportunities for all through the spatial distribution of development.

Development in the following key strategic employment locations will ensure the continued economic growth of the West of England. The locations include:

Existing city and strategic town centres

- **Bristol City Centre**
- **Bath City Centre, and**
- **Weston-super-Mare Town Centre**

Enterprise Zones and Areas

- **Temple Quarter Enterprise Zone**
- **Avonmouth Severnside Enterprise Area**
- **Filton Enterprise Area**
- **Emersons Green Enterprise Area**
- **Bath Riverside Enterprise Zone**
- **Somer Valley Enterprise Zone**
- **Junction 21 Enterprise Area, Weston-super-Mare**

Key strategic infrastructure employment locations

- **Bristol Port,**
- **Bristol Airport,**
- **Oldbury Power Station new nuclear build.**

Additional employment opportunities are provided throughout the West of England in town, district and local centres, business and industrial estates.

These contribute to the stability of the sub-regional economy, and maintenance of employment land in these locations will be addressed through policy set out in the Local Plans. Improved accessibility to employment for residents in south Bristol, Bath and Weston-super-Mare will be supported through investment in sustainable transport infrastructure.

Strategic Development Locations (SDL)

In order to support the delivery of the employment growth required in the West of England, new employment land may be identified at the SDLs. The amount of employment land provided for at the SDLs will respond to the amount of residential development proposed and the context and scale of any existing community in the area. The delivery of employment land in the SDLs will be secured through allocation and policy detail in Local Plans, and through master planning and Supplementary Planning Documents as appropriate.

Reasoned Justification for Policy 4

22. In order to support the continued economic growth of the West of England, the area will need to be able to accommodate an additional 82,500 jobs (c.69,400 Full Time Equivalents) between 2016 and 2036 (all use classes not just B Class use). This figure has been derived from the 2015 Medium High growth forecasts from Oxford Economics with a small uplift of 1.1%.

23. The growth in jobs will be supported by the portfolio of employment opportunities available across the West of England. The continued changes in the employment market mean that flexibility is required within the employment land portfolio, in order to respond to changes in market demand during the plan period and beyond.

24. The employment land requirement to support the delivery of employment growth has been assessed, and the Economic Development Needs Assessment (EDNA) has identified that existing employment land is sufficient to deliver strategic employment needs, and the anticipated jobs growth over the period to 2036. Whilst the EDNA identified some localised mismatches between supply and demand for example in some parts of the WoE such as the Avonmouth / Severnside area, within the single functional economic market of the West of England, the opportunities to satisfy economic and employment land needs exceed the requirements of the highest employment job forecasts. Although additional jobs will be delivered from the full range of employment types, the EDNA deals only with provision for office, industrial and warehouse uses ('B' class uses. This is consistent with the requirements of the NPPF and national PPG).

25. The employment potential of the strategic employment locations will continue to be reviewed to inform detailed policy formulation through each authority's Local Plan. The strategic focus for the increase in employment opportunity will primarily be within the Enterprise Zones and Enterprise Areas.

26. The overall strategy is to focus growth in City Centres and EZs which are sustainable locations and are successful business locations.

27. Whilst major growth in employment is targeted at these areas, additional growth opportunities for Port, airport and power station related activities, are recognised at 3 key strategic infrastructure employment locations, Bristol Airport in North Somerset and Bristol Port in North Somerset/Bristol, and Oldbury Power Station in South Gloucestershire. This is in response to the evidenced employment growth potential at these locations. Growth at Bristol Airport has the potential to create a range of new employment opportunities. However, significant growth in this location will require the delivery of improved public transport access from Bristol and Weston-super-Mare. In addition, the construction of Hinkley Point C in Somerset, though outside the plan area, will have a significant impact on business supply chains and labour markets across the West of England (e.g. as demonstrated by location of EDF headquarters at Bridgwater House, Bristol).

28. The Strategic Development Locations where appropriate provide for employment land, proportionate to the scale of development proposed and the proximity of the development to other employment provision, and local employment need. The

detailed capacity of the SDLs may be further tested in the preparation of the Local Plans. Although there will continue to be growth opportunities throughout the West of England as a result of intensification of activity within existing local business and industrial estates, there are constrained opportunities for new employment land in south Bristol.

29. The clear priority for the development of brownfield land in the urban areas of the West of England will provide the opportunity for increased homes and employment using vacant or underused land. Key sites available for an increase in employment activity or for the release to housing land from employment use within Bristol City, the urban edge of Bristol within South Gloucestershire, and within Weston–super-Mare and Bath will be identified through the new the Local Plans.

30. Additional employment opportunities are provided throughout the West of England in town, district and local centres, business and industrial estates. These contribute to the stability of the sub-regional economy, and maintenance of employment land in these locations will be addressed through policy set out in the Local Plans.

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POLICY 5: PLACE SHAPING PRINCIPLES:

All new development must contribute towards the delivery of high quality and sustainable places. The following key principles should be used to inform the development and delivery of high quality and sustainable places to:

1. **Create character, distinctiveness and sense of place which diversifies the residential offer, improves accessibility, affordability and enhances identity.**
2. **Improve health and wellbeing and enable independence, reduce health inequalities, and facilitate social interaction where people can meet to create healthy, inclusive and safe communities.**
3. **Enable inclusive and sustainable economic growth.**
4. **Ensure the protection and enhancement of the natural, built and historic environment.**
5. **Mitigate and adapt to climate change and use a catchment based approach to water management.**
6. **Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.**
7. **Provide and ensure access to infrastructure including public transport, which reduces reliance on use of cars.**
8. **Maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment.**

These Key Principles should be used to prepare the Strategic Development Locations (identified in Policy 2 and 7) concept frameworks and future master planning to be identified in local plans or other documents to secure a co-ordinated and comprehensively planned approach. They should also be used to support existing communities to ensure the delivery of sustainable urban living and regeneration led development.

The West of England local authorities through their local plans will build good working relationships with developers, infrastructure providers other agencies and local communities to achieve these key principles.

Reasoned Justification for Policy 5.

31. Place making is at the heart of achieving our ambition for the West of England for places that are environmentally, socially and economically sustainable. To support this, the Plan's vision and spatial strategy recognises the importance of working on key issues across boundaries whilst seeking to respect the character and identity of our individual communities and to make places more innovative, competitive, connected, diverse and healthy.

32. To achieve these key objectives requires the leadership, ambition and co-operation of public, private and voluntary sectors. This is critical in order to shift expectations,

perceptions and devise new delivery models. To support this, key principles have been developed that ensure the JSP incorporates strategic priorities for economic, environmental and social sustainability. These accord with the 3 pillars of sustainable development and are intended to articulate the West of England's ambition and focus for creating high quality places that fulfil and realise these objectives.

Social

Policy Principle1: Create character, distinctiveness and sense of place

33. The design, diversity and nature of housing in new developments is critical to their attractiveness as places to live and in establishing successful new communities. New development will demonstrate a high standard of design appropriate to their location. This should be inclusive enabling accessibility and independence helping to reduce health inequalities. A mix of housing typologies and tenures have a role to play in diversifying the residential offer, improving accessibility and affordability and enhancing identity and sense of place. This can link to new models of housing delivery provided by new small and medium sized enterprises (SMEs), such as self and custom build and build to rent. Projects at higher density and scale provide the potential for generating community energy and can help to alter perceptions about an area.

34. Having a sense of place requires that new development provides a clear sense of scale, density, and legibility, has strong landscape and multi-functional green and blue infrastructure features and the provision of a range of amenities and services. Connection to sustainable transport networks are important so that locations are accessible by means other than car travel. New development should provide places of interaction with, diverse local economies and a good standard of service provision such as education. In order to take this work forward, the WoE authorities will prepare an Urban living Supplementary Planning Document (SPD) to set out these principles.

Policy Principle 2: Improve health and wellbeing, reduce health inequalities, and facilitate social interaction where people can meet to create healthy, inclusive and safe communities.

35. The planning, design and management of places and homes has an impact on the health of both current and future generations. New development and infrastructure provide opportunities to improve public health and access to healthcare services. Such improvements can be direct, for example the installation of smart technology for independent living; or indirect by impacting on behaviour, for example provision of active travel options, improving safety and creating accessible spaces to encourage physical activity. The reduction of obesity by raising levels of physical activity has been shown to lessen the risk of physical and mental health issues and costs to health service providers.

36. Health inequalities, social opportunity and quality of life are differences between people or groups due to social, geographical, biological or other factors. These differences can have a huge impact, resulting in some people and groups experiencing poorer health and shorter lives. Development proposals must be

informed by a holistic and evidence-based approach which considers how the current and future health needs of the population can inform the design and planning of new places.

37. Development proposals should:
    - be planned to integrate transport and land use and recognise the opportunity to offer a variety of services and facilities including access to green space and nature. This includes places for leisure, social activity and business space and places, both inside and out, where people can interact.
    - be fit for the future, incorporate alternative sources and resilience to a more variable climate.
    - Support strong, vibrant and healthy communities, by creating clear urban design with a diversity of housing, flexibility of building uses and sufficient space for cycle paths and walkways, to the community's needs and support its health, social and cultural well-being.

Economic

Policy Principle 3: Enable inclusive and sustainable economic growth

38. The availability of land for business activity is important to the long-term sustainability of both our existing and new communities, as well as the performance of the local economy. Where development potential is identified, there is a risk that employment uses will be pushed out by the need for new homes and the values generated by residential development. However, whilst land should not be protected for employment use where there is little prospect of such use occurring, it is important that adequate provision for future change is made. This does not simply require the right quantum of floorspace but the provision of premises that can support a strong and productive economy.

39. To achieve this requires diversity of economic activity, enable business interaction and the retention and attraction of staff, provide for a range of flexible building types, including working from home. Development proposals should enable flourishing and successful economies by allowing for ideas to be generated, tested, developed and turned into services and products.

40. Where appropriate new employment opportunities should be provided at the strategic development locations with the form and type of development to be determined through local plans and SPD as appropriate.

Environment

Policy Principle 4: Ensure the protection and enhancement of the natural, built and historic environment

41. The West of England is bounded by natural features of international and national importance – the two limestone landscapes designated for their outstanding natural beauty - the Cotswolds AONB lies to the east and the Mendip Hills AONB to the south, the Severn Estuary is an international wetland habitat. A plethora of international and national sites of ecological importance also exist throughout the

WoE, that are not confined to these landscapes. Topic Paper x sets out these assets. The West of England's numerous historic sites and features contribute significantly to the distinctiveness and sense of place of many communities.

42. These natural, built and historic environments provide a wide range of services that benefit our economy, and encourage visitors to the region whilst also providing health related benefits to our residents. Therefore it is crucial that new development works with natural systems, and is responsive to the distinctive historic and landscape setting of the sub region.

43. By working closely with our key environmental partners we have sought to establish a strong evidence base against which to recognise the wider benefits of ecosystem services, providing net gains to biodiversity, ensure areas of high landscape and visual sensitivity are respected, and the historical environment is conserved and enhanced. This will be used to ensure new development will:

- Conform with planning legislation to ensure protection of Local to International designated sites (AONB, SNCI, SSSI, SAC, SPA, Ramsar sites) and should ensure enhanced protection through complimentary habitat creation to extend and/or buffer the site, implemented through the delivery of green infrastructure corridors.
- Be expected to contribute towards a net gain of the sub-regions diverse and high quality natural environment and biodiversity ensuring that new development creates high quality sustainable places that deliver the integration, enhancement and protection of the sub-regions environmental assets.
- Encourage opportunities to take a landscape-scale approach to improve the natural environments resilience and optimise the services they provide as demonstrated through the Severnside Wetlands Nature Improvement Area (NIA) and Bristol Avon Catchment.
- In delivering Strategic Development Locations, policy requirements will incorporate provision for multi-functional green infrastructure as mapped in the Strategic Development Locations framework diagrams.

44. The vehicle to deliver an assessment of the West of England's key environmental assets will be delivered through a Green Infrastructure Plan for the West of England, supported by the 4 Unitary Authorities. The scope is set out in Topic Paper x.

Policy Principle 5 – Mitigate and adapt to climate change and use a catchment based approach to water management.

45. All development proposals will be required to demonstrate how long term climate resilience has been taken into account in the location and design of new development.

46. To increase resilience of the water environment to tidal, fluvial and surface water flooding the West of England authorities are committed to work in partnership on a

catchment wide basis to achieve more holistic outcomes focused on multi-benefit projects across our administrative boundaries. A clear strategic priority is to increase investment opportunities for delivering improvements and adaption measures for water-based issues across the whole of the water catchment that falls within the Plan area, identifying new funding and delivery mechanisms to deliver positive change. These include reduced sedimentation of watercourses and associated maintenance costs, reduced risk of flooding and enhancement of the wider environment to improve the public realm through soft engineering solutions.

47. There is a need to work with wider partners including the EA and water companies to address adaption measures to respond to impacts such as drought and water shortages though schemes to manage water consumption. In working with wider partners development should positively contribute to managing the water environment by implementing a sustainable drainage strategy that adopts a catchment based approach to water management and which is integrated with the green infrastructure objectives to provide resilience against flooding.

48. To meet these objectives, the four West of England authorities will support the catchment wide action plan and its implementation.

Policy Principle 6: Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions:

49. The West of England Unitary Authorities are committed to improving energy security, address fuel poverty and to achieve an efficient low carbon economy. In addressing these challenges it is important for the West of England Authorities to contribute to and support the increased use and supply of renewable and low carbon energy in line with objectives and provisions of the Climate Change Act 2008, 2050 Carbon neutral targets. As such, the combined West of England CO2 reduction target is to reduce absolute CO2 emissions by 50% by 2035 from a 2014 baseline.

50. The scale of proposed development to be delivered through the JSP could generate significant additional CO2 emissions, making it harder to reach this target. To mitigate this, it will be necessary to maximise the energy efficiency of new development and integrate renewable energy technologies to supply the energy needs of new development in order to minimise energy demand. Technology continues to advance whilst costs fall and it is more cost effective to deliver efficient new buildings with renewable energy integrated from the outset than to retrofit them once they are built.

51. Through the production of the new Local Plans and supporting SPD, the potential for development to be built to a zero carbon standard, that is net zero emissions from regulated and unregulated heat and power, will be investigated using a

consistent methodology across all four Unitary Authorities. Where viable, policies requiring zero carbon development or development that produces more renewable energy than it uses through opportunities including heat networks and other measures to support the delivery of environmentally sustainable development will be considered for inclusion in Local Plans.

Infrastructure:

Policy Principle 7 Provide and ensure access to infrastructure including public transport, that reduces reliance on use of cars

52. Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links. The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth. New developments should also ensure that safe vehicle access is secured and appropriate local highway mitigations are identified and delivered.

53. Development should make provision of community infrastructure necessary to support the new development including provision of retail, education, health and sport and leisure. New services and facilities should be integrated with existing provision where appropriate.

Policy Principle 8 Maintain and enhance the West of England's Green Infrastructure network to deliver multiple benefits for people, place and the environment

54. Strategically planned and designed new green infrastructure and enhancing the existing green and blue infrastructure can provide a broad range of economic and social benefits that underpins the JSP's vision for sustainable growth.

55. In assessing the JSP Strategic Development Locations the four Unitary Authorities have taken account of the eight cross cutting Green Infrastructure objectives. Through the assessment of Green Infrastructure for the JSP strategic development locations, a framework for assessment has been created. This is intended to provide for a well-integrated, multifunctional public open space and green infrastructure network to provide a full range of formal and informal recreation opportunities (including allotments) and to help ensure the setting of local heritage and ecological assets are protected and enhanced.

56. This framework will help inform local plans to enable consistency within the design of all new development (urban living and non strategic as well as the SDLs), ensuring multi-functional green infrastructure objectives are incorporated and delivered.

57. Taking this work forward, the 4 West of England Unitary Authorities will devise and deliver a Green Infrastructure Plan (as referred to in principle 4) which will identify the West of England's key natural assets and the mechanisms for investment in those assets. It is envisaged that the Green Infrastrcuture plan will be the basis for identifying opportunities for enhancing and delivering Green Infrastructure and ecosystem services, both on and offsite, and prioritisation for large scale conservation management.

58. Through the delivery of a West of England Green Infrastructure Plan and Local Plans, issues will be addressed on a coordinated and strategic level, including any potential significant effects on Natura 2000 sites.

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POLICY 6 STRATEGIC INFRASTRUCTURE REQUIREMENTS

Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy.

Transport infrastructure:
Working with delivery partners, the strategic transport infrastructure identified on the Key Diagram and in the West of England Joint Infrastructure Delivery Programme will be provided within the period 2016-2036.

Priority will be given to schemes which support the delivery of the spatial strategy as set out in Policy 2.

Provision will be made in the Local Transport Plan and local plans for an integrated corridor-based approach to transport improvements which supports sustainable and active travel choices and maximises the effectiveness of non-car modes.

Other strategic infrastructure:
New development must be properly aligned with the provision of the necessary strategic infrastructure. Additional strategic infrastructure identified to support the delivery of the spatial strategy is future investment in strategic flood management infrastructure at Avonmouth / Severnside, and on the River Avon in relation to Bristol City Centre. This is indicated on the Key Diagram. Other infrastructure will be identified where appropriate in the WoE Joint Infrastructure Delivery Programme and will be identified through local plans and local infrastructure delivery programs.

Reasoned Justification for Policy 6

59. The policy identifies the strategic development infrastructure requirements which are identified as being required during the plan period to deliver the spatial strategy. These are identified on the Key Diagram and set out in the Infrastructure Delivery Programme. These are the critical transport requirements, flooding and drainage improvements and mitigations. Energy infrastructure to support low carbon development and resilience to climate change such as the Avonmouth / Severnside Heat Network, with cross-border network requirements, will also come forward.

60. The requirement for an effective network of green infrastructure will be set out in local plans and other policy guidance and delivered through an integrated approach to new development. Other more localised infrastructure will also be required and this will be identified through local plans.

61. A WoE GI plan will identify and help to secure any GI required to support the delivery of the JSP and local plans. This would include addressing any potential significant effects on Natura 2000 sites, and other designated sites.

62. Delivery of the strategic infrastructure in the Infrastructure Delivery Program will be ensured through joint working with delivery partners including Natural England, Environment Agency, Highways England, Network Rail, utilities companies and developers. The local authorities will explore a range of delivery mechanisms including the use of compulsory purchase powers (CPO) to make sure that essential infrastructure is delivered in step with new development.

63. Priority will be given to infrastructure delivery which is most effective in delivering the overall spatial strategy and, for example, tackling existing transport challenges, not just in respect of the new strategic development locations, but within the urban areas and at non-strategic locations across the plan area. Where infrastructure provision has cross-border or wider implications, the Unitary Authorities will work together to deliver the most effective solution through, for example, shared use of resources.

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POLICY 7 - STRATEGIC DEVELOPMENT LOCATIONS SITE REQUIREMENTS

The following Strategic Development Locations will be delivered during the plan period:

- **Bath and North East Somerset: North Keynsham, Whitchurch.**
- **Bristol: Land at Bath Road, Brislington.**
- **North Somerset: Backwell, Banwell Garden Village, Churchill Garden Village, Nailsea.**
- **South Gloucestershire: Buckover Garden Village, Charfield, Coalpit Heath, Thornbury, Yate.**

The guiding principles common to all the strategic development locations are set out in Policy 5 and the detailed location-specific requirements are set out in Policies 7.1 - 7.12.

The broad locations for the Strategic Development Locations are shown indicatively on the Key Diagram.

Reasoned Justification for Policy 7

64. As part of the overall spatial strategy to deliver the housing needs for the plan area, strategic development locations (ie locations capable of accommodating 500+ dwellings) have been identified for detailed assessment through local plans. These comprise 12 locations which are consistent with the sustainable development objectives of the Plan but also represent a variety of different areas and forms of development which will provide flexibility and choice over the plan period.

65. The broad locations for the strategic development locations are shown indicatively on the Key Diagram. The Joint Spatial Plan does not allocate these areas; it indicates their general extent which will be further assessed and refined through local plans. In order to provide strategic guidance for the detailed work to follow, the Joint Spatial Plan summarises the development principles, opportunities, constraints and infrastructure requirements to be taken into account. This includes the generic development principles which apply across the whole plan area, particularly the place-shaping principles set out in Policy 5, and also other aspects such as affordable housing targets contained in Policy 3. These principles apply equally to the Strategic Development Locations as well as to other locations.

66. While the starting point will be compliance with the broad principles set out in the main body of the Joint Spatial Plan, it is important to recognise that the individual locations will also have specific local issues, constraints and opportunities to take into account. These are important in terms of ensuring the retention and enhancement of local character and distinctiveness, and ensuring that necessary

infrastructure and other mitigations are introduced in an appropriate and timely manner.

67. Policies 7.1 – 7.12 set out the bespoke requirements for each location which will form the starting point for their detailed assessment through the local plans. These are derived from the evidence prepared as part of the plan-making process and summarised in the supporting documents, particularly the Strategic Development Location templates. The requirements identified in the Joint Spatial Plan policies are not exhaustive and will evolve as detailed assessment and masterplanning takes place at these locations.

68. While the trajectories need to be further refined as the proposals are developed in more detail, the 12 Strategic Development Locations are currently anticipated to deliver approximate 17,377 dwellings by 2036, with the capacity for a further 4,350 beyond the plan period. In many locations delivery is linked to the delivery of essential infrastructure, particularly highways and transport. This means that in several of the identified locations development is not anticipated to commence until later in the plan period.

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POLICY 7.1 - NORTH KEYNSHAM

North Keynsham, Bath & NE Somerset

Development at North and East Keynsham is shown on the Key Diagram. Development in this area should comply with the following key strategic principles and infrastructure requirements:

- **The delivery of around 1,500 new homes, with 1,400 homers built in the plan period, optimising densities and including affordable housing.**
- **Include around 50,000 m^2 of employment floorspace.**
- **Creation of a new local centre to provide a focal point for the new community with an appropriate range of small-scale retail, services and facilities.**
- **A new primary school on site and financial contribution to the provision of a secondary education provision off site.**
- **New mixed tenure marina providing residential and leisure moorings.**
- **A layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including key views from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network that includes new wetland features, restored floodplain meadows and new woodland.**
- **Provision of key transport infrastructure including:**

  i. **North Keynsham multi modal link from Avon Mill Lane to A4. This new link will be designed as a street through the development, considering the needs of pedestrians, cyclists, public transport and vehicles, and capable of performing a wider strategic function for traffic relief in Keynsham. Development will have a positive relationship with the link road;**

  ii. **Pedestrian and cycle connections in all directions which link the site with key services and facilities. These include Keynsham rail station, the town centre, the A4 public transport corridor, the A4175 Keynsham Road and the Bristol to Bath cycle path with the potential for new bridge connections across the River Avon;**

  iii. **Where existing vehicle routes across the railway line are no longer required for continued use by motor traffic, seek to downgrade them to pedestrian and cycle only links;**

  iv. **Metrobus (high quality public transport) route from Bristol to**

Keynsham on the A4 corridor;

v. **High frequency local bus service following an orbital route connecting the site to the town centre, Metrobus, rail and other local bus services;**

vi. **Improved passenger facilities at Keynsham rail station;**

vii. **Off-site junction improvements including at Hicks Gate; and**

viii. **Expanded or relocated A4 Bristol Park & Ride.**

No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed. This should not prejudice a full Transportation Assessment which will be required for each location.

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POLICY 7.2 – WHITCHURCH

Whitchurch, Bath & North East Somerset

The development of land at Whitchurch is shown on the Key Diagram. Development in this area should comply with the following key strategic principles and infrastructure requirements:

- **Around 2,500 new homes, optimising densities with 1,600 homes built in the plan period, including affordable housing.**
- **Provide retail, healthcare and community facilities, two new primary schools and a secondary school.**
- **Deliver environmental enhancements to Whitchurch village and its local centre.**
- **Retain the open gap between Whitchurch village and the Bristol urban area.**
- **Include employment spaces at a quantum and of a type to be determined though the Local Plan.**
- **Preserve and/or enhance the Queen Charlton Conservation Area, and the Maes Knoll and Wansdyke Scheduled Monuments and their settings.**
- **Provision of key transport infrastructure including;**

  i. Multi-modal link connecting A4, A37 and the south Bristol link road;

  ii. Park and ride provision;

  iii. Metrobus (high quality public transport) route from Bristol on the A4-A37 link;

  iv. Pedestrian and cycle connections in all directions which link the site with key services and facilities. These include extending and improving walking and cycling routes to Bristol, Keynsham and to the countryside to the south; and

  v. Off-site junction improvements including at Hicks Gate.

No dwelling will be completed at the Whitchurch SDL ahead of:

i. Park and Ride, and

ii. the multi-modal link A4-A37-south Bristol link including as a pre-requisite, the Callington Road scheme being completed.

The strategic infrastructure listed above should not prejudice a full

Transportation Assessment which will be required for each location.

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POLICY 7.3 – LAND AT BATH ROAD, BRISLINGTON

Bath Road, Brislington, Bristol

The relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset will enable the creation of a new neighbourhood within Bristol. Development in this area should comply with the following strategic principles and infrastructure requirements:

- **Provision of at least 750 new homes;**
- **Mix of uses to be provided in accordance with masterplanning process;**
- **Retention and incorporation of hedgerows into development, including the hedgerows along Scotland Lane;**
- **The Sustainable Drainage Systems (SuDS) strategy will include surface water runoff management measures to remediate existing issues on the Scotland Bottom watercourse and Scotland Lane;**
- **Provision of a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse and the protection and enhancement of nature conservation. The park should include walking and cycling routes;**
- **Avoidance of unnecessary sterilisation of coal resources within the Minerals Safeguarding Area;**
- **Financial contributions to the provision of primary school places off site;**

- **The provision of key transport infrastructure in advance of development including;**

  i. **Relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset;**
  ii. **Callington Road Link / A4 Rapid Transit Scheme;**
  iii. **Widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths with links across Bath Road, and a landscape frontage alongside the A4;**

- **Other transport improvements:**
  iv. **A4 – A37 link, which may incorporate a MetroBus route;**
  v. **Review the use of Scotland Lane, in light of delivering the A4-A37-south Bristol link, to reduce through traffic and provide walking and cycling facilities**
  vi. **Extending and improving cycle routes to Bristol, Keynsham, and to the countryside to the south.**

POLICY 7.4 - BACKWELL

Backwell, North Somerset

Land to the west of Backwell is shown indicatively on the Key Diagram as the broad location to accommodate an extension to the village. The key strategic principles and infrastructure requirements are as follows:

- **Delivery of an extension to Backwell village to create a sympathetic and well-designed development appropriate to its rural setting of around 700 dwellings including affordable housing.**
- **Lower densities will be expected on more sensitive parts of the site, including to safeguard heritage and ecological assets.**
- **Creation of new footpath and cycleways linking the site to the rail station, proposed MetroBus connections and local services and facilities.**
- **Improvements to the rail station to create a multimodal interchange including enhanced parking, facilitating increased frequency and capacity, accessibility and accommodating a MetroBus interchange.**
- **Local junction improvements will be required including at Station Road, and theA370 Backwell signalised junction.**
- **Provision of a primary school of at least 2.4ha to be located to maximise safe access from surrounding communities by walking and cycling.**
- **Protection of the settings of historic Chelvey and West Town Conservation Area and the need for sensitive treatment in respect of the setting of Grove Farm.**
- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat (particularly the Juvenile Sustenance Zone between the A370 and Chelvey Road), and Tickenham; Nailsea and Kenn Moor SSSI interests.**
- **Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long term water storage as part of the sustainable drainage strategy.**

- **Development to be mitigated with the delivery of:**
  - **i. New multi-modal link from A370 Long Ashton Bypass to station interchange (including rail crossing), Nailsea SDL and Nailsea town centre, with connection to A370 west of Backwell (including rail crossing) and a new or improved connection to M5.**
  - **ii. New MetroBus route linking Bristol to Nailsea from Long Ashton Bypass to the station interchange (including rail crossing), Nailsea SDL and Nailsea town centre, and potential onward link to Clevedon.**
  - **iii. Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored.**

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POLICY 7.5 - BANWELL GARDEN VILLAGE

NW of Banwell, North Somerset

Land to the north west of Banwell is shown indicatively on the Key Diagram as the broad location to accommodate a new Garden Village. The key strategic principles and infrastructure requirements are as follows:

- **Delivery of a new garden village to the north west of Banwell with its own character and sense of identity, whilst demonstrating sensitivity to the existing context for around 1900 dwellings including affordable housing.**

- **Creation of a new local centre to provide a focal point for the new community with an appropriate range of small-scale retail, services and facilities to complement existing facilities in Banwell.**

- **Potential for higher density at the local centre and other accessible locations.**

- **Creation of new footpath and cycleways connecting the garden village to Banwell, Weston-super-Mare and the nearby Weston Villages.**

- **Delivery of bus service improvements to Weston-super-Mare and Bristol including potential for MetroBus.**

- **Development will not commence until the construction of the Banwell Bypass is delivered as part of the M5 to A38 highway improvements with connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass. Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored particularly where delivery of infrastructure is directly within the land controlled by the developer. Development must not prejudice the delivery of future improvements to M5, including the construction of the new M5 junction.**

- **Local network and junction improvements including widening of Wolvershill Road.**

- **Provision of two primary schools one of at least 2.4ha and the other 3.4ha to be located to maximise safe accessibility from surrounding communities by walking and cycling. Provision for a new secondary school to serve the Banwell and Churchill SDL should be made with location to be confirmed through the local plan.**

- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat including investigation of the potential to create a 'dark corridor' link through the development from open countryside around Stonebridge towards the Grumplepill Rhyne corridor.**

- **Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long term water storage as part of a sustainable drainage strategy.**

- **Identification of around 5 ha of employment land primarily for B8 use class with good access to the M5 and new strategic transport infrastructure.**

- **As part of the approach to securing a multi-functional and interconnected green infrastructure, investigate the opportunity for an open setting along the northern edge of the existing village including potential for a nature reserve or other uses, with links out to open countryside to the east.**

- **Implementation of environmental improvements to the centre of Banwell following construction of the Bypass.**

- **Safeguarding of the setting of Banwell Conservation Area and protection and enhancement of the settings of listed heritage assets located both within and outside the historic core.**

- **Recognition that there are areas of high potential for archaeology which may require appropriate mitigation, particularly around Stonebridge and Wolvershill, and also between East Street and Riverside.**

- **Development form, and layout to respect the sensitivity of the location close to the Mendip Hills AONB.**

POLICY 7.6 – CHURCHILL GARDEN VILLAGE

NW of Langford and Churchill, North Somerset

The area of search for development to the north west of Churchill and Langford is shown indicatively on the Key Diagram as the broad location to accommodate a new Garden Village. The key strategic principles and infrastructure requirements are as follows:

- **Delivery of a new garden village to the north west of Langford with its own character and sense of identity for around 2675 dwellings including affordable housing. An additional 125 dwellings are estimated beyond 2036.**

- **An interconnected and multi-functional network of green infrastructure will be established, including the provision of an appropriate strategic (open space) gap between Churchill Garden Village and existing settlements.**

- **Development should avoid the flood plain and demonstrate reduced run-off rates including through the use of attenuation ponds and other features as appropriate. Additional land may be required off-site to facilitate long-term water storage as part of a sustainable drainage strategy.**

- **Protection and enhancement of local heritage assets and their settings, including Churchill Court unregistered park and garden and listed buildings at Churchill Green and Front Street.**

- **Creation of a new local centre to provide the heart of the new community with a range of retail, employment, services and facilities.**

- **Potential for higher densities at the local centre and other accessible locations, and reduced densities on the fringes of the development to provide a soft edge and setting for the new community.**

- **Creation of new footpath and cycleways linking the new community with existing settlements and facilities including access to the Strawberry Line.**

- **Package of highway schemes including a new M5 junction, Banwell Bypass, Sandford/Churchill Bypass and capacity improvements to A38/A368 junction. Bus service improvements to Bristol and Weston-**

super-Mare, including the potential for Metrobus.

- **Provision of three primary schools of at least 2.4ha each to be located to maximise safe access from surrounding communities by walking and cycling.**

- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat. Investigation and implementation of a green corridor through development linking from open countryside to the west to Windmill Hill to areas south of Langford and beyond to the Langford Brook.**

- **Identification of around 7.4 ha of employment land. Employment land to be located in close proximity to new highway link and will provide business opportunities in the B Use Class.**

- **Development form, and layout to respect the sensitivity of the location close to the Mendip Hills AONB.**

- **Windmill Hill to be retained as a focal green feature for ecological, recreational and landscape value. It also has archaeological significance as a location for the remains of Iron Age settlement.**

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POLICY 7.7 – NAILSEA

SW Nailsea, North Somerset

Land to the south west of Nailsea is shown indicatively on the Key Diagram as the broad location to accommodate a new extension to the town. The key strategic principles and infrastructure requirements are as follows:

- **Delivery of an extension to the south west of Nailsea with its own character and sense of identity for around 2575 dwellings including affordable housing. An additional 725 dwellings are estimated beyond 2036.**

- **Creation of a new local centre to form the heart of the new community with a range of retail, employment, services and facilities, but of a scale and type which is complementary to Nailsea town centre which will remain the main centre.**

- **Higher densities at the local centre and at accessible locations, particularly along the proposed MetroBus route and lower densities towards the western edge of the development.**

- **Creation of new footpath and cycleways linking the new local centre with residential areas, locations within Nailsea and the rail station and public transport services.**

- **Development to be mitigated with the delivery of:**

  i. **New multi-modal link from A370 Long Ashton Bypass to station interchange (including rail crossing), new development area and Nailsea town centre, with connection to A370 west of Backwell (including rail crossing) and a new or improved connection to the M5.**
  ii. **New MetroBus route linking Bristol to Nailsea from Long Ashton Bypass to the station interchange (including rail crossing), new development area and Nailsea town centre, and onward link to Clevedon via M5 J20 link.**
  iii. **Opportunities to phase delivery of the highway improvements in step with parts of the development may be explored.**

- **Local junction improvements including Station Road, and A370 Backwell signalised junction.**

- **Provision of a secondary school of 8 ha and four primary schools of at least 2.4ha each, located to maximise safe access by walking and**

cycling.

- **Strategic approach to the assessment, safeguarding and enhancement of greater and lesser horseshoe bat habitat, and Tickenham; Nailsea and Kenn Moor SSSI interests. This includes investigating the potential for a dark corridor through the new development linking habitats at Backwell through to open countryside to the north and at Batch Farm Meadow wildlife site.**

- **Protection of heritage assets and their settings particularly listed farm buildings in the area whose settings should be addressed through a sensitive green infrastructure strategy.**

- **Long-term water storage and other measures are likely to be required as part of a sustainable drainage strategy, as well as reduced run-off rates to surrounding area. Measures to ensure water quality and levels are not adversely impacted on the nearby Tickenham Moors SSSI must be in place.**

- **The separate identity and character of Nailsea and Backwell will be retained through the provision of an appropriate Strategic Gap.**

- **Improvements to the rail station to create a multimodal interchange including enhanced parking, facilitating increased frequency and capacity, accessibility and accommodating a MetroBus interchange.**

- **Consideration of relocation/undergrounding of existing pylons.**

- **Identification of around 10.5 ha of employment land well-connected to the railway station, local centre and Metrobus route. Investigate the potential for a new office park close to the railway with optimum travel links.**

POLICY 7.8 -BUCKOVER GARDEN VILLAGE

Buckover, South Gloucestershire

A Garden Village will be developed on land either side of the A38 at Buckover (east of Thornbury) as shown indicatively on the Key Diagram.

An appropriate delivery body, including the land value capture, ownership and management of assets, long-term stewardship and governance arrangements (for the benefit of the community), land uses, master planning and detailed design principles will accord with Garden City principles and shall be agreed with the Council following consultation with the local community, Parish and Town Councils and other relevant stakeholders.

These principles will be set out in a new Local Plan policy and other planning policy documentation and delivery agreements as appropriate.

The Garden Village should also comply with the following key strategic objectives and infrastructure requirements:

- **Provision of around 3,000 dwellings (including affordable homes), to be delivered by a full range of providers and of a wide range of types and tenures, complementing existing predominant house types in the local area. At least 1,500 will be delivered within the plan period. The homes will be innovative, of high quality design, spacious and well-planned, meeting Nationally Described Space Standards as a minimum.**

- **A new Local Plan policy will establish an appropriate policy designation to ensure a permanent strategic gap between the new Garden Village and Thornbury.**

- **A Green Infrastructure network will also be established to ensure a permanent and robust landscape edge to the western boundary of Buckover Garden Village, Ridgewood and the setting of local heritage and ecological assets are protected and local food production is given emphasis within the new settlement.**

- **Provision of and support for a range of retail, community & cultural facilities in the Garden Village and potentially other nearby communities to complement existing local provision.**

- **Provision of a primary school and 3-16 all through school and nursery(s).**

- **Provision of around 11 ha of employment land to provide a range of local employment opportunities, including provision for start-up, SMEs and larger businesses.**

- **Embedding of zero-carbon and energy positive solutions throughout the planning, design and delivery process across the whole settlement.**

- **Provision of a strategic transport package including as appropriate delivery of or contributions towards: Metrobus Extension to Thornbury & Buckover GV, A38(N) Park & Ride, M5 J14 improvements, Charfield rail station re-opening, local bus service improvements (including new local shuttlebus to Thornbury), strategic and local cycle and pedestrian connections to Thornbury and other local highway network improvements as necessary.**

- **Consideration will also be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health & wellbeing.**

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POLICY 7.9 - CHARFIELD

Charfield, South Gloucestershire

Land at Charfield will comprise a number of major interdependent development areas around the village. Development of these separate land parcels should be undertaken in a co-ordinated manner to ensure Charfield becomes a more sustainable settlement.

New development should also comply with and or contribute towards the following strategic principles and infrastructure requirements:

- **Provide around 1200 dwellings, including affordable housing, to be developed within the plan period. New housing should expand the range of types and tenures available in the village.**

- **The future role and function of existing retail and community assets and remaining greenfield land parcels within the centre of the village adjoining the Wotton Road will firstly be reviewed in consultation with the local community to ensure future needs are assessed, new and existing facilities make the most efficient use of land and they assist to maximise the sustainability of the expanded village.**

- **Replacement of the existing primary school with a new 3FE school in a central village location and contributions to delivery of an expanded secondary school in the locality, and or the delivery of a new all through 3-16 school at Buckover Garden Village.**

- **New and/or improved retail and community facilities.**

- **A minimum of 5 ha of new employment land (traditional B-use classes) distributed within the development areas at appropriate locations.**

- **The new development will provide or contribute to a strategic transport package including: M5 J14 improvements, Charfield rail station re-opening, local bus services, a comprehensive Wotton Road environmental enhancement scheme, new and improved foot and cycle connections through the village and to key local destinations such as Renishaws, KLB school and Wotton-under-Edge, and including a new Charfield circular public right of way route.**

- **A Green Infrastructure network will enhance and protect the Little Avon River and its flood zone, the setting to Elbury Hill and St James' Church, local SSSI, SNCIs and other Listed Buildings, as well as soften views from the AoNB.**

- **Reinforcement of the sewerage network and treatment works.**

POLICY 7.10 - COALPIT HEATH

Coalpit Heath, South Gloucestershire

Land to the east of Coalpit Heath will deliver a new neighbourhood that responds positively to the locality's rich mining heritage and visually prominent aspect. The new neighbourhood should also comply with the following key strategic principles and infrastructure requirements:

- **Provide around 1800 dwellings, including affordable housing, to be developed within the plan period.**
- **Provide a new local centre incorporating a new primary school, local retail outlet, & community facility/hub, and a second primary school (subject to further testing) plus contributions to a new or expanded secondary school in the wider locality.**
- **Incorporate up to 5ha of employment land (B-use classes)**
- **Provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Rail Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services. Vehicular access will be off Badminton Road/Frog Lane, Roundways and Woodside Road.**
- **Establish a Green Infrastructure network that will reinforce a new Green Belt boundary along the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting of nearby Listed Buildings.**

POLICY 7.11 – THORNBURY

Thornbury, South Gloucestershire

Land at Thornbury around the town's north and eastern edge off Butt Lane & Morton Way should comply with the following key strategic principles and infrastructure requirements:

- **A maximum of 500 dwellings, including affordable housing, to be developed within the plan period.**
- **The new Local Plan will establish an appropriate policy designation to ensure a permanent strategic gap between Buckover Garden Village and Thornbury.**
- **Around 5ha of additional employment land on land at Crossways east of Morton Way, sensitively designed to respect the rural nature of the locality.**
- **Incorporate a new convenience store/retail or community opportunity and new and enhanced public open space.**
- **Establish a Green Infrastructure network that will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane, include SUDs features at Crossways to manage potential flooding at Crossways, and extend the Picked Brook Rhine streamside walk.**
- **Development will also make financial contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover GV), A38(N) Park & Ride, M5 J14 improvements, Charfield rail** station **re-opening, local bus service improvements, local highway, foot and cycle improvements.**

POLICY 7.12 – YATE

Yate, South Gloucestershire

Land at Yate comprising two broad locations to the northwest and west of Yate will deliver a new residential neighbourhood and employment area which should comply with the following key strategic principles and infrastructure requirements:

- **A minimum of 2,000 dwellings, including affordable housing, of which at least 1,000 will be delivered within the plan period.**

- **Provide a new high quality, high density, mixed-use residential neighbourhood at NW Yate that improves connections through a regenerated Beeches Industrial Estate and to the rail station.**

- **The residential neighbourhood will contain a new local centre including a primary school(s) and/or all through 3-16 school, local retail and community facility/hub.**

- **A significant new employment land allocation totalling approx. 30ha will also be allocated at West Yate, of which, approximately:**
    - **11ha of land south of Badminton Road will be allocated for B1 and B2 office/light industrial and research use; and**
    - **19ha of land between the railway tracks off the Westerleigh Road will be allocated for B2/B8 and similar uses.**

- **The new development areas will provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, strategic cycle route, A432 Park and Ride, Yate Rail Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services. An on-site rail crossing and a new rail bridge is also likely to be required across the Nibley Lane.**

- **A Green Infrastructure network will reinforce a new Green Belt boundary, protect the river valley, linear settlement of Engine Common and Nibley Village, provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and the Frome river corridor through the Beeches Estate.**

- **The historic parliamentary enclosures, which comprise small to medium sized fields, reinforced by a strong mature hedgerow network and large number of trees, north of Mission Road and east and west of North Road will also be protected by a new landscape and or Green Belt designation which will be confirmed through the new local plan.**

- **Plus, early consideration of appropriate powers devolved to the West of England to enhance the prospect of land assembly, infrastructure**

delivery and the regeneration of existing industrial areas so also assisting bring forward a well planned and connected new residential development.

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CHAPTER 5 DELIVERY AND IMPLEMENTATION

1. The authorities recognise that the policies in this Plan are applied consistently across the plan area and used to inform local plan reviews. Whilst most of the actions required are the responsibility of or within the control of the authorities it is acknowledged that some rely on action from statutory agencies and delivery partners. These include: the Homes and Communities Agency, Highways England, Network Rail, Environment Agency, the Local Nature Partnership, infrastructure providers and the development industry. The West of England authorities through the Duty to Cooperate will continue to work with these organisations.

2. The West of England has a Strategic Solutions Panel comprising the key delivery agencies and has worked closely with neighbouring authorities in the production of the JSP. The JSP is supported by an evidence base on infrastructure delivery as set out in Topic Paper x.

3. The governance structure, within which joint working in the West of England operates, facilitates meeting the duty to co-operate. The four local authorities have a history of close joint working. Previously this was under the Planning Homes and Communities Board. There is now a formally constituted Joint Committee (Leaders/Mayor) and an Infrastructure Advisory Board (constituted of Cabinet Members and a business representative), to take a coordinated approach to Transport and Planning. These meetings are held in public as required to ensure transparency and accountability. The nature of the ongoing work to meet the duty to cooperate is set out in the duty to cooperate schedule which is reported to the Infrastructure Advisory Board.

Funding

4. The scale of the challenge means that delivering the JSP will require a multi-agency approach. The West of England Authorities recognise that our potential can only be achieved through collaborative working, and finding new ways and models of delivery such as compulsory purchase powers, in which we can secure the investment required to stimulate growth.

5. The JSP sets out our delivery priorities and seeks to influence decision making on investment (securing funding and directing that funding obtained) by internal and external decision makers.

6. In the West of England working closely with the Local Enterprise Partnership the four authorities operate a joined up approach to funding. This is a single pot which includes the revolving infrastructure fund, city deal funding and growth deal funding. In 2016, the three Authorities of Bath and North East Somerset, Bristol and South Gloucestershire agreed a devolution deal with Government and the West of England Combined Authority was established in 2017. As part of

devolution, Government devolved funds of some £900m investment (£30m per annum over 30 years) to the Combined Authority to assist in supporting priority infrastructure schemes. This includes schemes coming forward to support the JSP development locations.

7. Infrastructure delivery will be enabled through the most appropriate blend of funding and a range of funding mechanisms from the West of England and our partners. The principle of funding development is an equitable share of costs between the public and private sector.

8. Different sources of funding will be proactively sought and brought together. This enables a co-ordinated, targeted approach to investment, often with investment in infrastructure up front, to assist in 'unlocking' locations/sites in a timely and co-ordinated manner to achieve the most development potential. Where appropriate and necessary we will actively look to use Compulsory Purchase Powers (CPO) to undertake land assembly and to resolve barriers to the delivery of new homes, jobs and supporting infrastructure.

9. Positive planning in this way will support opportunities to accelerate sustainable growth. The JSP aims to direct investment to our shared strategic development locations, to seek alignment with other agencies capital investment programmes and to collaborate with the development industry, to assist in implementing the Plan.

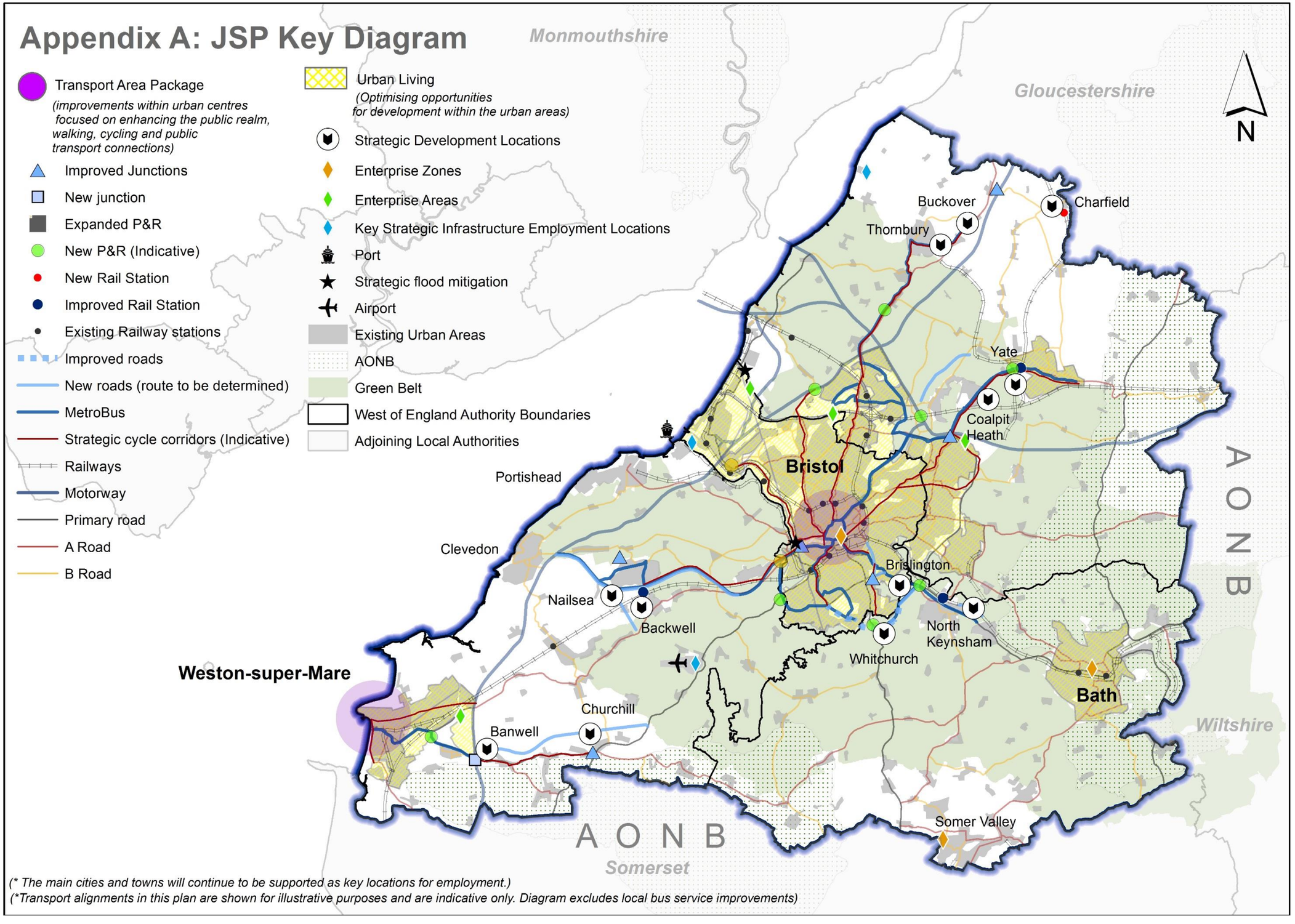
Monitoring

10. The preparation of the JSP has been informed by a supporting evidence base. The JSP will steer local plan reviews. Once adopted local plans will continue to be informed, monitored and reviewed so that they may respond to changing needs and circumstances.

11. Information on monitoring of the JSP is expected to be reported through joint or individual Council's Authority's Monitoring Reports.

12. Each authority will: -

- undertake a consistent and jointly agreed process of monitoring which will identify changes in stock, the contributions of different sources of supply, changes in housing requirements, and the provision of necessary infrastructure and services; and
- in considering the release of sites for housing through local plans, take account of progress in implementing the Plan's proposals across the Joint Spatial Plan area as a whole, including its neighbouring authorities.

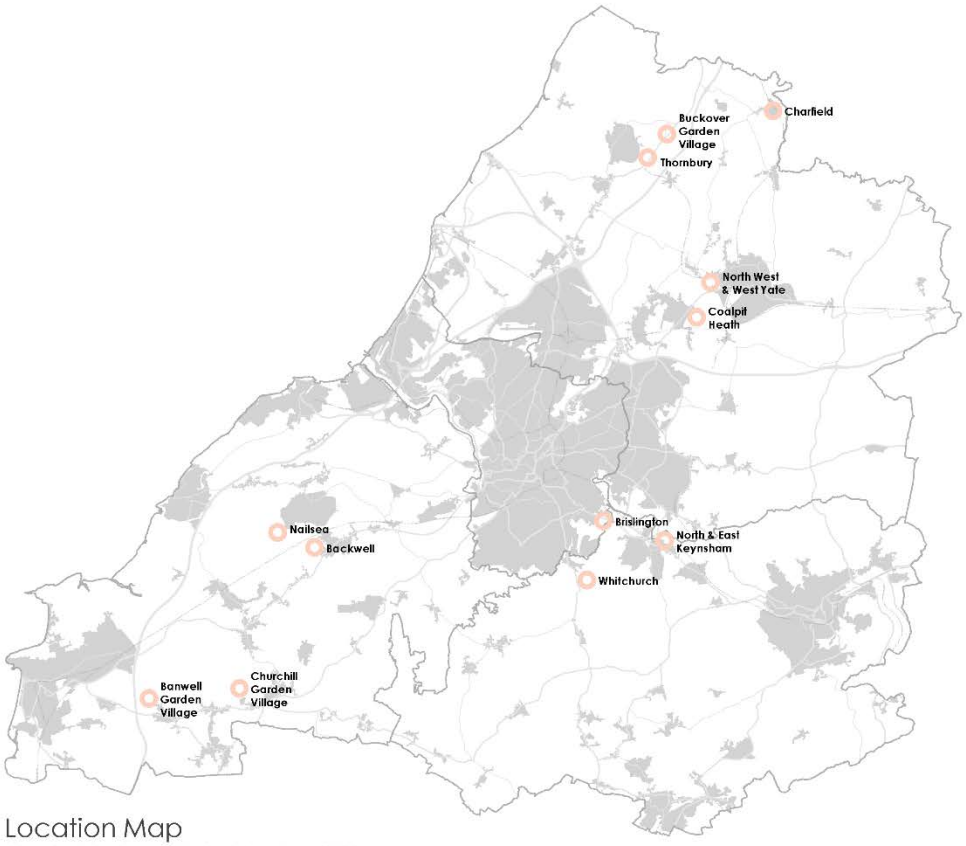

Appendix A: JSP Key Diagram
Transport Area Package
(improvements within urban centres focused on enhancing the public realm, walking, cycling and public transport connections)
Improved Junctions
New junction
Expanded P&R
New P&R (Indicative)
New Rail Station
Improved Rail Station
Existing Railway stations
Improved roads
New roads (route to be determined)
MetroBus
Strategic cycle corridors (Indicative)
Railways
Motorway
Primary road
A Road
B Road
Urban Living
(Optimising opportunities for development within the urban areas)
Strategic Development Locations
Enterprise Zones
Enterprise Areas
Key Strategic Infrastructure Employment Locations
Port
Strategic flood mitigation
Airport
Existing Urban Areas
AONB
Green Belt
West of England Authority Boundaries
Adjoining Local Authorities
Monmouthshire
Gloucestershire
N
Buckover
Charfield
Thornbury
Yate
Coalpit Heath
Bristol
Portishead
Clevedon
Nailsea
Backwell
Brislington
North Keynsham
Whitchurch
Bath
Weston-super-Mare
Churchill
Banwell
Somer Valley
AONB
Somerset
Wiltshire
AONB
(* The main cities and towns will continue to be supported as key locations for employment.)
(*Transport alignments in this plan are shown for illustrative purposes and are indicative only. Diagram excludes local bus service improvements)

Appendix B

West of England Joint Spatial Plan: Publication Draft

Strategic Development Location Templates

Date of issue: Papers for West of England Joint Committee - 30 October 2017



Location Map

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Strategic Development Location Templates

Introduction

This report documents the work carried out as part of the Joint Spatial Plan (JSP) to further refine the assessment of potential for development at the Strategic Development Locations (SDLs) identified in the previous draft of the JSP – *Towards an Emerging Spatial Strategy (TESS)* published in November 2016. The purpose of this phase of the work has been to more clearly establish the capacity and strategic development requirements at each strategic development location which has been used to inform JSP Policy 7.

The contents of this technical report are therefore intended to illustrate the possible extent of where development might take place (and where it might not). The diagrams presented are illustrative at this stage as further work is being undertaken by each UA through their respective Local Plans'.

Accessing prospects for delivery The previous iteration of the Joint Spatial Plan – *Towards an Emerging Spatial Strategy (TESS)* (Nov. 2016) included a range of potential Strategic Development Locations across the West of England and assigned a broad dwelling capacity to each. This work was supported by evidence published in the *'Assessment of Strategic Development Locations – Beyond Settlement Boundaries – Locational Dashboards*'. The templates presented in this document are a continuation of this earlier work.

For each of the proposed SDLs (listed in the table below), a template is provided which focusses on the delivery challenges and opportunities faced at each SDL and the approximate scale of development potential achievable.

SDL	Local Authority	Page
North Keynsham	Bath & North East Somerset	3-10
Whitchurch	Bath & North East Somerset	11-16
Brislington	Bristol City Council	17-22
Backwell	North Somerset	23-30
Nailsea	North Somerset	31-40
Churchill Garden Village	North Somerset	41-50
Banwell Garden Village	North Somerset	51-59
Buckover Garden Village	South Gloucestershire	60-65
Charfield	South Gloucestershire	66-71
Coalpit Heath	South Gloucestershire	72-77
North West & West Yate	South Gloucestershire	78-84
Thornbury	South Gloucestershire	85-90

For each SDL the following information is provided:

- **Location characteristics:** *Site location, approximate size, relevant planning history and designations, current land use.*
- **Suitability (constraints and opportunities):** *Strategic opportunity, site characteristics, physical & environmental constraints, existing development schemes, opportunities.*
- **Landuses, capacity, availability & viability:** *Mix of uses, employment, housing typology / density, housing capacity, availability, viability.*
- **Draft policy expectations for the location:** *Vision, housing capacity (types, typology & affordable housing) and other land-uses, access, Green infrastructure, infrastructure requirements***.** Draft policy expectations identified in this section are further articulated through relevant policies in the JSP (particularly policies 4 and 7).
- **Barriers to delivery / critical interventions:** *Identified risks to suitability availability & achievability, actions needed to reduce risks.*
- **An indicative housing trajectory:** Outlining indicative lead in times, start dates, build-out rates, and the number of developers (outlets) anticipated.

- **A concept diagram:** Which provides the broad location or area of search for growth in each SLD. It is important to note that the options for development of the SDLs, including the areas identified in the diagrams, are indicative and of the more precise allocations to be made in Local Plans will depend on further work to be undertaken.

Due to the scale of these strategic developments and the inherent long term nature of their planning and development, at this stage only key infrastructure requirements are identified as the exact requirements for each development and how these might correspond to a land use requirement are not yet known. Further evidence gathering and testing will be required to support their implementation and will be informed by further detailed land allocation, master planning and policy formulation, undertaken through local authorities' respective Local Plan processes.

Further technical information relating to the templates is provided within the supporting methodology paper.

Strategic Development Location – North Keynsham
Bath and North East Somerset

Date of Issue: October 2017

Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location**

The area lies to the north-east of Keynsham, between the town and the River Avon. The majority of the area lies between the river and the Great Western Main Line with a smaller section between the railway and the A4. It also includes the land south of the A4 which is safeguarded for development through B&NES Core Strategy.

1.2 **Size**

Approx: 150ha(Gross) and 70ha developable area.
Safeguarded land: 12 ha

1.3 **Relevant planning status and designations**

The area sits within the Green Belt.
North of the Wessex Water site is a former landfill site which has been allocated in the West of England Joint Waste Core Strategy for a residual waste facility.
Land around World's End Lane is allocated in the B&NES Local Plan as a Strategic Site for employment (30,000sqm of B1 and B2).
Land south of the A4 has been allocated for residential development and granted outline planning consent for 250 dwellings. Further land adjacent the allocated sites has been safeguarded for additional development of approximately 250 dwellings.

1.4 **Current land use**

Mixed including agricultural, industrial, utility, leisure, private riverside park with some residential moorings.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

The Emerging Strategy consultation identified North Keynsham as accommodating up to a further 1100 dwellings in the plan period (to 2036). However, further work indicates around 1,250 dwellings can be accommodated. Together with the safeguarded land capacity of 250 dwellings, a total of 1,500 dwellings can be accommodated in this location.

2.2 Site characteristics.

The area is largely characterised by open, flat arable and pasture fields of varied sizes around a mix of industrial, agricultural and residential buildings accessed by narrow lanes. Field boundaries and lanes are marked by strong hedge and treelines with stronger boundaries along the riverside and railway. Broadmead Brook runs south-north close to Broadmead Lane before heading east and discharging into the river

2.3 Physical & Environmental constraints.

Access: Access to the area is significantly constrained by the railway, the River Avon and by associated capacity constraints on the A4 and connecting roads. Existing lanes through the site are narrow and have constrained crossings at the railway. At present there are three vehicle access points: at the far western end via Keynsham Road or Avon Mill Lane, providing access to the town centre and railway station; in west via the Broadmead Lane underbridge; and in the east via the Pixash Lane overbridge (Heritage Listed, constraining opportunity to improve capacity). There are additional minor links at Unity Road (connecting the DS Smith site, under the A4, towards Bath Road) and east of World's End Lane.

A series of Public Rights of Way run through the eastern end of the site and provide access towards the long distance routes provided by the River Avon Trail, Monarch's Way and the Bristol and Bath Railway Path (NCN4), which provides opportunity to connect towards Bath. There is currently no direct pedestrian/ cycle route from the area across the river.

At present there is no public transport connectivity to the area with the nearest services running along the A4 and Keynsham Road. While the site is close to Keynsham Station, pedestrian and cycle access is poor and indirect.

Ecology: Stidham Farm Site of Special Scientific Interest (SSSI) is located to the east of the area and currently managed as an arable field. There are three Sites of Nature Conservation Interest on site: Stidham Farm SNCI, Broad Mead Field SNCI in the centre (designated for its marshy grassland and botanical interest), and the River Chew SNCI (designated for its running water and associated marginal habitats, including protected fauna, which use the site in part as a wildlife corridor). The River Avon SNCI runs adjacent to the northern site boundary and is designated for its running water and associated marginal habitats, including protected fauna, botanical and invertebrate interest.

Landscape: The area contains a number of character areas with woodland at the western end, around the DS Smith site and open fields in the centre and east. The main (northern) area of the area has a relatively open and tranquil character due to its physical and visual separation from the built settlement of Keynsham and the mid to long distance views of the Cotswolds. At the eastern end, the railway lies in a cutting and provides less visual severance. South of the railway, the land is urban fringe in nature, merging into open countryside. Landscape is sensitive and has limited capacity to accommodate new development, particularly at the eastern end. Buffer planting and/or setbacks will be required along these edges.

Green Belt: The area is located within the Bristol-Bath gap, an area in which Green Belt land generally contributes to some extent to the prevention of merger between Bristol, Keynsham and Bath.

Archaeolgy and Heritage: The site includes a small number of listed buildings around Avon Mill Lane, two Listed bridges (Pixash Lane and pedestrian bridge to the east) and a number of heritage sites with HER records, notably some Roman finds at Avon Valley Park. There are a small number of buildings with notable character at Broadmead Lane Industrial Estate and Avon Valley Farm.

Flood Risk: Primarily within Flood Zone 1. However the northern area of the peninsula including Broadmead Lane Industrial Estate, a corridor along the River Avon and the access from Avon Mill Lane / Keynsham Road are located Flood Zone 2 and 3 and may be affected by climate change.

Utilities: The site is highly constrained by the presence of the Wessex Water sewage treatment works at Broadmead Lane. Anecdotal evidence suggests that the site has odour nuisance issues which could limit it's attractiveness for more sensitive development such as residential. Wessex Water odour risk assessment would be triggered within a 400m consultation zone around the works site.
The site is crossed by a number of utilities, most notable is the gas pipeline (Feeder 14) which passes south-west to north-east at the eastern end of the type. The pipeline was not constructed to allow new roads above so would require upgrading or diverting if it were crossed. A National Grid easement of 10m exists either side with further HSE consultation zones around the alignment (inner zone: 40m, middle zone: 125m, outer zone: 155m).

A sludge pumping main crosses east-west through the centre of the site towards the Wessex Water site with a second route running north from the works.
The western end of the site is crossed by a number of high- and low-voltage Western Power lines. Many of these routes would require easement or diversion to facilitate development.
Proximity to active industrial sites: potential environmental health concerns, strong impact on views from and to the site and likely poor frontage along proposed North Keynsham Link Road route.

Ground Conditions: The site gently slopes down towards the River Avon with a more prominent slope at the eastern end close to the railway path.
The site includes some areas of artificial ground and historic landfill. This and the existing industrial uses could pose contamination issues for development.
The ground conditions are generally not expected to pose constraints for foundations however further investigation would be required.

2.4 Existing development schemes

Land south of the A4 has been allocated for residential development and granted outline planning consent for 250 dwellings.

2.5 Opportunities

- Upgrade the riverside area and link into the marina proposals, to provide an enhanced public experience alongside ecological improvements.
- Frontage and outlook onto the River Avon, providing a high-quality living and recreation environment. Strong opportunity around a new marina for high-density residential development.
- Provide a strong neighbourhood centre to act as a focus to the site, serving residents and employees. Opportunity to cluster retail, service and education uses around key open space and marina frontage.
- Opportunity to create strategic pedestrian and cycle connections to Keynsham town centre and railway station and the local schools. Connections across the river towards the long distance walks should be explored.
- Consider realignment of the proposed North Keynsham Link Road. Appropriate street environment to be used to provide traffic calming.
- Create green corridors between the riverside area and the railway corridor, providing a range of ecological, connection and recreation opportunities and accommodating surface water attenuation.
- Opportunity to provide a new, enhanced facilities at the Avon Valley Park to cater for an increased number of visitors with a wider range of attractions.
- Development provides the opportunity to improve the functionality of the floodplain and ease flows in connecting watercourses.

3.0 Landuses, capacity, availability & viability

3.1 Mix of uses

Housing, marina with residential moorings, employment (industrial), waste facilities, local centre with shops, primary care and community facilities, leisure facilities and open space.

3.2 Employment (type/ha)

Employment development around main access road: 14ha (55,000sqm floorspace)

3.3 Housing typology / density.

The development should support a high-quality mix of housing typologies and tenures to develop a sustainable community which compliments the existing settlement.
High-density apartments to give a strong frontage around the marina, mix of mid-density houses and apartments over the centre of the site and lower density family housing at the eastern edges where the visual impact will be greatest.
An assumption has been made that higher density units would be provided over 3-4 storeys giving strong frontages and higher densities around public open spaces and the main road. Development over the rest of the site is more appropriate at 2-3 storeys.
Around the edges, development should respond to the potential for attractive views towards the riverside and provide appropriate surveillance of public areas whilst minimising visual impact.
The site has potential as a location for custom-build or self-build housing with plots set aside for these alternative delivery mechanisms. This could help establish a strong and unique identity for the site.

3.4 Capacity

About 1500 units comprised 30 - 35% AH (34ha + 12ha), a full range of types and sizes.

3.5 Availability

Call for Sites: 2 representations Pegasus (Edward Ware) and JLL(Avon Valley Adventure & Wildlife Park, John Douglas Estates, The Bendall Family and 3C Commercial).
Multiple ownership

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

Refer to Appedix 1 Concept Diagram

5.0 Draft policy expectations for location

5.1 Vision

To create a new sustainable urban neighbourhood with increased access to the River Avon and connecting Keynsham to strategic walking and cycle routes.

This will be a lively, safe, sustainable and healthy place which reinforces the distinctive character of Keynsham, improves connectivity, enhances our understanding and respect of nature and creates spaces around which a new community can start to form.

The community will thrive and develop within a well-integrated and multifunctional green infrastructure network of new wetland features, restored floodplain meadows and new woodland.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most. The existing network of walking and cycle routes will be extended, public transport will be

significantly improved, and a new multi modal link road connecting Avon Mill Lane to the A4 will be constructed at an early stage in the development.

5.2 Housing capacity (types, typology & affordable housing) and other land uses.

About 1550 units comprised 30 - 35% AH (34ha + 12ha), a full range of types and sizes including marina providing residential and leisure moorings
Employment development around main access road: 14ha (55,000sqm floorspace)
New waste and recycling site (4ha)
New local centre (0.5ha) potentially including shops, primary care, community/ recreational facilities
Primary School (1.2ha)

5.3 Appearance

New marina providing residential and leisure moroings. High density housing fronting marina and riverside, maximising development along valuable views and provide strong surveillance.

5.4 Access

North Keynsham Link Road alignment through centre of site from Avon Mill Lane to A4 with new roundabout.
Pedestrian and cycle connections across the River Avon. Improved pedestrian and cycle connections to Keynsham railway station.
Existing vehicle routes downgraded to pedestrian and cycle only links.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

Green spines through residential areas providing surface water attenuation though SUDS. Public access to riverside area with ecological landscape and public realm improvements and increased leisure amenity. Links to the East Keynsham Strategic Allocation and community woodland. Extensive buffer planting around edges of site to mitigate the visual impact of development.

5.6 Infrastructure requirements (health, education, utilities) etc

A new primary school, new primary care facility, recreation facilities potentially including sports pitches, open space, new marina, neighbourhood centre

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Delivery of strategic transportation improvements including the North Keynsham Link Road and the link road between A4 and A37.
- Poor access to the site using existing routes and congestion on connections to the A4. Improvements would require new bridge access and new road provision at a cost to the project.
- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.
- Proximity to active industrial sites; potential environmental health concerns.
- Existing infrastructure considerably constrains the layout of the site unless relocated which will have an associated cost to the project.

6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Consideration / review of developer contributions strategy.
- Keynsham wide access and movement strategy required.

- Early engagement with local school academy / options assessment required.
- Land ownership and legal check (see trajectory below).

7.0 Indicative trajectory

7.1 Trajectory assumed lead in time of 11 yrs, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-200pa. Slow build out to allow new community to form.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
N Keynsham	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	**100**	**150**	**200**	**200**	**200**	**150**	**200**	**150**	**1,400**

Post 2036	Total Capacity
100	**1,500**

8.0 Appendix 1 Concept Diagram

Strategic Development Location – Whitchurch
Bath and North East Somerset

Date of Issue: October 2017

Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Land South East of Bristol, Whitchurch

1.2 **Size**
Approx. 120ha (Gross), 68 Ha Developable Area (approx.)

1.3 **Relevant planning status and designations**

- The area is within the Green Belt.
- The area is part of the setting of Maes Knoll and the setting of the Queen Charlton Conservation Area
- Land east of Whitchurch is allocated for 200 dwellings in the B&NES Local Plan as a Strategic Site. Of which 100 dwellings has been granted. (16/02055/FUL)

1.4 **Current land use**
Primarily agricultural land.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity
Assessments indicate capacity for around 2,500 dwellings in total, with 1,600 dwellings developed within the plan period.

2.2 Site characteristics.

This area lies to the south east of the village of Whitchurch. The land is mainly untended grassland with pasture and grazing land and areas of recreational land. To the south and east lie areas of open countryside with small clusters of dwellings along the lanes. Maes Knoll, an ancient hilltop fort, forms a significant landmark to the south west and its setting is very important.

2.3 Physical & Environmental constraints.

Access: The A37 provides a direct link to Bristol city centre. There are a number of narrow lanes with radiate out through the surrounding countryside. In terms of wider connections, Whitchurch Lane gives a link to the A4174 which provides access to the western parts of the city centre, on to the A4 and M5. Keynsham is accessed via Woolard Lane and Charlton Road.

Ecology: Adjacent to Sturminster Road and Stockwood Open SNCI.

Landscape: The site relates to parts of two landscape character areas: Stockwood Vale to the north east, and Dundry Plateau broadly to the west. Stockwood Vale is a particularly sensitive landscape character area, as is the setting of Maes Knoll. The landscape buffer between the southern Bristol suburbs and the village of Whitchurch ensures the physical and visual separation of the village from the Bristol urban area.

Heritage: Listed Buildings (including Lyons Court Farmhouse and St Nicholas Church). The site forms part of the setting of Queen Charlton Conservation Area and Maes Knoll Scheduled Ancient Monument and Wansdyke Scheduled Ancient Monument.

Flood Risk: The area around the village lies almost entirely within FZ1. A small area of fluvial FZ2 flows a tributary of Brislington Brook that flows between Whitchurch Park

and Stockwood. There are already significant existing surface water flooding issues in the adjoining urban areas of Dundry and Whitchurch. Any development upstream of these areas should ideally take the opportunity to reduce flood risk and as a minimum must not increase flood risk or create any new flood risk areas.

Utilities: The site contains a strategic gas pipe that needs to be taken into account when masterplanning the development site. New water mains and other infrastructure requirements will be met as part of the site development costs.

Ground Conditions: The ground conditions are generally not expected to pose constraints for foundations however further investigation would be required.

2.4 Existing development schemes

No existing development schemes apart from the land east of Whitchurch allocated for 200 dwellings in the B&NES Local Plan as a Strategic Site.

2.5 Opportunities

To encourage active travel and to reduce car dependency, there are important opportunities to enhance existing and to provide new sustainable transport routes, particularly into central Bristol and to Keynsham.

Green infrastructure opportunities should seek to optimise the setting of both Maes Knoll and Queen Charlton Conservation Area, enhance the potential of Stockwood Vale as an important green infrastructure asset for the wider community, and seek to safeguard the open green fields that separate Whitchurch village from Bristol.

3.0 Landuses, capacity, availability & viability

3.1 Mix of uses – housing led mixed use development

New community Including residential (2,500 dwellings), employment, new local centre, two new primary schools, a secondary school, Park and Ride and new green infrastructure

3.2 Employment (type/ha)

To be determined though the local plan process.

3.3 Housing typology / density.

Urban extension. Rage of densities to create variety and character responding to the local environment. Significant green infrastructure,and designed to encourage active travel. (68 ha, 2,500 dwellings max, at average 40dph)

3.4 Capacity

Predominately at 40 dph, with some lower density development in more sensitive locations, the area (would provide approximately 2,500 dwellings).

3.5 Availability

Multiple ownership, with some larger landowners and developer partnerships emerging.

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 Vision

The new development to the south east of Bristol will be an exemplary and inspirational place; a high quality, people centred environment that feels safe, sociable and attractive for all. The design of the new development will respond positively to its sensitive and important environmental, landscape and historic context, and will be at least zero carbon.

It will be a residential led community, and will include local centres, two new primary schools and a secondary school, new health and community facilities, a variety of employment workspaces, all integrated with new parks, open space and green infrastructure.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most trips. The existing network of walking and cycle routes will be extended, public transport will be significantly improved.

5.2 Housing capacity (types, typology & affordable housing) and other land uses.

2,500 dwellings Affordable Housing 35%

5.3 Appearance

The development of a contemporary, inspirational and recognisable place, that helps to create positive relationships with the built and natural environments and with neighbouring communities.

5.4 Access

Contribution to strategic transport package including: the link between the A4 and A37, from the A37 to South Bristol Link Road, and the construction of a new Park and Ride. Developer investment is required in highway, foot and cycle connections.

Enhancements are required to be made to existing cycle routes into Bristol and to the south, and the implementation of new cycles routes to improve connectivity with Keynsham, particularly the town centre and railway station.

Strong encouragement to walking, cycling and public transport use.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

Contributing to and reinforcing a comprehensive green infrastructure network and implementing opportunities for enhancing biodiversity.

5.6 Infrastructure requirements (health, education, utilities) etc

The new development will provide 2 new primary schools, a secondary school, Park and Ride, health and community facilities.

5.7 **Energy/heat**

New development will aim to maximise the range of sustainability measures, e.g. including micro renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. District heating networks will also be investigated.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 **Identified risks to suitability, availability and achievability.**

The critical risks are:

- Critical risk is the delivery of strategic transportation link between the A4 and A37. The location has the potential to be well linked to Bristol city centre by bus, and to Keynsham town centre by cycling.
- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.

6.2 **Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Early prioritisation, identification of funding and infrastructure delivery is required.
- Early engagement around viability modelling.
- Early consideration of utility strategy.

7.0 Indicative trajectory

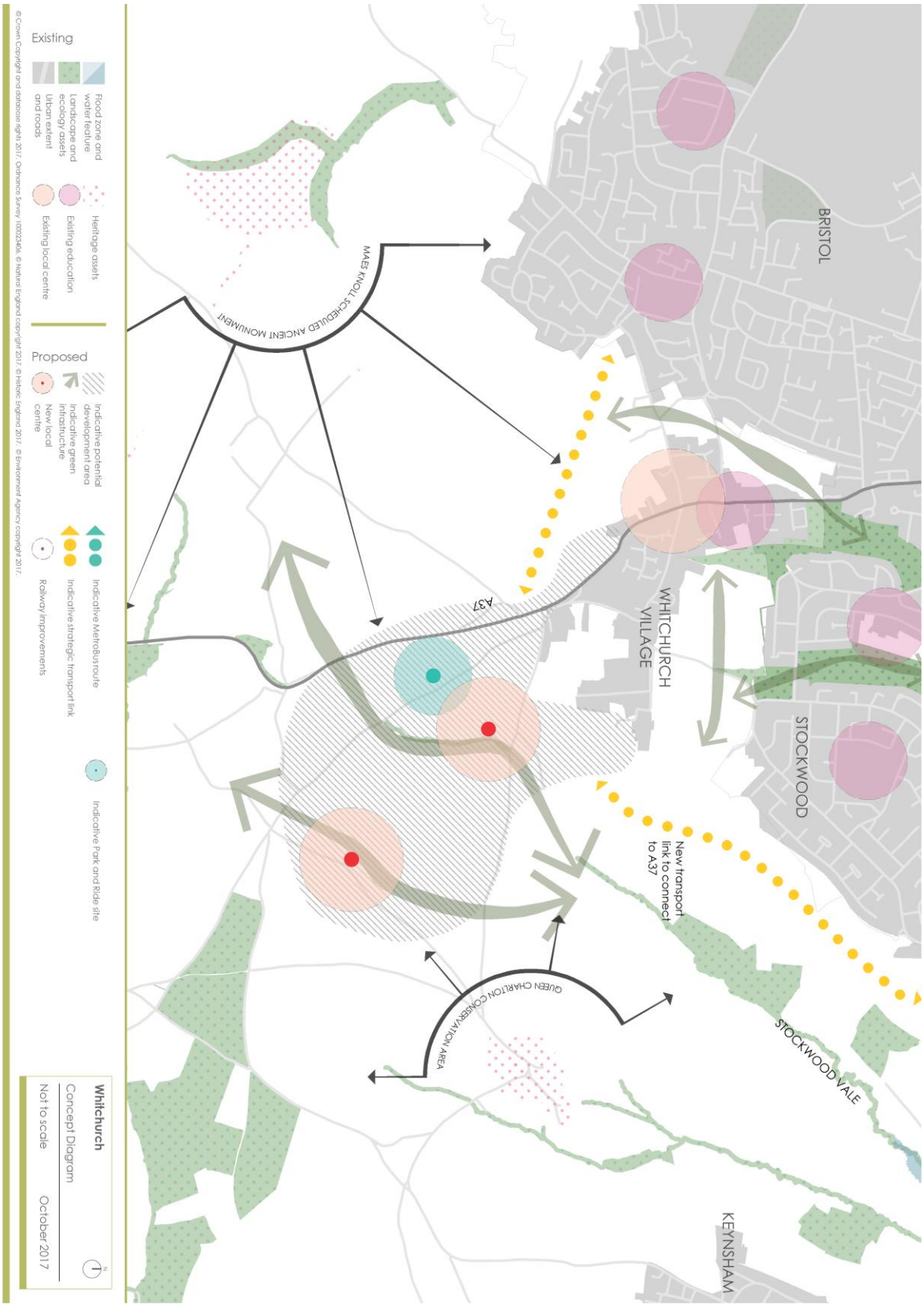
7.1 Trajectory assumed lead in time of 13 yrs, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-300pa. Slow build out to allow new community to form.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Whitchurch	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
0	**0**	50	150	250	250	300	300	300	1,600

Post 2036	Total Capacity
900	**2,500**

Appendix 1 Concept Diagram



Strategic Delivery Location – Brislington, Bristol

Date of Issue: October 2017

Location Map

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1.0 Location characteristics

1.1 Site Location (address)

Brislington Park and Ride and land at Bath Road, Brislington, Bristol

1.2 Size

Approx. 27ha.

1.3 Relevant planning status and designations

Policy BCS5 of the adopted Local Plan identified the use of some Green Belt land in southeast Bristol as a long-term contingency for an urban extension. The broad location of this land was indicated on the Key Diagram and the capacity was not expected to exceed 800 homes. Green Belt, two Minerals Safeguarding Areas, Coal Resource Area, Brislington Park and Ride Expansion - Safeguarded Park and Ride Sites.

1.4 Current land use

Agricultural, Park and Ride, Garden Centre

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

Brislington Strategic Development Location has been identified as capable of accommodating at least 750 dwellings in the plan period (to 2036).

Land at Brislington provides an opportunity for the creation of a new neighbourhood in Bristol with good links to the city centre and the countryside beyond Bristol's boundaries. It is dependent on, and would support the delivery of key transport infrastructure: Callington Road Link / A4 Rapid Transit Scheme; and the relocation of the Brislington Park and Ride to a more optimal location close to the Hicks Gate Roundabout.

2.2 Site characteristics

The site comprises Brislington Park and Ride, agricultural fields and Keynsham Garden Centre on the eastern edge of Bristol, south of the Bath Road (A4). The land slopes gently downwards from northwest to southeast continuing into Bath and North East Somerset, where it then slopes up more steeply to the ridge at Stockwood Lane.

2.3 Physical & Environmental constraints

Access: From the A4, ideally utilising existing Park and Ride Access.

Landscape & Heritage: Loss of Green Belt has the potential to impact on valued countryside and the historic landscape, including the network of hedgerows and woodland pockets on the edge of the city and the rural character of Stockwood Lane.

Pylons: Pylons run southeast-northwest across the site.

Ecology: Much of the site is a Wildlife Corridor. Hedgerows traverse the site. There are records of legally protected species in the vicinity.

Coal Resources: There is a potential requirement for extraction of surface coal resources in the area.

Land contamination: Potential for contamination from infilled quarry and landfill site to the south on Stockwood Lane.

Flood Risk: There is a low risk of flooding from Scotland Bottom Watercourse. Surface water drainage: Mitigating / managing surface water runoff may present significant constraint as Scotland Bottom watercourse has existing flood risk issues upstream and downstream of the site.

2.4 Existing development schemes

No existing development schemes exist for the site.

2.5 Opportunities

The land is constrained by Green Belt designation and existing Park and Ride on the site. Otherwise the site is relatively unconstrained land which has been promoted by the landowners. Development provides an opportunity to create a high quality new neighbourhood to the southeast of Bristol benefiting from close proximity to existing services, facilities and communities within Bristol, with good connections to the city centre.

3.0 Landuses, capacity, availability & viability

3.1 Mix of uses – housing led

Housing (at least 750 dwellings) and open space with further mix of uses to be provided following a detailed master-planning process. The provision of a local centre should be considered.

3.2 Housing typology / density

Broad range of housing types from 2-5 storeys to create variety and character within the new neighbourhood.

3.3 Capacity

At least 750 dwellings.

3.4 Availability

The land is owned by several landowners and the development of the site has been actively promoted in the Call for Sites. Relocation of Brislington Park and Ride to a site within Bath and North East Somerset is required to enable development.

3.5 Viability

Initial modelling shows the site to be viable, although alternative funding sources will be required to deliver transport infrastructure and the relocation of the Park and Ride site.

4.0 Concept Diagram

See Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 Vision

A new neighbourhood that will provide an attractive, high quality, well-functioning place with good connections to central Bristol, the wider city and the countryside beyond Bristol's boundaries. The development will be designed to promote safety, accessibility and permeability.

5.2 Housing capacity (types, typology & affordable housing) and other landuses.
It will provide at least 750 dwellings, comprised 35% affordable housing with a full range of types, sizes and tenures.

5.3 Appearance
Deliver high quality urban design, creating a strong sense of place, responding to the landscape features of the area.

5.4 Access
Contribution to strategic transport packages including: Callington Road Link / A4 Rapid Transit Scheme; A4 – A37 link; widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths with links across Bath Road. Developer contributions required for the removal of traffic from Scotland Lane to create a pedestrian and cyclist only greenway and to extend and improve cycle routes to Bristol, Keynsham, and to the countryside to the south.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)
The development must retain and incorporate the network of hedgerows into development, including the hedgerows along Scotland Lane. It should provide a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse, the protection and enhancement of nature conservation and the provision walking and cycling routes. It should also provide a Sustainable Drainage Systems (SuDS) strategy to include surface water runoff management measures to address existing issues on the Scotland Bottom Water Course and Scotland Lane.

5.6 Infrastructure requirements (health, education, utilities), etc.
The development will be subject to financial contributions to the provision of primary school places off-site. Other infrastructure requirements will be determined by the masterplan. No infrastructure constraints have been currently identified.

5.7 Energy/heat
The new neighbourhood will aim to be zero carbon standard or produce more renewable energy than it uses.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability
Development of the site is dependent on the:

- Delivery of strategic transportation improvements in advance of development, including:
  - Relocation of Brislington Park & Ride to land near Hicks Gate Roundabout within Bath and North East Somerset;
  - Callington Road Link / A4 Rapid Transit Scheme;
  - Widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound, and an adjacent strategic greenway providing walking and cycling paths;
- Site assembly.

6.2 Actions needed to reduce risks

- Prior relocation of Brislington Park and Ride to land near Hicks Gate Roundabout within Bath ad North East Somerset;
- Early prioritisation of transportation infrastructure.

7.0 Indicative trajectory

7.1 Trajectory

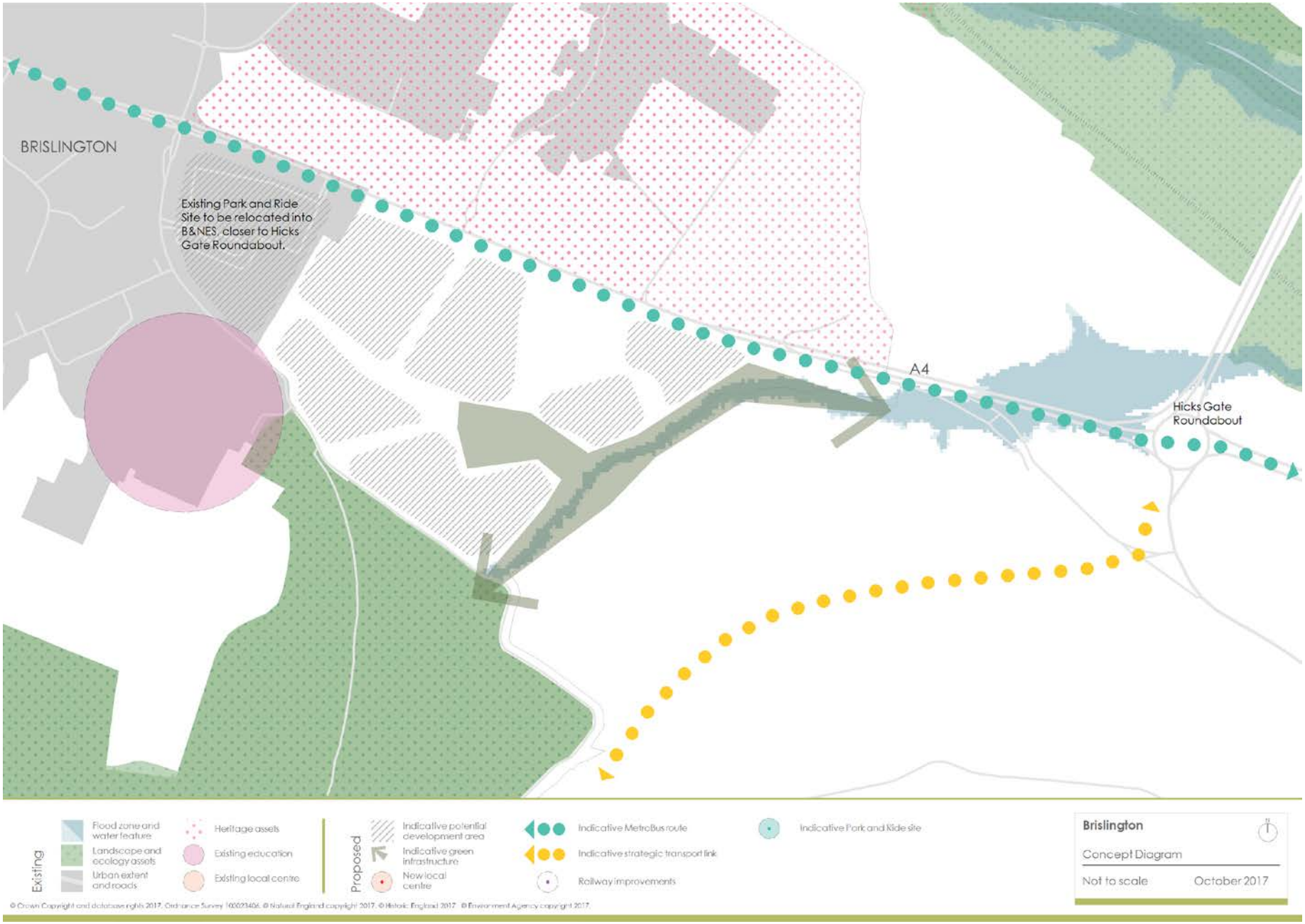
Assumed start date of 2031/32, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 150 per year.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Brislington	0	0	0	0	0	0	0	0	0	0	0

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within plan period
0	0	0	0	150	150	150	150	150	750

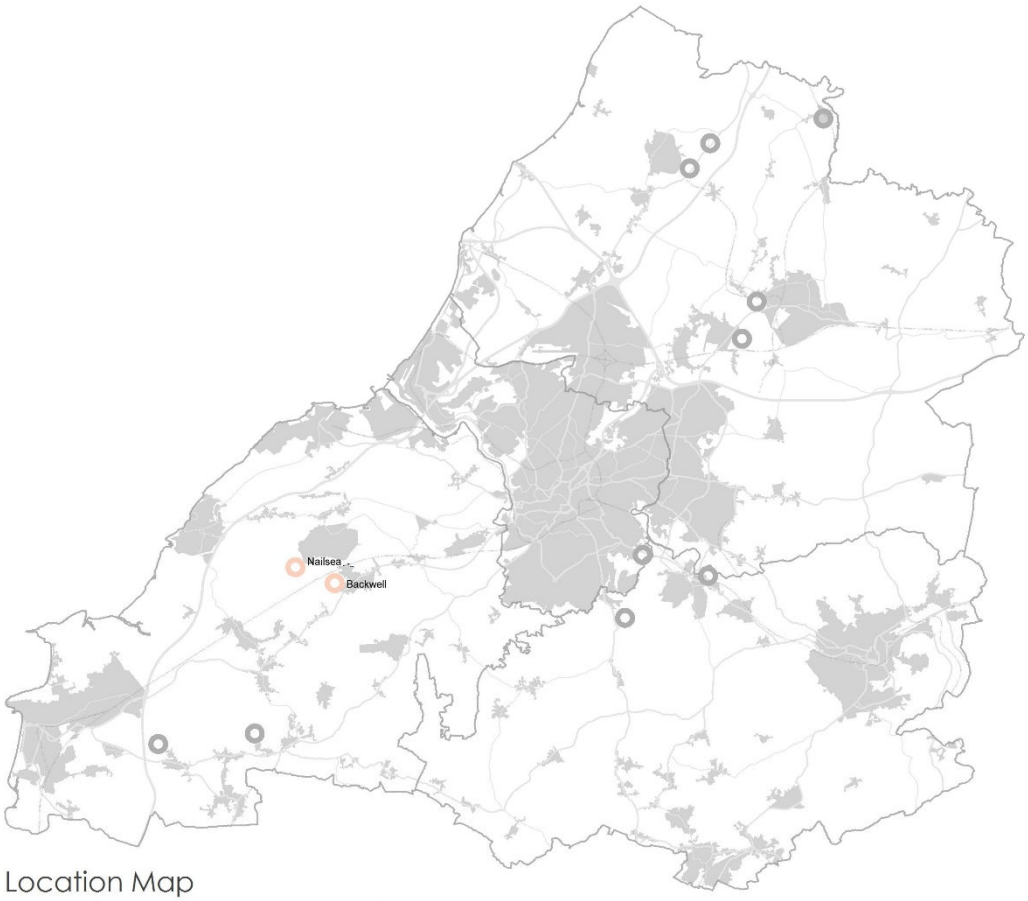
Post 2036	Total Capacity
0	**750**

Appendix 1 – Concept Diagram



Strategic Development Location – Backwell
North Somerset

Date of Issue: October 2017



Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 Site Location

Land to the west of Backwell.

1.2 Size

Approx. 30ha (gross), 18ha net residential area.

1.3 Relevant planning status and designations

- Backwell has an adopted Neighbourhood Plan
- Green Belt to the south of Chelvey Lane (not within area of search)

1.4 Current land use

Predominantly agricultural.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified Backwell as accommodating up to a further 800 dwellings in the plan period to 2036. The potential identified through this assessment is revised to 700.

2.2 Site characteristics

The site predominantly comprises agricultural fields. The area is undulating with higher ground to the east of Grove Farm. Hedgerows and watercourses are extensive across the area reinforcing the rural character of the area. The open aspect immediately to the south west of the village is considered an important feature supporting the West Town Conservation Area and should inform the design and layout of development on this edge. The area to the southwest of the village is also a critical area for horseshoe bat foraging.

2.3 Physical & Environmental constraints

Heritage: Listed Buildings including The Grove to the west of Backwell and the West Town Conservation Area have the potential to be impacted as a result of new development. However careful design can address this issue. Grove Farm lies just on the periphery of the proposed development area and could be set within an open space to retain its character and identity.

Setting of West Town Conservation Area likely to affect development potential immediately to the north. Further investigation required on the setting of importance and the relationship to new development, including the potential to maintain open space on field parcels north of the Conservation Area.

Archaeology: This area is poorly understood archaeologically, but there is the potential for coal mining heritage to exist in the northeast of this area.

Ecology: The area is used by horseshoe bats for foraging and commuting and a particularly sensitive foraging area is identified to the southwest of the area including the field parcels at the junction between West Town Rd and Chelvey Rd[1]. This may lead to specific requirements associated with the new development. The suggestion above associated with heritage may provide some safeguarding of the habitat by retaining a margin of open space.

Opportunities to improve ecological linkages between habitats west of Backwell including woodland at Backwell Hill to habitats in the Nailsea SDL should be explored.

The new strategic highway link from the Nailsea SDL to the west of Backwell is likely to interact with this sensitive foraging area at some point so consultation with Natural England will be required and suitable measures taken to address.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

Landscape: The development area sits on higher land and falls into the J5: Land Yeo and Kenn Rolling Valley Farmland Landscape Character Area of moderate character in good condition.

Flood risk: Area of search located in flood zone 1. There are areas of flood risk to the northwest of the area close to the railway. Whilst the potential development area is identified outside of the fluvial/tidal flood risk areas, the volume of surface water run-off has the potential to cause problems elsewhere particularly on lower lying ground. In places, water in these areas drains away slowly and the water table is high with potential for inundation. Further work is therefore required to understand the flood risk issues associated with development and supporting infrastructure, notably roads, and to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage systems, and more strategic solutions to enable the local environment to more effectively manage and provide long-term storage of surface water.

2.4 Existing development schemes

Land at Moor Lane is a proposed residential allocation for 65 units.

2.5 Opportunity

Backwell is a village in North Somerset located close to Nailsea, and is located on the main railway corridor and the A370. The village is therefore on the main transport corridor to both Bristol and WSM although improvements would be required to facilitate sustainable development. The area to the west of Backwell offers an opportunity to create a new extension to the village but would require

[1] This area is designated as a bat Juvenile Sustenance Zone, see guidance: http://www.somerset.gov.uk/policies-and-plans/plans/habitat-regulations/

transport mitigation to avoid further impact upon the Backwell signals junction. A new link road from the A370 west of Backwell would provide a connection to the new Nailsea SDL, connecting to an improved rail and transport interchange, and alleviating Station Road.

3.0 Land uses, capacity, availability & viability

3.1 Mix of uses

At this stage mix of uses is proposed to include residential, potential for small-scale retail, employment and open space. Areas for surface water storage are also envisaged but these could be provided off/near-site.

3.2 Employment (type/ha)

Employment provision and location to be addressed through the local planning process. Assumptions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

Likely to be beneficial to consider employment provision in tandem with the Nailsea SDL including potential to provide a new business site well connected to Nailsea and Backwell station and the new MetroBus route. Initial capacity of 10.5ha across both areas to test further through local planning process.

3.3 Housing typology / density

Medium density village extension. Average 40dph. A relatively higher site coverage is assumed taking into account the size of the potential development area and corresponding reduced requirement for non-residential land uses.

The density selected across the development should respect the existing village character and the rural setting present, particularly taking into account the need to safeguard heritage features, including Grove Farm and West Town Conservation Area.

3.4 Capacity

About 700 units.

3.5 Availability

Development being promoted by a single developer. Additional land likely to be required to deliver strategic transport mitigations.

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

5.0 Draft policy expectations for location

5.1 Vision

- Opportunity to create an extension of the existing settlement on its western edge, and extend out towards Grove Farm. Development is discouraged beyond Grove Farm to protect the separate identity of Backwell, to prevent coalescence with Chelvey, and to safeguard the setting of the West Town Conservation Area.

- Development is discouraged immediately adjacent to the West End Conservation Area to maintain the open aspect around it that contributes to its character and appearance.

5.2 Housing capacity and other land uses

- About 700 units of a range of types and sizes including affordable provision.
- A primary school on 2ha site. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- Expansion of existing secondary school.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Consider employment provision in association with the Nailsea SDL, in particular scope to provide a new business site well connected to Nailsea station.
- Community uses, to be identified and integrated through masterplanning.

5.3 Transport

- The development will contribute to a strategic transport package including a new link to the west of Backwell connecting the A370 to the new strategic highway associated with the Nailsea SDL. Improvements required to Nailsea and Backwell station, MetroBus provision and other local network improvements.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

5.4 Green infrastructure

- The approach to green infrastructure should seek to support the rural character of the area for example by creating 'soft' edges to the development blending well into the surrounding countryside and safeguarding heritage features. Multiple roles should be explored for GI including in relation to ecology, recreation, leisure, sustainable drainage and heritage

- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites.

5.5 Infrastructure requirements

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery - critical interventions

6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Delivery of strategic **transportation** improvements, to facilitate development, including programming and land assembly.
- Drainage constraints.
- Ecological/ biodiversity impacts.

6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.

- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues and mitigation, including on the North Somerset and Mendip Bats SAC to be addressed at the strategic scale across the Backwell and Nailsea SDLs. Particular attention required for nearby sensitive foraging habitat.

7.0 Indicative trajectory

7.1 Indicative lead-in time to initial completions assumed as 11 years, to allow for strategic transportation measures to be funded and programmed. Indicative build-out rate 50-100 dpa, with development completing within JSP plan period. Average annual build rate of 88 dwellings estimated with peak years of 100 units.

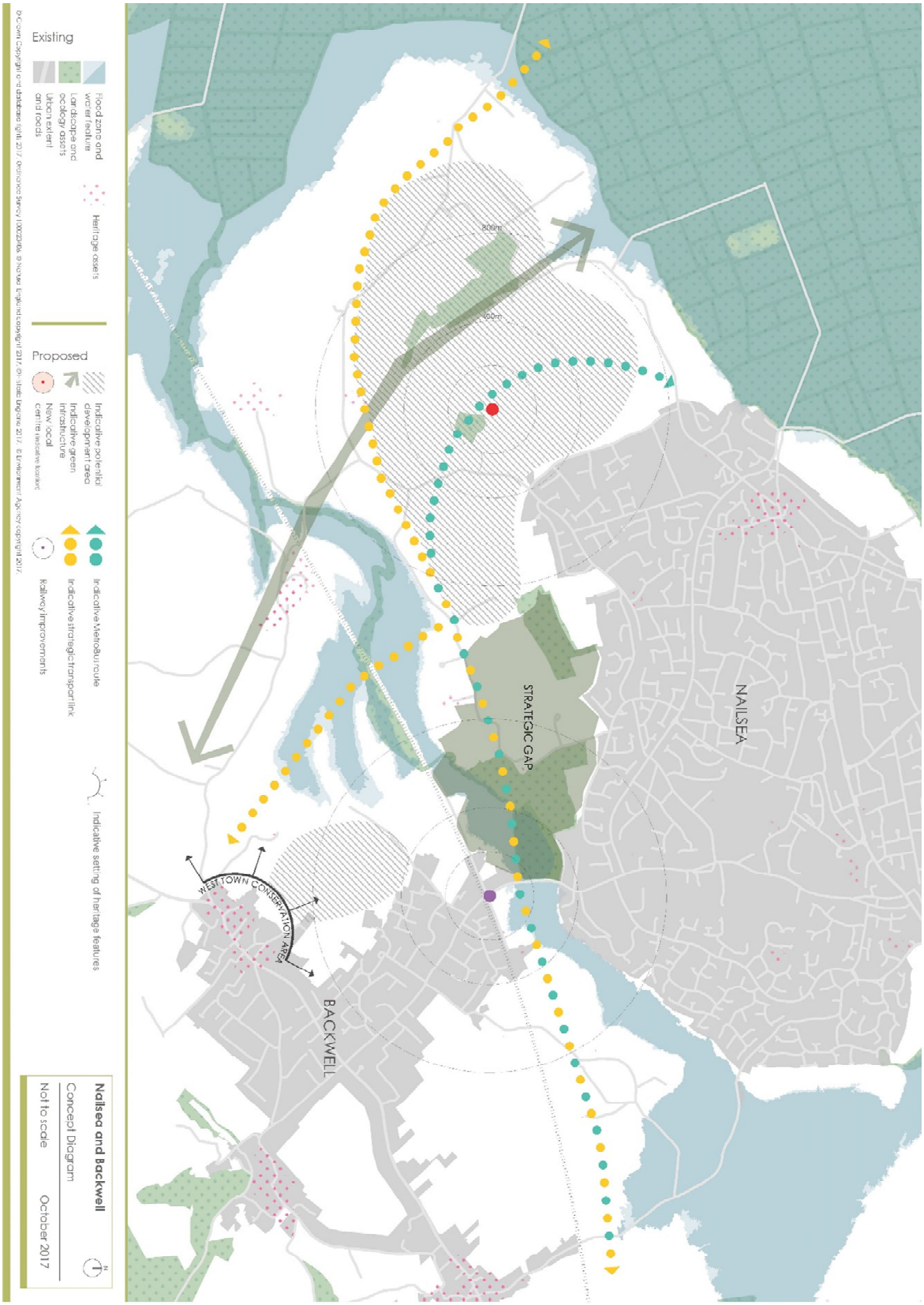
Critical dependencies include provision of strategic transport mitigations including schemes associated with Nailsea SDL, and A370 to Nailsea to the west of Backwell; provision of suitable ecological/environmental mitigation.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Backwell											

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
	50	**75**	**100**	**100**	**100**	**100**	**100**	**75**	**700**

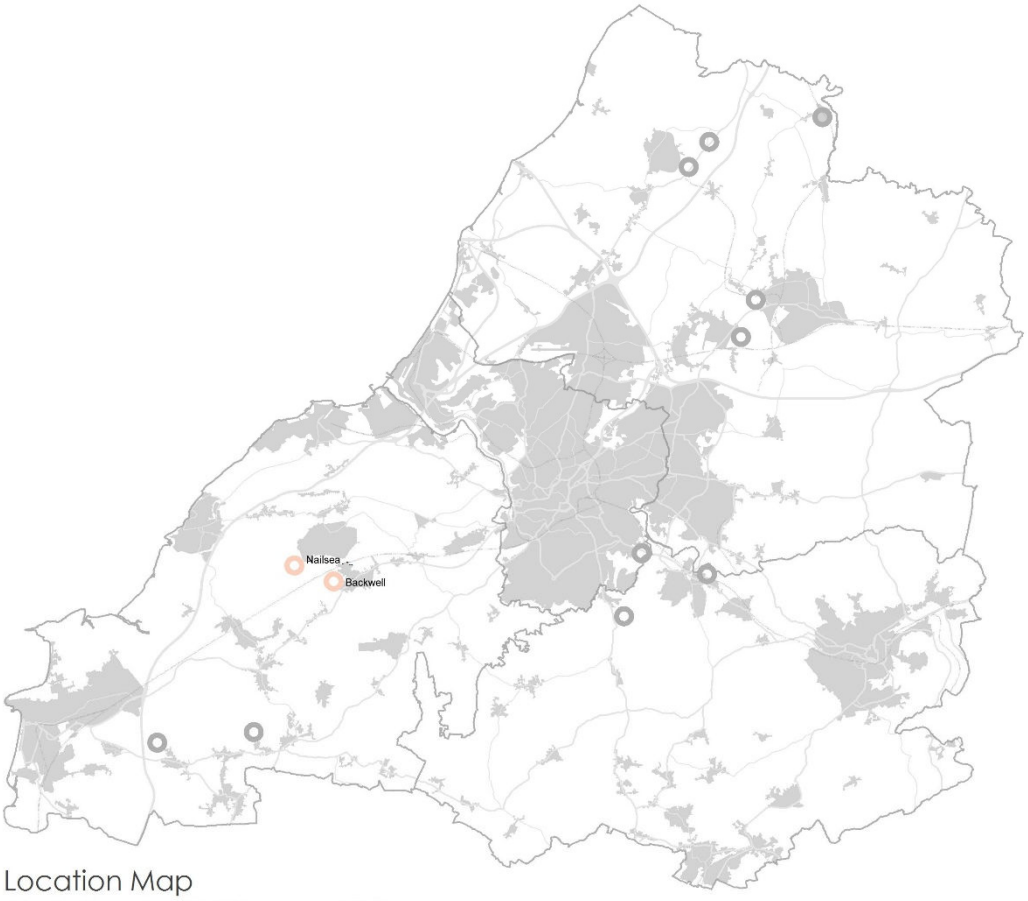
Post 2036	Total Capacity
0	**700**

Appendix 1 –Concept Diagram



Strategic Development Location – Nailsea
North Somerset

Date of Issue: October 2017



Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 Site location

Land to the south west of Nailsea.

1.2 Size

Approximately 157ha gross, 79ha net residential area.

1.3 Relevant planning status and designations

- Land to the east of the area is proposed Strategic Gap (SAP, Policy SA9). This area also includes four smaller areas proposed as Local Green Space (SAP, Policy SA7).

1.4 Current land use

Predominantly agricultural/open countryside.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified Nailsea as accommodating up to a further 2,800 dwellings in the plan period (to 2036). However, further work indicates potential for around 3,300 dwellings depending on the extent of land included in the development and the approach to residential density.

2.2 Site characteristics

The site predominantly comprises agricultural fields on gently south facing slopes. The landscape rises from the railway to the southern edge of the town. The landform drops away to the west to the Tickenham and Kenn Moor that has a network of ecologically important watercourses that are designated Site of Special Scientific Interest (SSSI). The ecological attributes of the area are supported by important habitats and features that should be assessed, retained, and or enhanced through new development.

The road network in the area is rural including many single lane carriageways.

2.3 Physical & Environmental constraints

Heritage: historic coal mining in the area may need to be investigated to ensure any heritage assets/ features are appropriately safeguarded. Listed Buildings at Nailsea Court and Chelvey have the potential to be impacted and key parts of their settings are likely to include land to the south of the proposed growth area. Further investigations should be carried out during subsequent masterplanning (including visual analysis) and appropriate design choices made to safeguard. This could

include maintaining an open aspect around Youngwood Lane/ Netherton Wood Lane, or assuming a lower density form of development on the southern fringe. There may be an opportunity to create green corridors anchored on Nailsea Court and Chelvey that could provide a degree of safeguarding, as well as potential to set up some interesting visual corridors centred on landmark buildings/ features.

Archaeology: West End is identified as an area of moderate archaeological potential. It is therefore expected that there could be features of interest that may impact upon development.

Landscape: The development area sits on higher land and falls into the K1: Nailsea Farmed Coal Measures Landscape Character Area of strong character in good condition.

A Strategic Gap is proposed to be safeguarded in the emerging North Somerset Site Allocations Plan, and covers a large area of land to the south of Nailsea. It is identified to protect the separate identity of Nailsea and Backwell. The Concept Diagram shows the gap retained in its current proposed form. Options to reconfigure may be considered through the local planning process taking wider strategic development objectives into account including transport and the relationship of new development to the improved Nailsea/Backwell station.

Ecology: The area is known to be used by horseshoe bats for foraging and commuting, with activity at the West End area and flight corridors are expected around the south western edge of the town linking south to key habitats around Backwell[1]. The presence of bats may require specific mitigation within new development including for example the inclusion of 'dark corridors'[2], and retention of habitat areas/ replacement habitat. One opportunity may be to provide a green corridor that links from the west of Backwell (and important bat habitat there), to the south of the Nailsea SDL, through the development on lower ground by Nursebatch and Batch Farm connecting Batch Farm Meadow Wildlife Site, and then through to open countryside to the north. (This suggested network is shown indicatively on the Concept Diagram in Appendix 1). This corridor provides a link to key habitats in the north of the district (woodland on the Tickenham Ridge), and south (woodland at Backwell Hill; important foraging habitat, and habitat near Yatton/ Cleeve).

The nearby SSSI network is also identified as a constraint. Surface water run-off into it is of concern (on water levels and quality) and will likely have to be addressed through an appropriate drainage strategy. Potential development areas to the west of the SDL are of particular relevance given their proximity to the SSSI and may require careful masterplanning to maintain a margin of open land to the SSSI and the inclusion of suitable environmental attenuation features. Lower density (gross and net) may also be appropriate on the western edge reflecting these issues.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and

[1] The area to the south west of Backwell between Chelvey Road and the A370 is identified to be within a horseshoe bat Juvenile Sustenance Zone, an important foraging habitat for juvenile bats in close range of key roosts. The following links to Somerset County Council website and guidance on North Somerset and Mendip Bats SAC: guidance on development: http://www.somerset.gov.uk/policies-and-plans/plans/habitat-regulations/

[2] Dark corridors typically comprise linear green spaces including hedgerow and possibly water features and are designed to specific specifications to maintain a certain level of illuminance.

reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

Flood risk: Area of search for development located in flood zone 1. Areas of land at risk of tidal / fluvial flooding are located to the west of the area that coincides with a network of man-made watercourses required to manage surface water on the Tickenham and Kenn Moors landscape. Many of these are also designated SSSI and are highly important ecological features. High water table and poor water conveyance are recognised issues affecting the area and may influence the location, scale and suitability of development and the need for measures to ensure there are no adverse impacts on or outside of the development area. Further work is required to understand the flood risk issues associated with development and supporting infrastructure, notably roads, and to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage, and more strategic solutions to enable the local environment to more effectively manage long-term storage and surface water. This has the potential to provide some betterment to existing areas where poor water conveyance and drainage is an issue. Such works as required have the potential to reduce the overall capacity of the development and whilst there is some allowance for this already built in, further allowance may be required.

The delivery of green corridors through development located to channel surface water should be considered together with maintenance corridors for watercourses. These could have a functional role as well as place making benefits.

Other constraints: *National Grid works* - National Grid have a Development Consent Order for a temporary site compound in the area although this only takes a relatively small site. New electricity distribution lines are proposed to the west of the area.

Utilities

Electricity distribution powerlines cross the site and would require an open corridor to be provided within the masterplan, or alternatively relocation. High Pressure Gas Mains run across the site broadly following the same corridor. These have Health and Safety Executive Consultation Zones associated with them to enable HSE to be consulted on development proposals and to control development within them. There may be restrictions on new roads crossing over these that could result in the need for upgrading or diverting.

2.4 Existing development schemes and recent activity

At the western end of the area are four proposed housing allocations – land at West End for 10; land west of Engine Lane for 183; land south of the Uplands for 50; and land at Youngwood Lane for 170. The first two have planning applications. The latter has a current application for a much larger site.

2.5 Opportunity

Nailsea is one of the four main towns in North Somerset well connected to both Weston-super-Mare and only a short distance away from Bristol. It is located on the

main railway corridor with a station, and the A370. The area to the south west of Nailsea offers an opportunity to create a new development well linked to the existing town supported by improved transport infrastructure including MetroBus connection through the new development, linking through to the existing town, and beyond to Bristol via a new improved Nailsea/Backwell station and interchange. There is potentially an opportunity to achieve a higher density of development given that Nailsea is a main town in North Somerset and the enhanced public transport infrastructure potential.

Development in this area provides the opportunity to deliver new development at a critical mass, using best practice principles, with the full range of new services, facilities and employment opportunities, and an improved public transport offer.

3.0 Land uses, capacity, availability & viability

3.1 Mix of uses

At this stage the mix of uses is proposed to include residential, mixed employment including office use (B1(a), rail station improvement and interchange, retail, leisure, recreation, education, various community uses, ecological areas and public open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Key requirement will be to connect MetroBus to the centre. Areas for surface water storage are also envisaged but these could be provided off/near-site.

3.2 Employment (type/ha)

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

Compared to other areas of the West of England and in North Somerset, employment land availability is limited in Nailsea. Improvements to highway infrastructure, the station with improved rail frequency, capacity and MetroBus connectivity, may improve the prospects as a business location.

Potential for new B1 office park well connected to enhanced Nailsea/ Backwell station with MetroBus connectivity. Along with the Backwell SDL, initial scenarios to test are for around 10.5ha of B Class land, comprising 6.3ha B1a, 4.2ha B1b and B1c, that could translate to around 55125sqm and 22,050sqm respectively.

3.3 Housing typology / density

Medium density urban extension at an average 42dph. A range of densities should be considered to create variety and character within the new settlement. There is potential for the net density to be increased to reflect a higher density core and form of development, and this could bring about benefits to transport and wider sustainability, however this has to balance with environmental constraints. Lower densities likely to be required to west of development in response to context and environmental constraints.

3.4 Capacity

About 3,300 units.

3.5 Availability

Multiple ownerships/ development interests present, and majority of land being actively promoted.

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

5.0 Draft policy expectations for location

5.1 Vision

- Creation of an urban extension to the south west of Nailsea.
- Residential densities considered around 40 to 45dph, applying the principles of 'graded densities'. Higher densities are encouraged closer to the train station, local centre, and MetroBus route through the development.
- Development around West End, South Common Farm and other parts west of the existing pylon corridor should be at a reduced density and incorporate features to mitigate environmental impacts e.g. open spaces, drainage features as well as to respect the rural setting to the west of the area.
- Integration with existing community with connectivity between new development and existing town.

5.2 Housing capacity and other land uses

- About 3,300 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. In particular opportunities to create a new business site well connected to Nailsea station should be explored with improved parking, MetroBus connectivity, rail frequency and capacity.
- Four primary schools on 2.4ha each. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- A secondary school is required on 10ha site including sixth form provision.
- Primary care health facility.

- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.
- Community uses, to be identified and integrated through masterplanning.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.

5.3 Transport

- The development will contribute to a strategic transport package including potential for a new or improved highway link connecting the M5 to the Nailsea SDL, with onwards connection to Bristol. Routes to be multi-modal including MetroBus provision with connection at an enhanced Nailsea and Backwell station. MetroBus connectivity to the station, new local centre, and back into Nailsea are required. Additional improvements to the local network required in addition.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

5.4 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

- Approach to green infrastructure to support the rural character of the area for example by creating 'soft' edges to the development blending well into the surrounding countryside particularly at the western end of development. Multiple roles encouraged including in relation to recreation, leisure, environmental and heritage safeguarding and sustainable drainage.
- The GI strategy should also seek to respect the setting of local heritage and provide an ecological corridor, provide for a sustainable drainage system and full range of open space including sports pitches, play areas and allotments.
- Retention of a Strategic Gap at the eastern end of the development between Backwell and Nailsea.
- An area of open space should be considered for retention around the Nursebatch Farm Fields SNCI and safeguarded for its ecological importance.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites

5.5 Infrastructure requirements

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage. In particular, potential impacts on the Tickenham, Nailsea, and Kenn Moors SSSI need to be addressed, including management of water quality and levels. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirement for utilities upgrade.

5.6 Energy/heat

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery - critical interventions

6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and infrastructure requirements and misses the opportunity to secure plan-led, comprehensive development. There may be a particular risk associated with the early release of development that is being promoted independently in the short-term.
- Delivery of strategic transportation improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery would be required.
- Drainage constraints linked to impacts on water quality in adjoining SSSI.
- Ecological/ biodiversity impacts.
- Utilities on site may affect viability and capacity. Potential to hinder optimum development layout.

6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, subsequent masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery. Opportunities to link distinct sections of the transport route to distinct phases of development should be explored. This is expected to help support their delivery. Pursue opportunities for funding.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues, including impacts on the North Somerset and Mendip Bats SAC, to be addressed on a strategic basis across the Nailsea and Backwell SDLs.
- Further dialogue with utilities and testing of options through masterplanning process.
- Ongoing engagement between the LPA and development interests is necessary, with ongoing mechanisms for engagement identified. Should consider models of delivery at an early stage, legal aspects and matters such as equalisation of land

values to ensure the most effective masterplan and infrastructure provision can be achieved.

7.0 Indicative trajectory

7.1 Indicative lead-in time of 9 years assumed, to allow for strategic transportation measures to be funded and programmed; land to be assembled; and suitable delivery vehicle/structures selected, setup and implemented. Indicative build-out rate of 50-300 dpa. It is currently anticipated that the entire planned development will extend beyond the JSP plan period by an estimated 725. An average annual rate of 234 dwellings is estimated with a peak-year rate of 300 dwellings.

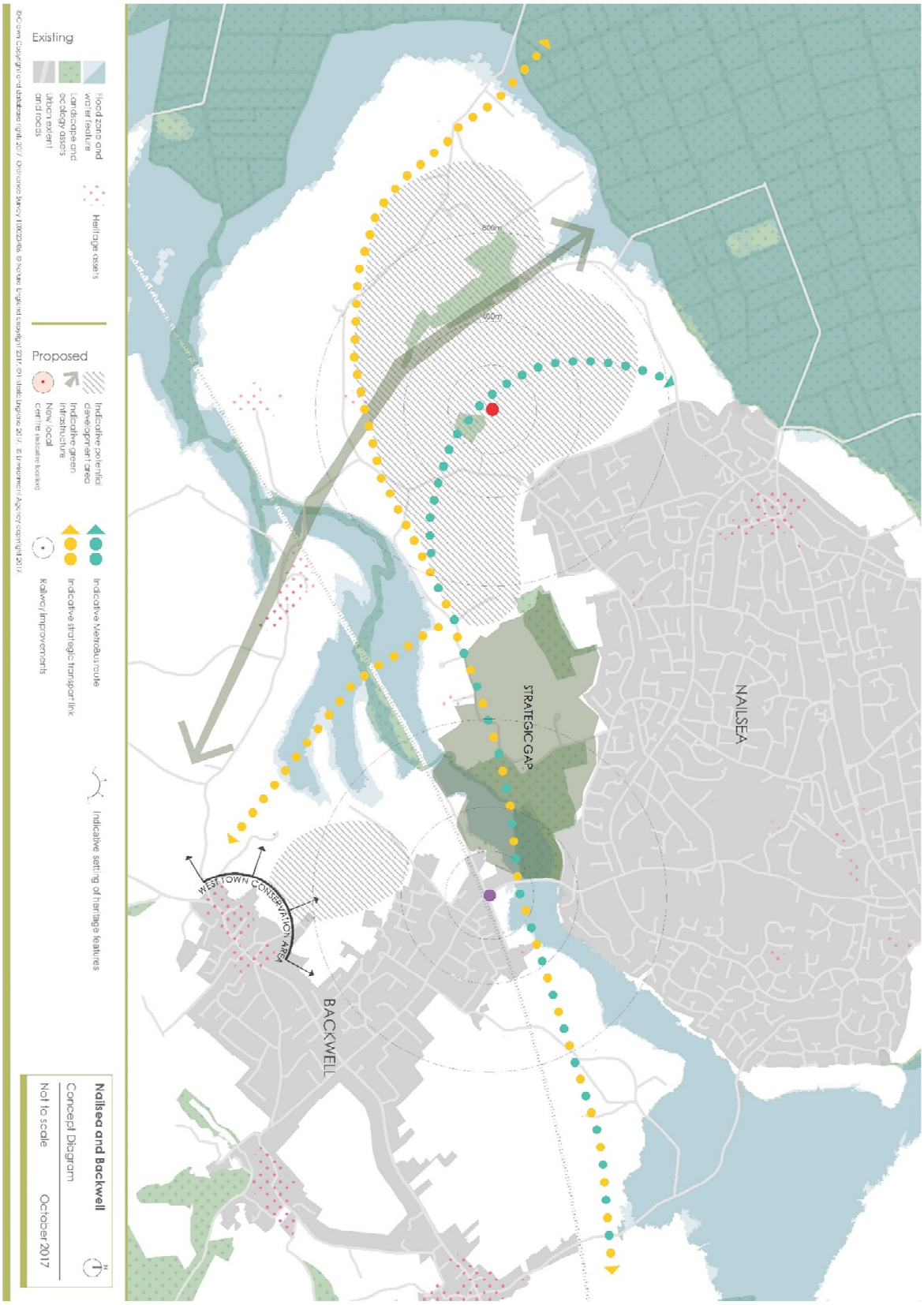
Critical dependencies include provision of strategic transport mitigations; achieving a critical mass of development required to support non-car modes including MetroBus; provision of suitable ecological/environmental mitigation including surface water storage, possible replacement habitat; land assembly, and legal/delivery structures in place.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Nailsea										50	75

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	**200**	**300**	**300**	**300**	**300**	**300**	**300**	**300**	2575

Post 2036	Total Capacity
725	**3300**

Appendix 1 – Concept Diagram



Strategic Development Location – M5 to A38 Corridor - Churchill North Somerset

Date of Issue: October 2017

Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 Site Location

Land to the northwest of Churchill and Langford.

1.2 Size

Approx. 165ha gross, 85ha net residential area.

1.3 Relevant planning status and designations

- Proposed Local Green Space designation within Langford – *Land to the West of Rowan Way*.

1.4 Current land use

Predominantly in agricultural use.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified the M5 to A38 Corridor as accommodating up to a further 5,400 dwellings in the plan period to 2036. The background evidence (*Assessment of Strategic Development Locations Beyond Settlement Boundaries*) identified Churchill along this corridor as a location with strategic development potential to be explored further. Further work has identified potential for around 2,800 dwellings at Churchill/Langford that, alongside the potential at Banwell, has reduced the overall dwelling potential on the M5 to A38 Corridor to around 4,700 dwellings.

2.2 Site characteristics

Location predominantly comprises agricultural fields, on undulating land, with a high point around Windmill Hill at around 75m AOD with significant archaeological interest. Hedgerows and watercourses are extensive across the area reinforcing the rural character. King Road passes through the site as well as a number of footpaths. Churchill Academy and Sixth Form is located close to the area off of Churchill Green. Various watercourses run in a northwest direction across the site including Churchill rhyne.

2.3 Physical & Environmental constraints

Heritage: the listed Church of St John the Baptist requires sensitive treatment and its setting may extend some way towards Langford. Any development will need to be sensitive to this feature that may have a significant influence on development capacity achievable in the vicinity. Churchill Green open space immediately to the north of the church likely to have key role in this regard occupying a field parcel bounded by trees and forming an immediate setting to the church and so it would be desirable to retain undeveloped.

The Concept Diagram shows an indicative green corridor linking from Windmill Hill to the west providing some separation of the church from development parcels to the north. Further more detailed visual appraisal is required to ascertain the setting

of importance and the appropriate treatment and layout of any nearby development through more detailed masterplanning.

Archaeology: Area has high archaeological potential. An Iron Age univallate hillfort and Roman Fort is identified at Windmill Hill as well as other notable features of significance in the area generally. Further investigations necessary.

Landscape: The development area sits on higher land and falls into the J2: River Yeo Rolling Valley Farmland Landscape Character Area of moderate character in good condition. It would be desirable to create distinct blocks of development that respect the existing character and form of settlement along the Mendip Hills edge rather than expanses of linear development. This can help to maintain the rural character. The form of development and interaction with surrounding countryside will be important considerations in creating new settlement that blends well with the landscape and will be an important consideration for masterplanning in due course.

Mendip Hills AONB

Although the site is located outside of the AONB, the potential for adverse impact on it is present. The landscape strategy may be beneficial in helping to accommodate development with minimal impact on the AONB.

Ecology: The area is likely to be utilised by horseshoe bats[1] for foraging and commuting particularly from the south of the village to the east and north connecting woodland areas and the Langford Brook. The area has numerous linear hedgerows that are likely to assist bat commuting and some with watercourses providing opportunities for foraging. This may lead to specific requirements associated with the new development including for example the inclusion of 'dark corridors', retention of key habitats, and other measures to safeguard bats and their habitats. One opportunity may be to provide a green corridor from open countryside to the west, connecting to Windmill Hill and woodland features there[2], and then linking to open countryside and woodland features to the south (shown indicatively on the Concept Diagram). The design of the new link road should also seek to minimise impacts, including for example tree planting with canopy and low level lighting subject to suitability and acceptability.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

Flood risk: Area of search for development located in flood zone 1. Areas of land at risk of tidal/fluvial flooding are located to the north of the area (outside of the area of search for development) that coincides with a network of man-made watercourses required to manage surface water on the levels landscape, as well as

[1] Greater and Lesser Horseshoe Bats are Annex II species notified as mobile qualifying features of the Mendip Limestone Grasslands Special Area of Conservation (SAC) and the North Somerset and Mendip Bats SAC designated under the EC Habitats Directive as part of the Natura 2000 network of European Sites

[2] The area surrounding Windmill Hill is identified as a biodiversity enhancement area.

key watercourses including the Congresbury Yeo. High water table and poor water conveyance are recognised issues affecting the area that would influence the location, scale and suitability of development and the need for measures to ensure there are no adverse impacts on or outside of the development area.

A strategy for managing surface water will be required. This may include both site-specific measures e.g. suds, and more strategic solutions to enable the local environment to more effectively manage surface water. This has the potential to provide some betterment to existing areas where poor water conveyance and drainage is an issue. Flood catchment modelling may be required in due course.

A series of watercourses flow into the site including Churchill Rhyne and another to the north between Brinsea Farm and Ladymeade Farm. Potential to retain these within the green infrastructure network for enhanced biodiversity value.

Other: The Proposed Southern Strategic Support Main Pipeline runs close to the area on its western edge crossing Brinsea and then broadly following the existing pylon corridor route to Banwell Riverside. This is currently being delivered (planning application ref: 16/P/1095/F2). This may provide some constraint on development, as does the electricity pylon corridor both of which may have easement or wayleave associated. These features form a potential constraint to development beyond, and would have to be suitably addressed through detailed masterplanning

2.4 Existing development schemes

The area has four proposed housing allocations; Pudding Pie Lane for 141; Says Lane for 43; land south of Bristol Road for 41; and Pudding Pie Lane (west) for 35. The first two have planning consent, the others a planning application in progress.

2.5 Opportunity

Churchill and Langford are settlements located some 3-4 miles east of Weston-super-Mare and approx. 5 miles from Bristol Airport, and are two of the multiple settlements located on the main A371/A368/A38 highway corridor. The area to the northwest of Churchill offers an opportunity to create a new garden village well linked to existing settlements and supported by improved transport infrastructure to mitigate impact upon the transport network. This provides an opportunity to take traffic away from existing routes/villages. Green space would surround the garden village, some remaining in existing agricultural use and also providing opportunity for leisure and recreation, ecological mitigation and enhancement, heritage and archaeological safeguarding, and environmental mitigation.

3.0 Land uses, capacity, availability & viability

3.1 Mix of uses

At this stage would be expected to include residential, employment (mixed B Class, and non-B Class), retail, leisure, recreation, education and open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Areas for surface water storage are also envisaged but these could be provided off/near-site, and should be designed to maximise wildlife value.

3.2 Employment (type/ha)

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

This area is on the main A38 corridor with good links to Bristol Airport. Improvements to the transport network in this area may provide opportunities for employment development, including business opportunities associated with the airport. Potential to explore employment land opportunities close to the existing mushroom farm at Stock Lane to create a consolidated business park.

Potential for mixed B class employment well connected to new strategic transport routes. Initial scenarios to test are for around 7.4ha of B Class land that could translate to around 40800sqm.

3.3 Housing typology / density

Low Density Garden Village. Average net residential densities of around 30 to 40dph reflecting rural character of area and potential need for lower density development. A range of densities is recommended to create variety and character within the new settlement to respond to context, and to secure higher densities around centres of activity and public transport nodes.

3.4 Capacity

About 2,800 units.

3.5 Availability

Multiple landownerships present.

Additional land is likely to be required to deliver transport mitigations and other off-site infrastructure.

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

See Appendix 1 – Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

5.0 Draft policy expectations for location

5.1 Vision

- Development of a new garden village to the north west of Churchill supported by new transport infrastructure.
- Form of development should respect the settlement character of the area and the rural characteristics present. In particular opportunities to safeguard the separate identity of Langford and Churchill should be explored alongside opportunities to create effective transport linkages between areas of settlement.
- Environmental enhancement and functioning of existing settlements once transport improvements are in place.

5.2 Housing capacity and other land uses

- About 2,800 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. Opportunities to link to the new transport infrastructure should be explored and the scope to support airport related businesses.
- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.
- Community uses, to be identified and integrated through masterplanning.
- Three primary schools of 2.4ha each to include early year's provision. Located to be accessible to surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.
- A secondary school is required for this and the Banwell SDL with location to be defined through more detailed masterplanning and consideration of educational requirements across North Somerset.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Primary health care facility.

5.3 Transport

- The development will contribute to a strategic transport package including a new distributor route connecting to the A38, and connection and improvement to the A368/A38 junction. This is a package of transport works with an early phase identified as the Banwell Bypass. Additional improvements to existing network also required.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

5.4 Green infrastructure

- The principle of multi-functional and interconnected green infrastructure should be pursued to offer multiple benefits including to wildlife and biodiversity, recreation, and flood attenuation and to include requirements for delivery, future maintenance and management.

- The approach to green infrastructure should seek to support the rural character for example by creating 'soft' edges to the development blending well into the surrounding countryside. This is likely to be important in protecting the setting of the AONB.
- Windmill Hill forms a key feature of landscape, heritage and ecological value that should form a focal point within the network of green infrastructure and safeguard the setting of the historic village of Churchill. Churchill Green also considered to have a key role within the green network and is considered to form an important part of the setting to the church.
- Identification of specific uses on green spaces surrounding new settlement particularly between existing settlements including potential for strategic gaps.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites

5.5 Infrastructure requirements

- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored.
- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery - critical interventions

6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure in a coordinated way, the necessary provision and improvement of services, facilities and infrastructure.
- Delivery of strategic transportation improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery required to enable development to be delivered. Land assembly for highway outside of the SDL will be critical to enabling development.
- Drainage constraints.
- Ecological/ biodiversity impacts.
- Impact on the AONB.

6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, subsequent masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery. Pursue opportunities for funding bids where available.
- Consider utilising New Towns legislation to deliver development effectively with required infrastructure. Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model.
- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues to be addressed on a strategic basis across SDL.
- Further consideration of landscape strategy including in consultation with the Mendip Hills AONB unit.

7.0 Indicative trajectory

7.1 Assumed lead in time of 9 years, to allow for strategic transportation measures to be funded and programmed, preparatory stages e.g. site acquisition, and setting in place of the Development Plan. Indicative build-out rate of 50-300 dpa. Estimated annual average rate of 243 dwellings.

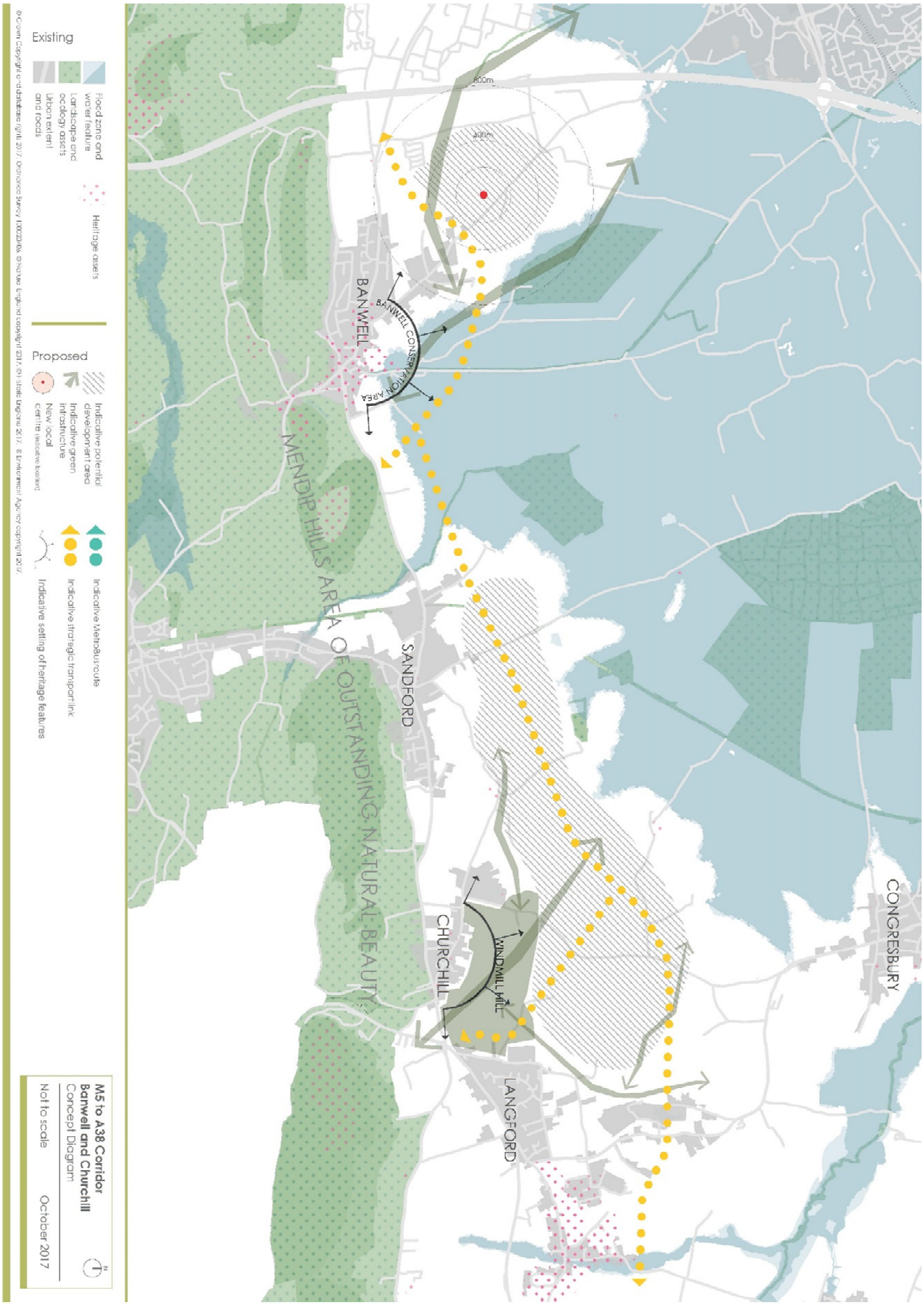
Critical dependencies include: provision of strategic transport mitigations; funding measures identified and in place during lead-in phase; provision of suitable ecological/environmental mitigation; and land assembly including for enabling infrastructure; legal/delivery structures in place.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Churchill										**50**	**75**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	**300**	**300**	**300**	**300**	**300**	**300**	**300**	**300**	2675

Post 2036	Total Capacity
125	**2800**

Appendix 1 –Concept Diagram



Strategic Development Location – M5 to A38 Corridor - Banwell North Somerset

Date of Issue: October 2017

Location Map

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Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 Site Location

Land northwest of Banwell.

1.2 Size

Approx. 106 ha gross, 54ha net residential area.

1.3 Relevant planning status and designations

- Mendip Hills Area of Outstanding Natural Beauty (AONB) to the south, wildlife site to the east, and heritage designations to the southeast. Areas of Priority Habitat are present to the east.
- Village has two Local Green Space designations, one at Riverside.
- The Banwell bypass route is a safeguarded scheme in the Sites and Policies Plan, Part 1: Development Management Policies.

1.4 Current land use

Predominantly agricultural.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity

The JSP - Towards the Emerging Spatial Strategy consultation identified the M5 to A38 Corridor as accommodating up to a further 5,400 dwellings in the plan period to 2036. The background evidence (Assessment of Strategic Development Locations Beyond Settlement Boundaries) identified Banwell along this corridor as a location with strategic development potential to be explored further. Further work has identified potential for around 1,900 dwellings at Banwell that, alongside the potential at Churchill/Langford, has reduced the overall dwelling potential on the M5 to A38 Corridor to around 4,700 dwellings.

2.2 Site characteristics

The site is characterised by open, and gently undulating pasture land set against the backdrop of the lower slopes of the AONB. The character of the area to the south of Banwell is heavily influenced by the steep, often wooded slopes of the AONB.

To the east the area drops down to the Locking and Banwell moors landscape and gently rises to the north at Woolvers Hill. The M5 motorway is a dominant feature to the west of the area set in a cutting in parts. To the west of Stonebridge, a shallow valley runs towards the motorway. Wolvershill Road passes through the site linking Banwell back into WsM near J21 of the M5.

2.3 Physical & Environmental constraints

Heritage: area to the east of the village has a particularly rich heritage including a former Abbey, Scheduled Monument, Conservation Area and various listed buildings. The Concept Diagram illustrates an indicative setting to these features.

Archaeology: The area, particularly around Stonebridge and Wolvershill Road, is identified as having moderate to high archaeological value including nationally significant Roman archaeology. The area between Riverside and East Street has the potential for medieval archaeology, palaeochannels and waterlogged archaeology. It is therefore expected that there would be features of interest that may impact upon development potential.

Landscape: The development area sits on higher land and falls into the J2: River Yeo Rolling Valley Farmland Landscape Character Area of moderate character in good condition. Lower lying landscape to east – Locking and Banwell Moors should be avoided due to its flood risk status. It would be desirable to create distinct blocks of development that respect the existing character and form of existing settlements along the Mendip Hills edge rather than expanses of linear development.

Mendip Hills AONB

Although the site is located outside of the AONB, the potential for adverse impact on it is present. The landscape strategy may be beneficial in helping to accommodate development with minimal impact on the AONB.

Ecology: The area is likely to be utilised by horseshoe bats for foraging and commuting particularly to the south of the village. The Banwell Ochre Caves are a key feature nearby and one of the component SAC sites[1]. The inclusion of specific features within the new development including for example 'dark corridors'[2] should be considered as part of a wider ecological strategy including potential for replacement habitat and safeguarding and enhancement of key habitats.

Opportunity to provide a green corridor to the west of Stonebridge that links to the Grumblepill Rhyne corridor at Parklands Village (shown indicatively in the Concept Diagram). This feature would track a depression in the landscape potentially incorporating water management features.

Consideration will be given to the protection of nationally significant species and habitats, notably Section 41 habitats and species. Examples of Section 41 habitats include: species rich lowland meadows, wet woodlands, traditional orchards, and reed beds. Examples of Section 41 species that have suffered sharp declines in population and/or distribution, include the Common Toad, Hedgehog, House Sparrow, Brown Hare and Skylark, as well as many insect species. Wildlife corridors and features such as 'stepping stone habitats' and other natural features need to be incorporated into new development to safeguard key habitats identified within Section 41 of the NERC Act (2006).

Flood risk: The area of search for development is located in flood zone 1. Impacts on flood risk elsewhere need to be considered. Further work is therefore required to understand the flood risk issues associated with development and supporting infrastructure, to identify possible options to mitigate any impacts. These may include both site-specific measures e.g. sustainable drainage systems (taking into account infiltration constraints), and more strategic solutions to enable the local

[1] Special Areas of Conservation – Areas given special protection under the EU Habitats Directive which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.
[2] Dark corridors typically comprise linear green spaces including hedgerow and possibly water features and are designed to specific specifications to maintain a certain level of illuminance.

environment to more effectively manage and provide long-term storage of surface water.

Other: The Proposed Southern Strategic Support Main Pipeline (water) runs through the area on its eastern edge up to Riverside. This is currently being delivered (planning application ref: 16/P/1095/F2). This coupled with other constraints on this part of the site make this a particularly sensitive area.

2.4 Existing development schemes

To the east of the village is a proposed housing allocation, east of Wolvershill Road for 44 dwellings (outline approved subject to legal agreement).

2.5 Opportunity

Banwell is located just outside Weston-super-Mare (WsM) on the A371. This main route through the village is subject to significant congestion at peak times exacerbated by a pinch point on the network at West Street. Strategic development would be required to be supported (and would contribute to) new transport infrastructure including the Banwell Bypass. Potential is identified to create a new garden village to the northwest of Banwell.

3.0 Land uses, capacity, availability & viability

3.1 Mix of uses

At this stage the mix of uses is expected to include residential, employment (including distribution (B8)), small-scale retail, leisure and recreation, education and open space. Local Centre likely to contain mix of uses with location and scale to be confirmed through local planning process. Areas for surface water storage are also envisaged that could be required on, off and / or near site.

3.2 Employment (type/ha)

Employment provision and location to be addressed through the local planning process. Assumptions and suggestions provided here are initial scenarios for testing. North Somerset Council are currently preparing an Employment Land Review that will inform employment planning at the SDLs through the local plan.

The area is located close to Weston-super-Mare and the Junction 21 Enterprise Area where there is a significant scale of employment development planned. The role this SDL may play needs to be addressed further in this context.

Potential for distribution type businesses well connected to the M5 and the new Banwell Bypass. Initial scenario to test for around 5ha of B Class land that could translate to around 15,000sqm.

3.3 Housing typology / density

Low to medium density Garden Village. Average net residential densities of around 30 to 40dph. A range of densities are recommended to create variety and character within the new settlement and to respond appropriately to context and environmental constraints.

3.4 Capacity

About 1,900 units.

3.5 Availability

Multiple landownerships present, although majority of land in area of search under control of single developer.

Various other sites submitted in area totalling around 37.1 ha.

Additional land required to deliver transport interventions and other infrastructure necessary to support development.

3.6 Viability

Viability likely to be dependent upon alternative sources of funding. See viability evidence for further information.

4.0 Concept Diagram

See Appendix 1 –Concept Diagram

*The Concept Diagrams provide the broad location or area of search for growth in each SDL denoted by the diagonal hatching. The extent of this covers the **gross development area** within which the range of land uses and features necessary to support the new development could potentially be provided, including residential, employment, education, retail, leisure, community uses, green infrastructure, and water storage as required. Development areas to be refined through more detailed work through the local planning process.*

5.0 Draft policy expectations for location

5.1 Vision

- To create a new garden village supported by the phased delivery of transport infrastructure.
- The form of development should seek to respect the character and separate identity of Banwell and respond sensitively to the semi-rural context.
- Development form to avoid linear expanses of development. Blocks of development sitting within landscape to be explored further through masterplanning.
- Improved connectivity between WSM, the airport and Bristol.

5.2 Housing capacity and other land uses

- About 1,900 units of a range of types and sizes including affordable provision.
- New employment development shall be investigated and masterplanned into the development. Opportunities to link to new transport infrastructure should be explored and the scope to support distribution type businesses.
- Community uses, to be identified and integrated through masterplanning.
- Two primary schools, one of 2.4ha and the other of 3.4ha for future expansion, both including early years provision. Located to be accessible to

surrounding neighbourhoods to maximise walking to school opportunities along safe and attractive routes.

- A secondary school is required for this and the Churchill SDL with location to be defined through more detailed masterplanning, and consideration of education requirements across North Somerset.
- Land to be identified to accommodate strategic transport mitigations and other infrastructure including both on-site, near-site and off-site requirements.
- Primary care health facility.
- Mixed use local centre to be provided, to be accessible to surrounding residential neighbourhoods and well connected to main highway network and public transport routes.

5.3 Transport

- The development will contribute to strategic transport including a new link between the M5 and the A38 comprising a package of schemes. To include a new motorway junction (J21a), the Banwell Bypass, and an onward connection to the A38, east of Langford. Additional improvements required to local network.
- This is a summary headline of the key transport requirements, is not definitive of the required transport mitigations and further detailed work will be progressed on transport matters. See Joint Transport Study and background papers for further detail.

5.4 Green Infrastructure

- The principle of multi-functional and interconnected green infrastructure should be pursued to offer multiple benefits including to wildlife and biodiversity, recreation, and flood attenuation and to include requirements for delivery, future maintenance and management.
- Investigation of an area of open space between Banwell and the proposed bypass linking through to open countryside to the east.
- The approach to green infrastructure should seek to support the rural character of the area for example by creating ‘soft’ edges to the development, blending well into the surrounding countryside. Green infrastructure is also likely to be important in protecting the setting of heritage features, and the setting of the AONB.
- A green corridor linking Stonebridge to the Grumblepill Rhyne at Parklands Village should be investigated including its use for bat foraging and commuting and surface water management. This could form a further phase of the dark corridor already established at Parklands Village.
- Additional strategic green infrastructure to avoid significant impacts to Natura 2000 sites.

5.5 Infrastructure requirements

- Ecological mitigation including features designed to safeguard habitats and species, retention of key habitats and replacement where necessary.
- Suitable drainage infrastructure including to reduce rate of run-off, and provision for long-term storage, and with benefits to water quality. Opportunities to enhance biodiversity should be explored. Selected strategy to take into account constraints on infiltration drainage.

- Sustainable energy infrastructure including opportunities for heat networks explored early in order that any enabling measures can be secured to enable an efficient and effective delivery. The form and layout of development, and the distribution of land uses is likely to be a key issue in designing the infrastructure. Management of the infrastructure going forward should also be considered.
- Potential requirements for utilities upgrades.

5.6 Energy

- Opportunities to secure a zero carbon new settlement will be explored including incorporating a range of sustainable measures, including potential district heating, renewables, energy generation, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery - critical interventions

6.1 Key identified risks to suitability, availability and achievability

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and infrastructure requirements. Pressure to bring forward sites earlier than planned has the potential to lead to ineffective development and could undermine a joined-up, masterplan-led approach to development. This could lead to land uses being poorly arranged.
- Delivery of strategic **transportation** improvements delivered at a suitable time to facilitate development within the JSP plan period. Early prioritisation / delivery required, particularly for the Banwell Bypass section.
- Drainage constraints.
- Ecological/ biodiversity impacts.
- Heritage issues are significant to the east of the village and should be carefully addressed.
- Impact on the AONB.
- Land assembly – ensuring sufficient land is assembled to support development and deliver enabling infrastructure.

6.2 Key actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Collaborative approach between public and private partners to achieve planning policy framework through local plan process, masterplanning and development management processes to secure consensus on phasing of infrastructure and approach to delivery.
- Clear understanding of transport requirements, options, and costs supported by funding strategy and means of delivery. Consensus achieved with development partners on schemes required and means of delivery including land assembly, particularly for Banwell Bypass. Pursue opportunities for funding.
- Review of developer contributions and wider funding strategy as part of selection of appropriate development delivery model. Some form of equalisation agreement is likely to be required to support an equitable return for land forming part of the overall development.

- Ongoing dialogue between flooding agencies. Further investigations are required to understand the existing drainage conditions of the area, the additional impacts of development including volumes of run-off, and the potential options for mitigation if required.
- It is expected that ecological issues can be addressed through masterplanning and the integration of suitable features/safeguarding on or off site. Further engagement with Natural England required to scope additional evidence required. Ecological issues to be addressed on a strategic basis across SDL.
- Further consideration of landscape strategy including in consultation with the Mendip Hills AONB unit.
- Further dialogue with Heritage England to ensure proposals provide adequate safeguarding of heritage assets. Requirement for heritage report where SDL relates to heritage assets.

7.0 Indicative trajectory

7.1 Indicative lead-in time to initial completions assumed 8 years to allow for strategic transportation measures to be funded and programmed. Lead-in largely dictated by transport matters including requirements for further technical work and land acquisition. Indicative build-out rate dependant on number of development partners- assuming 50 per sales outlet per annum. Estimated annual average rate of 158 dwellings with peak years delivering 200 per year.

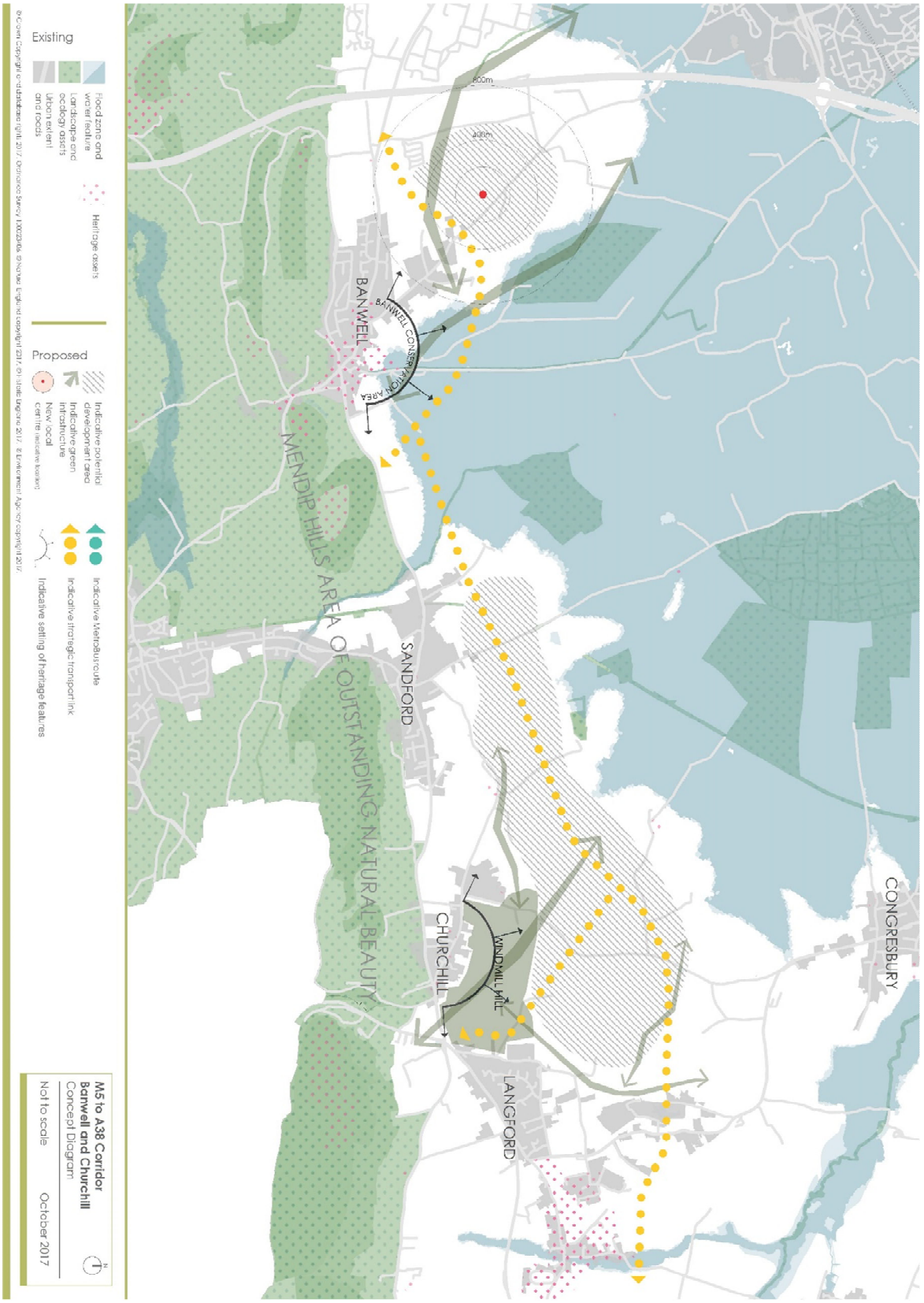
Critical dependencies include provision of suitable ecological/environmental mitigation; delivery of transport/ other infrastructure; and legal/delivery structures in place. May require alternative models of delivery to expedite delivery of transport infrastructure to facilitate residential development.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Banwell									50	75	150

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
200	200	200	200	200	200	200	150	75	1900

Post 2036	Total Capacity
0	**1900**

Appendix 1 –Concept Diagram



Strategic Development Location – Buckover Garden Village.
South Gloucestershire

Date of Issue: October 2017

Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Land east and west of A38 at Buckover, near Thornbury

1.2 **Size**
Approx. 160-170ha.

1.3 **Relevant planning status and designations**
None. Some small SSSI, SNCI and Listed Buildings.

1.4 **Current land use**
Agricultural

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity
The JSP Emerging Spatial Strategy (Nov 2016) identified Buckover as accommodating 2,200 dwellings in the plan period (to 2036) and up to 3,000 dwellings in total.

Opportunity: Buckover provides opportunity to deliver a new 21st Century Garden Village in the West of England. It broadens the housing supply model via a single ownership with a genuinely visionary approach to placemaking and land value capture. It could assist the case for a step change in public transport provision in the locality including Metrobus Extension to Thornbury, motorway junction improvements and re-opening of Charfield rail station. It would also provide a key part of long-term solution to housing pressure in the north of the district and potential growth point for the Oldbury New Nuclear Build.

2.2 Site characteristics.
The site predominantly comprises agricultural fields and sits in a 'bowl' rising up to woodland at the south of the potential development area.

2.3 Physical & Environmental constraints.
Access: From the A38. Local routes and connections back into Thornbury require investigation. M5 J14 is at capacity. The A38, which is a strategic alternative to the M5, bisects the potential development area in two.
Landscape & Heritage: Wooded ridgeline (inc. SNCI) and archaeological interest along southern boundary. Two Listed Buildings in centre of the site.
Pylons: run east-west across the site.
Ecology: Two SSSIs present; the A38 verge and small historic quarry in northeast corner.

2.4 Existing development schemes.
No existing development schemes.

2.5 Opportunities
Relatively unconstrained land and single ownership with a long-term interest, provides opportunity to develop new exemplar settlement unencumbered by existing development in accordance with Garden Village principles, with full range of new services, facilities and employment opportunities, including heat network and community renewable energy.

3.0 Landuses, capacity, availability & viability

3.1 **Mix of uses – housing, education, employment, retail/centres, and open space.**
New settlement, including primary school and 3-16 All-through school, local shops, services and POS.

3.2 **Employment (type/ha)**
Range of opportunities including office, SME workspaces, logistics, retail & leisure, care home, health & educational facilities, and hotel (11ha in total). Detailed employment provision to be addressed through the local planning process.

3.3 **Housing typology / density.**
Garden Village. Broad range of housing types from 1-3 storey to create variety and character within the new settlement and offer to all sections of the community. Average net densities of 30-50dph.

3.4 **Capacity**
Approximately 3,000 dwellings and 11ha of employment land (all employment uses).

3.5 **Availability**
Single landowner. No known restrictions. Some tenancies.

3.6 **Viability**
Considered good, but dependent upon innovative approach to land value and land value capture, i.e. opportunity to explore new model based on long-term return on investment and community governance. See viability evidence for further information.

4.0 Concept Diagram

See Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 **Vision**
An exemplar garden village that will be developed along Community Land Trust principles that recycles the uplift in land value into infrastructure, services and facilities and is managed in the long-term interest of the new community.

5.2 **Housing capacity (types, typology & affordable housing) and other landuses.**
It will provide around 3,000 dwellings, comprised 35% AH, a full range of types, sizes, new properties for rent, for elderly persons including extra-care facility, custom & self-build and opportunities for SME builders. It will also include a range of employment uses, including 'anchor' business, space for new start-ups, SMEs and live-work community hub, as well as employment to support a new full range of retail and community facilities. Facilities to complement such services available in Thornbury.

5.3 **Appearance**
Beautifully and imaginatively designed homes with gardens, of a range of traditional and contemporary styles and character areas that respond to South Gloucestershire's built heritage and local natural environment.

5.4 **Access**
Contribution to strategic transport package including: Metrobus Extension to Thornbury (& Buckover), M5 J14 improvements, Charfield Station re-opening, A38(N) Park & Ride,

local bus service improvements and strategic cycle and pedestrian routes. The A38 also acts as important relief road to the M5. Consideration is therefore also required to ensure it can continue to act as an effective relief road without detriment to the new residents. Developer investment required in local highway, foot and cycle connections to Thornbury, including local shuttlebus provision.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

A high quality network of strategic planting and open space to reinforce Ridgewood, respect the setting of local heritage and ecology assets, provide for a Sustainable Urban Drainage system and full range of open space including sports pitches, play areas, communal gardens, orchards and allotments. A strategic (open space) gap and or Green Belt between Buckover & Thornbury will be maintained. Its designation and purpose to be confirmed through the SG new Local Plan process.

5.6 Infrastructure requirements (health, education, utilities) etc

The new settlement will provide a primary school and 3-16 All-through school, nursery, health facility, community hub building, range of employment and office spaces for SMEs and larger businesses, local retail units and hotel. Measures to establish the new community, including BGV residents group and management board, community fund and development worker. Reinforcement of the High Voltage electricity network is likely to be required.

5.7 Energy/heat

The new settlement will embed zero-carbon and energy positive solutions throught the planning, design and delivery process across the whole settlement. Incorporating a range of energy conservation and generation measures, including potential district heat network, renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Delivery of strategic transportation improvements, including M5 J14 and Metrobus A38 extension, Charfield rail station, and need to maintain strategic capacity on A38.
- Failure to embed Garden Village landownership / land value capture delivery model required to maximise infrastructure provision and community facilities etc early in delivery process.
- Drainage & Utility strategy / costs required, including consideration of risk that pylons pose to capacity and viability.
- Eventual coalescence with Thornbury.

6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Early prioritisation of transportation infrastructure.
- Early engagement around viability modelling and land value capture principles.
- Early embedding of long-term community stewardship principles.
- Early consideration of utility strategy.
- Anchor employment strategy to ensure sustainability of new Garden Village.
- Early consideration and bringing forward of a ‘strategic gap’ policy, including potential greenbelt extension up the eastern edge of Thornbury.

7.0 Indicative trajectory

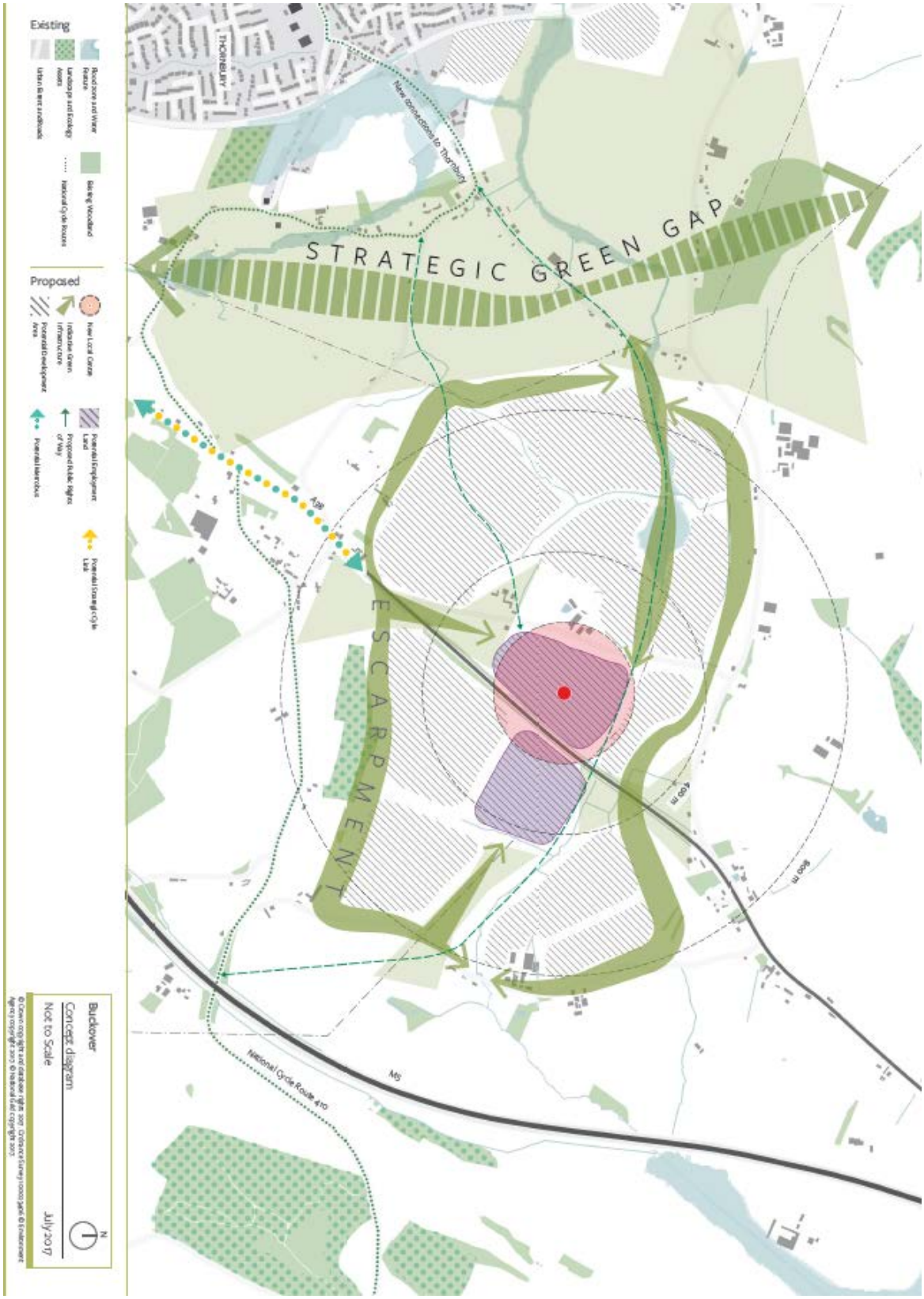
7.1 Assumed lead in time of 10 yrs (from 2017), to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-250pa. Relatively slow build out to allow new community to form. Number of developers (outlets): 1-3. School & community facility triggers tbc. Early local bus / shuttlebus improvements & provisions.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Buckover											

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	100	150	150	200	200	200	200	250	1,500

Post 2036	Total Capacity
1,500	3,000

Appendix 1 – Concept Diagram



Strategic Development Location – Charfield
South Gloucestershire

Date of Issue: October 2017

Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Charfield – comprising a number of major interdependent development areas around the village.

1.2 **Size**
Approximately 60-70ha (gross).

1.3 **Relevant planning status and designations**
Land north of Wotton Road west of the rail line is subject to a current planning application for 121 dwellings and a retail outlet (PT16/6924/O). Refused in July 17. Appeal date TBC.

1.4 **Current land use**
Agricultural

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity
The JSP Emerging Spatial Strategy (Nov. 2016) identified Charfield as accommodating up to a further 1,000 dwellings in the plan period (to 2036). Charfield is located outside the Green Belt, has land reserved for the re-opening of a rail station and benefits from a number of local services and facilities. New housing could strengthen the case for re-opening of the station, additional bus services and new services and facilities.
The future role and function of existing retail and community assets and remaining greenfield land parcels within the centre of the village adjoining the Wotton Road should be reviewed to ensure future needs are assessed, so that new and existing facilities make the most efficient use of land and they maximise the sustainability of the expanded village.

Development at Charfield would also provide a key part of long-term solution to housing pressure in the north of the district alongside new housing at Thornbury, Buckover Garden Village.

2.2 Site characteristics.
The sites predominantly comprise gently sloping agricultural fields.

2.3 Physical & Environmental constraints.
Access: M5 J14 capacity presents significant risk. All the sites are considered accessible, although all require further assessment to establish capacity and mitigation works required. The Wotton Road is busy and is the main road from Wotton-under-Edge to the M5 motorway and therefore requires a comprehensive scheme of improvements and traffic calming.

Listed Buildings & landscape: Land to the west is constrained a steep escarpment and Grade I listed church at Churchend. Land to the east is constrained by flood zone and the Stroud district boundary. Land to the north is of ecological, landscape and heritage interest. Land to the south is of ecological and landscape value. All sites are potentially visible from the Cotswold AoNB.

2.4 Existing development schemes.
Charfield currently has planning permission for circa 170 dwellings in addition to recent site completions for 20-30 dwellings. Land north of Wotton Road west of the rail line is

subject to a planning application for 121 dwellings and a retail outlet (PT16/6924/O), which was refused in July 17. Appeal date TBC.

2.5 Opportunities

Listed Buildings, the escarpment, Elbury Hill and the river flood zone provide the basis of a permanent and varied green infrastructure and public open space strategy. Substantive, planned development provides opportunity to bring forward additional facilities and comprehensive improvement scheme to the Wotton Road and new and improved foot & cycle connections throughout and around the village.

3.0 Landuses, capacity, availability & viability

3.1 Mix of uses – housing, education, employment, retail/centres, and open space.

Predominantly residential, with a 1.5FE primary school or replacement of existing school with new 3FE school, new convenience store, improved community facility and new & improved POS.

3.2 Employment (type/ha)

Compared to other areas of the West of England, availability of employment land in the Charfield area is limited. Allocations for new residential development should therefore be accompanied by a substantial amount of new employment land.

Detailed employment provision and location to be addressed through the local planning process. Initial scenario to test is for approx. 5ha of employment land to be distributed at appropriate locations within the new development area and at land northwest of Charfield along the B4509 (including the former Leyhill Prison visitors centre and at Elmtree Farm).

Non B Class employment should also be distributed at appropriate locations across the development.

3.3 Housing typology / density.

A broad range of housing types, predominantly 2 storey, including a significant proportion of smaller market dwellings (apartments and terraced) to supplement / expand the range, type and tenure of existing housing stock in the locality. Average net densities ranging between 30-50dph.

3.4 Capacity

Further technical work has indicated that around of 1,200 dwellings and approximately 5ha of new employment land can be accommodated.

3.5 Availability

All sites have been promoted by landowners/agents.

3.6 Viability

All sites have landowner / developer interest. Considered good. (See viability evidence for further information).

4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 Vision

Charfield will become a more sustainable settlement. New development will enhance the range of housing available, improve the safety and amenity of the Wotton Road, and provide new services and facilities, employment, public transport and walking & cycling opportunities.

5.2 Housing capacity (types, typology & affordable housing) and other landuses.

Growth will provide around 1,200 new dwellings, comprised 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space, and improved community facilities.

5.3 Appearance

New dwellings will generally be traditional in appearance respecting Charfield's rural character, but with instances of high quality modern architecture that respond to health & wellbeing and sustainability objectives, to add variety and interest to the village.

5.4 Access

Provide or contribute to strategic transport packages including: M5 J14 improvements, Charfield Station re-opening, local bus services and a comprehensive Wotton Road environmental enhancement scheme. Developer investment required in foot and cycle connections through and around the village, including potential for a new Charfield circular public right of way route and enhanced route to the Renishaw site, KLB school and Wotton-under-Edge.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

A Green Infrastructure network will enhance and protect the Little Avon River and its flood zone, setting to Elbury Hill, St James' Church, local SSSI & SNCIs and Listed Buildings. New development will also provide Sustainable Urban Drainage systems and full range of new and or improved open space including sports pitches, play areas and allotments.

5.6 Infrastructure requirements (health, education, utilities) etc

The Council will work with landowners, developers and the local community to provide a new or enlarged primary school, new convenience store and improved community facilities, preferably within the centre of the village. Additional employment units will also be provided within the new development areas and along the B4509 adjacent the village settlement boundary. Reinforcement of the existing sewerage network and treatment works is likely to be required.

5.7 Energy/heat

New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Un-coordinated piecemeal development that fails to secure necessary improvements to the range of services, facilities and accessibility improvements.
- Delivery of strategic transportation improvements, inc M5 J14 and station re-opening,
- Congestion & safety along Wotton Road

- School capacity (will be full once existing permissions are built out)
- Possible reinforcement to existing sewerage network & treatment works.

6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Early and thorough community and stakeholder engagement is required to assess land uses & facilities demand & options, particularly in light of the existing planning application and appeal for 120 dwellings on land in the centre of the village, which may be better utilised for other uses.
- Consideration / review of developer contributions strategy.
- Continued vigorous promotion of Charfield Station re-opening and early prioritisation / delivery required of M5 J14 improvements.
- Charfield wide access and movement strategy required, including early consideration of a holistic Wotton Road environmental improvement and traffic calming scheme.
- Early engagement with local school academy and the Parish Council / options assessment required.
- Landownership and legal check (see trajectory below).
- Early engagement with Wessex Water.

7.0 Indicative trajectory

7.1 Potential development areas comprise 4 major land holdings.

- The major landholding (comprising 4 landowners) is controlled by Commercial Estates Group around the southwest of the village (circa 650-750 dwellings).
- Bloor homes have made representations relating to land off the Wotton Road NE of the village centre (circa 250 dwellings).
- Barratt currently have a planning application for 121 dwellings on land off the Wotton Road, adjacent the railway in the centre of the village. However, the Council is concerned that this does not represent best use of land, in this central location, ahead of community engagement relating to land-use and service requirements and has refused the application. Appeal date TBC. Use and capacity of this site is thus still tbc.
- Land has also been promoted south of the Crest Nicholson scheme, through which access would be required. Capacity would be restricted by vehicular access requirements (circa 150 dwellings).

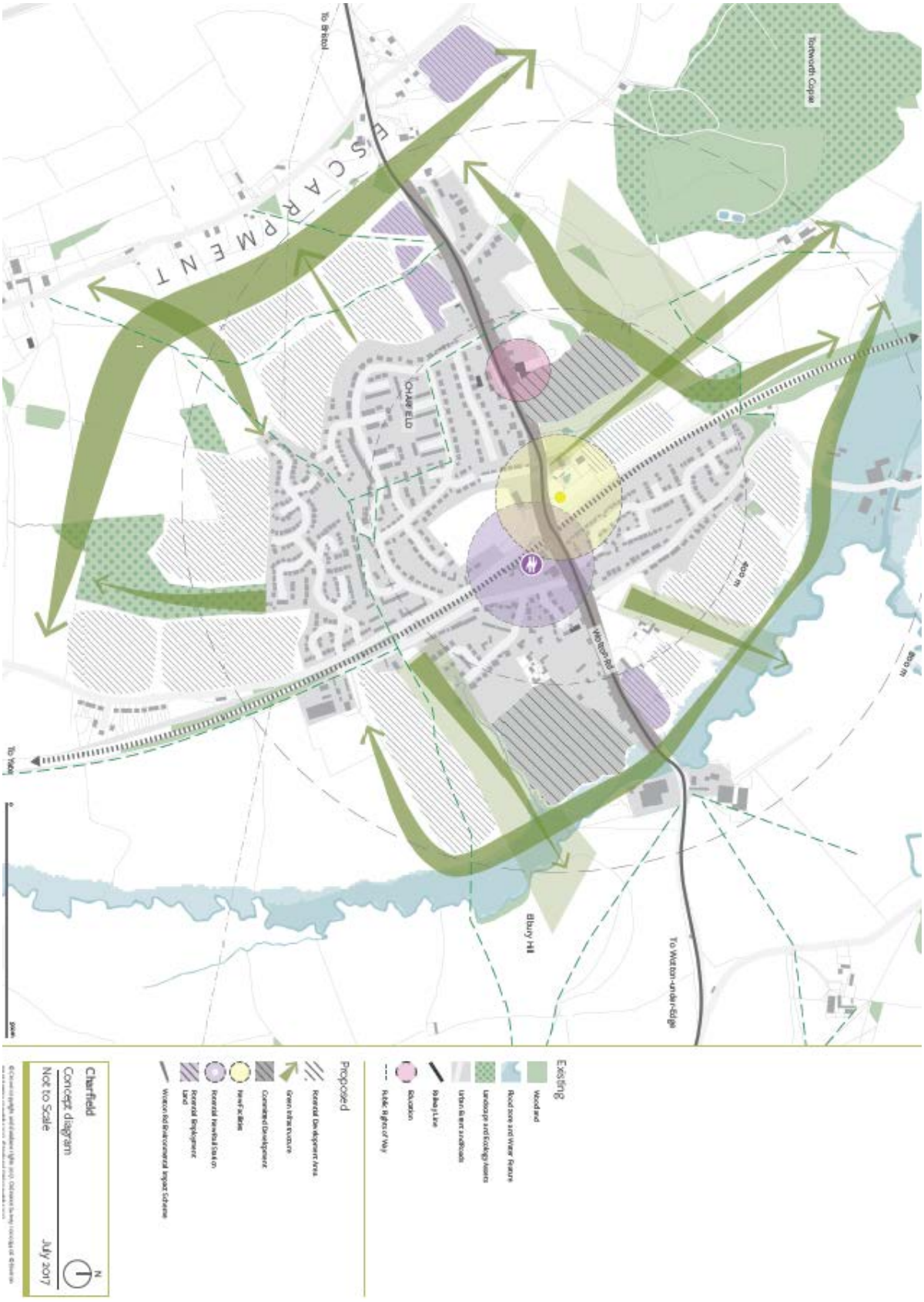
A thorough landownership and legal check is required to corroborate the stated positions.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Charfield							**50**	**50**	**100**	**150**	**150**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	**150**	**150**	**100**	**100**	**50**				

Post 2036	Total Capacity
0	**1,200**

Appendix 1 – Concept Diagram



Strategic Development Location – Coalpit Heath
South Gloucestershire

Date of Issue: October 2017

Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Land east of Roundways to Frog Lane, Coalpit Heath.

1.2 **Size**
Approx. 75ha

1.3 **Relevant planning status and designations**
No previous planning history. Green Belt.

1.4 **Current land use**
Agricultural

2.0 Suitability (Constraints & Opportunities)

2.1 **Strategic Opportunity**
The JSP Emerging Spatial Strategy (Nov 2016) identified Coalpit Heath as accommodating a further 1,500 dwellings in the plan period (to 2036).

Coalpit Heath offers close proximity to the Science Park and EGE Enterprise Area, and Bristol North Fringe. Strategic development along the A432 Badminton Road, in combination with proposed growth at Yate would support investment in rail and metrobus extension to Yate. It would also support existing and provide new services and facilities and employment opportunities in the locality.

2.2 **Site characteristics.**
The site predominantly comprises agricultural fields and generally rises up to a north-south running ridge along the centre of the site and slopes down to Frog Lane. Some historic earthworks are evident in the fields nearest to Roundways. The historic Dramway runs east west across the southern part of the site.

2.3 **Physical & Environmental constraints.**
Access: From the Badminton Road/Frog Lane, Roundways and Woodside Road. Local junction improvements required.
Landscape: Ridgeline is highly visible from Yate and the BNF. Consideration required to master planning and architectural response to mitigate impact.
Historic mine workings: Site was bounded by Frog Lane colliery to north and Ram Hill colliery to the south. Extent and depth of mine workings to be determined. Preliminary investigations suggest that the western edge of the site is at risk from historical shallow coal mining and associated mine entries and to a lesser extent deeper underground workings. Some of the mine entries have been secured whilst some have not. Historic bell pits also appear to be present in the west of the westernmost fields. The mine workings also deepen to the east. Risk of subsidence is considered low. Further more detailed investigations are required, particularly across the western most fields, although remedial measures are considered capable of addressing the mine workings.
Heritage: Historic Dramway across southern part of site and Listed Building settings to take account of through master planning.

2.4 **Existing development schemes.**
No existing development schemes.

2.5 **Opportunities**
The potential development area provides opportunity to provide a new residential / mixed-use neighbourhood in close proximity to a possible Metrobus extension route. Former mine workings could potentially provide water source for heat networks.

3.0 Landuses, capacity, availability & viability

3.1 **Mix of uses – housing, education, employment, retail/centres, and open space.**
Predominantly residential, with 1 or 2 primary schools, new local centre retail to serve the development, community hub/facility, new POS & mining heritage interpretation facility.

3.2 **Employment (type/ha)**
Detailed employment provision and location to be addressed through the local planning process. Initial scenarios to test are for around 5ha of small scale (B-use class) employment units for SME's (e.g. offices, workshops and logistics). Non B-use Class employment (e.g. small scale retail) should also be distributed at appropriate locations across the development.

3.3 **Housing typology / density / capacity.**
A broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality. Average net densities ranging between 30-70dph.

3.4 **Capacity**
Further testing / technical work has identified that around 1,800 dwellings and approximately 5ha of employment land can be delivered at this SDL.

3.5 **Availability**
Potential development area has 100% landowner / developer interest, approximately 50:50 Bloor & Edward Ware Homes.

3.6 **Viability**
Considered good, (subject to no significant anomalies identified as consequence of historic mine workings). Refer to viability evidence for further information.

4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 **Vision**
A comprehensive development scheme delivering a high quality new neighbourhood that responds positively to the localities rich mining heritage and visually prominent aspect.

5.2 **Housing capacity (types, typology & affordable housing) and other landuses.**
A new modern neighbourhood of around 1,800 new dwellings, comprised 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space, and new community facilities.

5.3 **Appearance**
Dwellings will generally be modern in appearance, responding to health, wellbeing and sustainability objectives, providing a fresh new style to the locality, but with instances of high quality traditional architecture that respond to the area's history and site characteristics to add interest and variety.

5.4 **Access**
The development will provide or contribute to a strategic transport package including: Metrobus extension along the Badminton Road to Yate / Chipping Sodbury, Winterbourne & Frampton Cotterell Bypass, A432 Park & Ride west of Yate, Yate Station enhancement, and strategic cycle route and local bus services. Developer investment will also be required in local highway improvements and the local network of foot and cycle connections. Vehicular access will be off the Badminton Road / Frog Lane, Roundways and Woodside Road.

5.5 **Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)**
A Green Infrastructure network will reinforce the new Green Belt boundary along the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting to Listed Buildings. New development will also provide Sustainable Urban Drainage systems and the full range of new open space including sports pitches, play areas and allotments. POS may need to be located on areas worst impacted by historic coal mining.

5.6 **Infrastructure requirements (health, education, utilities) etc.**
A new primary school, new convenience store/retail opportunity, small scale employment units for SMEs, (office space, workshops, logistics), care home and extra-care facility will be provided. Reinforcement of the high voltage electricity network likely to be required. Diversion of or 'plan around' a strategic gas main.

5.7 **Energy/heat**
New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. A district heating network will also be investigated.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 **Identified risks to suitability, availability and achievability.**
The critical risks are:

- Historic mineworkings. Impact on capacity, abnormal cost of filling, capping and additional foundations.
- Landowner / developer disagreement & over valuation of land.

6.2 **Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)**

- Independent engineering review of developer land (geophysics and Lidar) surveys.
- Landownership and legal check.
- Council pressure to require land equalisation agreement / comprehensive approach and realistic land valuation.

7.0 Indicative trajectory

7.1 Potential development areas comprise two major land holdings controlled by Bloors and Edward Ware Homes. 2-3 outlets. Start subject to certainty around programming of strategic transport package.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Coalpit Heath							**50**	**100**	**100**	**150**	**150**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
150	**150**	**175**	**150**	**150**	**150**	**150**	**100**	**75**	**1,800**

Post 2036	Total Capacity
0	**1,800**

Appendix 1 – Concept Diagram

Strategic Development Location – Northwest & West Yate South Gloucestershire

Date of Issue: October 2017

Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Land comprising two broad locations to the northwest and west of Yate.

1.2 **Size**
Total area of approximately 160ha (gross).

1.3 **Relevant planning status and designations**
Green Belt (with exception of land at Engine Common).

1.4 **Current land use**
Predominantly agricultural & paddocks.

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity
The JSP Emerging Spatial Strategy (Nov 2016) identified the 'Yate Strategic Corridor' as accommodating a further 2,600 dwellings in the plan period (to 2036).

Yate & Chipping Sodbury is the 4th largest settlement in the West of England, with good links including rail to the Bristol Urban Area. Land to the west of Yate has close proximity to major employment areas and the rail station plus is closely related to the proposed Metrobus extension along the Badminton Road.

2.2 Site characteristics.
The potential development area is characterised by small historic parliamentary field enclosures at its eastern edge adjacent Engine Common, then predominantly comprises larger agricultural fields and paddocks around the northwestern part of Yate, is generally flat, before sloping down to the Frome south of Nibley Lane. Pylons cross land adjoining the Badminton Road. South of Badminton Road, the northern half of this western edge, is open agricultural fields that slope gently down westwards from the Nibley Lane to a drainage channel and pylon running north – south. The southern part is surrounded by rail lines predominantly on embankments. A pylon crosses from northwest to southeast. Land is mainly used as paddocks and has a neglected feel. Some is filled ground.

2.3 Physical & Environmental constraints.
2.4

Access: New highway access points will be required off the Badminton Road (across the Frome valley), Yate Road, Iron Acton Way and possibly Stover Road. A new crossing over the Yate-Thornbury rail track bed *may* be required. South of the Badminton Road new highway access points will be required off the Badminton Road from the north and possibly the industrial estate to the west across the Nibley Lane. A new rail crossing and widening of the Nibley Lane east of the rail line will also be required. Other: Flood plain and pylons run through the centre of the locality and across land off the Westerleigh Road in the south of the potential development area restricting developable area and residential potential.

2.5 Existing development schemes.
Site at Engine Common (PK12/1751/F) for 210 dwellings refused in 2013. A planning application (PK17/608/O) for up to 90 dwellings was also refused in July 2017.

2.6 Opportunities

Pool Farm and petrol station along the Yate Road could provide the basis of a new local centre to serve the north western development area. Alternatively, it may be more appropriate to locate a new local centre off Stover Road, closer to the rail station. The Frome Valley, rail line and fields to rear of properties along North Road, Engine Common provide the basis of a Green Infrastructure strategy, plus new substantive buffer planting to create a permanent and softened edge to Yate. South of the Badminton Road, development could provide an improved edge and employment development in close proximity to the Badminton Road (new Metrobus extension route and strategic cycle route) and the rail station. Nibley Lane could be downgraded to a green (foot / cycle route). The southern part of the area is compromised by rail lines, pylons and filled ground, hence is not considered suitable for residential use, but could provide new employment land (B2-B8), providing for new and businesses potentially decanted from possible regeneration of the Beeches Estate for higher value, more intensive employment and residential uses in close proximity to the rail station.

3.0 Landuses, capacity, availability & viability

3.1 Mix of uses – housing, education, employment, retail/centres, and open space.

Predominantly residential to northwest of Yate, with a primary school, new small scale retail / local centre, community hub/facility, new POS. West of Yate possible residential and or employment area.

3.2 Employment (type/ha)

Detailed employment provision and location to be addressed through the local planning process. Initial scenarios to test as follows:

- Northwest Yate: Some small-scale employment units for SMEs (e.g. offices, workshops) as part of a high density mixed-use new neighbourhood. Non B Class employment should also be distributed at appropriate locations across the development

- West Yate: Area west of the Badminton Road Trading Estate for 11ha of high quality (B1, B2 uses) extension to the trading estate, remaining area within rail land to the southwest, 19ha B2, B8 use.

3.3 Housing typology / density.

Northwest Yate: A broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality. Average net densities ranging between 30-70dph.

3.4 Capacity

Northwest Yate: The SDL comprises approx. 100-120ha of land which has capacity for a minimum of 2,000 dwellings and supporting facilities and POS.

3.5 Availability

Some developer / landowner interest at Engine Common and South of Badminton Road. Landowner interest subject to ongoing investigation on the remainder of the search area.

3.6 Viability

Considered satisfactory, subject to significant public sector involvement in land assembly and infrastructure delivery. (Refer to viability evidence for further information).

4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 Vision

Northwest Yate will provide a new high quality, high density, mixed-use residential neighbourhood that connects to a regenerated rail station and Beeches Industrial Estate. It will provide new school(s) and new centre off the Yate or Stover Road, improved connections to the station and green infrastructure throughout the locality. West Yate is favoured for a new strategic employment area (approx. 30ha), comprising high quality office opportunities off the Badminton Road and B2/B8 opportunities within the railway land.

5.2 Housing capacity (types, typology & affordable housing) and other landuses.

Northwest Yate has capacity for around 2,000 new dwellings, of which at least 1,000 will be delivered within plan period, comprising a broad range of housing types from 2-4 storey, including a significant proportion of smaller house types (apartments and terraced dwellings) to supplement existing housing stock in the locality and provide a new offer, complemented with high quality community space and public realm, 35% AH, a range of types, sizes, new accommodation for elderly persons and some custom & self-build opportunities, plus new small scale employment space, and new community facilities.

5.3 Appearance

Dwellings will generally be modern in appearance, responding to health, wellbeing and sustainability objectives, providing a fresh new style to the locality but with instances of high quality traditional architecture that respond to the area's history and site characteristics to add some interest and variety. The approach should contrast Yate's 'modern' distinctiveness to Chipping Sodbury's more historic character.

5.4 Access

The development will provide or contribute to a strategic transport package including: Metrobus extension along the Badminton Road to Yate / Chipping Sodbury, Winterbourne & Frampton Cotterell Bypass, A432 Park & Ride west of Yate, a strategic cycle route, Yate Station enhancement and local bus services. Developer investment will also be required in local highway improvements and the local network of foot and cycle connections. An on-site rail crossing, and a new rail bridge is also likely to be required across the Nibley Lane.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

Green Infrastructure network will reinforce the new Green Belt boundary, protect the river valley, linear settlement of Engine Common and Nibley Village, provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate. New development will also provide Sustainable Urban Drainage systems and the full range of new open space including sports pitches, play areas and allotments. The historic parliamentary enclosures, which comprise small to medium sized fields, reinforced by a strong mature hedgerow network and large number of trees, north of Mission Road and east and west of North Road will also need to be protected by a new landscape and or Green Belt designation.

5.6 Infrastructure requirements (health, education, utilities) etc

A new primary school and 3-16 all through school, new convenience store/retail opportunity, small scale employment units for SMEs, (workshops), care home and extra-care facility will need to be provided, plus new employment areas south of the Badminton Road.

5.7 Energy/heat

New development will aim to be zero carbon by maximising the range of energy conservation and generation measures, e.g. including renewables, passivhaus standard homes, homeworking measures and electric car charging facilities etc. A district heating network(s) will also be investigated.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- Multiple landownerships & potential new rail crossing(s).

6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Immediate landownership and legal check. Direct contact of landowners and engagement.
- Early consideration of the role and designation of a Mayoral Development Corporation to enhance the prospect of land assembly, infrastructure delivery and the regeneration of existing industrial areas to bring forward a coherent and well connected new residential development.
- Formulation of Project Plan, comprising:
- Detailed feasibility (capacity, access & movement, rail crossing) study
- Employment market assessment.
- Landownership / delivery model / infrastructure delivery options assessment, inc review of CPO & Devo powers and Council delivery aspirations.
- Council produced SPD & Outline Planning Application.
- CPO, infrastructure provision etc
- Early consideration of extent and purpose of new landscape and or Green Belt designation at Engine Common either side of North Road, north of Mission Road.

7.0 Indicative trajectory

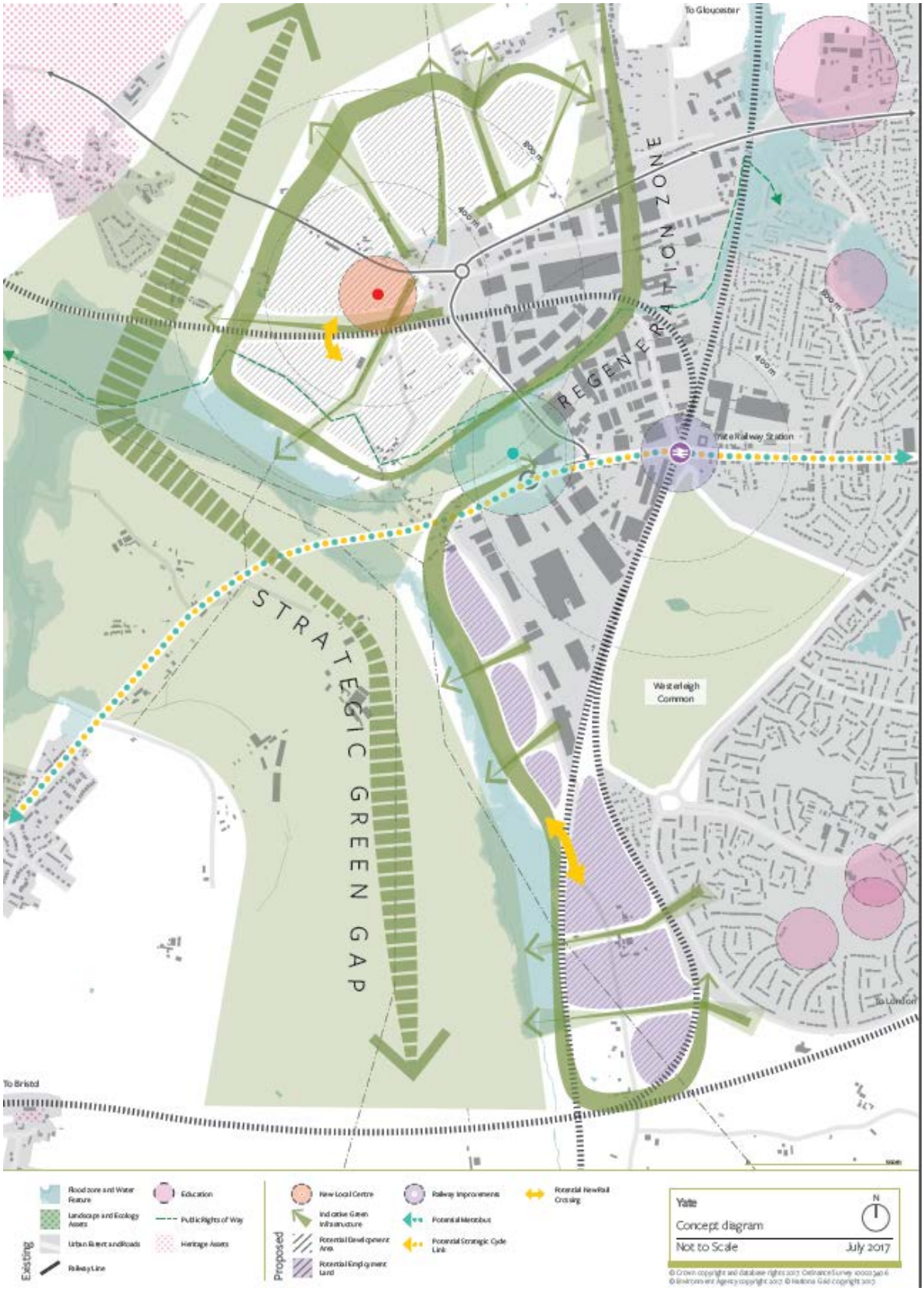
7.1 Potential early releases at Engine Common and south of Badminton Road. Otherwise 10yr lead in re majority of residential development at Northwest Yate due to land assembly issues.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
North West Yate							**25**	**25**	**50**	**50**	**50**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	**50**	**50**	**50**	**50**	**100**	**150**	**150**	**150**	**1,000**

Post 2036	Total Capacity
1,000	**2,000**

Appendix 1 – Concept Diagram



Strategic Development Location – Thornbury
South Gloucestershire

Date of Issue: October 2017

Bath & North East Somerset Council

Bristol City Council

North Somerset Council

South Gloucestershire Council

1.0 Location characteristics

1.1 **Site Location (address)**
Land at Thornbury around the town's northern and eastern edge off Butt Lane & Morton Way.

1.2 **Size**
Approx. 35ha (Gross).

1.3 **Relevant planning status and designations**

- Land west of Gloucester Road 130 dwellings (ref PT16/4774/O) approved Aug 17.
- Land at Cleve Park 350 dwellings (ref PT16/3565/O) refused in March 17 – s78 Appeal pending.
- Land at NE Thornbury (south of Gloucester Road) is also subject to a planning application for some 370 dwellings (PT17/2006/O).

1.4 **Current land use**
Agricultural

2.0 Suitability (Constraints & Opportunities)

2.1 Strategic Opportunity
The JSP Emerging Spatial Strategy (Nov. 2016) identified Thornbury as accommodating up to a further 600 dwellings in the plan period (to 2036).

Opportunity: Development would serve to complete the eastern expansion of the town along Morton Way. Additional housing will assist to address demand in the north of the district and assist the case for Metrobus extension to Thornbury & Buckover GV. Potential to reinforce recreational access and green infrastructure objectives to the east of Thornbury in potential gap to Buckover Garden Village. Additional employment land could assist sustainability objectives.

2.2 Site characteristics
Predominantly comprising gently sloping agricultural fields.

2.3 Physical & Environmental constraints
Access: Highways England continue to consider mitigation required to increase capacity at M5 J14. Listed Buildings & landscape: Land at Crossways is subject to some flooding. Crossways and Cleve Wood are SNCIs.

2.4 Existing development schemes
Thornbury currently has planning permission for circa 625 dwellings at Park Farm & Post Farm. Land west of Gloucester Road has recently been approved for 130 dwellings. Land at Cleve Park was recently refused permission for up to 350 dwellings and a retail/community space and care home, as not in accordance with Core Strategy policy CS32 and the scale and massing of buildings not in keeping with the character of the local area.

2.5 Opportunities
Planned development provides opportunity to bring forward additional small scale retail and employment opportunities to serve the eastern side of the town and assists the case for the Metrobus extension and enhance green infrastructure in the locality.

3.0 Landuses, capacity, availability & viability

3.1 **Mix of uses – housing, education, employment, retail/centres, and open space.**
Predominantly residential, with a new convenience store or community facility, care home & improved POS.

3.2 **Employment (type/ha)**
Detailed employment provision and location to be addressed through the local planning process. Initial scenario to test is around 5ha of employment land for SMEs (workshops, logistics) at Crossways.

3.3 **Housing typology / density.**
Predominantly traditional design at net densities ranging between 30-50dph, including some self-build homes and accommodation for elderly persons.

3.4 **Capacity**
A maximum of 500 dwellings, plus 5ha of employment land at Crossways, from the SDL specified land parcels.

3.5 **Availability**
All sites have landowner / developer interest, although for residential development at Crossways.

3.6 **Viability**
Considered good. Refer to viability evidence for further information.

4.0 Concept Diagram

Refer to Appendix 1 – Concept Diagram

5.0 Draft policy expectations for location

5.1 **Vision**
Thornbury will provide further high quality housing which will contribute to sustaining the town centre and meet need in the north of the district alongside development at Buckover Garden Village and Charfield. Access to facilities, employment opportunities and open space and countryside will be improved along the Town's eastern edge.

5.2 **Housing capacity (types, typology & affordable housing) and other landuses.**
Growth will provide a maximum of 500 new dwellings (over and above existing permissions at Park Farm, Thornbury Fields & Post Farm), comprising 35% AH, a full range of types, sizes, new accommodation for elderly persons and custom & self-build opportunities, plus new employment space and community facilities.

5.3 **Appearance**
New dwellings will generally be traditional in appearance respecting Thornbury's market town character, but with instances of high quality modern architecture that respond to health & wellbeing and sustainability objectives, to add variety and interest to the town.

5.4 **Access**
The development will contribute towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover), A38(N) Park & Ride, M5 J14 improvements, Charfield Station re-opening, local bus service improvements, local highway, and foot and cycle improvements.

5.5 Green Infrastructure (flood risk/mitigation, ecology, heritage, POS)

A Green Infrastructure network will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane and extend the Pickedbrook Rhine streamside walk. Development will also provide Sustainable Urban Drainage systems and range of new and or improved open space including, play areas and allotments. A Strategic Green (open space) Gap and/or new greenbelt between Thornbury and Buckover Garden Village will be maintained.

5.6 Infrastructure requirements (health, education, utilities) etc

CIL contributions towards existing facilities within Thornbury (subject to SGC capital programme decisions).

5.7 Energy/heat

New development will aim to maximise the range of energy conservation and generation measures, e.g. including renewables and homeworking measures.

6.0 Barriers to delivery / critical interventions (Achievability Risks)

6.1 Identified risks to suitability, availability and achievability.

The critical risks are:

- None identified. Most of the remainder of the requirement is subject to a current appealed planning application.

6.2 Actions needed to reduce risks (e.g. investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy)

- Early community and stakeholder engagement is required to assess options for land at Crossways, which could comprise residential, employment or mixed-use.
- Preparation of a Community Facilities Audit and close working with Thornbury Neighbourhood Plan Team.
- Liaison with the LEA to understand emerging education situation.
- Continued vigorous promotion of Charfield Station re-opening and early prioritisation / delivery required of J14 improvements.
- Early consideration of extent and purpose of strategic green gap to Buckover. Potential extension to Green Belt in this locality.
- Early engagement with Buckover GV promoters to assess needs for new school(s).

7.0 Indicative trajectory

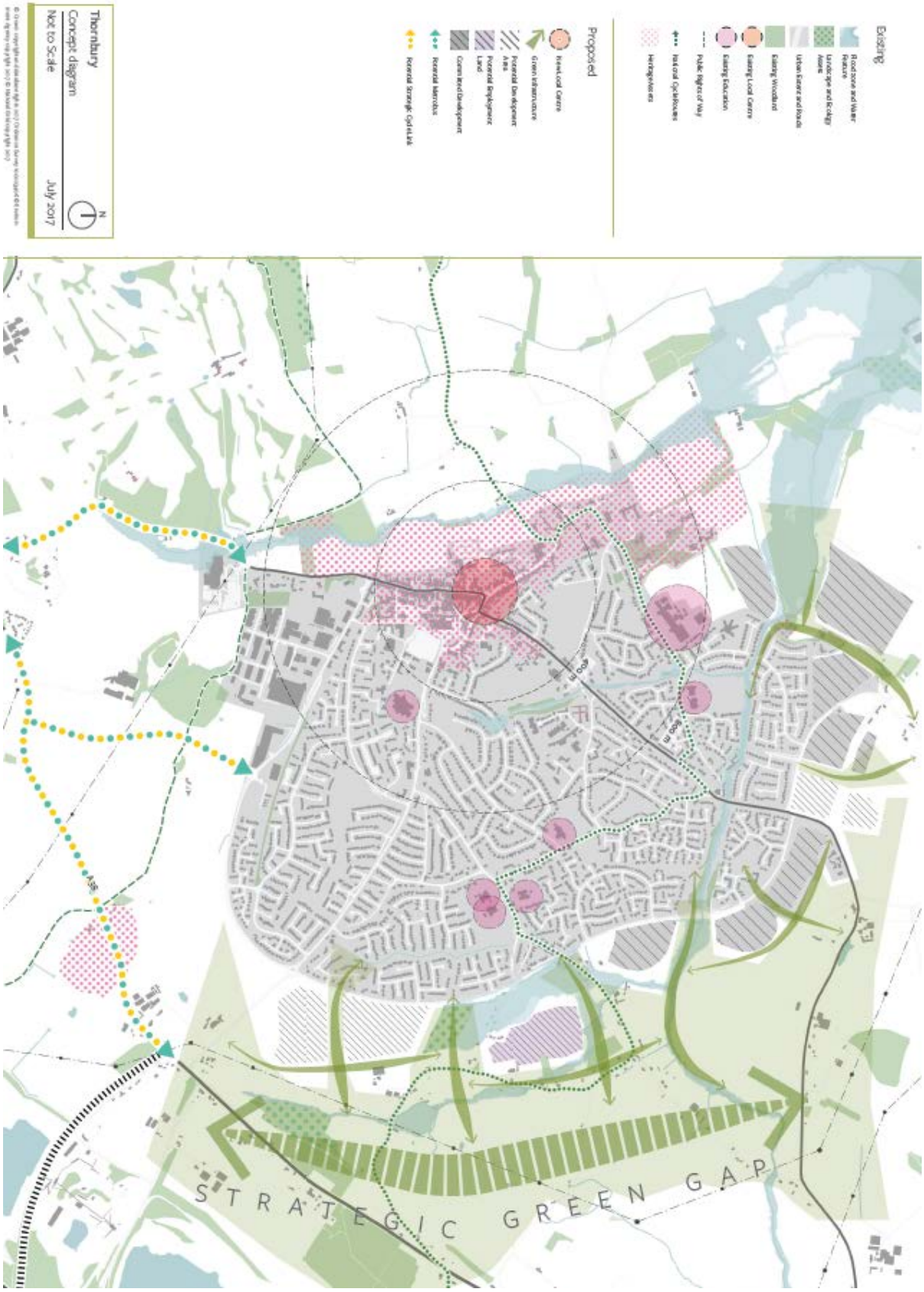
7.1 2-3 year lead in for land west of Gloucester Road contribution from other sites anticipated post 2022. 1 outlet per site. 50 dwellings per annum per site. Starts 2019/20, completion by 2030.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Thornbury				**30**	**50**	**50**	**50**	**50**	**50**	**50**	**50**

2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Capacity within Plan period
50	**50**	**20**							

Post 2036	Total Capacity
0	**500**

Appendix 1 – Concept Diagram



Appendix C

West of England Joint Spatial Plan

Sustainability Appraisal
Draft SA Report
October 2017

Bath and North East Somerset Council
Bristol City Council
North Somerset Council
South Gloucestershire Council

Appendix C

Contents

1. Introduction
2. West of England Joint Spatial Plan
3. Methodology
4. Planning context
5. Baseline information
6. Reasonable alternatives and difficulties encountered
7. Appraisal of effects
8. Monitoring
9. Next steps

Appendices

Appendix A Review of relevant plans, programmes and strategies
Appendix B Baseline data
Appendix C SA Framework
Appendix D Appraisal tables
Appendix E Legal compliance checklist

Appendix C

1. Introduction

What the SEA Regulations states:

Interpretation

2.—*(1) In these Regulations—*

"plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which—

(a) are subject to preparation or adoption by an authority at national, regional or local level; or

(b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case,

(c) are required by legislative, regulatory or administrative provisions;

Environmental assessment for plans and programmes: first formal preparatory act on or after 21st July 2004

5.—*(1) Subject to paragraphs (5) and (6) and regulation 7, where—*

(a) the first formal preparatory act of a plan or programme is on or after 21st July 2004; and (b) the plan or programme is of the description set out in either paragraph (2) or paragraph (3), the responsible authority shall carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure.

(2) The description is a plan or programme which—

(a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and

(b) sets the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC.

(3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.

Consultation procedures

13.—*(1) Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.*

(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall—

(a) send a copy of those documents to each consultation body;

(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees");

(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, or from which a copy may be obtained; and

(d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

Purpose of the Report

1.1 Sustainability Appraisal (SA) is a structured process for identifying and evaluating the likely significant effects – economic, environmental and social – of implementing a plan. It is a statutory requirement for all emerging Development Plan Documents, incorporating the separate requirements for Strategic Environmental Assessment (SEA).

1.2 The preparation of the West of England Joint Spatial Plan (JSP) has been subject to a fully integrated Sustainability Appraisal and Strategic Environmental Assessment in line with the requirements of:

- the Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework which set out the requirement for SA of emerging Development Plan Documents;
- the SEA Regulations (*Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004)* which require an environmental assessment to be carried out on certain plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment; and
- applicable Government guidance including Planning Practice Guidance.
- The 2005 guidance from the Office of the Deputy Prime Minister, *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* ('the ODPM guide'), though no longer having formal status, remains a useful source of practical advice.

Components of the Report

1.3 Work has been undertaken to accompany each stage of JSP production. Chapter 3 identifies all the documents produced. At this stage, to accompany the Publication Version of the JSP, the documents added are this covering report and the appraisal tables for each of the Strategic Development Locations (SDLs). This report is the main output of the SA.

1.4 The documents produced meet the requirements for an environmental report set out in the SEA Regulations. Appendix X signposts the relevant elements of the SA Report in relation to the contents required.

1.5 This chapter introduces the SA process. The rest of this report is structured as follows:

- Chapter 2 describes the content and main objectives of the JSP;
- Chapter 3 outlines the methodology used in the SA;
- Chapter 4 describes the plan's relationship with other plans, programmes and environmental / sustainability objectives;
- Chapter 5 describes the sustainability baseline;
- Chapter 6 sets out the reasons for selecting the alternatives dealt with and the results of the appraisal of options considered in the development of the draft JSP;
- Chapter 7 sets out the results of the appraisal of the policies within the draft JSP;
- Chapter 8 outlines initial proposals for monitoring the sustainability effects of the options; and
- Chapter 9 describes the next steps.

How to comment on this Report

1.6 The Draft SA will be published for consultation alongside the Publication Version from 22nd November 2017 to 10th January 2018. During the consultation period statutory environmental bodies and other interested parties, will have the opportunity to review the draft SA Report. The SA Report will then be finalised for submission along with the plan to the Secretary of State.

1.7 If you have comments, please send these to:

West of England Joint Planning Consultation
c/o South Gloucestershire Council
PO Box 299
Corporate Research and Consultation Team
Civic Centre, High Street, Kingswood
Bristol
BS15 0DR

Email: comment@jointplanningwofe.org.uk

Other assessments undertaken

1.8 The JSP has been subject to a parallel Habitats Regulations Assessment (HRA). The HRA of plans is a requirement of the Habitats Regulations 2010 and relates to the protection of European designated nature conservation sites. European sites are collectively termed Natura 2000 sites and comprise Special Areas

for Conservation (SACs) and Special Protection Areas (SPAs) together with Ramsar sites. The potential effect of the JSP on these sites will be considered in detailed as part of the assessments carried out under the Habitat Regulations.

1.9 The full HRA report will be published alongside the SA for consultation on the 22nd November 2017.

1.10 An Equalities Impact Assessment has also been produced. The Equality Impact Assessment and SA are two separate processes. The EqIA has been carried out alongside the SA to assess the impact on equality on emerging policies and documents.

2. West of England Joint Spatial Plan

What the SEA Regulations say...
Information for environmental reports (Schedule 2):
1. *An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.*

Process

2.1 The Joint Spatial Plan (JSP) is a formal development plan document being prepared by the four West of England (WoE) unitary authorities of Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council. It will cover the period 2016-2036.

2.2 The JSP identifies two Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-Super-Mare as a sub housing market area, and the other focussed on Bath. The Bath SHMA has been updated to provide consistent information to 2036.

2.3 The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. The SHMA prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) & 12,800 dwellings for the Bath HMA. It identifies an overall supply of 105,500 new homes to enable flexibility.

2.4 The JSP will provide the framework to deliver up to 105,500 additional new homes between 2016 and 2036 of which, around 32,200 (30%) should be affordable homes. The housing target supports the planned job growth of 82,500 jobs for the period 2016-2036 (or 125,900 jobs between the period from 2010-2036).

2.5 Once adopted, the JSP will form the strategic framework for Local Plans and Neighbourhood Plans. It is through these that the JSP policies will be put into effect. These plans will make site-specific allocations and include other detail not available at this stage and will, where required, be subject to SA and/or SEA in their own right.

Content

2.6 The JSP is a strategic plan, focused on provision to meet identified housing and employment needs over the plan period, through area-wide policies and through the identification of SDLs.

2.7 The plan's objectives – its 'strategic priorities' – are:

"…1. To meet in full the identified needs for housing, as far as possible, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.

2. To accommodate the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.

3. To ensure a spatial strategy where new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.

4. Substantially improve the quality and sustainability of new development by;

- *Incorporating a Placemaking approach*
- *Facilitating health, social and cultural well-being*
- *Integrating high quality, multi-functional green infrastructure*
- *Reducing greenhouse gas emissions and ensure resilience to the impacts of climate change.*

5. To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.

6. To retain the overall function of the Bristol & Bath Green Belt."

These plan objectives are important in the development of options to be appraised (see Chapter 6) because 'reasonable alternatives' are defined *"taking into account the objectives and the geographical scope of the plan or programme".*

3. Methodology

What the SEA Regulations say...

Preparation of environmental report:

12.—*(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.*

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—

(a) current knowledge and methods of assessment;

(b) the contents and level of detail in the plan or programme;

(c) the stage of the plan or programme in the decision-making process; and

(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.

(5) When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.

Developing the SA approach

3.1 The methodology for this appraisal was developed in accordance with the ODPM guide as outlined in Table 1 below.

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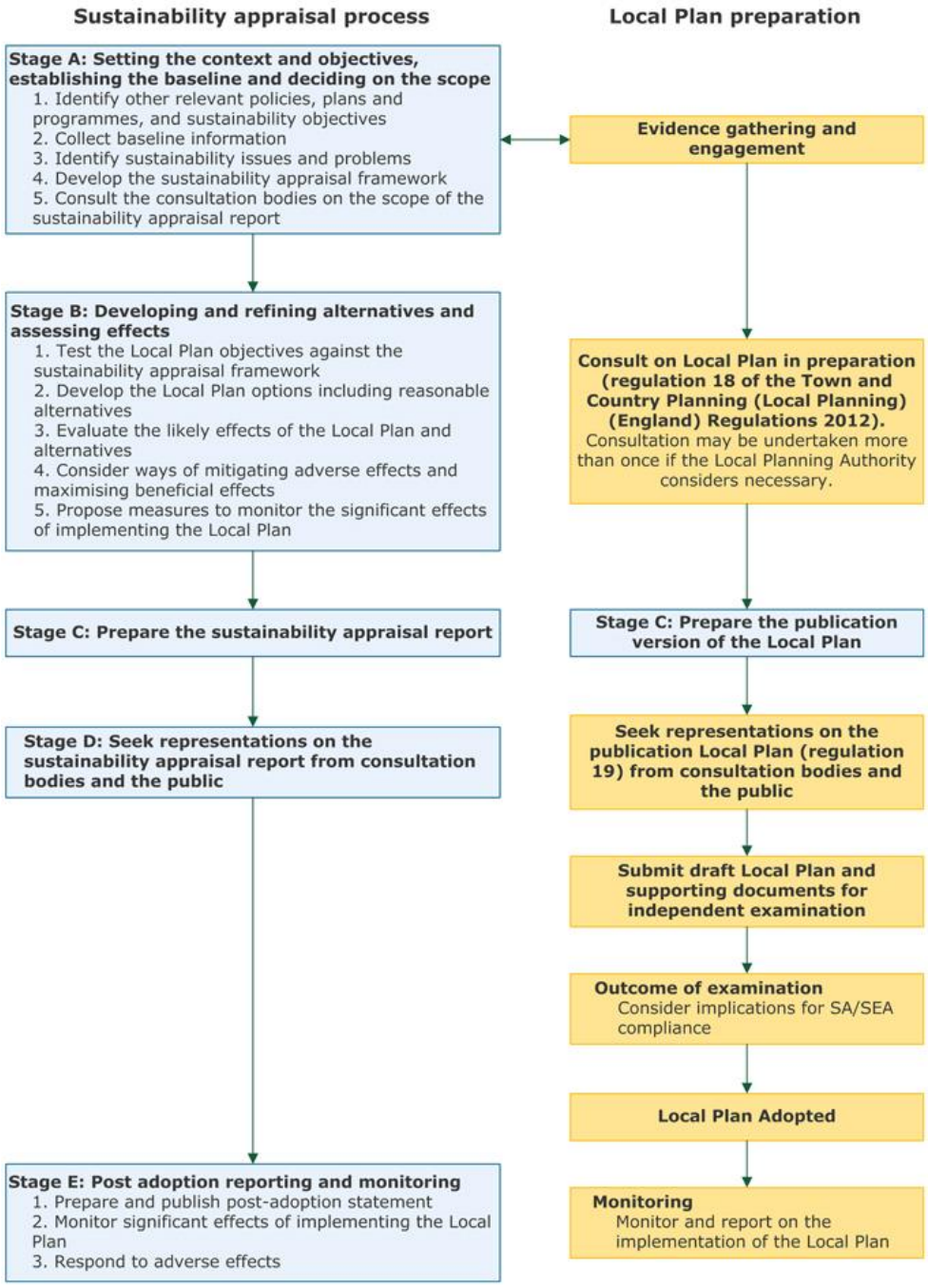
Table 1: SA process and Local Plan preparation



3.2 This chapter outlines the work undertaken on the SA at each stage of plan-making. Previously published SA reports for the Issues and Options (November 2015) and Towards the Emerging Spatial Strategy (November 2016) should be read as component parts of this report. Table 2 below outlines the documents produced at each stage.

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Table 2: SA iterations

Iteration and publication date	Stage	Documents	Weblinks
0 – June 2015	A	• Draft Scoping Report	
1 – November 2015	A/B	• Revised Scoping Report • Interim SA report: Issues & Options	https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387 https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/view?objectId=274387#274387
2 – November 2016	A/B	• Methodology Paper • Towards an Emerging Spatial Strategy SA	https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/view?objectId=295187#295187
3 – November 2017	B/C	• Draft SA Report	https://www.jointplanningwofe.org.uk/consult.ti

3.3 The SA has been developed alongside other workstreams. It does not consider the Green Belt status of potential development locations, nor does it consider in detail whether proposed developments are viable and deliverable. Scoring reflects the assumptions on deliverability and phasing made by the plan itself. However, where further work is needed to confirm these, the scoring and potential for mitigation also reflects this uncertainty.

Stage A: Scoping

3.4 Stage A has been completed. A SA Scoping Report, to help ensure that the SA process for the JSP covers the key sustainability issues for spatial planning in the West of England, was produced and consulted on from 15th June to 20th July 2015. The 'consultation bodies' for the purposes of the SEA Regulations – Historic England, Natural England and the Environment Agency – were consulted. The Scoping Report was revised, responding to the comments received during the consultation, and republished in November 2015.

3.5 The Scoping Report presents the outputs of all the tasks in Stage A (the scoping phase of the SA) and includes baseline information, review of relevant plans and identification of significant sustainability issues for the JSP. From the information collected, an "SA Framework", or set of sustainability objectives, was developed, against which the various components of the JSP have been appraised.

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The SA framework provides a way in which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan. These can differ from the plan's own objectives; they are designed to document the full range of relevant economic, environmental and social effects rather than to define what the plan aims to achieve. A draft SA Framework was included in the Scoping Report and has been updated following consultation on the Scoping Report. This updated version of the SA Framework has been used to appraise the sustainability of the JSP at each stage of its preparation.

3.6 The starting point for this SA framework are the Scoping Reports prepared for WoE authorities' Development Plans. These were reviewed and amended to ensure their relevance to the scope of the JSP. The policy context and baseline information have since been reviewed to ensure that they remain up-to-date. The revised policy context and a summary of the baseline information are provided as Appendices A and B respectively. Appendix C reproduces the current SA Framework. This includes the 21 objectives against which the plan's policies have been scored.

Stage B: Assessing Options

3.7 The integration of sustainability into the plan starts formally at the stage of Issues and Options. The effects of the options have been assessed in broad terms with the aim of assisting in the selection of the preferred options. The interim SA report was produced and published and subject to public consultation alongside the JSP Issues and Options document from 9th November 2015 to 29th January 2016.

3.8 Through the process of preparing the draft Plan options were further reviewed due to changes in circumstances such as market change, site availability and changes in national guidance. Therefore, relevant options were reviewed taking into account the objectives of the JSP.

3.9 Therefore, Alternative Options appraisals (as reported in Appendix C) helped to inform the draft Plan. The appraisals of the draft Plan policies are presented in Appendix D.

3.10 Matrices have been used to identify the sustainability effects of the options. These matrices are designed to help identify the potential impacts of the plan on each SA topic (guided by the SA Questions). The matrix for the assessment of the options is a relatively simple matrix. It allows for a discussion and comparison of each of the options under consideration. The simplicity of the matrix is designed to reflect the fact that strategic options should (and in many cases can only be) assessed in broad terms due a lack of spatial expression. A combination of expert judgement and analysis of baseline data has been used to judge the effects of the issues and options.

3.11 The Sustainability appraisal process relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out and reported using a matrix enabling an expert, judgement-led qualitative assessment to be made in most cases. The assessment does not seek to identify the likely level of influence of other strategies or policy documents and represents a 'face value' assessment of the likely effects of the JSP proposed policy options.

3.12 A 'precautionary approach' is taken, especially where qualitative judgements and mitigation is suggested if there is any doubt as to the effect of the plan.

Stage C: Preparing the SA Report

3.13 This document is the main part of the SA Report. It outlines the significant effects on the environment, social and economic factors of the Publication Version and the reasonable alternatives considered as part of the options assessment. It outlines the reasons for selecting the preferred option and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the plan.

Stage D: Consulting on the SA Report

3.14 The draft SA Report has been produced for consultation alongside the Publication Version of the JSP. The consultation period for the draft plan and SA Report is 22nd November 2017 to 10th January 2018. The next stages of the production of the JSP are:

Spring 2018	: Submission to the Secretary of State
Mid 2018	: Examination in Public; and
Late 2018	: Adoption

4. Planning context

What the SEA Regulations state:
Information for environmental reports (Schedule 2):
1. *An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.*
5. *The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.*

4.1 As identified in Chapter 3, the purpose of this stage is to document how the plan is affected by outside factors and suggest ideas for addressing any constraints. In order to fulfil the requirements of the SEA Regulations (above), a review has been undertaken of other relevant plans, policies, programmes (PPPs) and objectives.

4.2 Reviews of relevant plans and programmes were presented in the Scoping Report. The review has been updated to take account of publications since the last update of the review undertaken in June 2015 and this is presented in Appendix A.

4.3 Many of the plans, policies and programmes that have been reviewed pick up on some aspect of the "sustainable development" agenda but this may not be their primary purpose. Some of the key "sustainable development" messages coming out of the review of plans, policies and programmes are presented in Table X.

Table X: Sustainable Development Messages Identified in the Review of Plans, Policies and Programmes

Topic	Sustainable Development Messages
Air quality and noise	• Improve air quality and reduce air, noise and light pollution;
Biodiversity	• Protect and enhance biodiversity;
Climate change and flood risk	• Flood risk is increasing with climate change and there is a need to adapt to all predicted consequences of climate change;
Community, health and well-being	• Improve peoples' health and reduce health inequalities; • Improve access to health and well-being facilities • Protect and provide access to appropriate levels of open space and community facilities; • Create mixed, safe communities and promote social inclusion;
Employment	• Promote high quality and sustainable tourism; • Ensure a resilient and economically sustainable food system; • Facilitate building competitive economy and improve access to employment and training opportunities

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Energy and carbon emissions	• Support low carbon economies; • Achieve successful and competitive businesses both urban and rural; • Promote energy efficiency; • Promote and provide for renewable energy;
Historic environment	• Protect and enhance the historic environment; • Promote good design and sustainable construction;
Housing	• Meet strategic housing requirements for the district; • Provide affordable housing to meet identified needs; • Promote good design and sustainable construction; • Incorporate the principles of sustainable development;
Natural resources	• Make the best use of previously developed land; • Promote higher densities of development in accessible locations; • Protect soil resources including high quality agricultural land; • Promote water efficiency; • Promote local food production
Landscape	• Protect and provide access to appropriate levels of open space; • Protect and enhance landscape settings
Transport	• Reduce the need to travel • Promote a sustainable way of travelling • Encourage waling and cycling and public transport

5. Baseline information

What the SEA Regulations say...
Information for environmental reports (Schedule 2):
2. *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*
3. *The environmental characteristics of areas likely to be significantly affected.*
4. *Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.*

5.1 The comprehensive baseline information which describes the WoE area is presented in the Scoping Report [weblink]. Key baseline data has been updated and presented in Appendix B and Table 3 below provides a summary. In addition, trend information reported in the Scoping Report has been used to identify the "future baseline", the potential evolution of the baseline in the absence of the plan.

Table 3: Summary of the sustainability baseline data

Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
Air quality	
Clean air is a basic requirement for health and wellbeing. Road transport is the primary source of urban air pollution. A number of different air-borne particulates are antagonistic to the sensitive lining of airways and act as irritants, causing difficulties and discomfort. The incidence of asthma has been increasing, particularly among children. There is a clear association between long-term exposure to particulate air pollution (PM2, 5 and sulphate and sulphur dioxide) and a reduction in life-expectancy caused by cardiovascular disease. The interaction between particulates, nitrogen dioxide and ozone can aggravate these issues. **Individual AQMAs** **Bristol City Council** - in the City Centre where nitrogen dioxide (NO2) and fine particles (PM10) are being monitored. **Bath & North East Somerset Council** - in Bath, Keynsham and Saltford. **South Gloucestershire Council** - in the district: Kingswood, Staple Hill and Cribbs Causeway (adjacent to M5 Junction 17). The main air pollutant of concern locally is nitrogen dioxide (NO2), which originates primarily from road traffic emissions.	There are parts of the West of England, particularly the central urbanised areas, where on average over the course of a year air quality is unlikely to achieve national objectives. Nitrogen oxides like nitric oxide (NO) and nitrogen dioxide (NO2) can react in the air to produce ozone and other harmful pollutants that lead to smog. Nitrogen dioxide emissions can also be further oxidised in air to acid gases, which contribute to the production of acid rain. Particulate matter, especially very fine particles, is thought to have a very large impact on human health and is one of the major problems facing environmental professionals. PM10 particles and even smaller fractions (PM2.5) can reach deep into our lungs and can cause severe respiratory problems as well as possibly

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<table>
<tr><td colspan="6">Table 3: Summary of the sustainability baseline data</td></tr>
<tr><td colspan="5">Sustainability baseline / issues / characteristics of the area</td><td>Suggested evolution without the plan</td></tr>
<tr><td colspan="5">No AQMA in North Somerset. However the council has a duty to monitor and manage air quality within the District.</td><td>contributing to many other conditions and diseases.

The WoE Transport Strategy is a major transport programme designed to provide an improved public transport system, relieve traffic congestion and improve emissions.</td></tr>
<tr><td colspan="6">Noise</td></tr>
<tr><td colspan="5">Bristol City Council mapped noise levels from traffic across the city. However there is a gap in the baseline data regarding noise levels in other areas.</td><td>Noise problems related to traffic may increase. There is uncertainty over what will happen to neighbourhood noise in the future.</td></tr>
<tr><td colspan="6">Biodiversity</td></tr>
<tr><td colspan="5"><table>
<tr><th></th><th>B&NES</th><th>Bristol</th><th>North Somerset</th><th>South Glos</th></tr>
<tr><td>Wildlife Site of International Importance (Ramsar)</td><td></td><td>1 (Severn Estuary)</td><td>1 (Severn Estuary)</td><td>1 (Severn Estuary)</td></tr>
<tr><td>Special Areas of Conservation (SAC)</td><td>2 (Bath & Bradford-on-Avon Bats; North Somerset and Mendip Bats)</td><td>2 (Avon Gorge Woodland, Severn Estuary)</td><td>4 (Avon Gorge Woodlands, Mendip Limestone Grasslands, North Somerset and Mendip Bats, Severn Estuary)</td><td>1 (Severn Estuary)</td></tr>
<tr><td>Special Protectio</td><td>1 (Chew</td><td>1 (Severn Estuary)</td><td>1 (Severn Estuary)</td><td>1 (Severn Estuary)</td></tr>
</table></td><td>The region’s biodiversity is at threat from development; human activities such as pollution, roads, disturbance, farming practices; loss of habitat; loss of food sources and a changing climate.
Climate change is likely to disadvantage some species through altering seasons, changing habitats, causing habitat fragmentation (e.g. through drought) and introducing new species which could compete with others for space or could prey on them. However, climate change may also benefit some species for the same reasons.</td></tr>
</table>

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Table 3: Summary of the sustainability baseline data

Sustainability baseline / issues / characteristics of the area					**Suggested evolution without the plan**
n Area (SPA)	Valley Lake)				
National Nature Reserves (NNR)			2		
Sites of Special Scientific Interest (SSSIs)	24	5	56, covering c. 3,483 ha of area	22, covering 553 hectares	
Local Nature Reserves (LNR)	tbc	8	13, covering 291.424ha	X, covering over 109 ha	
Local Geological Sites (LGS)	tbc		77	269 Sites of Nature Conservation Interest (SNCIs)	
Local Wildlife Sites	tbc	83	205, covering 8509.39ha	53 Regionally Important Geological / Geomorphological Sites (RIGS)	
Climate change and flood risk					
The areas prone to flooding tend to follow the main rivers. The areas most at risk of flooding are: **Bath -** at risk of flooding from rivers, sewers, surface water, artificial sources and to a lesser degree from groundwater (springs). Level 2 SFRA has shown that large proportions of the central area and areas closest to the River Avon are in Flood Zone 3a and 3b (the highest risk). The Black and Veatch Bath Flood Risk Management					

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
Project Technical Note (February 2012) confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes and implement compensatory flow conveyance schemes. Bath Waterside Project is being progressed. **Keynsham -**at risk of flooding from rivers (which may be tidally influenced), surface water, sewers and artificial sources. A level 2 SFRA has shown that a small area to the north of the Somerdale site is in Flood Zone 2. A small area to the South East of the town centre may also be Flood Zone 3a. **Midsomer Norton** -at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that the town centre is in Flood Zone 1. Small areas are at higher risk of flooding. Midsomer Norton benefits from a flood alleviation scheme during a 1% AEP river flood event. **Radstock** - at risk of flooding from rivers, surface water and sewers. A level 2 SFRA has shown that some of the central parts of the town centre are in Flood Zone 2 and 3a. Chew Magna and downstream communities -at risk of flooding from rivers, surface water and artificial sources.	
Community and well being	
In rural areas the level of service deprivation is naturally high due to geographical distance to the services. There is increasing diversity within local communities and identified pockets of deprivation amongst growing levels of affluence across the region. The English Indices of Multiple Deprivation identify the most deprived areas across the country. An updated national dataset is being released in July 2015. This will be utilised within the sustainability appraisal to create a revised baseline understanding of the most deprived Lower Super Output Areas (LSOA) within the WoE. The appraisal will consider whether spatial scenarios are located in or near the most deprived LSOA's and whether specific approaches are included to address deprivation in those areas. Individual Authorities IMD information The following descriptions utilise 2010 IMD data (using the 'Average of LSOA Scores' measure). **Bristol** is ranked 79 out of 326 English authorities. It has 32 LSOAs in the most deprived 10% in England for multiple deprivation (compared to 39 in 2007 and 35 for 2004). Of these 32 LSOAs there are 14 in the most	If not addressed, crime, deprivation and access to services are likely to remain problems. The patterns of deprivation are likely to follow existing trends and will respond to external pressures. Nationally, predicted future trends in population dynamics are: rising household numbers, reflecting increasingly rapid decline in household size, due to ever increasing life expectancy, more households separating and higher inward migration both from other areas of the UK and internationally. Obesity is an increasing issue facing the whole of the country. Without the Plan, the market led development approach may result in inappropriate uses take

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
deprived 5% and 1 in the most deprived 1%. The number of people living in the most deprived 10% of LSOAs is 60,665 people, which is 14% of all residents living in Bristol. **In Bristol** as a whole 69,500 – 16% of the population – suffer from income deprivation. There are 22 LSOAs where more than a third of all people live in income deprivation. On a ward basis, more than a third of people are income-deprived in Lawrence Hill (36%) and Filwood (35%). The whole of Lawrence Hill ward falls within the most deprived 10% of areas in England with the exception of 'Redcliffe'. **Bath and North East Somerset** is one of the least deprived authorities in the country, ranking 247 out of 326 English authorities. It is ranked 49 out of 56 unitary authorities. Despite these relatively low levels of deprivation, pockets of high deprivation remain within the area. The following five areas are within the most deprived 20% of the country, Twerton West, Whiteway, Twerton, Fox Hill North and Whiteway West. A research project to understand the issues facing south west Bath is currently underway. **North Somerset** is ranked as 224th out of 326 English authorities. This relative affluence however, hides a number of deprived urban wards. North Somerset has the 7th largest range of inequality of all of the 326 authorities in England. It includes areas within both the most deprived 1% nationally, and the least deprived 1% nationally. 15 of the Lower Level Super Output Areas are within the most deprived 25% of areas nationally, all of these areas being in Weston-Super-Mare. **South Gloucestershire** is ranked as 272nd out of 326 authorities. Compared to many other local authority areas, levels of deprivation in South Gloucestershire are low, but there are sub ward pockets of relatively high deprivation. South Gloucestershire's most deprived LSOA's are generally located within the urban wards of Staple Hill, Kings Chase, Patchway, Woodstock and Filton. In terms of the IMD (the composite measure of multiple deprivation), South Gloucestershire only has one LSOA (within Staple Hill) within the most deprived 20% of areas in England. In terms of the Employment Deprivation Domain, South Gloucestershire has two LSOAs (in Staple Hill and Kings Chase) within the most deprived 20% of areas in England.	up the key regeneration sites resulting not meeting to create balance communities.
Economy and employment	
There is an uneven spatial distribution of skills levels in the West of England region.	Without intervention the pattern of skills levels and

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Within **Bristol** the economic planning strategy is set out in Core Strategy BCS8 'Delivering a Thriving Economy'. This sets out that 220000m2 of additional office space will be provided in the city centre, South Bristol and within designated centres. The policy also protects Primary Industrial and Warehousing (PIWA) areas for existing and future employment use. PIWAs are designated on the proposals map, the Site Allocations and Development Management Policies Plan, contains supporting policy DM18. Bristol also contains an Enterprise Zone, called Bristol Temple Quarter. The planning approach to this area is set out in the Bristol Central Area Plan, policy BCAP 35. The **Bath and North East Somerset** Core Strategy sets out the economic strategy promoting a net increase of 10,300 jobs. The planning approach for the Enterprise Area in Bath is set out in the Core Strategy, policy B2. **North Somerset**'s Core Strategy (Policy CS20) seeks to provide at least 10,100 additional employment opportunities 2006-2026. This is additional to the existing backlog of jobs in relation to past housing growth at Weston-super-Mare. The overall jobs target for North Somerset is therefore about 14,000 jobs. **South Gloucestershire**'s Core Strategy seeks to maintain a supply of economic development land in accordance with the Plan's strategy for development set out in Policy CS5. This land is distributed between the North and East Fringe of Bristol urban area, Yate & Chipping Sodbury, Thornbury, the Rural Area and Severnside.	wages within the district is likely to remain the same. The patterns of deprivation are likely to follow existing trends and will respond to external pressures. Unemployment in some wards, again, may remain the same, without intervention to improve skills levels and the diversity of employers in the area.
Historic environment	
Bath was designated a World Heritage site in 1987. There are 37 Conservation Areas, 11 Registered Historic Parks and Gardens, 84 SAMs and approximately 6,400 listed buildings and structures in **B&NES** (of which 5,000 lie within the City of Bath). There are currently 17 Conservation Areas, 9 Scheduled Monuments, 4 buildings and 1 Designated Park and Garden on the Heritage at Risk Register 2010. The area which was formerly part of the Somerset coalfield retains a rich industrial heritage. **North Somerset** has 36 Conservation Areas, 8 Registered Historic Parks and Gardens, 70 SAMs and 1,072 listed buildings and structures. There are currently 4 Conservation Areas, 2 Scheduled Monuments and 3 listed buildings on the Heritage at Risk Register.	If no development takes place (in the absence of the plan) the value of the designated sites and areas should remain the same. However, climate change may put historic assets at risk due to extreme weather events, flooding, hotter, drier summers and wetter winters.

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
South Gloucestershire has 2074 Listed Building entries of which 2% are Grade I, 6% are Grade II*, and 92% are Grade II, also over 1,470 locally listed buildings, 38 Scheduled monuments, 30 Conservation Areas, 8 registered parks and gardens and 1 battlefield.	
Housing	
High house prices and a lack of affordable housing make it difficult to attract people to the area and to retain key workers. Lower quartile house price in Bath and North East Somerset are more than 9 times the lower quartile resident annual earnings. Nearly half the overall need for affordable housing in B&NES is concentrated in Bath City. Of the households in need, newly forming households unable to afford to buy are the dominant group in Bath & North East Somerset. Achieving an appropriate mix of decent, affordable homes will need to be a priority in any new development proposals. Specific attention needs to be devoted to ensuring energy efficiency, water consumption, and the use of sustainable building materials. In 2011, there are 3,850 HMOs in the district (as defined under planning regulations), the majority of which are located in the City of Bath. There is a strong geographical clustering of HMO in specific parts of the City. The wards of Widcombe, Westmoreland and Oldfield have the highest numbers of HMO with shared facilities, there are estimated to be up to 1,500 properties of this type in these wards alone. To encourage a sustainable community in Bath, by encouraging an appropriately balanced housing mix across Bath, supporting a wide variety of households in all areas, Article 4 Direction was issued to manage the change of use from Family Homes (Use Class C3) to Houses in Multiple Occupation (Use Classes C4 of Sui Generis) across the entire City of Bath.	Without the pro-active planning represented by the Plan, it is unlikely that B&NES will be able to provide enough affordable housing to satisfy future requirements. Without the Plan, the market led development approach may result in inappropriate uses take up the key regeneration sites in Bath resulting not meeting the Council's economic and housing objectives. With the improvements in the Building Regulations the sustainability of new houses is likely to improve.
Land	
B&NES has prepared a Remediation Statement (2002) relating to contaminated land located in Keynsham. This land has been remediated, including the removal of all material, contaminated and uncontaminated, from the site and, therefore, permanently removing the pollutant linkage. No further land is registered as contaminated under Part 2A of the Environmental Protection Act 1990.	As developments occur on contaminated land they will be remediated. Therefore, the amount of contaminated land will decrease over the next 5-10 years. The amount of development that is built on brownfield land should remain high in the district.

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
82% of now or converted dwellings in the District completed during 2008/09 were built on previously developed land. In the year to April 2016 some 55% of dwelling completions were on previously developed land (PDL). The South Gloucestershire Local Plan sets a target that 50% of all new dwelling completions should be on PDL, since 2004 this target has been exceeded in all except the 2013/2014 monitoring year.	Without the Plan, the market led development approach may result in inappropriate uses take up the key regeneration sites in Bath resulting not meeting efficient use of the brownfield land within the settlement boundaries.
Landscape	
There are 2 AONBs partly within the West of England – Mendip and Cotswolds AONBs. The district has a varied landscape represented by 18 LCAs. Large areas of B&NES are Green Belt (61%). Bath has a distinctive townscape in the way that buildings respond to the distinct topography. Many buildings and terraces follow contours, often overlooking open ground and panoramic views. The character of Keynsham, Norton-Radstock and the villages are enriched and partly defined by the landscapes which surround and in some cases penetrate the built up areas. Large areas of Radstock are covered by a Conservation Area. **South Gloucestershire** has a varied and complex landscape which includes the nationally protected landscapes of the Cotswolds Area of Outstanding Natural Beauty (AONB) and the protected habitats of the Severn Estuary, whilst being an important area for growth and economic development.	Landscape character may be threatened by lack of appropriate management, inappropriate development and climate change. Without the Core Strategy, areas deemed to be of poor townscape character will not be pro-actively improved, leading to a degradation in townscape quality.
Transport	
The current Joint Local Transport Plan (JLTP3) was published in 2011 and sets out the priorities for transport to 2026. In particular, the JLTP3 seeks to achieve a better connected, more balanced and more customer focused transport network. The four West of England authorities, in partnership with the Department for Transport and public transport operators, have invested £80 million to improve key bus corridors as part of the Greater Bristol Bus Network (GBBN) programme which was completed in 2012. **B&NES** There is no direct link to the motorway network in B&NES and Bath suffers particularly from the sub-	The high proportion of the district's population recorded in 2001 who travel to work by car will continue unless alternative and more attractive modes of transport are provided. Increased traffic would exacerbate all of the existing problems outlined in the baseline data. The Plan facilitates the implementation of the Transport Strategy. Without the Plan, traffic congestion and air

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
region's poor internal transport links. The A4 through Keynsham is subject to high levels of congestion. Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303. Bath is well served by conventional bus services, with good penetration to most parts of the City. These services have difficulty in keeping to timetable due to congestion. High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic. **North Somerset** Despite high car ownership levels, North Somerset contains pockets of deprivation with two wards in Weston-super-Mare within the bottom 5% of most deprived wards nationally. This is reflected in car ownership levels with up to 49% having no access to a car in these areas. Accessibility by public transport, walking and cycling to services, facilities and employment in the rural areas is limited. Information for 2010/2011 indicates the following: • 54% of households live within 30 minutes travel time by public transport of those health facilities in the Bristol Health Service Plan. • 55% of households live within 40 minutes travel time by public transport from key employment sites. GBBN investment, together with further investment in other schemes and improvements, has in recent years contributed to increases in bus passenger numbers. The number of passengers boarding services in North Somerset increased by 11% from 2010/11 to 5,286,127 passengers in 2013/14. Cycling trips have also continued to grow with continued investment in new routes and cycling facilities as well as ongoing promotion of cycling in the area. Department for Transport figures show a 52% increase in cycling on North Somerset roads between 2000 and 2013. On a single selected survey day in November 2013, 7,583 rail journeys were made using the five stations in North Somerset. Since 2003, when it stood at 4,507, the number has increased every year.	quality are likely to remain the same or will be worsen.

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Table 3: Summary of the sustainability baseline data	
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Bristol Airport is the largest airport serving the South West and South Wales, the ninth largest in the UK and the UK's fifth largest outside London. During 2013, air transport movements increased by 8.8% to 55,640 as a result of the transfer of corporate charter movements from Filton and the growth of scheduled services to Europe. Total aircraft movements increased by 6.7% to 65,299 (compared with 61,206 in 2012 and 66,179 in 2011). Terminal air passengers increased by 3.5%, to a total of 6,125,149. In August 2013, the Airport recorded the busiest month in its history, handling over 700,000 passengers. An estimated 13% of air passengers used public transport for their journey to or from the airport. The number of people working at the airport in summer 2013 was 2,618 (full-time equivalent), up from 2,585 in 2012. Planning permission was granted in February 2011 for a comprehensive expansion of the airport facilities. **South Gloucestershire** has higher than average car ownership and usage. According to the 2011 Census: 86.9% of households have access to at least one car or van, compared to 74.2% nationally. There were 158,289 cars or vans in South Gloucestershire, an average of 1.47 cars or vans per household. In general terms, households without a car tend to be located in parts of the district which are more urban in character, such as Kingswood and Patchway. In 2016, the proportion of people who say they normally cycle to work (13.5%) increased marginally on the 2015 figure (13.3%). In 2015/16 just over 9.4 million journeys were made by bus. This is a 5.8% increase on the previous year and continues the overall trend for increasing bus use in recent years.	
Waste	
B&NES is one of the top recycling authorities within the country, recycling 41% of household waste in 2009/10. Waste infrastructure: 2 x waster transfer stations (Bath and Radstock), 9 x Recycling Collection Points, 3 x Recycling Centres (bulkier items), 1 x railhead, and 2 x refuse collection and cleansing depots. Every day B&NES sends 15 containers by road to Shortwood Landfill Site in South Gloucestershire and Dimmer Landfill Site in Somerset. In 2015/16, 120,590 tonnes* of waste was produced by households in **South Gloucestershire**, an increase on the	Levels of recycling have been increasing and there is no reason to believe that this trend will change. However, household waste generation may also rise, as a result of new development and population growth and therefore total amounts of residual waste may also increase.

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
amount produced the previous year. The increase in overall household waste is proportionate to the increase in the number of new households built since 2014/15. In 2015/16, 47.7%* of household waste was recycled compared to 47.5% in the previous year. Although more recycling was collected via the kerbside recycling services, including flats, the overall amount of residual waste (black bin and Sort It Centres) also increased and less recycling was collected at the Sort It Centres compared to 2014/15. Since the start of the contract with SITA (now Suez) in 2000, the total amount of waste sent to landfll is for another year in succession at its lowest point. In 2015/16 only 13% of household waste was sent to landfll compared to around 15% in 2014/15. More material has been diverted from landfll to alternative treatment methods – thermal treatment by Suez, mechanical biological treatment (MBT) and the treatment and recycling of street sweepings. A number of changes are currently being implemented and planned for to further improve recycling rates including future changes to the existing kerbside recycling services and containers in 2017, as well as current changes to the Sort It Centre services to make them more accessible and easier to use e.g. new vehicle registration system and van permit scheme. Some improvements for recycling have already been introduced at the Sort It Centres including providing facilities for residents to separate recycling from bagged waste which is brought to the centres.	
Energy and carbon emissions	
CO_2 emissions from B&NES = 1182 kt annually. Emissions from Domestic sources is 2.7 tonnes per capita (UK average = 2.6 tonnes) There is no record of any major renewable energy schemes within the district. There are a few small scale schemes undertaken on an individual basis but no comprehensive survey of existing installations has been undertaken and this may be a gap in baseline information. A renewable energy research study has been undertaken. Initiatives to improve energy efficiency and utilise renewable energy need to be addressed in relation to the historic buildings. Renewable energy currently generated in **South Gloucestershire** is equal to 1.5% of projected 2020 energy demand. If all the consented renewable energy schemes are developed, the amount of renewable	With the expected improvements in the Building Regulations, the energy efficiency of new dwellings is likely to improve over the next 5 years. Historic buildings may be difficult to make more energy efficient in light of existing planning controls. On-site renewable energy technologies are developing in response to Part L of the Building Regulations and targets set in other areas of the UK. The percentage of energy generated from renewable sources is likely to increase in the future.

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Table 3: Summary of the sustainability baseline data	
Sustainability baseline / issues / characteristics of the area	**Suggested evolution without the plan**
energy being generated will be equal to 4.8% of projected 2020 total energy demand which is more than half of the 7.5% target. An assessment of opportunities to deliver additional renewable and low carbon energy in South Gloucestershire by 2020 is being undertaken, and feasibility studies into the potential for strategic district heat networks are currently underway.	
Water	
Wessex Water has two unused abstraction licences at Newton Meadows and Monkton Combe that may be invested in, in the future. They are implementing sustainable reduction in abstractions in the Malmesbury area and on the Hampshire Avon, outside of this CAMS area but used to supply water into this catchment. During a drought, in the upper reaches of the Bristol Avon flows can be increased by more than 30Ml/d using water taken from boreholes. In Somerset some water must be released from reservoirs to compensate for the impact that dams have on flows. **Chew Valley Lake pumped storage** The use of Chew Valley Lake for storage of water from the River Avon near Saltford, for use when flows in the river are low in very dry periods <u>Low volume appliances in new homes</u> Working with developers to provide water efficient appliances in new homes and, where applicable, providing appropriate subsidies	With the expected improvements in the Building Regulations, the water efficiency of new dwellings is likely to improve over the next 5 years.

6. Reasonable alternatives and difficulties encountered

What the SEA Regulations state:.
Information for environmental reports (Schedule 2):
8. *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.*

Selecting alternatives

6.1 The ODPM guide and the Planning Practice Guidance state that to meet the requirement to justify the alternatives selected the report should outline:

- the main strategic options considered, how they were identified and the reasons for selecting the options;
- a comparison of the social, environmental and economic effects of the options and how social, environmental and economic issues were considered in choosing the preferred options; and
- other options considered, and why these were rejected.

6.2 The SA iterations mirrored those of the JSP. Iteration 1 (2015) identified a number of typologies – 'urban intensification', 'urban extension', 'town expansion', 'other settlements / locations', and 'dispersed' – and broad locations associated with each, based on a call for sites and other information on development potential. For Iteration 2 (2016), this range of options was refined, identifying for each of the settlements studied potential directions for expansion. Based on the findings, the options were then divided into those to be taken forward into the preferred strategy and those considered not to be reasonable alternatives beyond this stage. The latter are listed in Table 2 of the document Towards an Emerging Spatial Strategy [weblink], which identifies the reasons why they were filtered out.

6.3 For Iteration 3 (2017), the preferred strategy to be assessed consists of provision that is not specific to a known location and that which is included in the 12 SDLs. The former includes urban intensification and non-strategic growth (up to 500 dwellings). This provision is assessed through SA of the relevant JSP policies. Specific appraisal tables have been produced for each of the SDLs; their relationship to previous work is described in Table 4 below. Iteration 3 was a mix of old and revised locations and took into account the more precise requirements for development set out in the JSP wording.

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Table 4: SDLs appraised in 2017

Policy	SDL	Description
7.1	North Keynsham	An expansion of Keynsham is proposed to the north, a location appraised in 2016.
7.2	Whitchurch	An expansion of Whitchurch is proposed to the south east, a location appraised in 2016.
7.3	Land at Bath Road, Brislington	An expansion of Bristol is proposed to the east
7.4	Backwell	An expansion of Backwell is proposed to the west, a location appraised in 2016.
7.5	Banwell Garden Village	Banwell Garden Village is proposed as freestanding development close to the existing village of Banwell. It was not appraised in the 2016 SA, which focused on the existing village.
7.6	Churchill Garden Village	Churchill Garden Village is proposed as freestanding development close to the existing village of Churchill. It was not appraised in the 2016 SA, which focused on the existing village.
7.7	Nailsea	An expansion of Nailsea is proposed to the west. This location was appraised in 2016 but for a less extensive form of development. Previous findings have been reviewed on the basis of the current proposals.
7.8	Buckover Garden Village	Buckover Garden Village provides opportunity to deliver a new Garden Village in the West of England. The site was appraised in the 2016 SA.
7.9	Charfield	An expansion of Charfield is proposed to the North, West, South and East. The site was appraised in the 2016 SA.
7.10	Coalpit Heath	An expansion of Coalpit Heath is proposed to the West. The site was appraised in the 2016 SA.
7.11	Yate	An expansion of Yate is proposed to the North and West. The site was appraised in the 2016 SA.
7.12	Thornbury	An expansion of Thornbury is proposed to the East. The site was appraised in the 2016 SA.

6.4 Each SDL has been assessed as an individual location rather than for its contribution to a strategy. The *Issues and Options* document set out for discussion a number of possible spatial scenarios: protection of the Green Belt, concentration at the Bristol urban area, transport-focused, a more even spread, and a new settlement or limited number of new settlements. Arguments for and against each of these were presented. The spatial scenarios were not subject to SA, which would have required greater certainty about the locations to be included in each scenario. A brief comparison was done of Green Belt versus non-Green Belt locations. SA of alternative strategies becomes increasingly difficult as the number of possible locational combinations increases. It is also somewhat artificial where a preferred

strategy combines elements of several theoretical possibilities in order to respond to a range of local constraints and opportunities.

Undertaking the assessment

6.5 The SA was undertaken internally by officers from the four councils, using readily available information. The core team was not directly involved in the production of the plan itself.

Baseline data

6.6 Some data gaps have been identified within Appendix B. Where there are gaps in the baseline, this has made it difficult to predict the future evolution of the baseline characteristics without the JSP. There is no 'noise map' for the plan area and little other information is available relating to the noise baseline. Tranquillity maps produced by the Campaign to Protect Rural England are available but are now 10 years old. Effects on the noise environment, including exposure to existing noise, have therefore not been assessed.

6.7 Data on agricultural land quality is taken from the provisional Agricultural Land Classification maps, updated by reference to Natural England's ALC Strategic Map, supplemented by detailed surveys where available. Where no detailed survey is known, the SA has identified the potential for agricultural land quality to be of a specified grade. The scale of the ALC maps is such that there is scope for considerable local variation and so detailed survey would be needed for confirmation.

Proposal definition

6.8 The level of detail available for assessment increased through the stages of JSP preparation. This allowed scores to be refined from 'uncertain' to 'positive' or 'negative'. In particular, the policy requirements for each SDL set out in the wording of the Publication Version have allowed more '++' scores, on the basis that the proposal would not normally be permitted to proceed unless this mitigation or enhancement is included. Some uncertainties remain, mainly where viability / deliverability has yet to be tested.

7. Appraisal of effects

What the SEA Regulations say...
Information for environmental reports (Schedule 2):
6. *The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—*
(a) biodiversity;
(b) population;
(c) human health;
(d) fauna;
(e) flora;
(f) soil;
(g) water;
(h) air;
(i) climatic factors;
(j) material assets;
(k) cultural heritage, including architectural and archaeological heritage;
(l) landscape; and
(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).
7. *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*

Range of effects

7.1 The time frames used are as follows:

Short term	0-5 years (2016-2021)
Medium term	5-10 years (2021-2026)
Long term	10-20 years (2026-2036)

'Long-term' also includes effects extending or arising beyond the plan period. National policy is assumed to endure for the long-term. Some climate change effects will also be long-term.

All effects are assumed to be long-term unless there is evidence to the contrary. At the SDLs, short-term effects are discounted because of the lead-in times required to make a start on development. This does not mean that a start could not be made, only that it is considered unlikely.

7.2 All effects are assumed to be permanent, at least for the lifetime of the development, unless there is evidence that they are temporary.

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7.3 Positive and negative effects have been defined according to the following scale:

0	no discernible effect
-	negative effect capable of mitigation
--	negative effect incapable of mitigation
+/-	mixed effect
+	positive effect capable of enhancement
++	positive effect incapable of enhancement
?	uncertain effect

Where necessary, these scores have been combined, for example '+/?' where the scale of development could result in the effect described but there is some uncertainty over viability / deliverability.

7.4 Secondary, cumulative and synergistic effects have not been identified. Given the limited detail available in a strategic plan such as the JSP, the likelihood of all these types of effect has been treated as uncertain.

7.5 Cumulative effects are likely but difficult to identify. The main cumulative effect is on climate change, where development in principle increases carbon emissions. Infrastructure capacity constraints can also arise as a result of incremental growth in demand but the JSP seeks developer contributions to address these. The JSP plan period overlaps with the adopted Core Strategies of the four councils and so part of the housing requirement will be met through developments that are committed but not yet built. These are therefore additions to the JSP baseline that have not been appraised as part of the JSP, though each Core Strategy was subject to its own SA prior to adoption. The JSP SA has been carried out with the benefit of local knowledge of where these sites are. However, some SDLs are new to large-scale development and in these cases there will be little or no cumulative impact from current housebuilding to be taken into account. The case for new transport infrastructure takes into account the current demand for travel and that generated by all new development over the JSP period, from whatever source. Cumulative effects on biodiversity are in part addressed through the Habitats Regulations Assessment, which looks at cumulative effects on particularly sensitive receptors, including the most important protected habitats. Cumulative effects on flood risk are of concern in some areas and the use of sustainable drainage systems to limit or reduce risk is therefore an important mitigation. Cumulative effects on school rolls are uncertain because reliable projections at primary school level cannot be made more than five years ahead.

7.5 Cumulative and synergistic effects may also arise in conjunction with the plans and programmes of other bodies, outside the planning system. However, work undertaken by, for example, public utilities, is often directed towards meeting needs arising from development and where such bodies are statutory consultees within the planning system there are procedures in place for co-operation.

7.6 The 21 sustainability objectives used cover the full range of issues from (a) to (l). There are inter-relationships between the various issues studied (issue (m)) and therefore overlap between some of the sustainability objectives used. These should be clear from a reading of the appraisal tables.

Mitigation

7.7 The final column of each appraisal table sets out any potential to mitigate the negative effects identified. In some cases, this will be through further detail to be made available through Local Plans or planning applications. The SDLs are of such a scale that it is to be expected that they will provide significant new infrastructure to meet the needs arising from development, which could also benefit existing residents and/or their environment.

Appraisal tables

7.8 The appraisal tables for

- Vision
- Policies
- SDLs (including updated Summary Table at the start)

are set out as Appendix D.

8. Monitoring

What the SEA Regulations say...
Monitoring of implementation of plans and programmes:
17.—*(1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*
(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).
Information for environmental reports (Schedule 2):
9. *A description of the measures envisaged concerning monitoring in accordance with regulation 17.*

8.1 The monitoring of the JSP will help to:

- monitor the significant effects of the plan;
- track whether the plan has had any unforeseen effects;
- ensure that action can be taken to reduce / offset the significant adverse effects of the plan; and
- provide baseline data for the next SA and to provide a picture of how those factors assessed by the environmental / sustainability criteria are evolving.

8.2 A summary of the proposed approach to monitoring for each objective is in Appendix C, including potential indicators. This will be further developed before submission of the plan. The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the JSP when they occur. Due to this difficulty we have suggested a number of more general monitoring indicators which are linked to the SA objectives (contextual indicators, to be appended to DraftSA produced with draft Plan).

8.3 Monitoring forms part of the councils' Annual Monitoring Reports. It will allow them to identify whether the recommended mitigation measures from the SA have been effective and develop further mitigation proposals that may be required where unforeseen adverse effects are identified. In some cases monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the JSP, or for further policy guidance to be developed (for example a Supplementary Planning Document).

9. Next steps

Adoption

What the SEA Regulations say...

Restriction on adoption or submission of plans, programmes and modifications

8.—*(2) A plan or programme for which an environmental assessment is required by any provision of this Part shall not be adopted or submitted to the legislative procedure for the purpose of its adoption before—*

(a) if it is a plan or programme co-financed by the European Community, the environmental assessment has been carried out as mentioned in regulation 7;

(b) in any other case, the requirements of paragraph (3) below, and such requirements of Part 3 as apply in relation to the plan or programme, have been met.

(3) The requirements of this paragraph are that account shall be taken of—

(a) the environmental report for the plan or programme;

(b) opinions expressed in response to the invitation referred to in regulation 13(2)(d);

(c) opinions expressed in response to action taken by the responsible authority in accordance with regulation 13(4); and

(d) the outcome of any consultations under regulation 14(4).

Information as to adoption of plan or programme

16.—*(1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—*

(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and

(b) take such steps as it considers appropriate to bring to the attention of the public—

(i) the title of the plan or programme;

(ii) the date on which it was adopted;

(iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;

(iv) the times at which inspection may be made; and

(v) that inspection may be made free of charge.

(2) As soon as reasonably practicable after the adoption of a plan or programme—

(a) the responsible authority shall inform—

(i) the consultation bodies;

(ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and

(iii) where the responsible authority is not the Secretary of State, the Secretary of State; and

(b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).

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(3) The matters are—

(a) that the plan or programme has been adopted;

(b) the date on which it was adopted; and

(c) the address (which may include a website) at which a copy of—

(i) the plan or programme, as adopted,

(ii) its accompanying environmental report, and

(iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.

(4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —

(a) how environmental considerations have been integrated into the plan or programme;

(b) how the environmental report has been taken into account;

(c) how opinions expressed in response to—

(i) the invitation referred to in regulation 13(2)(d);

(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;

(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

9.1 If any significant issues arise through consultation leading to amendments to the JSP, then further consultation would be required. If the changes made to the JSP are significant, they would also need to be subject to SA.

9.2 Once the plan is adopted, a Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with SEA Reg. 16(4). This legal requirement relates to environmental considerations but it would be good practice to consider sustainability considerations generally and an Adoption Statement is also a requirement of the Local Plan Regulations (Town and Country Planning (Local Planning) (England) Regulations 2012, Reg. 26).

APPENDIX C: SA Framework

The framework used to appraise the JSP has been developed and refined at each stage. The sustainability objectives and linked effect criteria, used to score the locations appraised, were first set out in the Revised SA Scoping Report (November 2015). The Methodology Paper (October 2016) identified a number of adjustments required in the light of experience and set these out in an additional column. For this draft SA Report, a further column has been added to identify potential monitoring requirements. Infrastructure mitigation thresholds mentioned here are indicative only. Actual mitigation would be determined on a case-by-case basis dependent on viability, deliverability and site conditions. The assessment of the Publication Version assumes that specific mitigation required by policy is delivered but not mitigation that is to be investigated, as there is no certainty that these investigations would be successful.

Sustainability Objective / Related SEA Topic	Effect Criteria		Adjustments	Monitoring Approach / Potential Indicators
	Positive Effect (+/++)	Negative Effect (-/--)		
Theme 1: Improve the health, safety and wellbeing of all				
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way) ***SEA Topic*** Landscape Human Health Population	• Development in location providing access to suitable (in terms of both quantity and quality) public open space • Development on or adjacent primary walking network / public rights of way routes. ***Reasonable Distance***	• Development in location lacking access to suitable (in terms of both quantity and quality) public open space • Development on public open space which reduces quantity, quality and accessibility.	○ Consistency / objectivity unlikely to be achieved at this stage: LPA standards / data availability differ. NSC have included 2km distance from major open spaces. ○ Generally the standards used are:	Local plans / masterplans should ensure POS standards are met.

	Open Space 400m	• Development outside public rights of way network ***Reasonable Distance*** *Open Space 400m*	400m from playgrounds, 800 metres from natural spaces, countryside in reasonable walking distance, e.g. via PRoWs. ○ [+] or [-], depending on compliance. ○ [++] where range of facilities is exceptionally good, e.g. both major and minor POS, or urban fringe site with direct access to POS plus PRoW access to countryside. ○ [?] where location already includes POS but it is not known whether this would be retained or replaced by development.	
1b. Minimise impacts on air quality and locate sensitive development	• Sensitive uses (residential, schools, children's facilities,	• No consideration or inclusion of mitigation	○ [+] no AQMA, not next to motorway.	Local plans / masterplans should ensure that provision is made.

away from areas of poor air quality ***SEA Topic*** Air Climatic factors Human health Population	food production and distribution) placed outside of AQMA • Construction methods / design to reduce and / or eliminate air pollution within new sensitive development • Multiple trees included to assist in reducing poor air quality	techniques / methods proposed for sensitive development in areas of high air pollution and AQMAs • Development which will significantly increase pollution in and around AQMA	○ [+/?] close to AQMA – additional traffic could lead to deteriorating conditions. ○ [-] AQMA or next to motorway. ○ [--] if no mitigation exists. ○ Note need for transport impact assessment as framework for mitigation. ○ Note nearby railway line if this may give rise to an air quality issue. Evidence on rail traffic levels may be insufficiently clear to affect the score.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals) ***SEA Topic*** Material assets	• Development generating need for health facilities within reasonable distance. ***Reasonable distance*** *Hospital 5km* *GP Surgery 1200m*	• Development generating need for health facilities outside reasonable distance. ***Reasonable distance*** *Hospital 5km* *GP Surgery 1200m*	○ [++] location is within the specified distance of all 5 aspects. ○ [+] 1-4 aspects. ○ Otherwise, [-] or [--], depending on potential for mitigation.	Local plans / masterplans should ensure that provision is made.

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Population	*Dentist 1200m* *Opticians 800m* *Pharmacies 800m*	*Dentist 1200m* *Opticians 800m* *Pharmacies 800m*	○ At least 1,500 homes needed to deliver a small satellite surgery, but trend is towards super surgeries.	
Theme 2: Support communities that meet people's needs				
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region ***SEA Topic*** Material assets Population	• Development that contributes to meeting the needs identified by the wider Bristol SHMA	• Development that does not contribute to meeting the needs identified by the wider Bristol SHMA	○ Generally [++] as all locations deliver housing within one of the relevant HMAs – now including Bath as well as Bristol. ○ Exception only where slope angle and on-site restrictions could severely limit development potential, resulting in [0] score.	Local plans / masterplans should ensure that provision is made.
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of	• Development that contributes to meeting the needs identified by the wider Bristol SHMA	• Development that does not contribute to meeting the needs identified by the wider Bristol SHMA	○ As 2a: housing quantum. ○ Note greenfield as more viable and so	Local plans / masterplans should ensure that provision is made.

society within the West of England sub-region ***SEA Topic*** Material assets Population			offering more affordable housing.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres) ***SEA Topic*** Material assets Human health Population	• Development generating need for community facilities within a reasonable distance ***Reasonable distance*** *Post Offices 600m* *Meeting Venues 600m* *Youth Facilities 400m*	**Significant negative effect:** • Development generating a need for community facilities, beyond a reasonable distance, with no public transport to community facilities. **Negative effect:** • Development generating a need for community facilities, beyond a reasonable distance ***Reasonable distance*** *Post Offices 600m* *Meeting Venues 600m* *Youth Facilities 400m*	○ Consistency / objectivity unlikely to be achieved at this stage: LPA standards / data availability differ. ○ [++] location within specified distance of all 3 aspects. ○ [+] 1-2 aspects. ○ Otherwise, [-] or [--], depending on potential for mitigation. ○ Libraries added as equivalent to meeting venues, as they may have potential for evening use. ○ Around 1,500 homes needed to deliver a new community meeting space.	Local plans / masterplans should ensure that provision is made.

2d. Achieve reasonable access to educational facilities (primary schools, secondary schools) ***SEA Topic*** Material assets Population	• Development generating a need for education facilities within reasonable distance. • Development which adds to capacity of educational facilities, where known capacity issues exist. ***Reasonable distance*** *Primary School 800m* *Secondary School 1500m*	**Significant negative effect:** • Development generating a need for educational facilities beyond a reasonable distance, and no public transport access to educational facilities. **Negative effect:** • Development in location beyond a reasonable distance to education facilities. • Development which places capacity on educational facilities, where known capacity issues exist. ***Reasonable distance*** *Primary School 800m* *Secondary School 1500m*	○ Assessment split into primary and secondary, with separate scores reflected in overall score. ○ [++] if mostly within 800m of primary AND mostly within 1500m of secondary. ○ [+] if compliant with only one of these. ○ [-] if school lacking in the location but potential to provide one. Can combine with positive score as [+/-] if the other type of school is already present. ○ [--] if impossible to provide a required school (e.g. scale of new housing may be insufficient to fund). This applies mainly to secondary schools: can combine with score for existing	Local plans / masterplans should ensure that provision is made.

			primary school as [+/--]. ○ Around 5,000 homes needed to deliver a new secondary school ○ Around 600 homes for a small primary school. ○ Note any potential for strategic mitigation: redrawing of notional catchment areas, etc. ○ Capacity issues fall into mitigation, i.e. extra classrooms would be needed and form part of developer costs. ○ May need to highlight existing school sites that are too small to accommodate extra classrooms. Scope here for [?] score if unclear.	
2e. Achieve reasonable access to town centre services and facilities	• Development within reasonable distance of designated city,	**Significant negative effect:** • Development beyond reasonable	○ Consistency / objectivity unlikely to be achieved at this stage: LPAs vary in	Local plans / masterplans should ensure that provision is made. However, some

(Designated City, Town and District Centres) ***SEA Topic*** Material assets Population	town or district centre. • Development which adds to the retail and leisure services and facilities within a city, town or district centre. • Development which would create a demonstrable increase in footfall and potential use of a centre. • Development with potential to create a critical mass / sense of place which would enable conditions / circumstances to establish a new town / district centre ***Reasonable distance*** *City centre (plus WsM) 5km* *(includes access by public transport)* *Town / District Centre 1500m*	distance to designated centres, and no public transport access to town centre services and facilities. **Negative effect:** • Development beyond a reasonable distance of designated city, town or district centre. ***Reasonable distance*** *City centre (plus WsM) 5km* *(includes access by public transport)* *Town / District Centre 1500m*	approach to defining centres. ○ Villages are likely to score poorly. Note village shop if there is one but score on access to district centre and above. ○ [++] if mostly within both distances. ○ [+] if mostly within one distance. ○ [-] if mostly beyond 5km of city / WsM centre but with reasonable public transport access available. Can be combined with being within 1500m of district centre, as [+/-]. ○ [--] if mostly beyond both distances and no reasonable public transport available. ○ Around 5,000 homes needed to deliver a new district centre.	development will be remote from district / town centres.

2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage ***SEA Topic*** Material assets Population	• Development that helps to regenerate the areas identified as the most deprived 25% of areas in England • Development that provides good access to employment opportunities for the areas identified as the most deprived 20% of areas in England	• Development that does not help to regenerate the areas identified as the most deprived 25% of areas in England • Development that does not provide good access to employment opportunities for the areas identified as the most deprived 20% of areas in England	○ Where locations adjoin areas of concentrated disadvantage, mitigation column needs to refer to difficulty of making any credible linkage. This may mean that all or most scores are [0] but this is a realistic assessment.	Local plans / masterplans should ensure that provision is made. However, some development will be remote from these areas.
Theme 3: Develop a diverse and thriving economy that meets people's needs				
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region ***SEA Topic*** Material assets Population	• Development that contributes towards the needs identified by the Economic Development Needs Assessment and the outputs and requirements of the Strategic Economic Plan	• Development that [does not] contribute towards the needs identified by the Economic Development Needs Assessment and the outputs and requirements of the Strategic Economic Plan	○ Emphasis of assessment under 3a should be employment development potential rather than current employment opportunities. ○ Most locations suitable for housing will also be suitable	Local plans / masterplans should ensure that provision is made.

			for some level of employment provision, though commercial attractiveness may be expected to be higher in the larger settlements where economic opportunities of all kinds are wider. ○ [++] for towns and above (including urban extensions). ○ [+] for villages. ○ If evidence exists that a location is unsuited to employment, discount to the next lower score.	
3b. Achieve reasonable access to major employment areas ***Major Employment sites*** Enterprise Zones Locally designated key employment areas ***SEA Topic***	• Development within reasonable distance of major employment areas *Thresholds to be confirmed:* *Walking/Cycling distances,*	• Development beyond reasonable distance of major employment areas *Thresholds to be confirmed:* *Walking/Cycling distances,*	○ Emphasis of assessment under 3b should be current employment opportunities rather than employment development potential.	Local plans / masterplans should ensure that provision is made.

Material assets Population Air Climatic factors	*Served by Public Transport*	*Served by Public Transport*	○ Consistency / objectivity unlikely to be achieved at this stage: LPAs vary in approach to defining major employment areas / priority sites. As well as EZ / EA and designated employment areas, could consider significant undesignated complexes such as the port and airport. ○ No distance thresholds have been established, either in terms of direct access or by public transport. Future work could consider further possible indicators of proximity, journey length, journey time, and mode of travel. ○ At this stage, a [+/-] judgement has to be	

			made on whether or not good employment opportunities are available in the location assessed. ○	
Theme 4: Maintain and improve environmental quality and assets				
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings ***Assets*** Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Historic Parks and Gardens, Unregistered Historic Parks and Gardens Registered Battlefields, Undesignated local assets (HER) World Heritage Site	• Development is likely to safeguard, protect, and where appropriate enhance, the significance of any affected heritage asset, historic townscape or landscape	• Development that leads to loss, change or harm of significance of any affected heritage assets, historic townscape or landscape • Development in locations which would harm the character and setting of an asset	○ [0] if no known heritage constraints. ○ [-] if evidence of avoidable harm. Mitigation of avoidable harm includes reducing the area considered for development. ○ [--] for registered landscape (i.e. scheduled monument, open space landscape), if this is unavoidable harm, with no way of mitigating negative impact.	Local plans / masterplans should ensure that provision is made.

Protected Wreck Site Locally listed structure Town and village greens Local Green Spaces ***SEA Topic*** Climatic factors Cultural heritage			○ [?] for listed buildings. Impact could be positive, neutral or negative and will not be known until design work is progressed.	
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change) ***National Sites and assets*** SSSI National Nature Reserves Local Nature Reserves UK Priority Habitat ***Local Sites*** SNCI – All authorities Wildlife Corridors – Bristol Ecological Networks ***SEA Topic*** Biodiversity Fauna Flora Landscape	• Development that integrates/preserves or enhances existing local sites habitats or features • Development that maintains/enhances the connectivity and integrity of Wildlife Networks • Development which enhances existing GI corridors and linked assets • Development that takes opportunities to provide new/strengthen existing GI corridors	• Development on or adjacent national and local sites (including Wildlife Corridors) that creates potential for harm • Development that would fragment the Connectivity and Integrity of Wildlife Networks • Development that severs existing GI corridor • Development that leads to loss of individual GI assets on existing corridors in the Strategic Network	○ Similar range to 4a: heritage. ○ [0] if no known biodiversity constraints. ○ [-] if evidence of avoidable harm. Mitigation of avoidable harm includes reducing the area considered for development. ○ [--] where impact on European sites seems likely, if this is unavoidable harm, with no way of mitigating negative impact. ○ [?] for most sites – SNCI, etc. Impact	Local plans / masterplans should ensure that provision is made.

Material assets Soil			could be positive, neutral or negative and will not be known until design work is progressed. Phase 1 assessments may be needed.	
4c. Minimise impact on and where appropriate enhance valued landscapes ***National designations*** AONB ***SEA Topic*** Biodiversity Climatic factors Cultural heritage Fauna Flora Landscape Soil	• Development utilises topography and landform to enhance valued landscape • Development that avoids the impacts on the AONB	• Damage or harm to sensitive areas of the AONB • Overbearing or unsympathetic development in and around key landscape features	○ Note AONB where present but scoring now extended to landscape as a whole, based on initial assessment of sensitivity to strategic level of development: [++] Low [+] Low to medium [0] Medium [-] Medium to high [--] High	Local plans / masterplans should ensure that provision is made.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	• Development on previously developed land / brownfield sites	• Development on previously undeveloped / open space / greenfield sites	○ [--] in almost all conceivable cases. Opportunities for urban intensification were examined at the Issues & Options	Local plans / masterplans should ensure that opportunities are taken.

SEA Topic Fauna Flora Landscape Soil			stage; this stage of SA is focused on greenfield alternatives supplementing that potential. Except at Severnside, brownfield land at the locations assessed is likely to be minimal. ○ Explain score: no scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land ***SEA Topic*** Landscape Soil	**Significant positive effect:** • Safeguarding the protection of high value agricultural land (1 to 3a) which is also outside of flood risk zones 3a and 3b. **Positive effect:** • Development on land with no current or immediate potential agricultural value • Provision or enhancement of	**Significant negative effect:** • Development on land with agricultural value 1 to 3a, which is also outside of flood risk zones 3a and 3b. **Negative effect:** • Loss of local food growing land of demonstrable value	○ Use the provisional ALC data except where superseded by site-specific surveys. ○ [--] Grades 1 to 3a, outside FZ3 ○ [-] Grades 1 to 3a, inside FZ3 ○ [?] Grade 3 (where 3a/3b split unknown) ○ [+] Grades 3b to 5 ○ [++] Non-agricultural land – but ALC includes under this heading some urban fringe land planned for development in	Local plans / masterplans should ensure that opportunities are taken.

	local food growing land of demonstrable value		the past that is currently farmed: commentary needs to acknowledge this.	
4f. Minimise vulnerability to tidal / fluvial flooding (taking account of climate change), without increasing flood risk elsewhere ***SEA Topic*** Climatic factors Water	**Significant positive effect:** • Highly vulnerable and more vulnerable development in flood zone 1 (as contained in Table 3 of the Flood Risk and Coastal Change PPG). **Positive effect:** • Development proposed in areas of lowest flood risk (as contained in Table 2 and 3 of the Flood Risk and Coastal Change PPG). • Development which mitigates existing flood risk from tidal or fluvial sources	**Significant negative effect:** • Highly, more and less vulnerable development in flood risk zone 3b (as contained in Table 3 of the Flood Risk and Coastal Change PPG). • Highly vulnerable development in flood risk zone 3a **Negative effect:** • Any other development in areas of flood risk (as contained in Table 3 of the Flood Risk and Coastal Change PPG). • Flood defences and mitigation measures would have negative effects on flooding elsewhere	○ [++] FZ1 ○ [+] FZ2 ○ [-] FZ3a ○ [--] FZ3b (current locations affected are already sieved-out but significant negative impact could be reintroduced via climate change) ○ [+/-] if substantially mixed ○ Normally no need for [?] as all land has a known FZ status: exceptions can be made where climate change effect is unclear.	SFRA / site-specific FRA needed to support local plan allocations / masterplans

4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere ***SEA Topic*** Climatic factors Water	• Development proposed outside of identified high risk surface water areas. • Development which includes measures to reduce run off • Development which mitigates existing surface water flood risk	• Development proposed in identified areas at high risk from surface water flooding • Development which significantly increases run off, increasing the risk of surface water flooding	○ Variety of the locations encountered makes consistent scoring difficult. ○ Use EA Updated Flood Map for Surface Water and score directly if possible: [--] 1 in 30 [-] 1 in 100 [+] 1 in 1000 [++] less than 1 in 1000. This data is comprehensive and so avoids the need for a [0] score. ○ On most sites with SWF, the area at risk is little more than the width of local watercourses, so will be a mixed score [+/-] unless a wider area is noticeably affected. ○ Where a score based on EA categories appears not relevant, because of the	SFRA / site-specific FRA needed to support local plan allocations / masterplans

			complexity of SWF risk across the site, an alternative scoring is possible, based on assessment of the extent of the area at risk and potential for mitigation [-], including reduced site area. ○ SuDS may offer a solution to be noted as possible mitigation. ○ Note groundwater (also reservoir) information where known but consistency unlikely to be achievable at this stage as data availability varies between LPAs.	
4h. Minimise harm to, and where possible improve, water quality and availability ***SEA Topic***	• Development with potential to improve water quality and/or availability	• Development posing a risk to water quality and/or availability	○ Generally [0], unless an issue exists: examples below. ○ [?/-] in Groundwater Source Protection Zone.	Local plans / masterplans should ensure that provision is made.

Water			○ [?] GSPZ nearby. ○ [?] location crossed by major streams, especially if of wildlife interest, as polluted run-off from housing could affect these, even if damage is accidental.	
Theme 5: Minimise consumption of natural resources				
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways) ***SEA Topic*** Material assets Population Air	• Development generating need for travel within reasonable distance of rail station • Development generating need for travel within reasonable distance of bus stops • Development with access to multiple bus routes • Development on or adjacent to the	• Development generating need for travel outside reasonable distance of rail station • Development generating need for travel outside distance to bus stops • Development outside cycling network • Development that reduces connectivity, safety or use of cycling network	○ [+] or [-], depending on compliance. Many locations will be mixed [+/-]. ○ Note where significant mitigation required. ○ 'Reasonable access to sustainable transportation' is mainly about distance to travel facilities but note any capacity constraints that if	Local plans / masterplans should ensure that provision is made.

	existing cycling and PROW network • Extension or enhancement to cycling network to facilitate and encourage sustainable travel ***Reasonable distance:*** *Rail Station 800m* *Bus Stop 400m* *Cycle and Public Rights of Way 400m*	***Reasonable distance:*** *Rail Station 800m* *Bus Stop 400m* *Cycle and Public Rights of Way 400m*	severe can reduce score to [--].	
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks ***SEA Topic*** Air Climatic factors Material assets	• Development that contributes to reducing non-renewable energy consumption and 'greenhouse' emissions • Development that provide opportunities to link into an existing energy network	• Development that does not contribute to reducing non-renewable energy consumption and 'greenhouse' emissions • Development that does not provide opportunities to link into an existing energy network	○ Sustainable development teams can advise on heat opportunities. ○ Generally [0], as although there is potential for more energy-efficient housing, opportunities will not vary greatly by broad location. ○ Note that dispersed development is likely to have some negative effects.	Local plans / masterplans should ensure that provision is made.

			Where these have been identified under other more specific objectives it would be double-counting to repeat them under this. ○ [?] if urban extension or close to Bristol and potential for heat network cannot be ruled out.	

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APPENDIX D: Appraisal tables

Vision and Priorities					
Sustainability Objective	**S/T**	**M/T**	**L/T**	**Commentary**	**Mitigation or enhancement**
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**++**	**++**	The proposed Vision states that 'The rich and diverse environmental character will be integral to health and economic prosperity. Patterns of development and transport will facilitate healthy and sustainable lifestyles. Strategic Priority 4 includes improve substantially the quality and sustainability of new development by • Incorporating a Placemaking approach • Facilitating health, social and cultural well-being • Integrating high quality, multi-functional green infrastructure	
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**0/?**	**0/?**	Air quality is not specifically mentioned within the Vision and Priorities however the Vision refers to patterns of development and transport facilitating healthy and sustainable lifestyles. The Priority 4 also refers to health well-being and reducing greenhouse gas emission.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**++**	**++**	The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. The Priority 4 also refers substantially improving the quality and sustainability of new development by facilitating health, social and cultural well-being.	

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2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	The Vision refers to the WoE to be one of Europe's fastest growing and most prosperous city regions and provision of a range of housing types will be of high quality and more affordable. Strategic Priority 1 refers to meeting in full the identified needs for housing, as far as possible, in a sustainable way.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	The Vision refers to the WoE to be one of Europe's fastest growing and most prosperous city regions and provision of a range of housing types will be of high quality and more affordable. Strategic Priority 1 refers to meeting in full the identified needs for housing, as far as possible, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the plan area.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**++**	**++**	The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure Strategic Priority 3 refers to new development to be properly aligned with infrastructure and maximises opportunities for sustainable and active travel. Strategic Priority 4 refers to improving the quality and sustainability of new development by facilitating health, social and cultural well-being.	
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++**	**++**	The Vision refers to existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. Strategic Priority 4 refers to improving the quality and sustainability of new development by facilitating social and cultural well-being.	
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**++**	**++**	The access to town Centre services and facilities are no specifically mentioned in the Vision, however Strategy Priority refers to to improving the quality and sustainability of new development by facilitating health, social and cultural well-being.	

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2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**++**	**++**	The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all. Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**++**	**++**	The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all. Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.	
3b. Achieve reasonable access to major employment areas	**0**	**++**	**++**	The Vision states that by 2036 the WoE will be one of Europe's fastest growing and most prosperous city regions with the gap between disadvantaged and other communities closed and a rising quality of life for all. Strategic Priority 1 refers to accommodating the economic growth objectives of the LEP Strategic Economic Plan, particularly growth of existing employment centres such as the Enterprise Zones and Enterprise Areas and economic rebalancing to help address inequality and improve accessibility to jobs.	
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**++**	**++**	The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity. Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment.	

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4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**++**	**++**	The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity. Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity.	
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**++**	**++**	The Vision states that the rich and diverse environmental character will be integral to health and economic prosperity. Strategic Priority 4 refers to protect and enhance the sub-region's diverse and high quality natural, built and historic environment.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**?/+**	**?/+**	The Vision does not specifically refer to promoting conservation and wise use of land. However Strategic Priority 4 refers to retaining the overall function of the Bristol and Bath Green Belt which encourage more efficient use of previously developed land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?**	**?**	The Vision and priorities don't specifically refer to minimize the loss of productive land.	
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change. Strategic Priority 4 refers to ensuring resilience to the impacts of climate change	

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4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+**	**+**	The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change. Strategic Priority 4 refers to ensuring resilience to the impacts of climate change	
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**?**	**?**	The Vision and priorities don't specifically refer to minimize the loss of productive land.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**++**	**++**	The Vision states that patterns of development and transport will facilitate healthy and sustainable lifestyles and existing and new communities will be well integrated, attractive and desirable places and supported by the necessary infrastructure. Strategic Priority 3 refers to ensuring a spatial strategy where new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel.	
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**+**	**+**	The Vision states that new development will be designed to be resilient to, and reduce the impacts of climate change. Strategic Priority 4 refers to reducing greenhouse gas emissions and ensure resilience to the impacts of climate change.	

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POLICIES 1-6

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+**	**+**	Policy 5; Clause 4 states "*ensure the protection and enhancement of the natural, built and historic environment*" and Clause 8 is to "*maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment*" to inform new development and delivery of high quality and sustainable places. Non-strategic development will be identified through each authority's Local Plan process and will need to adhere to local standards addressing open space. Within Policy 5, under Policy Principle 4, the production of a regional Green Infrastructure plan is highlighted as future assessment of the regional environmental assets and will highlight areas in need of protection or enhancement.	Policy 7 indicates where new recreational open space and Green Infrastructure is required as part of individual Strategic Development Locations. Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**-/+**	**-/+**	No specific mention in Policy text. Policy 5; Clause 2 refers to "*improve health and wellbeing*"; Clause 4 refers to *"ensure the protection and enhancement of the natural, built and historic environment";* Clause 5 refers to *"mitigate and adapt to climate change"*; Clause 6 refers to "*minimise energy demand and maximise the use of renewable energy*", Clause 7 refers to "*provide and ensure access to infrastructure including public transport, which reduces reliance on use of cars*". Delivery of housing targets would likely result in increased traffic generation and increased trips throughout the region, particularly where strategic growth is proposed. Increasing density of urban areas would have a similar effect in more vulnerable air quality locations. While policy requirements in Policy 5 would have indirect consequences, the issue of air quality impact should be made more explicit in the Plan.	Wording relating to impact on air quality should be included in policy – Potentially Policy 5. Transport Impact Assessments would be required on larger scale development and have been identified in Strategic Development Locations where necessary. Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan. Individual Local Plan site allocations should identify problematic areas where non-strategic growth may be impacted and take appropriate action.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+**	**+**	Policy 5; Clause 2 refers to reducing health inequalities. Clause 7 refers to provide and ensure access to infrastructure. Policy 6 states "*Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy*" and later that "*new development must be properly aligned with the provision of the necessary strategic infrastructure*". SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development	Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme. Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
				should make provision of community infrastructure necessary to support the new development.	Other, more localised infrastructure will also be required and this will be identified through local plans.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	Policy 1 gives figures relating to the housing need in the region and what will be achieved / delivered during the life of the plan. This includes the identification of suitable strategic growth locations. Policy 5 aims to facilitate all new development to contribute towards the delivery of high quality places. Policy 2; Clause 3 allows non-strategic locations to identified through individual Local Plans. A key objective of the Plan is to provide for the future housing need of the region and supply the necessary amount of homes to each sub-region. The risk of not planning for this adequately would result in development in inappropriate and unsustainable locations.	Policy 2 ensures strategic growth is directed towards the most appropriate locations. Non-strategic growth is to be identified and controlled at Local Plan level.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	Policy 3; Clause 1 is focused upon the delivery of Affordable Housing in the region and sets out a target number of affordable homes that the plan will deliver. Policy 3; Clause 3 sets the affordable housing requirement for development in the region, giving a minimum target of 35% affordable homes on applications delivering 5 or more dwellings or on sites larger than 0.2ha and broadens the requirement to self-contained C2 developments, including student accommodation. Policy 3; Clause 4 reaffirms that each Strategic Development Location will have a specific affordable housing target. Policy 5 more generally aims to facilitate all new development to contribute towards the delivery of high quality places. A key objective of the plan is to ensure an adequate supply of affordable homes is delivered in conjunction with overall housing targets. Affordable housing will be delivered through individual development and therefore would be subject to individual viability tests.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+**	**+**	Policy 5; Clause 2 refers to "*reducing health inequalities and facilitate social interaction"*. Clause 7 refers to "*provide and ensure access to infrastructure".* Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements. Policy 6 states "*Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy*" and later that "*new development must be properly aligned with the provision of the necessary strategic infrastructure*". SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.	Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme. Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section. Other, more localised infrastructure will also be required and this will be identified through local plans.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements held in the relevant section of Policy 7. Policy 6 states "*Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy*" and later that "*new development must be properly aligned with the provision of the necessary strategic infrastructure*". SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.	Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme. Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section. Other, more localised infrastructure will also be required and this will be identified through local plans.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+**	**+**	Policy 5; Clause 7 creates a requirement to "*provide and ensure access to infrastructure*". Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements. Policy 6 states "*Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy*" and later that "*new development must be properly aligned with the provision of the necessary strategic infrastructure*". SDLs, and their relevant Policy, highlight issues relating to the identified areas for strategic growth. Non-strategic growth will be directed by Local Plans and, as expanded on in Policy Principle 7 in Policy 5, development should make provision of community infrastructure necessary to support the new development.	Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme. Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section. Other, more localised infrastructure will also be required and this will be identified through local plans.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0/+**	Policy 4 identifies the need to provide better access to employment in South Bristol. Policy 5; Clause 2 refers to "*reducing health inequalities and facilitate social interaction"*. Clause 7 refers to "*provide and ensure access to infrastructure".*	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region.	**0**	**++**	**++**	Policy 4 set out the region's requirements for employment and identifies key strategic employment locations. The delivery and protection of employment in these locations will be set out in individual Local Plans. In relation to Strategic Development Locations, Policy 4 states "*The amount of employment land provided for at the SDLs will respond to the amount of residential development proposed… will be secured through allocation and policy detail in Local Plans*".	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
3b. Achieve reasonable access to major employment areas	**0**	**+**	**+**	Policy 4 prioritises the growth of existing centres and explicitly identifies areas - South Bristol, Bath and Weston-super-Mare – as areas where improved accessibility is required. Where additional growth is identified, the policy reaffirms the overall strategic aim to provide new supporting transport infrastructure. Policy 5; refers to "*enable inclusive and sustainable economic growth*"; while Clause 7 creates a requirement to "*provide and ensure access to infrastructure*". Policy 2 reinforces the need for delivery of development in Strategic Development Locations to adhere to specific set out policy requirements. Policy 6 states "*Strategic infrastructure will be required to support the effective implementation of the Joint Spatial Plan Spatial Strategy*" and later that "*new development must be properly aligned with the provision of the necessary strategic infrastructure*".	Where strategic growth is proposed, key new infrastructure has been identified within the relevant policy. Other more localised infrastructure will also be required and this will be identified through local plans.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**+/?**	**+/?**	Policy 5; Clause 4 requires "*the protection and enhancement of the natural, built and historic environment*". The Plan gives firm direction to the protection of historic assets. Detail of the historic environment will be pursued through individual Local Plans and through mechanisms such as Conservation Appraisals. Development will be assessed against the impact on heritage asserts on a case by case basis.	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**+/?**	**+/?**	Within Policy 5, policy requirement for all new development follows the set clauses - Clause 4 requires the "*protection and enhancement of the natural, built and historic environment*"; Clause 5 refers to "*mitigate and adapt to climate change and use a catchment based approach to water management*"; Clause 6 to "*Minimise energy demand and maximise the use of renewable energy*" and; 'Clause 8 refers to "*maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment*".	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**+/?**	**+/?**	Within Policy 5, policy requirement for all new development follows the set clauses - Clause 1 refers to "*create character, distinctiveness and sense of place*". Clause 4 refers to "*ensure the protection and enhancement of the natural, built and historic environment*". Clause 8 refers to "*maintain and enhance the Green Infrastructure network to deliver multiple benefits for people, place and the environment*". The Plan encourages the protection of valuable landscapes. Detail on important areas or local issues will be identified through the Local Plans of each authority and development will be assessed on a case by case basis.	Further enhancement opportunities could be delivered through the intended associated Green Infrastructure Plan.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**+/--**	**+/--**	Policy 2; Clause 2 directs the delivery of housing and employment land to maximise "*the sustainable development of previously developed land and other appropriate opportunities within existing urban areas*". Policy 5 later states that "The general extent of the Green Belt will be maintained except where it is required to be amended through local plans to enable the delivery of the strategic development locations". Policy 1 - 60% of currently allocated land, accounting for 61,500 of the proposed housing number in Policy 1, is previously developed land. Of the 44,000 additional dwellings needed identified in Policy 1, it is estimated that 16,200 will be delivered through urban living; i.e on previously developed urban land. Policy 4 seeks to direct employment growth to existing employment zones and centres, thereby promoting the use of previously developed land. Non-strategic growth will be identified through individual plans and is likely to be a combination of brownfield and greenfield land. Strategic Development Locations which total some 17,600, account for the majority of the remaining 27,800 required dwellings and will be greenfield land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**-**	**-**	No specific mention in Policy text. Evidence on Agricultural Land classification is not complete and it is not fully understood at this stage if land is classified as 3a or 3b land, which is a	Green Infrastructure Plan, NPPF. Wording relating to the maintaining Best and Most

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
				significant differentiation to make. In general, having a strategic plan will minimize loss through the identification of SDLs as development will be discouraged at inappropriate locations that may be best and most versatile agricultural land. Further work would be required to ascertain the agricultural land classification.	versatile Agricultural Land should be included in policy – potentially within Policy 5.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+/?**	**+/?**	Policy 5; Clause 5 refers to "*mitigate and adapt to climate change and use a catchment based approach to water management*". Policy 6 states "*New development must be properly aligned with the provision of the necessary strategic infrastructure*", and identifies the need for strategic flood management infrastructure at Avonmouth/Severnside; and the River Avon relating Bristol City Centre. The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.	Strategic flood management plans and risk assessments will identify problematic areas at local level.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/?**	**+/?**	Policy 5; Clause 5 refers to "mitigate and adapt to climate change and use a catchment based approach to water management". Policy 6 states "*New development must be properly aligned with the provision of the necessary strategic infrastructure*", including flood management. The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.	Strategic flood management plans and risk assessments will identify problematic areas at local level.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**+/?**	**+/?**	Policy 5; Clause 5 refers to "*mitigate and adapt to climate change and use a catchment based approach to water management*". The Plan gives direction to Local Plans for the approach to Flood Management. Each authority will be responsible for identifying issues and addressing those on a case by case basis.	Strategic flood management plans and risk assessments will identify problematic areas at local level.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+**	**+**	Policy 5; Clause 7 requires the provision and access to "*infrastructure including public transport, which reduces reliance on use of cars*". Policy 6 explicitly requires the implementation of transport infrastructure to support the delivery of the Plan and states priority will be given to development schemes that benefit the delivery of the wider spatial strategy in Policy 2. The Plan explicitly highlights the importance of new infrastructure where growth is identified, particularly through SDLs.	Policy 6 will be supported by the West of England Joint Infrastructure Delivery Programme. Policy 7 indicates where strategic growth is proposed, key new infrastructure has been identified within the relevant location policy section. Other, more localised infrastructure will also be required and this will be identified through local plans.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**+**	**+**	Policy 5; Clause 6 states "*Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions*".	

Policy Commentary

Policy 1: The housing requirement

The thrust of Policy 1 is the underlying principle of the Plan - that the sustainable future of the region is through growth - and so sets out the housing requirements for the region. The housing target is based upon the calculated need for each authority area and then forms the basis of the wider strategy and the identification of Strategic Development Locations (SDLs) and the distribution of

growth throughout the region. Inherently, the delivery of housing and, therefore, growth has strong benefits for the economic and social sustainability of the region and would help address key issues relating to social and economic disparities.

However, in isolation and without mitigation, there is potential for the delivery of such large numbers of new homes to cause harm to the environment and, in the wrong locations, would not necessarily deliver on overall economic and social sustainability objectives. As such, the role of the spatial strategy must be incorporated into the assessment of the sustainability of Policy 1, which is recognised in the policy itself. With the identification of SDLs, new development is encouraged towards the most suitable locations in terms of specific sustainability issues – the individual SDLs also form part of this Sustainability Assessment – and the risk of haphazard delivery of homes is greatly reduced.

Primarily, potentially negative impacts arising from the delivery of housing (such as to Green Infrastructure, flood management or pressure on the existing built environment) are mitigated through the rest of the Plan's policies, which seek to address such risks.

One point on concern would relate to air quality where, although other policy requirements would have indirect consequences, the issue of air quality impact should be made more explicit in the Plan. It is recognised that, in the majority of SDLs, a Transport Impact Assessment would be a policy requirement and non-strategic growth will be allocated in individual Local Plans where there issues can be addressed.

Policy 2: The spatial strategy

The spatial strategy relates predominantly to sustainability objectives 2a and 2b, although through individual SDL policy can broaden out to include objective relating to employment, infrastructure. Therefore, the policy also links strongly with Policy 4.

Policy 5 is the mitigation against poorly located strategic development and preventing harmful impacts that development in unsuitable locations would bring, such as impacts on valuable landscapes or where poor accessibility to services exist. As Policy 5 is part of the delivery mechanism for Policy 1, the commentary for that policy is also relevant here.

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Policy 3: The affordable housing target

Similar to Policy 1, Policy 3 specifies the target figure for Affordable Housing for the region and, in terms of assessing against sustainability objectives, should be read in the wider context of the strategic policies. The policy seeks to ensure a suitable mix of housing types, relevant only to objective 2b, and mitigation to development would be through the remaining policies of the Plan. Non-strategic growth will be allocated in individual Local Plans where there issues relating to viability can be addressed.

Policy 4: The employment requirement

The growth of employment land in inextricably linked to the growth in housing numbers and, therefore, supplying the appropriate quantum of employment land increases the economic and social sustainability of the region. In respect to specific sustainability objectives, the policy relates to objectives 3a and 3b; setting out the overall targets for employment growth in the region to meet need.

Policy 4 prioritises the delivery of employment land at existing employment Enterprise Zones and Areas as well as designated Town Centres. These locations are generally in sustainable locations with existing infrastructure in place. Where employment need has been identified at SDLs, the level will be appropriate to the site, which will be determined at a later date and mitigation will take place according to the individual location.

Both existing and new locations of employment growth must be mitigated with suitable transport infrastructure to ensure good access as growth continues, however, the policy does explicitly reference south Bristol, Bath and Weston-Super-Mare as areas where access to employment will be supported.

In terms of environmental sustainability, the Policy prioritises and encourages development on previously developed land, minimising loss of green infrastructure and minimising flood risk and other environmental concerns.

Intensifying areas within Flood Risk areas may be an issue and further assessments would be needed.

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Policy 5: Place-shaping policies

Policy 5 provides a set of principle for development to follow, both at SDLs and non-strategic development and support a wide range of sustainability issues. As such, the policy scores well against the majority of sustainability objectives.

When assessed against the objectives, however, there are gaps, as the policy makes no reference to minimising loss of agricultural land nor makes emphasis of development on previously developed land, although does encourage 'regeneration led development'. Development on previously developed land is advocated through Policy 5 and so is also mitigated against within the Plan. In order to achieve a more positive score, mention should be made of minimising loss of best quality agricultural land within the Plan.

Policy 6: strategic infrastructure requirements

Policy 6 essentially acts as mitigation to ameliorate any impacts of delivering the scale of growth the Plan seeks and identifies key strategic infrastructure, relating to transport, energy and flooding among others, that is critical to support housing and employment growth.

The policy does not explicitly state what the requirements will be, but defers to the West of England Infrastructure Delivery Programme. and to individual Local Plans to pinpoint where infrastructure will be required and programme the delivery timescales. These infrastructure plans are essential in the mitigation of the Plan.

Where key infrastructure is required to deliver SDLs, this has been identified in each individual location.

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Summary of SA Findings (long-term effects) for Strategic Development Locations

Strategic Development Location	*1a*	*1b*	*1c*	*2a*	*2b*	*2c*	*2d*	*2e*	*2f*	*3a*	*3b*	*4a*	*4b*	*4c*	*4d*	*4e*	*4f*	*4g*	*4h*	*5a*	*5b*
B&NES 7.1 North Keynsham	+	-/?	+	++	++	+	+	+	0	++	+	?	-/?	--	--	?/-	+	+/-	0	+/?	?
B&NES 7.2 Whitchurch	+	?	+	++	++	+	+	+	0	+/?	+	?	-/?	--	--	?	++	+/-	0	+/?	?
Bristol 7.3 Brislington	+	-	-/+	++	++	+/?	+	+/?	0	+/?	+	?	-/?	?	-	?	+	+/-	0	+/?	?
NSC 7.4 Backwell	+/?	+	+/?	++	++	+/?	++	-	0	+/?	++	0	+	0/--	--	--	++	+/-	?	++	?
NSC 7.5 Banwell Garden Village	+/?	+/?	+/?	++	++	+/?	++/ --	-	0	+	+	?	?/-	--	--	?	++	+/-	?/-	+/-	?
NSC 7.6 Churchill Garden Village	++	+	+/?	++	++	+/?	++	--	0	+/?	+/-	++	-/?	--	--	?	++	+/-	0	+/?	?
NSC 7.7 Nailsea	+/?	+	+/?	++	++	+/?	++	+/-	0	+/?	++	0	0/?	--	--	--	++	+/-	?	++	?
SGC 7.8 Buckover Garden Village	+	+/?	-	++	++	+	+	-	0	+	-	?	?	-	--	--	++	+/-	0	-	+

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SGC 7.9 Charfield	+	+	-	++	++	+	++/ -	-	0	+	-	?	?	-	--	+/?	+	+/-	0	-	?
SGC 7.10 Coalpit Heath	+	+	+	++	++	+/?	+/-	-	0	+	+	?	0	-	--	+/?	+	+/-	0	+	?
SGC 7.11 Thornbury	+	+	+	++	++	-/?	+	+	0	++	+	?	?	-/--	--	--	+	+/-	0	+	?
SGC 7.12 Yate	++	+/?	+	++	++	+	+/-	+	0	++	+	-/?	?	-/--	--	?/+	+/-	+/-	0	+	?
Strategic Development Location	***1a***	***1b***	***1c***	***2a***	***2b***	***2c***	***2d***	***2e***	***2f***	***3a***	***3b***	***4a***	***4b***	***4c***	***4d***	***4e***	***4f***	***4g***	***4h***	***5a***	***5b***

Appendix C

Sustainability Appraisal of the Joint Spatial Plan Publication Version	
Strategic Location:	**North Keynsham**

Summary

- Good link to National Cycle Route 4, Regional 16, Avon Cycle Route and other local routes. East part of the area has good access to Manor Wood and Saltford Community Association recreational grounds.
- An AQMA was declared for the Centre of Keynsham. It is also closely linked to the AQMA in Saltford.
- There is a relatively good range of healthcare facilities and community services in Keynsham Town Centre. It also has good public transport links to large urban centres in Bath and Bristol.
- Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs including a new primary school.
- Policy facilitates around 1,500 new homes of which 1,400 homes in the plan period.
- In general good access to local employment sites, Bristol EZ and Bath EA with public transport and Policy facilitates around 50,000 sq.m of employment space.
- Parts of the area are highly sensitive associated with Keynsham and Queen Charlton Conservation Areas.
- Some land is or close to protected ecological sites the Stidham farm geological SSSI of which a small part is a RIG. The River Avon SNCI runs north of the site boundary, The Broad Mead SNCI field lies entirely within the site at the eastern end.
- Cotswolds AONB lies east of Saltford.
- Policy facilitates the implementation of key transport infrastructure prior to the housing development.
- Mainly Flood Zone 1. Existing industrial area is within FZ2.

Sustainability Objective	**S/ T**	**M/ T**	**L/ T**	**Commentary**	**Mitigation or enhancement**
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+**	**+**	Good link to National Cycle Route 4, Regional 16, Avon Cycle Route and other local routes. East part of the area has good access to Manor Wood. Saltford Community Association recreational grounds.	Policy requires a well-integrated and multifunctional green infrastructure network

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1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**-/?**	**-/?**	An AQMA was declared for the Centre of Keynsham in July 2010. Development may cause pressure on the key transport network impacting on air quality. It is also closely linked to the AQMA in Saltford.	Policy requires a full Transport Assessment.Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+**	**+**	There is a relatively good range of healthcare facilities and services in Keynsham Town Centre. It also has good public transport links to large urban centres – Bath and Bristol – with healthcare facilities. However some areas are quite remote from the town centre and beyond a reasonable walking distance of facilities. East part of the area is within 1200m of the Doctor Surgery in Saltford. All facilities in Keynsham are beyond a reasonable walking distance of facilities. There is currently no public transport route to the area.	This level of strategic growth may require mitigation or future provision of health facilities. This would need to be identified at masterplanning stage. Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs including healthcare facilities.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	Policy facilitates around 1,500 new homes of which 1,400 homes in the plan period. This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing.	Policy 3 sets a minimum target of 35%.

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2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+**	**+**	There is a good range of community facilities and services in Keynsham Town Centre as the second largest town in the district. In general it also has good public transport links to large urban centres – Bath and Bristol – with good community facilities. However Area S1 is largely remote from these centres. *Community Facilities:* No existing community facilities located within the site area or within a reasonable distance.	Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	There are currently 5 primary schools and 3 secondary schools in the town however there is no or limited capacity to accommodate primary school students from new development. Within 1500m from Wellsway School.	Policy requires a new primary school on site and financial contribution to the provision of a secondary education provision off site.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+**	**+**	There is a relatively good range of town centre uses in Keynsham. Eastern part of the area is within 1500m of Saltford centre.	Policy requires a new local centre with facilities to provide a focus for the new community to meet their needs.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**++**	**++**	Policy facilitates around 50,000 sq.m of employment space.	

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3b. Achieve reasonable access to major employment areas	**0**	**+**	**+**	In general good access to local employment sites, Bristol EZ and Bath EA with public transport.	
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	Parts of the area are highly sensitive associated with Keynsham and Queen Charlton Conservation Areas.	The area with high sensitivity should be avoided. Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and mitigates impact on sensitive views (including key views from the Cotswold AONB).

4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**-/?**	**-/?**	Some land is or close to protected ecological sites the Stidham farm geological SSSI of which a small part is a RIG. The River Avon SNCI runs north of the site boundary, The Broad Mead SNCI field lies entirely within the site at the eastern end.	The area with high sensitivity should be avoided. Further assessment and ecological mitigation plan are necessary. Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including key views from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network that includes new wetland features, restored floodplain meadows and new woodland.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**--**	**--**	Cotswolds AONB lies east of Saltford. Keynsham is located where the River Chew meets the River Avon. The town has principally grown out along plateau areas either side of the Chew Valley, avoiding the low lying floodplain areas of the River Avon and the River Chew; and also the steeper valley slopes of the River Chew and the Stockwood Vale tributary valleys. The beautiful valley of the River Chew funnels through into the centre of Keynsham from the south west, effectively dividing the settlement into two halves. Development resulting in the extension of the urban area into the distinctive tributary valleys of the River Avon and the Chew Valley affects the distinctive character of the existing landscape.	Policy requires a layout and form that produces a high quality of urban design, contributes positively to local character and distinctiveness, and mitigates impact on sensitive views (including key views from the Cotswold AONB).

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4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	The western part of the area is previously developed land however majority of the development area would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land.	No apparent scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?/-**	**?/-**	The majority of the area is Grade 2 and 3 therefore further detailed survey needed to identify precise land grading. Mixture of Grade 2 and Grade 3	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	Mainly Flood Zone 1. Existing industrial area is within FZ2. To the north the area is bounded by the River Avon, which forms a corridor of fluvial Flood Zone 3 that also forms part of the functional floodplain.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional floodplain.

4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	Areas of surface water flood risk exist along the river corridors but are largely contained within the fluvial extents.	Surface water runoff should be carefully managed to avoid adverse downstream impacts on Keynsham. Policy Principle 5 includes implementation of a sustainable drainage strategy.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	There is a small Groundwater Source Protection Zone at Somerdale, contained within the site. There are no Drinking Water Safeguard Zones nearby.	

5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+/?**	**+/?**	This site has particular challenges in providing suitable and appropriate access across the railway line. The railway line and A4 will act as barriers for potential future residents to access the town centre, railway station and facilities in the town by sustainable modes of travel. There is the opportunity for the site to benefit from access to the Bristol-Bath cycle path to the north of the site (and its link to NCN Route 410 in Saltford), which will require improvement to the existing PROW connecting to the cycle path. Maximising access to the higher frequency bus corridor on the A4 will be important for providing access to bus services in the area. Traffic generated from this site will contribute towards congestion on the A4, B3116 and in Keynsham town centre. Policy states that 'No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed.'	The traffic impacts of this site will need to be considered as part of an assessment of the cumulative impact of traffic generated by other planned and proposed development sites in the West of England area. Policy requires provision of key transport infrastructure including: i. North Keynsham multi modal link from Avon Mill Lane to A4. ii. Pedestrian and cycle connections in all directions which link the site with key services and facilities. iii.Where existing vehicle routes across the railway line are no longer required for continued use by motor traffic, seek to downgrade them to pedestrian and cycle only links; iv.Metrobus route from Bristol to Keynsham on the A4 corridor; v.High frequency local bus service vi.Improved passenger facilities at Keynsham rail station; vii.Off-site junction improvements including at Hicks Gate; and viii.Expanded or relocated A4 Bristol Park & Ride.

5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**?**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips. Potential opportunities for hydropower along the river, as identified in the B&NES Renewable Energy and Planning Research Update (2010)	Policy 4 requires; 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.

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Joint Spatial Plan Sustainability Appraisal	
Strategic Location:	**Land South East of Bristol** **Whitchurch**

Summary

- The area has good access to National Route 3.
- The northern part of the area is designated as Ecological Networks through B&NES Placemaking Plan Policy NE4 and Green Infrastructure Policy NE1.
- Not in AQMA but close to Bristol AQMA. The Council has started a short term monitoring scheme (6 months) to clarify the levels of NO2 in Whitchurch.
- Residential expansion is likely to relate better to Bristol or Keynsham rather than Bath for local facilities. There are limited facilities at Whitchurch village. However Policy requires to provide retail, healthcare and community facilities, two new primary schools and a secondary school.
- Policy facilitates approximately 2,500 new homes of which 1,600 homes in the plan period.
- Policy requires to include employment spaces at a quantum and of a type to be determined though the Local Plan.
- The west of Whitchurch village is very sensitive within the setting of the Maes Knoll, Wansdyke Scheduled Ancient Monuments and a number of listed buildings. The area towards Queen Charlton is very sensitive within the setting of Queen Charlton Conservation Area.
- The area is located within the Dundry Plateau landscape area. The assets and aspects of significance including the Maes Knoll and Wansdyke Scheduled Ancient Monument, the historic landscape around Whitchurch, a visually important references point for much of southern Bristol and countryside to the south of the ridge and the interface with the distinctive landscape of the Chew Valley contributes to the distinctiveness of this part of the Dundry plateau area.
- The area around the village lies almost entirely within FZ1.
- There is good connection to Bristol with existing footpath and cycle path infrastructure, and opportunities for enhancing routes in to Keynsham.
- Policy facilitates the implementation of key transport infrastructure prior to the housing development.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	The area has good access to National Route 3. There are a number of sites used as playing fields between Whitchurch and Stockwood and along A37.The northern part of the area is designated as Ecological Networks through B&NES Placemaking Plan Policy NE4 and Green Infrastructure Policy NE1. *Public Space* • The area contains open greenspace, two existing sports grounds, playing field and a playground; • Hursley Brow football ground, village Fete Field, allotment, football and rugby pitches (Bristol Telephones RFC and Stockwood Wanderers), Stockwood Vale Golf Club	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.2 requires to create a comprehensive green infrastructure network that reinforces and enhances the important characteristics of the area, including the existing green gaps between Whitchurch village and the Bristol urban area.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	?	?	Not in AQMA but close to Bristol AQMA. The Council has started a short term monitoring scheme (6 months) to clarify the levels of NO2. This data will help to inform any decision on the need for an air quality management area in Whitchurch. Policy requires a full Transport Impact Assessment.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	Residential expansion is likely to relate better to Bristol rather than Bath for local facilities. There are limited facilities at Whitchurch village and in the adjoining urban edge of Bristol within walking or cycling distance. It is also proposed, where possible, to enhance public transport provision and cycling routes to Keynsham. *Healthcare Facilities:* • Dentist located 450m to the north, at present there is no other healthcare facilities in the surrounding area that could serve the site area.	Large development with good on-site facilities will benefit new and existing communities. Policy requires providing retail, healthcare and community facilities, two new primary schools and a secondary school**.**
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	Policy facilitates approximately 2,500 new homes of which 1,600 homes in the plan period. This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	Greenfield development is likely to be more viable than brownfield. Viability likely to be dependent upon alternative sources of funding.	Policy 3 sets a minimum target of 35%.
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+**	**+**	Residential expansion is likely to relate better to Bristol rather than Bath for local facilities, but there are limited facilities at Whitchurch village and in the adjoining urban edge of Bristol within walking or cycling distance. Keynsham is within relatively close proximity and it is proposed to enhance cycling routes to the town. *Existing Facilities:* • Stockwood Lane recreation ground located within the site area: and • Whitchurch Cricket Club located 600m to the west.	Policy requires to provide retail, healthcare and community facilities, two new primary schools and a secondary school.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	No or limited capacity to accommodate primary school students from new development into existing schools. The Council currently provides bus services to secondary schools in Keynsham. Policy requires providing two new primary schools and a secondary school.	
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+**	**+**	Keynsham is the nearest town centre and is within relatively close proximity, it is proposed, where possible, to enhance public transport provision and cycling routes to the town. The area potentially has good access to facilities within south Bristol but this is dependent on securing a good level of public transport services.	Policy requires the provision of new local centre(s) within reasonable walking distances of the new community and environmental enhancement to Whitchurch village and its local centre.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 20%of areas in Bath or Bristol.	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**+/?**	**+/?**	Policy requires to include employment spaces at a quantum and of a type to be determined though the Local Plan. No specific quantum or types are identified.	
3b. Achieve reasonable access to major employment areas *Major Employment sites* Enterprise Zones Locally designated key employment areas	**0**	**+**	**+**	Good access to employment opportunities in Bristol with improved transport infrastructure including public transport.	Policy requires key transport infrastructure including; i.Multi modal A4 – A37 link and the south Bristol link road ii.Park and Ride iii.Metrobus route from Bristol on the A4 – A37 link iv Pedestrian and cycle connections v Off-site junction improvements including at Hicks Gate
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	The west of Whitchurch village is very sensitive within the setting of the Maes Knoll, Wansdyke Scheduled Ancient Monuments and a number of listed buildings. The area towards Queen Charlton is very sensitive within the setting of Queen Charlton Conservation Area.	The area with high sensitivity should be avoided. Policy requires protecting and enhancing areas of high landscape character and visual sensitivity including the setting of Queen Charlton Conservation Area, Maes Knoll and Wansdyke Scheduled Ancient Monuments Policy also requires mitigating impacts on sensitive views.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change) *National Sites and assets*	**0**	**-/?**	**-/?**	The east of Whitchurch village is relatively unconstrained but there are a number of SNCIs. • Sturminster Road SNCI and Stockwood Open Space SNCI • Carlton Bottom and Queen Charton Watercourse SNCI	The area with high sensitivity should be avoided. Further assessment and ecological mitigation plan are necessary.
4c. Minimise impact on and where appropriate enhance valued landscapes *National designations* AONB	**0**	**--**	**--**	The area is located within the Dundry Plateau landscape area. The assets and aspects of significance including the Maes Knoll and Wansdyke Scheduled Ancient Monument, the historic landscape around Whitchurch, a visually important references point for much of southern Bristol and countryside to the south of the ridge and the interface with the distinctive landscape of the Chew Valley contributes to the distinctiveness of this part of the Dundry plateau area. Policy requires protecting and enhancing areas of high landscape character and visual sensitivity including the setting of Queen Charlton Conservation Area, Maes Knoll and Wansdyke Scheduled Ancient Monuments Policy also requires mitigating impacts on sensitive view	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	Development on greenfield land does not contribute to promoting the conservation and wise use of land.	No apparent scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?**	**?**	The majority of the area is Grade 3 therefore further detailed survey needed to identify precise land grading. Mixture of Grade 2 and Grade 3	Further Agricultural Land Classification (ALC) assessment to identify Grade 3a and 3b is necessary.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	The area around the village lies almost entirely within FZ1. A small area of fluvial FZ2 flows a tributary of Brislington Brook that flows between Whitchurch Park and Stockwood.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional floodplain.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**-/+**	**-/+**	Several parts of the area are at risk of surface water flooding, with particular areas west of A37, along Queen Charlton Lane and adjoining the settlement area of Whitchurch in Bristol.	Policy Principle 5 includes implementation of a sustainable drainage strategy.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+/?**	**+/?**	This area is not within a reasonable distance to railway stations. There is good connection to Bristol with existing footpath and cycle path infrastructure, and opportunities for enhancing routes in to Keynsham. The area also benefits from existing bus services which provide a regular service to Keynsham, Bristol and Bath. Existing Sustainable Transportation: • PROWs run through the site area which provide connection to Whitchurch; • Cycle paths are located immediately north (A37) and south (Norton Lane); and • Area is well serviced with a number of bus stops along the A37 which provide regular bus services. Policy stats that No housing will be completed at the Whitchurch SDL ahead of: i. Park and Ride, and ii. the multi-modal link A4-A37-south Bristol link including as a pre-requisite, the Callington Road scheme being completed.	The traffic impacts of this site will need to be considered as part of an assessment of the cumulative impact of traffic generated by other planned and proposed development sites in the West of England area. Policy requires key transport infrastructure including; i.Multi modal A4 – A37 link and the south Bristol link road ii.Park and Ride iii.Metrobus route from Bristol on the A4 – A37 link iv Pedestrian and cycle connections v Off-site junction improvements including at Hicks Gate

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	?	?	?	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. Policy 4 requires; 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Location:	**Land at Bath Road,**
Highlights: • Near Stockwood Local Nature Reserve, which sits to the south of the location, while Durley Park is found to the east. Bath Road Allotments are located adjacent to the location. • The provision of at least 750 new homes. • The area is not within an Air Quality Management Area, but sits between the Keynsham and Bristol AQMAs. • There is good public transport availability along the A4 to SE Bristol, Keynsham and Bath where a range of facilities, jobs and services can be accessed. • Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process. • The Grade II Registered Garden of Brislington House, along with the Avon Valley Conservation Area terminates at the northern side of the A4. • The surface water flooding area follows the path of Scotland Bottom and generally follow the areas of Flood Zone**.**	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+**	**+**	There is a good range of different types of space within the walking distance of the location. The area is near to Stockwood Local Nature Reserve, which sits to the south of the location, while Durley Park is found to the east. Bath Road Allotments are located adjacent to the location. Though not designated, there is easy access to the wider countryside, historic wood land and other natural green sites via main cycle routes and the River Avon Trail. Provision of a further new recreational linear park will be made through development of the site is a policy requirement.	The creation of a new recreational facility would provide a benefit to both potential future residents and wider existing residents in accordance with local open space standards. Policy 7.3 requires provision of a linear recreational park incorporating Scotland Bottom watercourse to allow for maintenance of the watercourse and the protection and enhancement of nature conservation. The park should include walking and cycling routes
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**-**	**-**	The area is not within an Air Quality Management Area, but sits between the Keynsham and Bristol AQMAs. Given the nature of the A4, it would be likely that the AQMA would have to be reviewed as part of a wider Transport Impact Assessment.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**-/+**	**-/+**	There is good public transport availability along the A4 to SE Bristol, Keynsham and Bath where a range of facilities can be accessed. Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.	This level of strategic growth may require mitigation or future provision of health facilities. This would need to be identified at masterplanning stage. New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	An approximate 750 homes will be provided at the location. This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective and the housing need of the region.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	No specific local issues. The site is a mix of green and brown field. Greenfield development is likely to be more viable than brownfield, therefore, the majority of the location could provide more certainty for the delivery of a mix of suitable tenures.	Policy 3 sets a minimum target of 35%.
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	A range of community facilities exist in the Brislington and Keynsham areas, accessible via public transport. Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.	This level of strategic growth may require mitigation or future provision of community facilities. This would need to be identified at masterplanning stage. New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole. Policy 7.13 has no specific requirements.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	There are schools within the existing urban areas. Within Bristol, there are 4 primary schools and 3 secondary schools within reasonable distance of the edge of the settlement.	This level of strategic growth would be expected to contribute to primary school places and this mitigation would be required. It is a policy requirement that off-site contribution to the provision of primary school places is made.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+/?**	**+/?**	Keynsham Town Centre (approx 1.5km away) is accessible by public transport, but beyond comfortable walking distance. Brislington Local Centre is also approximately 1.5km away, but is too low in the centre hierarchy to be scored here. Both Bristol and Bath City Centres can be accessed by public transport. Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process.	This level of strategic growth will require mitigation or future provision of retail facilities. The level of provision would need to be identified at masterplanning stage. New transport infrastructure, including pedestrian and cycling links connected to the location, is a policy requirement. This will improve current connectivity for the wider area as a whole.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit nearby disadvantaged areas, the means to do this must be specified.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region.	**0**	**+/?**	**+/?**	Although on-site development would be residential led, a mix of uses is also being encouraged in policy. These supporting uses will be identified through the masterplanning process. New transport infrastructure, including pedestrian and cycling links connected to the location, is integral to the development of the location and is a policy requirement. This will improve current connectivity for the wider area as a whole.	
3b. Achieve reasonable access to major employment areas	**0**	**+**	**+**	There is good public transport access to both the Bristol EZ and Bath EA. The Brislington Trading Estate PIWA is located approx. 0.5km north west along Bath Road and Keynsham Industrial Estate is approx. 2km southbound on the A4.	New transport infrastructure, including pedestrian and cycling links connected to the location, is integral to the development of the location and is a policy requirement. This will improve current connectivity for the wider area as a whole.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	The Grade II Registered Garden of Brislington House, along with the Avon Valley Conservation Area terminates at the northern side of the A4, but does not encroach into the strategic location. Brislington House Lodge itself is also Grade II Listed and found immediately on the opposite side of the A4, leading to the Grade II listed Long Fox Manor. The Grade II Listed 1 and 2 Oakleigh are also found to the north.	Further heritage assessment may be necessary. Ensuring no harm to valuable heritage assets would need to inform the design process.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**-**	**-**	The strategic location is outside any designated ecological areas, but skirts SNCI land to the south in Stockwood Local Nature Reserve. An area of Priority Habitat deciduous woodland is found within the location. The Bickley Wood SSSI is also north of the River Avon, whose impact zones include the settlement area. Policy requires the protection and enhancement of nature conservation.	Appropriate mitigation may be necessary once the nature of development has been determined and if there is sufficient impact on protected habitats. This would be through planning obligations.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**?**	**?**	The area is located within the Hicks Gate landscape character area. Not in proximity to AONB. The location itself mostly medium sensitivity landscape value and provides green relief with views from the A4 with hedgerows and trees. There is a network of very good, thick, tree-lined hedgerows with scrubby woodland, and Scotland Bottom stream to the south requiring protection. There is a mixture of high to medium landscape in the surrounding area. To the north of the A4 is a recognised heritage landscape in Brislington House Gardens, and to the south is a prominent and attractive ridge line, forming a green visual backdrop to the character area and adjacent areas. The retention of hedgerows within the location and the integration of Scotland Bottom in any future design is a policy requirement.	The retention of hedgerows within the location and the integration of Scotland Bottom in any future design is a policy requirement.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**-**	**-**	The location includes previously developed land at Bath Road Park and Ride and existing garden centre, though the majority of the site is greenfield and therefore would not contribute towards this objective.	No scope for mitigation.
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?**	**?**	Data and information is limited. Location is classified predominantly as urban land, which does potentially include Grade 3 land.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	Mainly FZ1. Both FZ2 and FZ3 run along the southeast boundary on the southern section, along Scotland Bottom, and intrude somewhat into the area. Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.	New residential development should be focused on the parts of the area in Flood Zone 1, avoiding the areas identified as functional flood plain. Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	The surface water flooding area follows the path of Scotland Bottom and generally follow the areas of Flood Zone**.** Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.	Policy requires SuDS strategy to ameliorate exiting issues along Scotland Bottom.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	There are no Groundwater Source Protection or Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+/?**	**+/?**	The settlement surrounds Bath Road (A4) with good access to sustainable transport. The road is a major bus route with dedicated bus lanes and numerous bus stops. Regional Route 16 of the Sustrans cycle network is nearby. The nearest train station is in Keynsham. The development of the location is dependent on key transport infrastructure improvements, set out in the policy. This includes a range of pedestrian and cycling links, upgrading the A4 corridor for public transport and new link roads.	The Bath Road park and ride is located within the strategic location and would require to be relocated as a policy requirement – minimising the impact of any loss.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**?**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. Proximity to Bristol may provide opportunities to link up with existing heat networks. However, there is no evidence at present that this is feasible.	Large scale development provides an opportunity to incorporate larger scale, low carbon schemes which potentially allows higher standards to be achieved. This would be determined at the design stage. Policy 4 requires; 6. Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Development Location:	**Backwell**

Highlights:

- Village expansion, accessible to largely existing facilities, with some enhancements required.
- Lack of capacity on A370 corridor – Backwell crossroads a particular constraint.
- Existing station and opportunity to improve links to Bristol with MetroBus.
- Ecological issues related to bat foraging and commuting routes.
- Impact on nearby heritage assets to be considered.
- Loss of high-grade agricultural land.
- Local surface water flooding issues.

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement

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1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+/?**	**+/?**	Backwell Lake LNR is nearby, though a 400m radius extends only slightly south of the railway. Backwell is flanked by National Cycle Routes to the west (410: Avon Cycleway) and east (33: Festival Way) and there is a local cycle route along Backwell Common. Crossed by PRoWS running into countryside. Adjoins outdoor playing space near Lunty Mead.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.4 has no specific requirements.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+**	**+**	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+/?**	**+/?**	Backwell has a GP practice/health centre (plus 3 in Nailsea), pharmacy (plus 4 in Nailsea) and dentist (plus 3 in Nailsea). No hospital. No opticians (nearest is Nailsea).	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.4 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 700 dwellings.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 210.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	Backwell has a post office, village hall and youth centre. There is no library (the nearest is Nailsea) but there are 2 mobile library stops. Eastern part is within 600m of village facilities.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.4 has no specific requirements.

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2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++**	**++**	Two primary schools serve the village but these comprise West Leigh Infants and Backwell Junior, on widely separated sites. Within 800m of West Leigh only. There is a secondary school in Backwell and another nearby at Nailsea. All within 1500m of Backwell School. Empty places at primary level are predicted for 2015-2019, with an increasing trend. A shortfall in secondary places is predicted for 2015-2021. Empty places are predicted at Nailsea School over the same period, with an increasing trend.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.4 requirement for additional primary school.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**-**	**-**	Local Centre only. More than 1500m from any town / district centre. Over 5km from any city centre or equivalent but on bus / rail routes to Bristol / WsM.	
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**+/?**	**+/?**	Currently limited local employment opportunities. Local Plan employment allocation at Moor Lane has not been taken up.	Policy 7.4 requires delivery of about 8.2ha of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	**0**	**++**	**++**	No major employment area, though Temple Quarter EZ is accessible by rail. Backwell is well-placed to continue to serve as a commuter settlement with rail access to central Bristol and Weston-super-Mare but transport capacity constraints may restrict this.	Policy 7.4 requires phasing in line with transport improvements. Scoring assumes delivery of these.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**0**	**0**	Important to maintain open aspect around Chelvey and West Town Conservation Areas. Grove Farm is listed.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable area is large enough do this without difficulty.

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					Policy 7.4 requires sensitive treatment of listed building's setting. Scoring assumes this results in a neutral impact.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**+**	**+**	Wildlife Sites at Backwell are on the higher ground to the south and east and along the River Kenn. Backwell Lake is a LNR. There are patches of Priority Habitat in and around the village. The proposed development location itself is free from biodiversity designations but there are likely to be bat foraging and commuting routes associated with this land.	Further ecological assessments would be required. However it is considered that mitigation is readily achievable through the integration of certain ecological features as part of any new development. Policy 7.4 requires safeguarding and enhancement of bat habitat. Scoring assumes this results in a positive impact.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**0/--**	**0/--**	Not in proximity to AONB. Impact on setting of hills to south. The area is within the Land Yeo and Kenn Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, winding rural lanes and modern ribbon / infill development along the A370. Area is considered to be of medium / medium to high / high sensitivity, with sensitivity generally increasing towards higher ground.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**--**	**--**	Detailed surveys already exist of almost all the land between Backwell and Chelvey. Proposed development location is confirmed as partly Grade 2/3a.	Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).

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4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	Within Flood Zone 1.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	There are wide areas of surface water flood risk associated with the River Kenn and its tributaries, including those running down from Backwell Hill, some of which appear to be culverted beneath modern development. There is another large area at risk NE of Grove Farm. There are possible issues of groundwater flooding associated with Backwell Hill, which is a Groundwater Source Protection Zone.	Surface water runoff should be carefully managed to avoid adverse downstream impacts on Clevedon.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**?**	**?**	Backwell is within the Groundwater Source Protection Zone for Chelvey spring. There are no Drinking Water Safeguard Zones nearby.	Further engagement with regulators is necessary to understand what constraints or opportunities exist. The constraint on land north of the A370 is identified as 'subsurface activity only'.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**++**	**++**	Existing rail station (Nailsea & Backwell), although no current capacity considered at AM and PM peaks. Good bus links to Bristol. Lack of capacity on A370 corridor – Backwell crossroads a particular constraint. Mostly within 800m of the station and accessible via existing roads/PRoWs.	Policy 7.4 requires phasing in line with transport improvements. Scoring assumes delivery of these.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Development Location:	**Banwell Garden Village**

Highlights:

- New development location with potential for community infrastructure package.
- Not currently well-located in relation to employment, retail or public transport, though close to Weston-super-Mare.
- Delivery of Banwell Bypass would enable environmental conditions in the centre of Banwell to be improved.
- No secondary school.
- Ecological sensitivities in relation to bat flight corridors.
- Impact on AONB to the south.
- Low flood risk generally but some surface water issues.

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+/?**	**+/?**	Currently agricultural land detached from facilities in the existing village of Banwell. Development here would connect existing PROWs and is of a scale that could deliver new public open space to meet its own needs and those arising from the existing village.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.5 has no specific requirements.

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1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+/?**	**+/?**	There is no AQMA in this location. Not adjacent to motorway but could be within 200-300m. M5 is in cutting at this location. Bypass would reduce traffic impact in centre of Banwell and so improve air quality there.	Transport Impact Assessment and adequate preventative and mitigation measures are required. Distance from housing could be increased by zoning employment as buffer.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+/?**	**+/?**	Banwell has a GP practice and pharmacy (plus others at Locking and Winscombe). Only SE edge of proposed development location is within 1200m. No hospital. No dentist or opticians (nearest are Winscombe and Worle). Population growth in the broader Weston-super-Mare area would contribute to the development of services at Weston General Hospital.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 1,900 dwellings could support a small satellite surgery. Policy 7.5 has no specific requirements but expects local centre provision to complement facilities in existing village.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 1,900 dwellings.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 570.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	Banwell has a post office, village hall and youth centre. There is no library (the nearest are Winscombe and Worle) but there is a mobile library stop. Existing village facilities are all beyond 600m of proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 1,900 dwellings could support a new community meeting space. Policy 7.5 has no specific requirements but expects local centre provision

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					to complement facilities in existing village.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++/--**	**++/--**	There is a primary school in Banwell but no secondary school. Empty places at primary level are predicted for 2015-2019, with an increasing trend. Proposed development location is more than 800m from any primary school. More than 1500m from any existing secondary school and too small a development on its own to deliver a new one. However, a secondary school is required to serve this and the Churchill SDL, with location to be defined through more detailed masterplanning, and consideration of educational requirements across North Somerset. Policy 7.5 requires two new primary schools to serve the new development.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.5 requirement for additional primary schools.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**-**	**-**	Existing Banwell village has a Local Centre. More than 1500m from any town / district centre. Over 5km from any city centre or equivalent.	Policy proposes bus improvements to Bristol and WsM.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**+**	**+**	Currently limited local employment opportunities.	Policy requires mixed use development, including 5 ha of employment. This is expected to be B8, which does not have a high employment density.
3b. Achieve reasonable access to major employment areas	**0**	**+**	**+**	No major employment area, though close to J21 EA at Weston-super-Mare.	Policy proposes bus improvements to Bristol and WsM.

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4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	Proposed development location avoids known heritage assets but potential archæology at Stonebridge and Wolvershill Road and between East Street and Riverside requires appropriate mitigation. Environmental improvements to the centre of Banwell are proposed, dependent on the Banwell Bypass. However, these would necessarily be limited if the Bypass does not provide for a north-south link towards Winscombe, whereas the policy specifically addresses only the A368 corridor.	No direct impacts on designated areas but further archæological work may be necessary to establish what constraints exist.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**?/-**	**?/-**	Ecological sensitivities in relation to bat flight corridors. Eastern side of proposed development location is Natural England Priority Habitat.	A full HRA may be required to assess the potential impacts of any future development in the area, given SAC to the south of Banwell. Policy 7.5 requires safeguarding and enhancement of bat habitat. Scoring assumes this results in a positive impact but loss of Priority Habitat may require replacement habitat or enhancement of wildlife value of other land. The overall score is therefore negative in this respect.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**--**	**--**	Not in AONB but this is nearby, south of Banwell village. The proposed development location is within the River Yeo Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, small rural roads and modern ribbon / infill development along the A371. The area is considered to be of high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	

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4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?**	**?**	Provisionally Grade 3 agricultural land but Natural England's ALC Strategic Map shows potential for high-grade land on the northern edge. There are no detailed surveys of land at Banwell.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	Within Flood Zone 1.	Climate change additional extents should be considered in detailed layout planning.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	Localised surface water flood risk. Significant area at risk north of Stonebridge. Location identified as an area susceptible to groundwater flooding.	Surface water runoff should be carefully managed to avoid further increasing flood risk in the surrounding area.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**?/-**	**?/-**	There are no Groundwater Source Protection Zones nearby, except to the south of Banwell village. There is a known issue concerning cutting into Banwell Hill, raised in connection with proposals for a Banwell bypass, in which context hydrogeological studies were sought by the Environment Agency but have not been commissioned. This is an issue for this location to the extent that development relies on a full Banwell bypass scheme but not if the bypass excludes a north-south link to Winscombe. There are no Drinking Water Safeguard Zones nearby.	Development involving cutting into Banwell Hill would require further environmental assessment, including hydrogeological studies.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+/-**	**+/-**	No rail station. Nearest is Worle (3km to the NW). Bus stops on Wolvershill Road.	Significant mitigation required. Policy 7.5 requires provision but many details remain unknown.

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5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Development Location:	**Churchill Garden Village**

Highlights:

- New development location, accessible to Churchill Academy, with potential for community infrastructure package.
- Not currently well-located in relation to employment, retail or public transport, though relatively good for a rural area and potential for growth.
- Impact on AONB to the south, and also sensitive local topography, particularly west of Churchill village.
- Ecological sensitivities in relation to bat flight corridors.
- Local surface water flooding issues.
- High probability of BMV land.

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village	**0**	**++**	**++**	Churchill has a small central open space off Rowan Way but this is remote from likely strategic development. There are no nearby large open spaces but easy access to the Mendip Hills. Churchill Batch and Havyatt Green are common land.	Strategic level of development with appropriate on-site provision would contribute to this objective. Scoring assumes delivery of Policy 7.6

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Greens, and Public Rights of Way)				The existing village centre (Churchill Gate) is 2.8km from National Cycle Network Route 26 (Strawberry Line). The Garden Village could have access at Sandford. There is an extensive network of PRoWs.	requirements for a Green Infrastructure network and a multi-functional network of green spaces.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+**	**+**	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+/?**	**+/?**	Churchill has a GP practice on Pudding Pie Lane, capable of serving the Garden Village. No hospital. No opticians (nearest are Winscombe and Wrington). No pharmacy (nearest are Winscombe and Wrington). No dentist (nearest is Winscombe).	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 2,800 dwellings could support a small satellite surgery. Policy 7.6 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 2,800 dwellings, of which 96% would be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 840.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	Churchill has a post office, village hall and youth centre but these are widely separated and at the SW side of the village; only the southern parts of the proposed development location are within 600m. There is no library (the nearest are Congresbury and Winscombe) but there is a mobile library stop. Policy 7.6 requires new local centre.	Should strategic growth be proposed, work will be required to assess projected requirements. Development of 2,800 dwellings could support a new community meeting space. Policy 7.6 has no specific requirements.

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2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++**	**++**	There are primary and secondary schools in Churchill. There is also a primary school nearby at Sandford. Empty places at primary level are predicted for 2015-2019, with an increasing trend. Empty places are also predicted at secondary level for 2015-2021, with a decreasing trend. Policy requires three new primary schools. Proposed development location is predominantly within 1500m of Churchill Academy. However, a secondary school is required to serve this and the Banwell SDL, with location to be defined through more detailed masterplanning, and consideration of educational requirements across North Somerset.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.6 requirement for additional primary schools.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**--**	**--**	Local Centre only. More than 1500m from any town / district centre. Over 5km from any city centre or equivalent but on bus routes to Bristol. Policy 7.6 requires new local centre.	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**+/?**	**+/?**	Currently limited local employment opportunities. Significant employers are the University of Bristol (Langford House), Monaghan Mushrooms, Churchill Academy and Thatchers Cider. Yeo Valley Foods is nearby in Blagdon parish. Policy 7.6 requires investigation of potential for about 7.4ha of employment land.	Policy 7.6 requires delivery of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	**0**	**+/-**	**+/-**	No major employment area, though Bristol Airport in the adjoining parish of Wrington is accessible via the A38.	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.

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4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**++**	**++**	**++**	Heritage assets are associated with the existing villages of Churchill and Langford. There are none in the proposed development location but it does have potential to impact on settings. Policy requires protection and enhancement of local heritage assets and their settings and retention of Windmill Hill (potential Iron Age settlement) as a focal green feature.	Scoring assumes delivery of Policy 7.6 requirements for enhancement.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**-/?**	**-/?**	Natural environment designations are to the north (North Somerset Levels) and south (Mendip Hills) or in small parcels adjacent to the existing villages. Proposed development location is largely unconstrained except for areas of Priority Habitat near Nye Road and West Brinsea Farm. Ecological sensitivities in relation to bat flight corridors. Policy 7.6 requires safeguarding and enhancement of bat habitat and investigation of green corridor linking Windmill Hill to south of Langford and Langford Brook.	Policy 7.6 requires green corridor to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability, and that impact on Priority Habitat not addressed through specific mitigation measures, score has been revised to '-/?'.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**--**	**--**	Not in AONB but potential for indirect impact. The area is within the River Yeo Rolling Valley Farmland landscape character area, a pastoral landscape intermediate between the valley floor and wooded limestone ridges. It is marked by stone farmsteads, thick hedgerows, small rural roads and modern ribbon / infill development along the A38 and A368. Area is considered to be of high sensitivity. Sensitive local topography around Windmill Hill, which Policy 7.6 requires be retained as a focal green feature.	Policy 7.6 requirements for development form and layout and for green infrastructure may mitigate landscape impact but details are currently unknown. There may be residual impacts that cannot be mitigated. A requirement for very high quality development, informed by detailed sensitivity assessment, would minimise these.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore this location has a negative effect on this objective and there is no apparent scope for mitigation.	

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4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?**	**?**	There are extensive areas of potentially Grade 2 agricultural land at Churchill / Langford, above the floodplain but below the higher ground, along with some Grade 1. There are no detailed surveys of land at Churchill. According to the provisional Agricultural Land Classification mapping, the proposed development location is unconstrained by BMV land but Natural England's ALC Strategic Map shows it as predominantly Grades 1 and 2.	Detailed Agricultural Land Classification Assessment required to establish the precise land grading. Site definition should seek to avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	Within Flood Zone 1.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	There are narrow areas of surface water flood risk associated with local watercourses and roads. There are possible issues of groundwater flooding associated with the Mendip Hills, which are a Groundwater Source Protection Zone.	Surface water runoff should be carefully managed to avoid adverse downstream impacts on Wrington and Congresbury.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	No apparent groundwater constraints in the proposed development location. A large part of the Mendip Hills to the south are a Groundwater Source Protection Zone. Burrington Combe is part of a Drinking Water Safeguard Zone.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+/?**	**+/?**	No rail station. Nearest is Yatton (6km to the NW). Bus stops mainly on classified roads south and east of the existing village. A38 corridor has more capacity than A370, but impacts on local road network.	Policy 7.6 requires transport improvements but does not specify how public transport would serve the Garden Village.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

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DIAGRAM TO BE INSERTED	
Strategic Development Location:	**Nailsea**

Highlights:

- Town expansion, remote from all existing town facilities and so requiring extensive community infrastructure package.
- Not currently well-located in relation to employment, retail or public transport, though potential for growth.
- Resumed housing growth addresses demographic imbalance in Nailsea resulting from past expansion.
- Existing station and opportunity to improve links to Bristol with MetroBus.
- Ecological sensitivities in relation to bat flight corridors.
- Landscape and heritage sensitivities, requiring high quality mitigation but little detail yet available.
- Loss of high-grade agricultural land, with no apparent scope to avoid through design.
- Low flood risk generally but complex surface water issues to be resolved affecting biodiversity and drainage.

Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement

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1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+/?**	**+/?**	The major open space within Nailsea (Scotch Horn) is more than 400m from the town's edge. There are local cycle routes within and surrounding Nailsea. Route 410 (Avon Cycleway) runs to the SW of Nailsea through Chelvey. There are PRoWs within the proposed development location but these are poorly connected to the surrounding countryside to the west.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.7 has no specific requirements.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+**	**+**	There is no AQMA in the area.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+/?**	**+/?**	No local hospital. Part within 5km of Clevedon Hospital. All other local health care facilities present in the town but all over 1200m from proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.7 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy suggests 3,300 dwellings, of which 2,575 are within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	There is concern locally that Nailsea's demographic profile is becoming unbalanced as the population attracted by a previous era of town expansion ages. Further housing could enable more opportunities for younger people. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy suggests 30%, namely 990, assuming 30% target continues to apply beyond the plan period, or 773 if not.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	There is a relatively good range of community facilities and services within Nailsea and surrounding villages but the countryside to the west of Nailsea is not well-served. The Blue Flame public house is the only meeting place currently at the proposed development location.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.7 has no specific requirements.

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2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++**	**++**	There are 5 primary schools in the town, of which Hannah More Infants and Grove Junior share a site. Backwell, Claverham and Tickenham also have primary schools nearby. The Nailsea group of primary schools all have a projected surplus of places (2015-2019). In some schools the surplus is projected to increase and in others to decrease. Nailsea has a secondary school and there is another nearby at Backwell. Nailsea is projected (2015-2021) to have an increasing surplus, while Backwell has an increasing shortfall. Land south and west of Nailsea is almost all beyond 800m of any primary school. Small part within 800m of Grove/Hannah More. Eastern edge only within 1500m of Nailsea Secondary School.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Scoring assumes delivery of Policy 7.7 requirement for additional primary and secondary schools.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+/-**	**+/-**	There is a relatively good range of town centre uses in Nailsea but proposed development location is more than 1500m away and remote from existing public transport. Over 5km from any city centre or equivalent but bus / rail routes exist to Bristol / WsM.	Scoring assumes delivery of Policy 7.7 requirement for MetroBus corridor and improved access to station. Scoring would improve if proposed local centre had District Centre status but emphasis is on protection of Nailsea Town Centre, which is too remote to serve this area conveniently.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	It is unlikely that development in this area would help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within	**0**	**+/?**	**+/?**	Nailsea does not have extensive undeveloped employment land provision. It has poor access from the strategic road network and is less attractive because of its location south of the Avonmouth Bridge. However, as a town it has some potential for economic development. Policy 7.7 requires investigation of potential for 2.3 ha employment land and proposes new transport infrastructure. Reference to additional potential for 8.2ha at Backwell duplicates Policy 7.4, assessed under Backwell.	Policy 7.7 requires delivery of employment land to be investigated but does not require delivery to be achieved, hence scoring cannot be '++'. Given uncertainty of deliverability,

the West of England sub-region					score has been revised to '+/?'.
3b. Achieve reasonable access to major employment areas	**0**	**++**	**++**	No EZ or locally designated key employment site. NW and NE industrial estates serve the town. Nailsea is well-placed to continue to serve as a commuter settlement with rail access to central Bristol and Weston-super-Mare but transport capacity constraints may restrict this.	Policy 7.7 requires phasing in line with transport improvements. Revised scoring assumes delivery of these.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**0**	**0**	Nailsea Court (listed building and unregistered historic park & garden) and Chelvey (listed buildings and Conservation Area) to SW. Several listed farmhouses and other buildings in the rural area.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable area is large enough do this without difficulty. Policy 7.7 requires protection of heritage assets and their settings. Scoring assumes this results in a neutral impact.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**0/?**	**0/?**	Wildlife designations around the town, notably to NW and south. Tickenham, Nailsea and Kenn Moors SSSI lies to the NW of the town. Relates to the watercourses rather than large expanses of land. There is a scatter of Wildlife Sites and small areas of Priority Habitat directly affecting land south and west of Nailsea. Ecological sensitivities related to bat flight corridors and foraging habitat.	Policy 7.7 requires protection and enhancement of bat habitat. Scoring assumes this results in a neutral impact. However, potential for a dark corridor is not proven and indirect impact on SSSI may need to be assessed, so overall score is '0/?'. Important overlap with surface water drainage issues affecting aquatic environment (water levels and quality) of the Moors.

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4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	--	--	Not in proximity to AONB. Nailsea sits within the Nailsea Farmed Coal Measures landscape character area, a remote, intimate, early mediæval pastoral landscape into which the urban edge protrudes. Area is considered to be of high sensitivity.	Policy 7.7 provides no specific mitigation beyond consideration of re-location / undergrounding of existing pylons. Assessments to identify areas with potential for mitigation may form part of the proposed sensitive green infrastructure strategy.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	--	--	Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	--	--	Potential for proposed development location to be very largely Grade 2. This land is also outside Flood Zone 3. Detailed surveys so far confirm predominantly BMV status.	Detailed Agricultural Land Classification Assessment required to establish the precise land grading in unsurveyed areas. However, grades 1, 2 and 3a appear to be so extensive in this location that avoiding them would not be possible.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	Within Flood Zone 1. The town is surrounded by large areas of fluvial and tidal Flood Zone 3. These areas are also in the functional floodplain for the Land Yeo, River Kenn and surrounding tributaries and rhynes. Climate change will lead to slight enlargement of Flood Zone 3.	
4g. Minimise vulnerability to surface water flooding and other sources of flooding,	**0**	**+/-**	**+/-**	Extensive areas of surface water flood risk exist along the river corridors but are contained within the fluvial extents. So too are the inundation zones for the Barrow Tanks reservoirs. Localised	Surface water runoff should be carefully managed to avoid adverse downstream impacts. Important overlap

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without increasing flood risk elsewhere.				surface water flood risk along watercourses and elsewhere. Southern part susceptible to groundwater flooding.	with biodiversity issues as drainage affects aquatic environment (water levels and quality) of the Moors.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**?**	**?**	There is a Groundwater Source Protection Zone for Chelvey spring that includes land S and W of Nailsea. There are no Drinking Water Safeguard Zones nearby.	Further engagement with regulators needed to understand what constraints or opportunities exist. The constraint is identified as 'subsurface activity only'.
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**++**	**++**	Existing rail station (Nailsea & Backwell) but hardly any of the town is within 400m. Good bus links to Bristol via Backwell but poor connectivity to elsewhere. Lack of capacity on A370 corridor constrains improvements: Backwell crossroads is a particular constraint.	Policy 7.7 requires phasing in line with transport improvements. Scoring assumes delivery of these.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. JSP seeks investigation of zero carbon development.

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DIAGRAM TO BE INSERTED	
Strategic Location:	**Buckover Garden Village**

Summary

- The vision for Buckover Garden Village is to deliver a holistically planned, free standing garden village which enhances the natural environment and provides high-quality and innovative homes, with local jobs in a beautiful, healthy place with diverse communities and delivers step-change in local sustainable transport opportunities.
- Potential medieval settlement located between Horseshoe Farm and Milbury Heath. Roman Road runs east-west through northern part of strategic development location. Two Grade II Listed Buildings towards the centre of the locality. Also consider setting of Tortworth Court (II*) and Eastwood Park.
- Development requires a package of local and strategic transport improvements.
- No known significant ecological constraints. Two geological SSSIs (Buckover Road Cutting and Brinkmarsh Quarry). SNCI at Ridgewood. Some landscape value on slopes to south and east of the locality. Limited flood risk.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+**	**+**	**BGV – Buckover** Currently agricultural land. Good potential access to the existing strategic cycle network through the Avon Cycleway. Potential to connect with the Jubilee Way and strategic PROW network. Potential to enhance the nearby cycle network and PROWs.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.8 requires that a GI network be established to ensure a permanent and robust landscape edge to the western boundary of Buckover Garden Village. It also requires that new Local Plan policy will establish a designation to establish a permanent strategic gap between Buckover Garden Village and Thornbury is created and maintained. Transport mitigation will improve accessibility.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+/?**	**+/?**	**BGV – Buckover** There is no AQMA in the area. Potential for areas of poor air quality along the A38 and near to M5.	Transport Impact Assessment and adequate preventative and mitigation measures are required. Policy 7.8 requires that consideration will be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health & wellbeing.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**-**	**-**	**BGV – Buckover** There are no healthcare facilities in Buckover. The nearest GP practice, dental practice and pharmacy are located in Thornbury, outside of reasonable distance. The nearest hospital is outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.8 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	**BGV – Buckover** This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.8 states that around 3,000 dwellings, of which at least 1,500 will be delivered within the plan period.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society Within the West of England sub-region	**0**	**++**	**++**	**BGV – Buckover** No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.8 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+**	**+**	**BGV – Buckover** There are no dedicated community centres, post offices or libraries in the area or within reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.8 requires the provision of and support for a range of retail, community & cultural facilities in the Garden Village and potentially other nearby communities to complement existing local provision.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	**BGV – Buckover** There are no schools in Buckover. The nearest primary and secondary school provision is within Thornbury, outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.8 requires the provision of a primary school and a 3-16 all through school and nursery(s).
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**-**	**-**	**BGV – Buckover** Buckover is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance. There are no local shops located within Buckover.	Policy 7.8 requires the provision of a strategic transport package, including a new local shuttlebus and cycle/ pedestrian improvements will improve access to Thornbury. The potential also exists for limited town centre services and facilities to be provided in small-scale retail units on site.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	**BGV – Buckover** It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.
3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the west of England sub-region	**0**	**+**	**+**	**BGV – Buckover** Very limited local employment opportunities at present. Likely that additional employment floor space would need to be provided at this location.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.8 requires the provision of around 11ha of employment land to provide a range of employment opportunities. Potential also exists for the provision of local retail units, cultural and community facilities which will add to the local employment offer.
3b. Achieve reasonable access to major employment areas	**0**	**-**	**-**	**BGV – Buckover** No major employment area. Area is relatively close to employment opportunities in Thornbury.	Policy 7.8 requires a strategic transport package, including a new local shuttlebus and cycle/ pedestrian improvements will improve access to Thornbury and links to major employment areas in the north fringe of Bristol.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	**BGV – Buckover** Potential medieval settlement located between Horseshoe Farm and Milbury Heath. Roman Road runs east-west through northern part of strategic development location. There are two grade II Listed Buildings within the site, which have a collection of outbuildings (new and historic) that form their immediate curtilage. No other heritage assets fall within the zone but two listed farmhouses and a locally listed lodge lie to the north.	Impacts could largely be mitigated through provision of open space buffers around heritage assets. Developable areas are large enough do this without difficulty. Policy 7.8 requires a GI network be established to ensure that the setting of local heritage assets is protected.
4b. Minimise impact on and where possible enhance	**0**	**?**	**?**	**BGV – Buckover**	Impacts could largely be mitigated through provision of

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
habitats and species (taking account of climate change)				There are two geological SSSIs within the area. Buckover Road Cutting SSSI consists of rock exposures either side of the A38 immediately north of the junction with the Old Gloucester Road. Brinkmarsh Quarry SSSI is situated in the far north of the eastern half of the SDL and is notified for its fossil-rich shales and sandy limestones. Ridgewood near the hamlet of Buckover in the eastern half of the SDL is designated as an SNCI for its ancient semi-natural woodland.	open space buffers around ecological assets. Developable areas are large enough do this without difficulty. Policy 7.8 requires a GI network be established to ensure that Ridgewood and other local ecological assets are protected.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**-**	**-**	**BGV – Buckover** Buckover is not in or near the Cotswolds AONB. Buckover is located in the Falfield Vale landscape character area and including the side slopes of the Severn Ridge at Milbury Heath which overlook the area from the south. The bowl shaped landscape is overlooked from the higher ground to the north where the medieval deer park of Eastwood Park has a parkland character. The landscape in this area is considered to be of high and medium to high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	**BGV – Buckover** Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**--**	**--**	**BGV – Buckover** Buckover contains areas of potential Grades 2 and 3 agricultural land. There are small areas of Flood Zone 3 around the river corridors.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**++**	**++**	**BGV – Buckover** Majority of this location is within a low risk flood zone (FZ1). A small part of this location, along the Pickedmoor Brook, is within a high risk flood zone (FZ2 and FZ3).	New residential development should not take place in high-risk areas if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**BGV – Buckover** The site is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridors. Small areas of surface water pooling across site.	Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	**BGV – Buckover** There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**-**	**-**	**BGV – Buckover** Limited access to bus-based public transport network at present. There is at present no nearby access to the rail network.	Policy 7.8 requires provision of a strategic transport package including as appropriate delivery of or contributions towards: Metrobus Extension to Thornbury & Buckover GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements (including new local shuttlebus to Thornbury), strategic and local cycle and pedestrian connections to Thornbury and other local highway network improvements as necessary.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**+**	**+**	**BGV – Buckover** All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Policy 7.8 requires the embedding of zero-carbon and energy positive solutions throughout the planning, design and delivery process across the whole settlement. Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

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DIAGRAM TO BE INSERTED	
Strategic Location:	**Charfield**
Summary • To the south of Charfield the small hamlet of Churchend contains the Grade I listed Church of St James, the Grade II listed Rectory Manor Cottages and other locally listed buildings. LBs also at Poolfield Farm and Park Farm. • Development requires a package of local and strategic transport improvements. • Escarpment, slopes and wooded areas through the west and northwest of the village and Elbury Hill to the east have landscape value. Flood risk limited to the Little Avon running along the Stroud District boundary to the east. • Tortworth Copse is a designated SNCI and Cullimore's Quarry is both a geological SSSI and Regionally Important Geological Site (RIGS). Some associated ecological value to northwest of the village, along the Little Avon River and SNCI's to the south.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	**Charfield** The main open space provision is currently located centrally in the village. Potential to enhance the currently limited local cycle and Public Rights Of Way network.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.9 requires that the future role and function of remaining greenfield land parcels within the centre of the village will firstly be reviewed in consultation with the local community to ensure future uses make the most efficient use of land. It also requires that a GI network enhances and protects existing assets.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	**Charfield** No local AQMAs. Rural area. SDL areas bisected by Bristol to Gloucester railway line and B4058.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	-	-	**Charfield** There are no health care facilities in Charfield. The nearest healthcare facilities are located within Thornbury, outside of reasonable distance. There are also healthcare facilities in Yate, to the south. The nearest hospital is located in Southmead.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.9 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	**Charfield** This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.9 states that around 1,200 dwellings will be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	0	++	++	**Charfield** No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.9 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community	0	+	+	**Charfield** There is a dedicated community centre and a post office located within Charfield. There is no library in Charfield. The majority of the SDL to the	Should strategic growth be proposed, work will be required to assess projected

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
facilities (post office, meeting venues, youth centres)				west of the railway line is within reasonable distance of the post office, but nearly all of the area to the east is not, The majority of the SDL to the east of the railway line and around half of the area to the west is within reasonable distance of the community centre.	requirements. Policy 7.9 requires that the future role and function of existing community assets within the centre of the village will firstly be reviewed in consultation with the local community to ensure future uses make the most efficient use of land.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**++/-**	**++/-**	**Charfield** Majority of the area is within reasonable distance of the primary school in Charfield. The nearest secondary school is Katherine Lady Berkeley, outside of a reasonable distance to the east. There is also secondary school provision in Thornbury to the west and Yate to the south.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.9 requires the replacement of the existing primary school with a new 3FE school in a central village location and contributions to delivery of an expanded secondary school in the locality, and/or the delivery of a new all through 3-16 school at Buckover Garden Village.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**-**	**-**	**Charfield** Charfield is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance, over 5km to the west, where there is a good range of town centre services and facilities. There is also a good range of town centre services and facilities in Yate, to the south. There are local shops located within Charfield.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus service enhancements – increasing access to Thornbury/Yate.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	**Charfield** It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.
3a. Deliver a reasonable quantum of employment floorspace/land and increase	**0**	**+**	**+**	**Charfield** Charfield does not have undeveloped employment land provision. Limited employment development potential within area.	Policy 7.9 requires the provision of a minimum of 5ha of employment land for B-Use

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
access to work opportunities for all parts of society within the West of England sub-region					Classes and a range of non B-Use Class employment opportunities. Potential also exists for new and/or improved retail and community facilities which will add to the local employment offer.
3b. Achieve reasonable access to major employment areas	**0**	**-**	**-**	**Charfield** There is a safeguarded employment site in the village. A large employer (Renishaw), based in Stroud DC, has premises on the edge of the settlement. Further towards Wotton-Under-Edge is Renishaw's headquarters.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus service enhancement to improve access to employment in Yate and the Bristol north fringe.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	**Charfield** A number of prominent Listed Buildings are located around the periphery of the village, including a Grade I listed church at Churchend. There is also some archaeological potential but not sufficient to prevent development.	Policy 7.9 requires that a GI network will enhance and protect listed buildings. Investigation of archaeological interest may be required.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**?**	**?**	**Charfield** There is a SSSI and a number of SNCIs in/near the parts of the SDL to the west of the railway line. There are no formal ecological constraints in the parts of the SDL to the east of the railway line.In some cases, further work may be required to determine their value.	Policy 7.9 requires that a GI network will enhance and protect local ecological assets.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**-**	**-**	**Charfield** Charfield is not in or near the Cotswolds AONB. Charfield is within the Wickwar Ridge and Vale landscape character area, a diverse undulating landscape coverer with a mix of farmland, woodland and common. The landscapes in this SDL are considered to be of high and medium to high sensitivity.	Policy 7.9 requires that a GI network will enhance and protect areas of local landscape importance such as Elbury Hill and the Little Avon river and flood zone.
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	**Charfield** Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?/-**	**?/-**	**Charfield** The majority of Charfield is surrounded by potential Grade 3 agricultural land, although there are small areas of potential Grade 2 land to the east of the railway line. The majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a). Policy 7.9 requires that areas of high flood risk along the Little Avon River will form an important part of the GI network.
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	**Charfield** Majority of this location is within a low risk flood zone (FZ1). The Little Avon River is located on the eastern side of the railway line. Areas adjacent to the river are in a high risk flood zone (FZ2 and FZ3).	Policy 7.9 requires that the Little Avon River and its flood zone will form part of a GI network.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**Charfield** The location is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events.	New development will need to provide Sustainable Urban Drainage systems. Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	**Charfield** There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**-**	**-**	**Charfield** There is an hourly bus service operating between Wotton-under-Edge and Yate. The majority of the area is within reasonable distance of a bus stop. Land is safeguarded in order that a station service can be reinstated in future at Charfield. The potential for this to happen has been studied and could be viable, depending on the scale of development proposed and the provision of new train services between Bristol, Yate and Gloucester via MetroWest Phase 2.	Policy 7.9 requires a strategic transport package including: M5 J14 improvements, Charfield Rail Station re-opening, local bus services, a comprehensive Wotton Road environmental enhancement scheme, new and improved foot and cycle connections through the village and to key local destinations.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	**Charfield** All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved. Policy 7.8 has no specific requirements.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Location:	**Coalpit Heath**

Summary

- Historic coalmining across the site.
- Good proximity to employment opportunities and other services in the North & North East Bristol Fringe, and Yate rail station.
- Development requires a package of local and strategic transport improvements.
- Development requires sensitive response to building on ridgeline.
- Setting of Listed Buildings and historic Dramway will require careful consideration.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	**0**	**+**	**+**	**Coalpit Heath** There are a range of PRoWs and cycle routes travel through the village. There is range of open space provision. Potential to enhance the current cycle network and PRoWs, with cycle network traveling through this area. The main playing field for Coalpit Heath is close by (<400m, in some parts). A suitable scale of development with appropriate on-site provision will contribute to this objective.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.10 requires a GI network to reinforce a new Green Belt boundary the rail cutting, provide attractive routes through the site to the nearby countryside (including along the historic Dramway), break up development impact along the ridgeline and protect the setting of nearby Listed Buildings.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	**0**	**+**	**+**	**Coalpit Heath** No local AQMAs. Air quality likely to vary among development areas. There are no major traffic routes in proximity to the SDL. No closer to A432 than existing development.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	**0**	**+**	**+**	**Coalpit Heath** There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) distributed throughout Winterbourne, Frampton Cotterell and Coalpit Heath. The SDL is within reasonable distance of the GP surgery in Frampton Cotterell, but is outside of reasonable distance of a dental practice, an optician and a pharmacy. The nearest hospital is outside of reasonable distance.	Policy 7.10 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	**0**	**++**	**++**	**Coalpit Heath** This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.10 states that around 1,800 dwellings will be delivered within the plan period.	
2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	**Coalpit Heath** No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.10 states that affordable housing will be delivered.	

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2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+/?**	**+/?**	**Coalpit Heath** There are six dedicated community centres distributed between Winterbourne, Frampton Cotterell and Coalpit Heath. There are post offices in Winterbourne and Coalpit Heath. Around half of the SDL area is within reasonable distance of a dedicated community centre. Less than half of the SDL area is within reasonable distance of a post office.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.10 requires the provision of a new community facility/hub.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+/-**	**+/-**	**Coalpit Heath** There are six primary schools distributed between Winterbourne, Frampton Cotterell and Coalpit Heath. There is one secondary school in the area, although there are also secondary schools in Yate. Access to primary schools is good for all assessment areas. Over half of the SDL area is within reasonable distance of a primary school. The SDL area is outside of reasonable distance of a secondary school.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.10 requires the provision of a new primary school (subject to further testing) plus contributions to a new or expanded secondary school in the wider locality.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**-**	**-**	**Coalpit Heath** Coalpit Heath is outside of reasonable distance to Bristol City centre. The nearest town centres are outside of reasonable distance, located within the north and east fringes of Bristol and Yate. Winterbourne has a local centre and offers some services and facilities. There are also a number of local shops distributed around the Winterbourne, Frampton Cotterell and Coalpit Heath area. As a result, most areas are near a local shop.	Policy 7.10 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services – increasing access to Yate.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	**Coalpit Heath** It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

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3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**+**	**+**	**Coalpit Heath** Limited local employment opportunities, although area is located close to employment opportunities at Yate, Emersons Green (EA). Given close proximity to existing employment opportunities it is unlikely that additional employment floor space would be provided at this location	Policy 7.10 requires the provision of a minimum of 5ha of employment land for B-Use Classes and a range of non B-Use Class employment opportunities as well as a local centre incorporating a local retail outlet.
3b. Achieve reasonable access to major employment areas *Major Employment sites* Enterprise Zones Locally designated key employment areas	**0**	**+**	**+**	**Coalpit Heath** There is little in the way of an employment base beyond local shops and services. Areas to the west lie close to Enterprise Area at Emersons Green. Areas to the west lie relatively close to the North Bristol Fringe.	Policy 7.10 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	**Coalpit Heath** The area lies in an historic landscape with numerous heritage assets and significant archaeological potential associated with medieval settlement, the civil war and mining history. Significant archaeological potential associated with a medieval settlement and Frog Lane colliery to northeast of the area. Mayshill Farm sits on a prominent location overlooking north-eastern part of the area. Listed Farmhouse overlooks southern part of the area.	Policy 7.10 requires a GI network to provide attractive routes through the site to the nearby countryside (including along the historic Dramway) protect the setting of Listed Buildings Elsewhere investigation of archaeological potential required.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**0**	**0**	**Coalpit Heath** There are no significant ecological constraints within the SDL area, although the south eastern boundary abuts an SNCI.	Policy 7.10 requires a GI network, of which the SNCI will be part and which will protect and enhance the nature conservation interest.

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4c. Minimise impact on and where appropriate enhance valued landscapes *National designations* AONB	**0**	**-**	**-**	**Coalpit Heath** The area is within the Frome Valley character area, a diverse, enclosed, intricate combination of agriculture and settlement, divided by major roads. Within this area, there are landforms that make a significant contribution to the distinctive character of the locality and to the rural setting of the surrounding existing residential development. The landscape in this area is considered to be of medium to high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**--**	**--**	**--**	**Coalpit Heath** Development would be on greenfield land. There are no opportunities for strategic-level development on brownfield land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?/+**	**?/+**	**Coalpit Heath** The majority of the SDL is potential Grade 3 agricultural land, although there are small areas of potential Grades 4 and 7. The majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	**Coalpit Heath** No main rivers in SDL area. Tubbs Bottom Watercourse becomes main river downstream of Badminton Road. Area is in a low risk flood zone (FZ1).	
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**Coalpit Heath** The site is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridor; south to north in north of area; and west to east in south of area. Large areas of surface water pooling on north west boundary near bridge and along north boundary. Small areas of surface water pooling across area. Approx. 10% of area is within a zone where there is limited potential for groundwater to occur.	Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	**Coalpit Heath** There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	

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5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+**	**+**	**Coalpit Heath** The Yate – Bristol bus services run along the A432 (47/X47, half-hourly) and B4058/Church Road (46/X46, 81/82, each hourly). The nearest train stations are Yate and Bristol Parkway (4 to 5km away) - all of the area is outside of reasonable distance of a secondary school.	Policy 7.10 requires that development will provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, Yate Station enhancement, the Winterbourne and Frampton Cotterell Bypass, strategic cycle route and local bus services.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	**Coalpit Heath** No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

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DIAGRAM TO BE INSERTED	
Strategic Location:	**Thornbury**

Summary

- Development requires a package of local and strategic transport improvements.
- Scarp slope running from north east to south west around the eastern edge of the town and around the southern end of the town is a significant physical constraint to development. Development will be contained within this landscape feature.
- Some ecological constraints including SNCI and ancient woodland in the area.
- Flood risk along river corridors at Crossways.

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	**Thornbury** Currently agricultural land. There are a range of PRoWs and cycle routes travelling through the town. There is range of open space provisions with further planned through already determined planning permissions.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.11 requires that a Green Infrastructure network that will protect Crossways & Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane & Crossways Lane, include SUDs features at Crossways to manage potential flooding at Crossways, and extend the Picked Brook Rhine streamside walk.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+	+	**Thornbury** No AQMAs in locality and no existing air quality issues from major traffic routes. Future air quality will be affected by extent of development.	
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	**Thornbury** There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) in Thornbury as one of South Gloucestershire's market towns. The majority of these services are located in the town centre, in the west of Thornbury. There is also a hospital which offers mainly outpatient facilities. The residential area to the north is within reasonable distance of a GP surgery and health centre. Around a quarter of the residential area to the east is within reasonable distance of a GP surgery and health centre. Both residential areas are outside of reasonable distance to a dental practice, optician and the majority of both areas area also outside of reasonable distance to a pharmacy. The nearest hospital is outside of reasonable distance.	A strategic level of development with appropriate on-site provision will contribute to this objective. Policy 7.11 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	**Thornbury** This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.11 states that a maximum of 500 dwellings will be delivered within the plan period.	

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2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	**Thornbury** No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.11 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**-/?**	**-/?**	**Thornbury** There are three dedicated community centres, all of which are located on the west side of the town. There are three post offices in and around Thornbury. The SDL areas are outside of reasonable distance from the dedicated community centres and post offices in Thornbury.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.11 requires development to incorporate a new convenience store/retail or community opportunity.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+**	**+**	**Thornbury** There are six primary schools in Thornbury and one secondary school (Castle). Castle school is located on the opposite end of Thornbury to areas T3 and T4. Marlwood School is the next nearest school, located in Alveston. Around two thirds of the SDL residential areas are located within reasonable distance of one of Thornbury's primary schools. The residential area to the north is within reasonable distance of a secondary school, but the residential area to the west is not.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.11 requires the new development to contribute towards new school places.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+**	**+**	**Thornbury** Thornbury is outside of reasonable distance to Bristol City centre. As a market town, there is a good range of services and facilities in Thornbury town centre. There are also some limited services and facilities in small parades around the town. The vast majority of the SDL area is within reasonable distance of Thornbury town centre.	Policy 7.11 requires development to incorporate a new convenience store/retail or community opportunity.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	**Thornbury** It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England.	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

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3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**++**	**++**	**Thornbury** Thornbury has a range of employment opportunities. It does not have extensive undeveloped employment land provision but does have good access to the strategic road network.	Policy 7.11 requires the provision of around 5ha of employment land and a new retail store to provide a range of employment opportunities.
3b. Achieve reasonable access to major employment areas *Major Employment sites* Enterprise Zones Locally designated key employment areas	**0**	**+**	**+**	**Thornbury** Employment opportunities within the town are mainly located at Midland Way Business Park (safeguarded employment site) and within the service sector in the town centre. Reasonable access (via A38) to Bristol North Fringe for other employment opportunities (EA).	Policy 7.11 requires the development to provide contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover) GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements, local highway, foot and cycle improvements.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**?**	**?**	**Thornbury** The north, and eastern side of Thornbury contains a number of Listed Buildings and some archaeological potential. There are Listed Buildings located just outside of the SDL areas and some potential for archaeology of considerable value.	Policy 7.11 requires a GI network that will protect among other things the setting of Hacket Farm, as well as the rural nature of Hacket Lane, Clay Lane & Crossways Lane. Elsewhere archaeological investigation is required.
4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**?**	**?**	**Thornbury** There are no significant ecological constraints within the residential area to the north. The area to the east contains/ is adjacent to the Crossways Wood and Cleeve Wood SNCIs, which are designated for their ancient semi-natural woodland.	Policy 7.11 requires that a GI network will protect both Crossways Wood and Cleve Wood.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**--/-**	**--/-**	**Thornbury** Thornbury is not in or near the Cotswold AONB. It is located within the Severn Ridges, a complex landform of abrupt scarps and gentle ridges, which rise from the Severn levels. The landscapes in the SDL areas are considered to be of high sensitivity and medium to high/ high sensitivity.	Policy 7.11 requires that a GI network will protect important landscape features, including the rural nature of Hacket Lane, Clay Lane and Crossway Lane.

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4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	**Thornbury** Development would be on greenfield land. There are no opportunities for strategic-level development on brownfield land.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**--**	**--**	**Thornbury** There are large areas of potential Grade 2 agricultural land surrounding parts of Thornbury. The majority of the SDL area is potential Grade 2 agricultural land, with a small area of potential Grade 3 land at the southernmost extent of the residential area to the east of Thornbury. The vast majority of the SDL area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+**	**+**	**Thornbury** There are no main rivers in the SDL area. The vast majority of the SDL area is in a low risk flood zone (FZ1). In the residential area to the west, Pickedmoor Brook river corridor is in high risk flood zone (FZ2 and FZ3).	New residential development should not take place in this location if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.
4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**Thornbury** The area is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes east to west in south of northern part of SDL area. Small area of surface water pooling in south of SDL area. Majority of area is within a zone where there is limited potential for groundwater to occur. In the eastern part of the SDL, surface water flow routes along river corridors, with small areas of surface water pooling across SDL. Part of area is within a zone where there is limited potential for groundwater to occur.	Policy 7.11 requires development to include SUDs features to manage potential flooding.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	**Thornbury** There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	

5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+**	**+**	**Thornbury** There is a half-hourly bus service (77/78/79) operating between Bristol and Thornbury which runs along the A38, although journey times to Bristol are lengthy at AM and PM peak. The nearest railway stations are Parkway and Pilning/Severn Beach, all of which are outside of reasonable distance.	Policy 7.11 requires the development to provide contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury (& Buckover) GV, A38(N) Park & Ride, M5 J14 improvements, Charfield Rail Station re-opening, local bus service improvements, local highway, foot and cycle improvements.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**?**	**?**	**Thornbury** No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development will provide an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

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Sustainability Appraisal of the Joint Spatial Plan Publication Version	
DIAGRAM TO BE INSERTED	
Strategic Location:	**Northwest and West Yate**
Summary • There are Listed Buildings and some archaeological potential across the SDL area. • Yate has good access to employment areas in the north & northeast Bristol Fringe and a main line rail station. Development requires a package of local and strategic transport improvements. • Flood risk and some ecological interest along Frome valley and tributaries.	

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Sustainability Objective	S/T	M/T	L/T	Commentary	Mitigation or enhancement
1a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens, and Public Rights of Way)	0	+	+	**Northwest and West Yate** There are a range of PRoWs, cycle routes and playing fields and nature reserves. Potential exists to enhance the current cycle network and PRoWs, with the Avon cycleway travelling through this area.	Strategic level of development with appropriate on-site provision would contribute to this objective. Policy 7.12 requires that a GI network will reinforce a new Green Belt boundary, protect the river valley and provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate. Transport mitigation will improve accessibility.
1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality	0	+/?	+/?	**Northwest and West Yate** No local AQMA although known areas of poor air quality in Yate. Railway line in the south and A432 bisecting the north of the area. Potentially some localised air quality issues. Future air quality may be affected by extent of development.	Transport Impact Assessment and adequate preventative and mitigation measures are required.
1c. Achieve reasonable access to healthcare facilities (Doctors, Opticians, Pharmacies, Dentists, Hospitals)	0	+	+	**Northwest and West Yate** There is a range of healthcare facilities and services (GP surgeries, dental practices and pharmacies) in Yate and Chipping Sodbury. The majority of these services are located in the town's centres. The majority of the SDL, including the area where residential development is likely to be focused, is outside of reasonable distance from an existing GP surgery, dental practice and pharmacy. Notwithstanding this, there will be a GP surgery delivered within the North Yate New Neighbourhood. All of the SDL area is outside of reasonable distance from an optician. The nearest hospital is outside of reasonable distance.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.12 has no specific requirements.
2a. Deliver a suitable quantum of high quality housing for the West of England sub-region	0	++	++	**Northwest and West Yate** This area is within the wider Bristol HMA therefore development in this area contributes well to meeting this objective. Policy 7.12 states that a minimum of 1,900 dwellings will be delivered, of which at least 1,000 will be delivered within the plan period.	

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2b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within the West of England sub-region	**0**	**++**	**++**	**Northwest and West Yate** No specific local issues. Greenfield development is likely to be more viable than brownfield therefore it could provide more certainty for the delivery of suitable tenures including affordable housing. Policy 7.12 states that affordable housing will be delivered.	
2c. Achieve reasonable access to community facilities (post office, meeting venues, youth centres)	**0**	**+**	**+**	**Northwest and West Yate** There are seven dedicated community centres, five post offices and two libraries distributed between Yate and Chipping Sodbury. The majority of the SDL, including the area where residential development is likely to be focused, is outside of reasonable distance from a dedicated community centre. All the SDL is outside of reasonable distance from a post office. Notwithstanding this, there will be a multi-use local centre comprising community meeting delivered within the North Yate New Neighbourhood.	Should strategic growth be proposed, work will be required to assess projected requirements. Policy 7.12 requires that the residential neighbourhood will contain a new local centre including a community facility/hub.
2d. Achieve reasonable access to educational facilities (primary schools, secondary schools)	**0**	**+/-**	**+/-**	**Northwest and West Yate** There are thirteen primary schools in the Yate and Chipping Sodbury area. There are three secondary schools (Brimsham Green, Yate International Academy and Chipping Sodbury) in the Yate and Chipping Sodbury area. Around half of the the area where residential development is likely to be focused is within reasonable distance of a primary school. In addition to this this, there will be additional primary school delivered within the North Yate New Neighbourhood. Around a third of the the area where residential development is likely to be focused is within reasonable distance of a secondary school.	Should strategic growth be proposed, work will be required to assess existing capacity in the context of projected requirements. Policy 7.12 requires that the residential neighbourhood will contain a new local centre including a primary school(s) and/or all through 3-16 school.
2e. Achieve reasonable access to town centre services and facilities (Designated City, Town and District Centres)	**0**	**+**	**+**	**Northwest and West Yate** Yate is outside of reasonable distance to Bristol City centre. As a market town, there is a good range of town centre services and facilities in Yate and nearby Chipping Sodbury. There are also some limited services and facilities in small parades around the town. The majority of the SDL area is within reasonable distance of Yate town centre. That said, the railway line presents a physical barrier to accessing it from the employment areas to the south (in west Yate).	Policy 7.12 states that an on-site rail crossing and a new rail bridge are also likely to be required across Nibley Lane. The '?' score reflects that this infrastructure is not a full policy requirement as yet.
2f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage	**0**	**0**	**0**	**Northwest and West Yate** It is unlikely that development in this area will help to regenerate the areas identified as the most deprived 25% of areas in England as measured by the English Indices of Deprivation 2015 - Index of Multiple Deprivation (IMD).	If development is to be used to benefit disadvantaged areas, the means to do this must be specified.

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3a. Deliver a reasonable quantum of employment floorspace/land and increase access to work opportunities for all parts of society within the West of England sub-region	**0**	**++**	**++**	**Northwest and West Yate** Yate and Chipping Sodbury does not have extensive undeveloped employment land provision, and has good access to the strategic road network due to proximity to M4 and M5.	Policy 7.12 provides a significant new employment land allocation totalling approx. 30ha will be allocated at West Yate, of which, approximately 11ha of land south of Badminton Road will be allocated for B1 and B2 office/light industrial and research use; and 19ha of land between the railway tracks off the Westerleigh Road will be allocated for B2/B8 and similar uses. Potential also exists for the provision of non B-use class employment at an appropriate location which will add to the local employment offer.
3b. Achieve reasonable access to major employment areas	**0**	**+**	**+**	**Northwest and West Yate** Variety of employment opportunities in Yate and Chipping Sodbury. Significant (safeguarded) industrial and trading estates are largely located at the western edge of Yate, close to the station.	Policy 7.12 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, A432 Park and Ride, a strategic cycle route, Yate Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services.
4a. Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	**0**	**-/?**	**-/?**	**Northwest and West Yate** There are Listed Buildings and potential for archaeology associated with this historic landscape all around the periphery of Yate. There are a number of Listed Buildings within the SDL area. Some archaeological potential across the SDL area, particularly associated with Nibley village and former Mayshill colliery, and areas in proximity to Acton Court SAM and Iron Acton village.	Investigation of archaeology and consideration of Listed Buildings required. Policy 7.12 has no specific requirements.

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4b. Minimise impact on and where possible enhance habitats and species (taking account of climate change)	**0**	**?**	**?**	**Northwest and West Yate** The River Frome forms part of the boundary of the SDL area, and is designated as an SNCI for its open flowing water and bankside vegetation. Fields at Mission Road/North Road – are also designated as an SNCI, again for their species-rich neutral grassland interest.	Policy 7.12 requires that a GI network will reinforce a new Green Belt boundary, protect the river valley and provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and Frome river corridor through the Beeches Estate.
4c. Minimise impact on and where appropriate enhance valued landscapes	**0**	**-/--**	**-/--**	**Northwest and West Yate** The SDL area is not located in the Cotswold AONB. The majority of Yate is within the Wickwar Ridge and Vale landscape character area, a diverse undulating landscape coverer with a mix of farmland, woodland and common. The landscape in this area is considered to be of medium to high/ high sensitivity.	
4d. Promote the conservation and wise use of land, maximising the re-use of previously developed land	**0**	**--**	**--**	**Northwest and West Yate** Development would be greenfield. Development on greenfield land does not contribute to promoting the conservation and wise use of land. Therefore all locations have a negative effect on this objective and there is no apparent scope for mitigation.	
4e. Minimise the loss of productive land, especially best and most versatile agricultural land.	**0**	**?/+**	**?/+**	**Northwest and West Yate** The area surrounding Yate and Chipping Sodbury contains areas of potential Grades 1, 2, 3 and 4 agricultural land. The majority of the SDL area is made up of potential Grade 3 agricultural land. There is however an area of potential Grade 2 land in West Yate, and a swathe of potential Grade 4 to the south. The area is outside of Flood Zone 3.	Detailed Agricultural Land Classification (ALC) Assessment required to establish the precise land grading. Site definition should avoid identified areas of the best and most versatile (high grade) agricultural land (land in grades 1, 2 and 3a).
4f. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**Northwest and West Yate** The majority of the SDL area is in a low risk flood zone (FZ1). There are however areas of high flood risk (FZ2 and FZ3) along the river corridors.	New residential development should not take place in this location if areas with a lower risk of flooding are reasonably available. The functional floodplain is to be avoided altogether.

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4g. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.	**0**	**+/-**	**+/-**	**Northwest and West Yate** The area is at risk of surface water flooding in 1 in 30, 1 in 100 and 1 in 1000 year events. Surface water flow routes along river corridors, with areas of surface water pooling across the SDL area. Along river corridor there is potential for groundwater flooding to occur at surface. Parts of the area are within a zone where there is limited potential for groundwater to occur.	New development will need to provide Sustainable Urban Drainage systems. Surface water runoff should be carefully managed to avoid adverse downstream impacts.
4h. Minimise harm to, and where possible improve, water quality and availability	**0**	**0**	**0**	**Northwest and West Yate** There are no Groundwater Source Protection Zones nearby. There are no Drinking Water Safeguard Zones nearby.	
5a. Achieve reasonable access to sustainable transportation (rail station, bus stops, cycle paths, footways)	**0**	**+**	**+**	**Northwest and West Yate** There are regular bus services between Yate and Bristol, although the quality of local bus services is variable, with services to/from Bristol being caught in traffic congestion. Yate Station is at the western edge of Yate and is served by 1-train per hour (a local service running between Malvern/Gloucester, Bristol and the South Coast). MetroWest Phase 2 will double the frequency of services from 2021; this improvement would use up the remaining capacity on the network at Westerleigh Junction.	Policy 7.12 requires the development to provide or contribute to a strategic transport package including: Metrobus extension to Yate and Chipping Sodbury, strategic cycle route A432 Park and Ride, Yate Rail Station enhancement, Winterbourne and Frampton Cotterell Bypass and local bus services.
5b. Reduce non-renewable energy consumption and 'greenhouse' emissions, and provide opportunities to link into existing heat networks	**0**	**0**	**0**	**Northwest and West Yate** All development will need to adhere to national and each council's planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.	Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieved.

APPENDIX E: Legal compliance checklist

Source References to Regulations and to Schedule 2 are to the 2004 SEA Regulations	**Requirements for an environmental report**	**Where covered in the SA Report**	**Notes**
Reg. 12	Prepare an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole report does this.	
	Provide the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment		
Regs. 8, 13	Consultation bodies with environmental responsibilities and the public to be given an effective opportunity to express their opinion on	Not applicable to the content of the report	Environmental bodies and the public will be given 7 weeks to

	the draft plan or programme and the accompanying environmental report before the plan or programme is adopted		comment on the JSP Publication Version and draft SA Report.
Schedule 2.1	Provide an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Chapter 2 and Appendix A The contents and main objectives of the plan are presented in Chapter 2. The plan's relationships to other plans and programmes is also addressed in Appendix A.	
Schedule 2.2	Provide information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 5 and Appendix B	
Schedule 2.3	Provide information on the environmental characteristics of areas likely to be significantly affected	Chapter 5 and Appendix B	
Schedule 2.4	Provide information on any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive	Scoping Report Chapter 5 and Appendix B See also Habitats Regulations Assessment	
Schedule 2.5	Provide information on the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way	Chapter 4 and Appendix A	

	those objectives and any environmental considerations have been taken into account during its preparation		
Schedule 2.6	Provide information on the likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, including on issues listed (see below)	Chapter 7 and Appendix D (Appraisal Tables)	
	Provide information on the likely significant effects on biodiversity, fauna and flora		Objective 4b
	Provide information on the likely significant effects on population and human health		Objectives 1a, 1b, 1c, 2a, 2b, 2c, 2d, 2e, 2f, 3a, 3b, 4f, 4g, 4h, 5a
	Provide information on the likely significant effects on soil		Objectives 4d, 4e
	Provide information on the likely significant effects on water		Objectives 4f, 4g, 4h
	Provide information on the likely significant effects on air		Objective 1b
	Provide information on the likely significant effects on climatic factors		Objective 5b
	Provide information on the likely significant effects on material assets		Objectives 2a, 2c, 2d, 2e, 3a, 3b, 5a
	Provide information on the likely significant effects on cultural heritage including architectural and archaeological heritage		Objective 4a
	Provide information on the likely significant effects on landscape		Objective 4c

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	Provide information on the likely significant effects on the interrelationship between the above factors		The Appraisal Tables, in appraising each policy, refer to cross-cutting issues where relevant
Schedule 2.7	Provide information on the measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme		The Appraisal Tables, in appraising each policy, make judgements on the extent to which it seeks to minimise negative effects. Where possible, they also suggest potential improvements to the Publication Version. Improvements to other options are not suggested, as these are not options that are planned to be taken forward.
Schedule 2.8	Provide an outline of the reasons for selecting the alternatives dealt with	Chapter 6	
	Provide a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information		
Schedule 2.9	Provide a description of the measures envisaged concerning monitoring in accordance with Reg. 17	Chapter 8 and Appendix C	
Schedule 2.10	Provide a non-technical summary of the information provided under the above headings	See separate non-technical summary	

Appendix D

Habitat Regulations Assessment (HRA):
West of England Joint Spatial Plan (JSP)
Update to the West of England Joint Committee 30th October 2017

1). Introduction

1.1 This paper has been produced by the four unitary authorities (UAs) which make up the West of England (WoE) sub-region. Its purpose is to provide an update on the progress of the Habitat Regulations Assessment for the Joint Spatial Plan.

The West of England

1.2 The West of England (WoE) covers the four unitary authorities (UAs) of Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire. The WoE thrives on its natural environment and excellent quality of life and has a growing national and international profile.

1.3 The outstanding environment of the sub-region makes a substantial contribution to quality of life and is a key driver for why people want to live, work and visit the area. The high quality environment additionally makes a significant contribution to the economic success of the area.

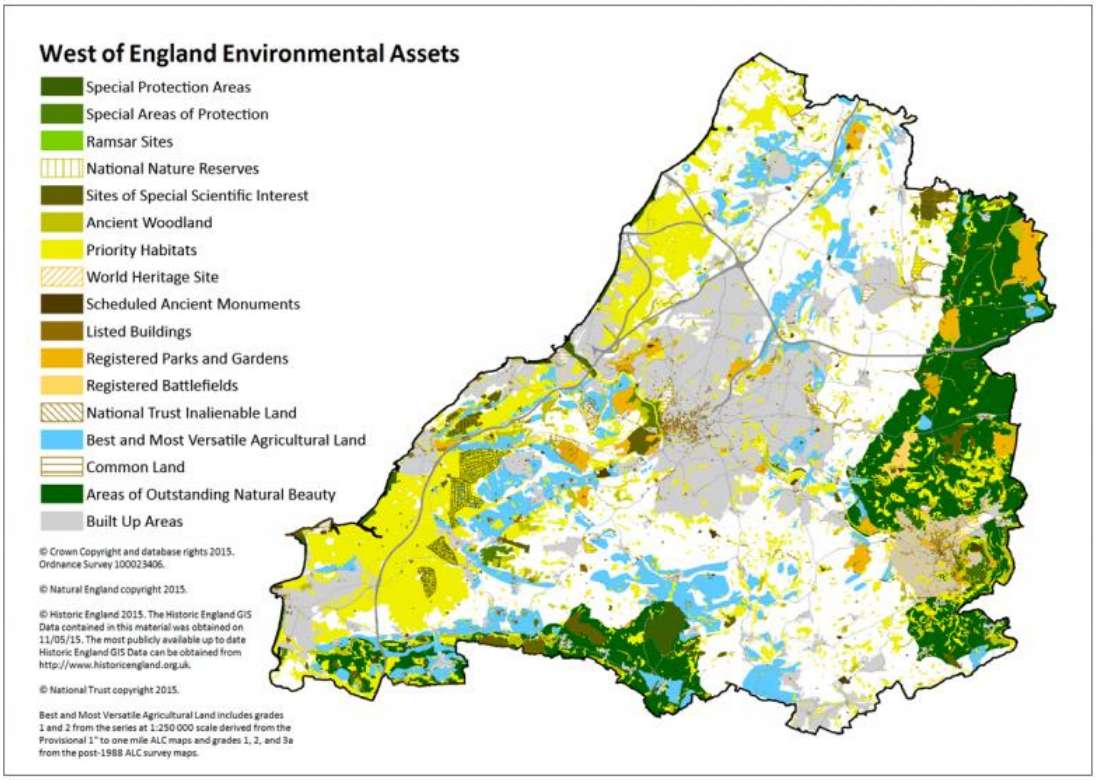

Figure 1 – the West of England's Environmental Assets.

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Joint Spatial Plan

1.4 The JSP identifies two Housing Market Areas that operate across the West of England. One focussed on the wider Bristol HMA, which includes Weston-Super-Mare as a sub housing market area, and the other focussed on Bath. The Bath SHMA has been updated to provide consistent information to 2036.

1.5 The Spatial Strategy has been formulated to deliver the Objectively Assessed Need of 97,800 new homes and the Housing Requirement of 102,200 new homes. The SHMA prepared for the West of England evidenced an Objectively Assessed Need (OAN) for housing of 97,800 dwellings for the plan period 2016-2036. This comprises 85,000 dwellings for Wider Bristol Housing Market Area (HMA) & 12,800 dwellings for the Bath HMA. It identifies an overall supply of 105,500 new homes to enable flexibility.

1.6 The JSP will provide the framework to deliver up to 105,500[1] net additional new homes between 2016 and 2036 of which, around 32,200 (30%) should be affordable homes.

1.7 The housing target supports the planned job growth of 82,500 jobs for the period 2016-2036 (or 125,900 jobs between the period from 2010-2036).

Relationship of the Joint Spatial Plan to Local Plans

1.8 The JSP will, upon adoption, carry significant weight and be used to inform key planning decisions. Whilst it will not replace existing local plans, it will be a material consideration in decision making. In the meantime, existing local plans will continue to deliver existing Core Strategy targets. Local plan reviews will need to respond to the new strategic context. The JSP will when adopted provide the new higher level strategic planning framework for the four authorities to 2036.

1.9 The Housing and Planning Act 2016 has a new route for planning permission for housing led development called 'planning permission in principle' or PIP. A PIP may be granted for housing-led development either on application to the local planning authority (or Secretary of State in some instances), or through qualifying documents. The JSP is not a qualifying document for establishing planning permission in principle. The JSP Spatial Strategy will identify strategic development locations which will be brought forward as allocations through the local plan process.

1 Opinion Research Services (2016) West of England Housing Target: The basis for the Housing Requirement in the Joint Spatial Plan.

2). Habitat Regulations Assessment

2.1 European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the 'Habitats Directive') implemented in Britain by the Habitat Regulations 2010, provides legal protection for a range of habitats and species identified as being of European importance.

2.2 Article 2 of the Directive requires the maintenance or restoration of these habitats and species, in a favourable condition, and is achieved through the establishment and maintenance of protected areas referred to as Natura 2000 sites. These are comprised of Special Areas of Conservation (SAC) designated under European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('the Habitats Directive 1992'), implemented in Britain by the Conservation (Natural Habitats & c) Regulations 2010 ('the Habitat Regulations'); and Special Protection Areas (SPA) designated under EC Directive 79/409 on the Conservation of Wild Birds ('the Birds Directive') and Ramsar site under the Ramsar Convention on the Conservation of Wetlands of Importance.

2.3 Sites designated as wetlands of international importance under the Ramsar Convention are subject to the same provisions as Natura 2000 sites.

2.4 Article 6(3) of the Directive requires any 'plan or project' likely to have a significant effect on a Natura 2000 site be subject to 'appropriate assessment'. This means an assessment of the impacts of the plan/project on the site. As 'plans', the Regulations require local authorities to carry out an 'appropriate assessment' ('Habitat Regulations Assessment' or HRA) of local development documents before being adopted with the purpose being to assess the impacts of a 'land-use plan' against the conservation objectives of Natura 2000 Sites.

2.5 The phrase 'land-use plan' has been deemed by the European Court to include Development Plan Documents (i.e. Local Plans). Accordingly, as a land-use plan, the Joint Spatial Plan (JSP) must be subject to Assessment under Regulation 61 of the Habitat Regulations 2010.

What is the process for carrying out an HRA?

2.6 Article 6(3) of the Habitats Directive requires an 'appropriate assessment' to be undertaken when a plan or development project is likely to have a significant effect upon a European site.

2.7 Article 6(4) also requires that where an appropriate assessment has been carried out and results in a negative assessment, i.e. any proposed avoidance or mitigation are unable to reduce the potential significant impacts, or if uncertainty remains over the significant effects, the proposal can only be granted if:

- there are no alternative solutions; and
- there are no imperative reasons of overriding pubic interest (IROPI) for the development; and
- compensatory measures have been secured.

2.8 The regulations make reference to 'competent authorities'. These include relevant public bodies, government ministers, and statutory undertakers etc. who are able to carry out the 'appropriate assessment' of impacts in relation to the Habitats Regulations. Regulation 65 sets out the necessary stages that apply where more than one competent authority is involved in decision making. In this case, the competent authority is the four West of England unitary authorities.

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3). Preparing the Joint Spatial Plan

3.1 The Joint Spatial Plan (JSP) has a clearly defined role which is to set out how the much needed new homes and employment land will be sustainably accommodated and what infrastructure is required to support this. Based on the JSP, more detailed land use policies will be set out in the local plans for the four Unitary Authorities (UAs).

3.2 The JSP will be prepared through a number of stages – these (and the timetable associated with them) are set out in Table 1 below, including reference to the relevant stages in the Town and Country Planning (Local Planning) Regulations 2012.

When	Stage	Time	Stage of HRA
October 2017	Draft plan to Infrastructure Advisory Board and Joint Committee		HRA update to inform draft Publication Plan and the Joint Committee.
November 2017 to January 2018	Publication Plan (Reg 19/20)	7 week consultation	Full HRA
Spring 2018	Submit to Secretary of State	TBC	N/A
Mid 2018	Examination in Public (EiP)	TBC	N/A

Table 1

3.3 With this in mind, the purpose of this paper is to update the process for undertaking, a full Habitat Regulations Assessment in support of the Join Spatial Plan, in line with up to date guidance. In doing so, it is intended that it will ensure the approach to the HRA process and the information on European sites to be considered is appropriate. The full HRA Report for the Joint Spatial Plan will be published alongside the Publication Plan in 2017.

3.4 Once the JSP is adopted, it will be for the four UAs, working with Natural England to decide what additional work is necessary to ensure that their Local Plans meet the requirements of the Conservation of Habitats and Species Regulations 2010.

4). The HRA Process

4.1 In line with up to date guidance, the JSP has been subject to a four stage process. This process represents a slight change from the three stage process used to assess the majority of the four UA's individual extant Local Plan documents.

4.2 The nature of the JSP means that the HRA required must be 'strategic' in nature and therefore by necessity defers specific assessments of impacts and detailed mitigation requirements to the four unitary authorities Local Plans. Additionally, assessments of transport mitigation to support JSP growth will be further assessed through the updated Joint Local Transport Plan HRA.

4.3 The objective of this HRA is therefore to determine if there can be a reasonable degree of certainty that the quantum of development proposed by the JSP can be delivered through the lower tier plans without resulting in significant harm to Natura 2000 sites.

4.4 Table 2 below sets out the four stages.

Habitat Regulation Assessment – Stage	**Purpose**
1. Screening	Process for identifying potential impacts of a plan or project on a European site, either individually or in combination, and consideration of whether likely effects will be significant.
2. Appropriate Assessment	Consideration of impacts on integrity of the site, either individually or in combination with other plans and projects, having regard to the site's structure, function and conservation objectives. Where adverse impacts are identified, assess mitigation options to identify impacts on the integrity of the site. This stage should involve consultation. If mitigation options do not result in avoidance of adverse effects permission can only be granted if the remaining 2 stages are followed.
3. Assessment of alternative solutions	Review and examine alternatives to achieve objectives; would these alternative solutions avoid or have less adverse effects on the European sites?
4. Assessment of any 'imperative reasons of overriding public interest' (IROPI)	Where no suitable alternative solution exists and adverse impacts still remain then assess whether the development is necessary for IROPI. If so then identify potential compensatory measures to maintain integrity and coherence of the protected site.

Table 2 – HRA process guide

Stage 1 - Screening

4.5 EC Directive 92/43/EEC requires that a screening assessment is undertaken by the competent authority, and should consider the following matters:

- assessment of the project including its objectives; and
- assessment of relevant plans, policies and projects; and
- assessment of relevant European sites that could potentially be affected – including their specific characteristics and conservation objectives.

4.6 A screening assessment, both alone and in combination, with other identified plans and projects will identify if any significant environmental affects will result affecting the site and conclude whether significant affects are likely or not.

4.7 When undertaking this assessment a precautionary approach is required to decision making and assessment. This means that when the likelihood of significant affects cannot be ruled out on the evidence available, then it must be assumed that a risk of significant affects may exist. These will then need to be addressed through either changes to the scheme, avoidance or through securing mitigation measures.

4.8 If no potential significant affects are identified, the process ends at this stage.

Stage 2 – Appropriate Assessment

4.9 Regulation 61 of the Habitat Regulations stipulates that the 'appropriate assessment' process should consider 'the implications for the site in view of that site's conservation objectives'. As such, the HRA needs to understand the reasons for the European sites' designation (i.e. the particular species and habitats present); the condition of each site *vis-a-vis* their conservation objectives; the factors which might adversely impact on the qualifying features; and determine whether or not the impact is likely to be significant.

4.10 A profile of each of the affected sites will need to be drawn up based on up to date information. This information will include the reasons for their designation (the qualifying features and species) as well as the factors likely to have the greatest deleterious effects on each site. This work will be undertaken once options for development are better defined.

4.11 If it is decided that the JSP would be likely to result in significant adverse impacts on a European site, an appropriate assessment will be undertaken. The Regulations do not define 'significant impacts', so an informed decision will be made on this issue. In order to decide whether an appropriate assessment is required, a variety of information will be considered. This could include:

- a detailed description of the European site, identifying any/all features potentially affected, highlighting the site's conservation objectives;
- a detailed description of the proposed development(s), processes, construction, phases, methods of work etc.;
- details of alternatives considered, along with any mitigation measures proposed to reduce, remove or manage impacts;
- provision of necessary data, evidence and reports – including interpretation of that information to aid decision making;
- appraisal of any other plans or projects likely to have a significant effect, either individually or in combination with the proposed development;
- appraisal of whether there is potential for the scheme to require two or more appropriate assessments by different competent authorities.

4.13 Natural England has also produced Site Improvement Plans for European Sites. These set out their understanding of the pressures on, and condition of European designated sites, and identify potential mitigation measures that might be introduced. This information will be of some material significance in supporting and informing the HRA for the Joint Spatial Plan.

4.14 More information regarding the Improvement Programme for England's Natura 2000 sites (IPENS)/LIFE Natura 2000 (LifeN2K) and the Site Improvement Plans (SIP) are also available (https://www.gov.uk/government/publications/improvement-programme-for-englands-natura-2000-sites-ipens) and may be used to inform this part of the process.

4.15 When considering whether a plan or project will adversely affect the integrity of the European site, regard will be had to the manner in which the JSP is to be delivered, i.e. through the UA's Local Plans.

Stage 3 – Alternative Solutions

4.16 At this stage the assessment will, if necessary, include consideration of alternatives, including how mitigation measures may help to reduce or avoid these affects. The opportunities for alternatives will vary depending upon the location and scale of development proposed, and as such, alternative solutions could include proposals of a different scale, location, phasing, a different scheme or no scheme at all.

4.17 Where it has been demonstrated there are no alternative solutions with lesser effects, the project can still be carried out if 'imperative reasons of overriding public interest' apply.

4.18 It is important to note that the detailed policies required to deliver the strategic growth proposed through the JSP will be delivered through UA's Local Plans.

Stage 4 – Considerations of overriding public interest

4.19 If it is agreed that there are no alternative solutions, and the plan must be progressed for imperative reasons of overriding public interest (IROPI) then it can still do so.

4.20 Where a location hosts a priority natural habitat type or a priority species, the reasons for justifying the scheme must relate to either:

- reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or
- any other reasons which the competent authority, having due regard to the opinion of the European Commission, consider to be imperative reasons of overriding public interest.

5. Screening

5.1 The initial screening stages have been competed for the draft publication JSP. This process has involved the initial screening in of sites that could feasibly be affected by the JSP, then more detailed screening of the objectives and JSP Policies in terms of sites screened in for further scrutiny. The staged screening approach involved the following:

Identifying likely significant effects (LSEs)

5.2 When considering the LSEs of a policy, it is recognised that some policy 'types' cannot affect any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies than can be safely screened out to ensure the HRA focuses on the policies with any potential to result in LSEs.

5.3 Table 3 below summarises the characteristics of policies that can usually be 'screened out'.

Policy type	Commentary
General statements of policy	The EC recognises that plans or plan components that are general statements of policy or political aspirations cannot have significant effects.
General design/ design criteria	A general 'criteria-based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals, or relate to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design).
External plan/ projects	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness.
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects.

Table 3

*European Commission (2000). Managing Natura 2000 sites: the provisions of Art. 6 of the 'Habitats' Directive 92/43/EEC April 2000 at 4.3.2

5.4 This assessment of likely significant effects has been undertaken in support of the publication Joint Spatial Plan.

Identification of relevant sites

5.5 Following consideration of the approach taken to HRA for previous Local Plan (development plan) documents in the West of England, e.g. Joint Waste Core Strategy and the Bristol City and South Gloucestershire Core Strategies, a list of Natura 2000 sites within the West of England and up to 15km from the boundary, as shown in Figure 2 (below), have been identified.

5.6 The radius of 15km was chosen following engagement with Natural England. It also accords with the HRA screening processes carried out on the Local Plan documents (listed above). This created an initial list of 14 sites which were then considered through the screening process. These sites are:

- Avon Gorge Woodlands Special Areas of Conservation (SAC);
- Bath & Bradford-on-Avon Bats Special Areas of Conservation (SAC);
- Chew Valley Special Protection Areas (SPA);

- Mells Valley Special Areas of Conservation (SAC);
- Mendip Limestone Grasslands Special Areas of Conservation (SAC);
- Mendip Woodlands Special Areas of Conservation (SAC);
- North Somerset and Mendip Bats Special Areas of Conservation (SAC);
- Rodborough Common Special Areas of Conservation (SAC);
- River Usk / Afon Wysg Special Areas of Conservation (SAC);
- River Wye / Afon Gwy Special Areas of Conservation (SAC);
- Severn Estuary Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar site;
- Somerset Levels and Moors Special Protection Areas (SPA) and Ramsar;
- Wye Valley & Forest of Dean Bat Sites Special Areas of Conservation (SAC); and
- Wye Valley Woodlands Special Areas of Conservation (SAC).

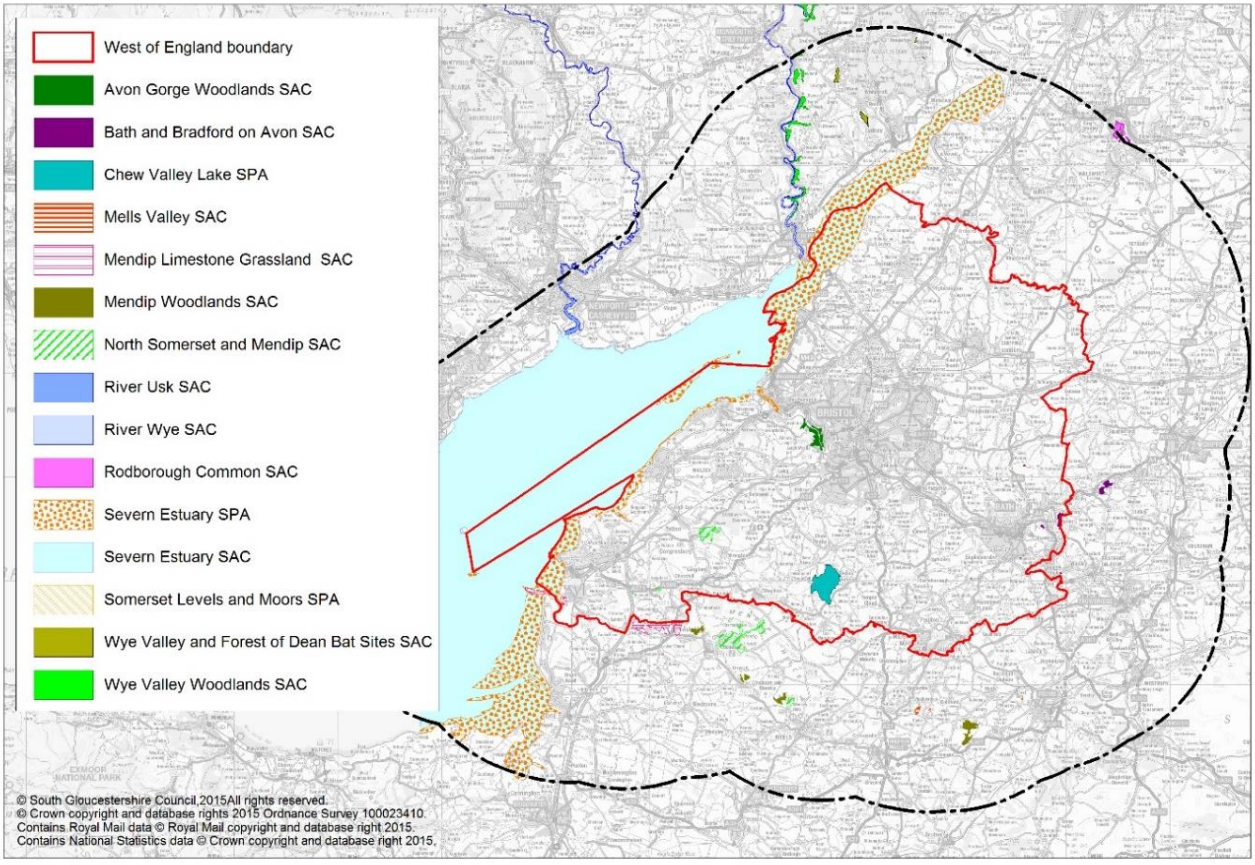

Figure 2

5.7 For reference, a summary of each European site, its qualifying criteria, conservation objectives and key sensitivities is set out at Appendix A.

Buffer zones

5.9 The Natura 2000 were then buffered using appropriate buffer zones to help identify any Natura 2000 sites that could be at risk of impact from the JSP proposals, and to filter out those sites not considered at risk of any significant impacts. Each element of the plan has been reviewed and its potential impacts considered.

5.10 The buffer zones used have been derived from consideration of the nature and character of each Natura 2000 site, including their conservation objectives, and consideration of the various elements of the JSP.

5.11 In this regard it is important to note that the high quality environment of the West of England is recognised as a critical issue for the plan, and the plan has been prepared using a spatial strategy that avoids any direct impacts upon protected sites, including Natura 2000 sites.

5.12 The buffers used to inform the screening stage were the subject of discussions with Natural England. The buffers used were:

- 4 km from the boundaries of the Bat SACs (Bath and Bradford-on-Avon Bats SAC and North Somerset and Mendips Bats SAC).
    - This reflects that these sites were considered to be at most potential risk from loss and fragmentation of foraging areas and flight lines, resulting from the development of greenfield sites and associated potential loss of grazing and hedgerow networks.
- 7km from the boundaries of the Chew Valley Lake SPA, Avon Gorge Woodlands SAC and the Severn Estuary SAC, SPA and Ramsar site.
    - This reflects that these sites were considered to be at most potential risk from an increase in recreational pressures. The buffer was based on the Thames Basin Heaths SPA Framework (LINK) and relates to the distances people travel for recreation.
- 200m from the boundary of sensitive sites (name).
    - This reflects the need to address highlight issues for grassland and woodland sites which are considered to potentially be at risk from increased air pollution resulting from increased traffic movement. This was based on Design Manual for Roads and Bridges (DMRB): Standards for Highways (LINK).

Outcomes

5.13 Following the buffering exercise, the following sites were screened in for further assessment:

- Chew Valley Lake SPA
- Avon Gorge Woodlands SAC
- Bath and Bradford-on-Avon Bats SAC
- North Somerset and Mendips Bats SAC
- Severn Estuary SAC, SPA and Ramsar

5.14 In order to facilitate the detailed assessment of likely impacts on these sites, the guidance and screening methods within the Handbook for HRA (LINK) were utilised.

5.15 A list of the generic impacts for the sites that have been screened in is set out below.

Appendix D

Generic Chew Valley Lake Impacts
Potential Issues: - Reduction in water level – increased abstraction through new housing - Reduction in water quality – eutrophication through increased visitors/recreation - Increased recreational use/visitors
Potential Effects: - Disturbance/displacement of SPA birds - Loss or degrading of habitat available to SPA birds

Generic Avon Gorge Woodlands Impacts
Potential Issues: - Increased recreational use/visitors - Increased NOx concentrations and nitrogen deposition.
Potential Effects: - Potential recreational impacts on the Tilio-Acerion forests of slopes, screes and ravines, with potential also for impacts on the secondary interest features - semi-natural dry grassland and scrubland facies: on calcareous substrates (Festuco-Brometalia). - Potential for eutrophication of qualifying interest feature habitats.

Generic Bat SAC (Bath and Bradford-on-Avon, North Somerset and Mendips) Impacts
Potential Issues: - Loss of greenfield land - Increased recreational pressures - Increased noise and light pollution - Traffic-generated air pollution - Increased urban-fringe pressures (domestic cats, noise, disturbance – potentially reducing agricultural viability) - Reduced viability and potential loss of existing agricultural landscape
Potential Effects: - Reduction of habitat quality and function close to some sites (including function as foraging grounds or access ways) - Habitat loss close to some sites - Habitat fragmentation

Generic Severn Estuary Impacts
Potential Issues: - Greater number of people visiting the Estuary and thus increased recreational pressure from more cyclists, dog walkers etc using coastal footpath (Severn Way). - Cumulative impact through increased recreational use and development within and around Avonmouth/Severnside Enterprise Area.
Potential Effects: - Disturbance/displacement of water birds along foreshore of the Severn Estuary.

Appendix D

Sequential approach to screening

5.16 The JSP vision and objectives, and polices were considered first and any potential recommendations for change, or requirements for the lower order plans (the four UAs Local Plans) to address were identified.

5.17 The key components of the JSP spatial strategy, strategic development locations (SDLs) and urban living, were then considered. To aid this process a list of generic potential impacts and mitigation solutions were identified and have been used to help assess the likelihood of significant impacts occurring and to identify the scope and nature of mitigation solutions that exist. These measures may then become requirements that need to be set out in JSP policy. Alternatively, they may become requirements to be delivered through the local plan process and/or should be addressed in future work, such as the West of England Environment Plan.

Natura 2000 site profiles

5.18 Site profiles have been created for each site to capture key site details and to identify likely impacts potentially resulting from the JSP, including cumulative impacts, and to identify potential mitigation solutions that can be included within / through the Plan (the JSP).

5.19 The format of the site profiles are as follows:

1. Qualifying Features
2. Key sites sensitivities
3. Conservation objectives
4. Conservation conditions
5. Site improvement plan
6. Impacts/risks
    a. Identification of risk/impacts
    b. Cumulative impacts
7. Mitigation – strategic level narrative
    a. Potential Impacts
    b. Mitigation solutions
    c. JSP measures
    d. Local Plan measures

5.20 In addition/ alongside the site profiles, a series of tables have been developed to record the initial screening of likely effects of each element of the plan on the screened in sites, and to enable mitigation solutions to be identified and secured. This table includes the following details:

a) Screening criteria
b) JSP strategic priorities and policies
c) SDL buffer screening
d) JSP Strategic Development Locations (SDLs)
e) JSP urban living
f) Non-strategic growth
g) Small windfall sites
h) JSP transport mitigation

5.21 The objective of this methodology is to enable any potential adverse impacts of the plan upon Nature 2000 sites to be identified and then removed or moderated to ensure no significant effects result. It

has been drafted on the basis of known best practice and has been discussed and agreed with Natural England. Further information is available at Appendix B.

Screening criteria

5.22 The screening categories used have been taken from The Habitats Regulations Assessment Handbook (Tyldesley, D and Chapman, C. (2013)), and are set out below for information/ reference in the table below.

Screening categories	Code
A general statement of policy	A
Policy listing general criteria for testing proposals	B
Proposals referred to but not proposed by the plan	C
Environmental protection policies	D
Steering change away from positive sites	E
Do not propose change, but control approach (e.g. design)	F
No conceivable effect	G
Actual or theoretical effects cannot undermine conservation objectives	H
Likely Significant Effect (LSE) on a site alone	I
No Likely Significant Effect (LSE) alone but an effect - check in combination	J
No Likely Significant Effect (LSE) even in combination	K
Likely Significant Effect (LSE) in combination	L

5.23 Any component of the JSP allocated a screening category of I, J or L (highlighted above in yellow) required an action to be taken or an amendment made to the Plan. Recommended solutions to address these issues will be set out in the full HRA which will be published alongside the publication version of the JSP in November.

Status of this document

5.24 The HRA is at an advanced stage of preparation, and has followed the process agreed with Natural England. The screening process has been completed and has informed the preparation of the draft Publication Plan.

5.25 This process screened in three policies for further review in the context of the requirements of HRA. Full details of this will be set out in the final HRA Report. Through working with Natural England, recommendations for additional policy wording and plan requirements have been identified which enable those policies to be screened out.

5.26 The HRA has therefore screened out any likely significant effects (LSE) and in doing so has informed the preparation of the draft Publication JSP document. Details of the process will be set out in full in the HRA report published alongside the publication version JSP.

5.27 A full HRA report is currently being finalised and will be published for formal consultation alongside the publication version Joint Spatial Plan in November 2017.

Appendix D

Appendix A – List of European sites, qualifying features, conservation objectives and key sensitivities

Site	Qualifying features	Conservation objectives	Key site sensitivities
Avon Gorge Woodlands SAC	Annex 1 Habitats that are a primary reason for selection: • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* Annex 1 Habitats present as a qualifying feature, but not a primary reason for selection of this site: • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely	<u>Air quality</u> – woodland and grassland. In particular eutrophication or acidification could lead to successional vegetation change. <u>Habitat management</u> Maintenance of woodland structure and composition <u>Habitat loss</u> Habitat fragmentation
Bath and Bradford-on-Avon Bats SAC	Annex II species that are a primary reason for selection of the site: • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat • S1323. Myotis bechsteinii; Bechstein`s bat Annex II species present as a qualifying feature, but not a primary reason for selection of the site: • S1303. Rhinolophus hipposideros; Lesser horseshoe bat	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and,	<u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat. <u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting. Direct loss of roost sites. <u>Other Management Issues</u> Local Grazing regimes

		• The distribution of qualifying species within the site.	
Chew Valley SPA	Internationally important bird assemblage. This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: Over winter: • A056. Anas clypeata; Northern shoveler (Non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	<u>Maintain favourable hydrology</u> Site is sensitive to changes in water levels. Both increases and reductions can impact upon shoveler, due to their need for soft mud in which to feed. Also to fluctuations in water quality including eutrophication and particularly phosphate levels.
Mells Valley SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone • H8310. Caves not open to the public Annex II species that are a primary reason for selection of the site: • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and,	<u>Air Quality</u> Eutrophication could lead to successional vegetation change <u>Habitat Management</u> Maintenance of grassland structure and composition Maintenance of foraging and commuting linkage habitat. <u>Habitat Loss</u> Habitat fragmentation resulting in loss of

		• The distribution of qualifying species within the site.	connectivity for foraging and commuting Direct loss of roost sites <u>Other Management Issues</u> Grazing regime
Mendip Limestone Grasslands SAC	Annex I habitats that are a primary reason for the selection of the site: • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia); Dry grasslands and scrublands on chalk or limestone Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • H4030. European dry heaths • H8310. Caves not open to the public • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	<u>Air Quality</u> Eutrophication could lead to successional vegetation change <u>Habitat Management</u> Maintenance of grassland structure and composition <u>Habitat Loss</u> Habitat fragmentation <u>Other Management Issues</u> Grazing regime
Mendip Woodlands SAC	Annex I habitats that are a primary reason for the selection of the site: • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats	<u>Air Quality</u> In particular eutrophication or acidification could lead to successional vegetation change <u>Habitat Management</u>

		• The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely	Maintenance of woodland structure and composition. <u>Habitat Loss</u> Habitat fragmentation. <u>Other Management Issues</u> Grazing regime.
North Somerset and Mendip Bats SAC	Annex I habitats that are a primary reason for the selection of the site: • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia); Dry grasslands and scrublands on chalk or limestone • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • H8310. Caves not open to the public Annex II species that are a primary reason for selection of the site: • S1303. Rhinolophus hipposideros; Lesser horseshoe bat • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying • species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site	<u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat. <u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting. Direct loss of roost sites <u>Other Management Issues</u> Local Grazing regimes

River Usk / Afon Wysg SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site • 3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation Annex II species that are a primary reason for selection of this site • 1095 Sea lamprey Petromyzon marinus • 1096 Brook lamprey Lampetra planeri • 1099 River lamprey Lampetra fluviatilis • 1103 Twaite shad Alosa fallax • 1106 Atlantic salmon Salmo salar • 1163 Bullhead Cottus gobio • 1355 Otter Lutra lutra Annex II species present as a qualifying feature, but not a primary reason for site selection • 1102 Allis shad Alosa alosa	• To maintain the availability of current spawning sites and lamprey nurseries. • To maintain suitable flows, water quality and sediment loads to sustain the population of shad, lamprey and nurseries. • To maintain riparian habitats to ensure optimum conditions for shad lamprey and bullhead. • To identify all linking factors on the population of shad, lamprey and bullhead and to seek to remove or minimise their effects. • Protection of otter breeding sites and resting places.	<u>Water Quality</u> Abstraction threats, changes in water level and water quality, including eutrophication.
River Wye / Afon Gwy SAC	Annex I habitats that are a primary reason for the selection of the site: • H3260. Water courses of plain to montane levels with the Ranunculion fluitantis and CallitrichoBatrachion vegetation; Rivers with floating vegetation often dominated by water-crowfoot Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species	<u>Water Quality</u> Abstraction threats, changes in water level and water quality, including eutrophication.

	• H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface Annex II species that are a primary reason for selection of the site: • S1092. Austropotamobius pallipes; White-clawed (or Atlantic stream) crayfish • S1095. Petromyzon marinus; Sea lamprey • S1096. Lampetra planeri; Brook lamprey • S1099. Lampetra fluviatilis; River lamprey • S1103. Alosa fallax; Twaite shad • S1106. Salmo salar; Atlantic salmon • S1163. Cottus gobio; Bullhead • S1355. Lutra lutra; Otter Annex II species present as a qualifying feature, but not a primary reason for selection of this site: • S1102. Alosa alosa; Allis shad	• The supporting processes on which qualifying natural habitats and habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	
Roborough Common SAC	Annex 1 habitats that are a primary reason for selection of this site: • H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely	<u>Air Quality</u> Eutrophication could lead to successional vegetation change <u>Habitat Management</u> Maintenance of grassland structure and composition <u>Habitat Loss</u> Habitat fragmentation.

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Severn Estuary SAC, SPA and Ramsar	<u>SAC</u> Annex I habitats that are a primary reason for the selection of the site: • 1130. Estuaries • 1140. Mudflats and sandflats not covered by seawater at low tide • 1330. Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • 1110. Sandbanks slightly covered by sea water all the time • 1170. Reefs Annex II species that are a primary reason for selection of the site: • 1095. Petromyzon marinus (Sea lamprey) • 1099. Lampetra fluviatilis (River lamprey) • 1109. Alosa fallax (Twaite shad) <u>SPA</u> This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: Over winter: • A037. Cygnus columbianus bewickii (Bewick's swan) • Internationally important bird assemblage.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	<u>Water Quality</u> Change in tidal regime leading to successional change of shoreline habitat. <u>Air Quality – Saltmarsh</u> Eutrophication could lead to successional vegetation change. <u>Habitat Disturbance - SPA</u> Wintering waterfowl populations. Displacement, litter, human disturbance – noise, visual.

	This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: On passage: • Charadrius hiaticula (Ringed plover) • Calidris alpina alpine (Dunlin) • Nuntenius phaeopus (Whimbrel) • Tringa tetanus (Redshank) Over winter: • A394. Anser albifrons albifrons; Greater white-fronted goose (Non-breeding) • A048. Tadorna tadorna; Common shelduck (Non-breeding) • A051. Anas strepera; Gadwall (Non-breeding) • A149. Calidris alpina alpina; Dunlin (Non-breeding) • A162. Tringa totanus; Common redshank (Non-breeding) The Estuary also supports nationally important wintering populations of a further 10 species: • Anas Penelope (Wigeon) • Anas crecca (Teal) • Anas acuta (Pintail) • Aythya ferina (Pochard) • Aythya fuligula (Tufted duck) • Charadrius hiaticula (Ringed plover) • Pluvialis squatarola (Grey plover) • Numenius arquata (Curlew) • Nuntenius phaeopus (Whimbrel) • Tringa tetanus (Redshank)		

	<u>Ramsar</u> Assemblage qualification: A wetland of international importance. The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl. • Criterion 1: Presence of Annex I features listed above for SAC. • Criterion 3: Unusual estuarine communities. • Criterion 4: Run of migratory fish between sea and river via estuary. • Criterion 5/6: Bird assemblages and species of international importance. • Criterion 8: Diverse fish populations, important feeding, nursery ground and migration route.		
Somerset Levels and Moors SPA and Ramsar	<u>SPA</u> This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: Over winter: • A037 Cygnus columbianus bewickii; Bewick's swan (Non-breeding) • A140 Pluvialis apricaria; European golden plover (Non-breeding) • Waterbird assemblage	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	<u>Water Quality</u> Maintain favourable hydrology. Water levels and abstraction. <u>Air Quality</u> Successional habitat change through eutrophication. <u>Habitat Management</u> Grazing issues

	This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: Over winter: • A052 Anas crecca; Eurasian teal (Non-breeding) • A142 Vanellus vanellus; Northern lapwing (Non-breeding) • Anas clypeata(Shoveler) • Anas crecca(Teal) • Anas penelope(Wigeon) <u>Ramsar</u> Assemblage qualification: A wetland of international importance. The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.		
Wye Valley & Forest of Dean Bat Sites SAC	Annex II species that are a primary reason for selection of the site: • S1303. Rhinolophus hipposideros; Lesser horseshoe bat • S1304. Rhinolophus ferrumequinum; Greater horseshoe bat	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and	<u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat. <u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting. Direct loss of roost sites.

Appendix D

		• The distribution of qualifying species within the site.	
Wye Valley Woodlands SAC	Annex I habitats that are a primary reason for the selection of the site: • H9130. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils • H9180. Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes* • H91J0. Taxus baccata woods of the British Isles; Yew-dominated woodland* Annex II species present as a qualifying feature, but not a primary reason for selection of this site: • S1303. Rhinolophus hipposideros; Lesser horseshoe bat)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	<u>Habitat Management</u> Maintenance of foraging and commuting linkage habitat. <u>Habitat Loss</u> Habitat fragmentation resulting in loss of connectivity for foraging and commuting. Direct loss of roost sites. <u>Air Quality</u> Eutrophication or acidification could lead to successional vegetation change.

West of England Joint Spatial Plan Development Plan Document Publication Draft

Report of Engagement and Main Issues Raised

October 2017

Appendix E

Report of Engagement and Main Issues:

1.0 Introduction, purpose and context

1.1 This statement has been produced in support of the West of England Joint Spatial Plan DPD Publication draft. It outlines how the 4 Unitary Authorities of Bristol, Bath & North East Somerset, North Somerset and South Gloucestershire have sought participation from communities and stakeholders during the preparation of this Plan, the main issues raised through the public engagement undertaken and how these issues have been taken into account. It covers the period from November 2015 – September 2017 and addresses the following in accordance with the Town & Country Planning (Local Planning) (England) Regulations 2012 – Reg. 22 (1) (C) (i-iv):

- Which bodies and persons were invited to make comments;
- How those bodies and persons were invited to make comments;
- A summary of the main issues raised; and
- How the 4 Councils have taken comments made into account.

1.2 The report provides an update from the two previous Consultation Reports prepared; the JSP Issues and Options consultation in November 2015 to January 2016 and the JSP Towards the Emerging Spatial Strategy November 2016 to December 2017. These documents can be viewed https://www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/consultationHome and, together with this report, provides a full summary of the consultation and engagement, main issues raised and the 4 Council's response throughout the duration of the plan's preparation.

1.3. This report deals with the engagement activities in Part 1 and the main issues arising and how the Councils have responded to them in Part 2.

Appendix E

Part 1: Engagement undertaken as part of Regulation 18 consultations

This section of the report sets out the key activities which have taken place up to September 2017. It does not list all the informal conversations, meetings and correspondance. This consultation and engagement has been carried out in accordance with Regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has been undertaken in accordance with the 4 Council's adopted Statements of Community Involvement (SCI).

Compliance with the Duty to Co-operate (DtC)

Through the creation of the JSP and the method of joint working the 4 Councils are able to demonstrate that the legal obligation of co-operation on strategic matters is satisfied. This report also serves to detail the ongoing engagement with our DtC contacts which has continued to take place in support of the preparation of the Joint Spatial Plan for the West of England.

Key consultation milestones in the Plan's preparation

The table below demonstrates an overview of all the key consultation milestones in the Plan's preparation to date. Previous key engagement on the plan (November 2016 to December 2017) can be viewed in more detail within JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017 which can be accessed https://www.jointplanningwofe.org.uk/gf2.ti/-/756738/25692261.1/PDF/-/Joint_Spatial_Plan_and_Transport_Study_Consultation_Report.pdf

Date	Activity
January 2015	Publication of JSP Pre-Commencement Document
January 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's preparation, the purpose of the JSP.
March 2016	Publication of the responses made to the JSP Pre-Commencement Document and West of England response to matters raised.
November 2015	JSP Issues and Options Launch event held at University of West of England
November 2015	Emails and letters sent out to everyone on the 4 Council's Local Plan databases (approx. 10,000 names) informing them of the start of the Plan's Issues and Options consultation.
November 2015	Town and Parish Council, MP and Joint Forum Briefings
November 2015 to January 2016 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	Series of exhibitions and drop in events held across the West of England to promote and publicise the JSP Issues and Options. Singe website for all consultation documents and redirects from each UAs websites Supporting documents, collateral and materials to facilitate greater engagements.

	Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate. Heads of Planning Policy presented to an audience at the University of the West of England – January 2016, to engage the younger communities of the West of England in the Joint Spatial Plan process.
May 2016	Letters to Neighbouring Authorities to understand the opportunities through the Duty to Cooperate to work with neighbouring authorities in order to meet some of the wider Bristol housing need should the evidence show that we are unable to meet it in full.
June 2016	Louise Fradd and, Directors of Development and Heads of Planning from the four unitary authorities met with Business West – June 2016
August 2016	Letter to the Strategic Solutions Panel including key government departments; the Environment Agency, Natural England, WENP, HCA and key infrastructure providers for the region) seeking to re-affirm our commitment to engage effectively with stakeholders and organisations and ask for feedback on the previous consultation process.
November 2016	JSP Towards the Emerging Spatial Strategy launch event held at Watershed Bristol
November to January 2017 Regulation 18 consultation offline and Online channels utilised during the consultation comprising	Four themed workshops across the West of England region held with targeted stakeholder audiences to discuss the key issues in the JSP. Six business consultation events were held with the support of Business West Bristol Avon Catchment Partnership briefed at meeting held on 30th November 15 local consultation drop in sessions were held across the West of England Single website for all consultation documents and redirects from each UAs websites www.jointplanningwofe.org Supporting documents, collateral and materials to facilitate greater engagements – summary flyer, Frequently asked

	questions, Office banners, posters to promote reginal location drop in events An audience friendly illustrative video explaining the JSP Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events Press releases issued on behalf of the 4 Councils and media coverage on TV and radio channels to raise awareness, encourage responses and allow people to participate. Written comments invited from statutory providers e.g. Wessex water, Bristol water, Western Power as part of Emerging Spatial Strategy consultation
April 2017 onwards	Officers from the JSP technical teams provide an update on the incorporation of Green Infrastructure within the JSP. Invited officers were from; Environment Agency, Natural England, Wessex Water, the Local Nature Partnership and Avon Wildlife Trust. Fortnightly meeting with the West of England Local Nature Partnership to discuss delivery of green infrastructure frameworks for the JSP Meeting Natural England officers to discuss the Habitat Regulation Assessment (HRA): Officers have met with Amanda Grundy and Simon Stonehouse to review the HRA process for the JSP throughout 2017 as we prepared the regulation19 Plan. Natural England have also been in communication with the local authorities throughout the plan process.
May 2017	Resilience Adaption workshop held 8th May 2017: Invited members of the key infrastructure provides for the region. This meeting was coordinated and chaired by Wessex Water to review issues of water and environmental resilience and the implications of the JSP.
May/June 2017	Specific WoE Affordable Housing stakeholder consultation via survey, building on research carried out by Bristol CC and National Housing Federation in Autumn 2016, resulting in high level assessment of capacity and appetite of Registered Providers to deliver Affordable Housing within the JSP period.
June 2017	Strategic Solutions Panel meeting held 29th June 2017:

	A presentation and series of round table discussions held to review the Emerging JSP policies with key stakeholder organisations.
June 2017	Meeting with digital infrastructure providers – VirginMedia, Hyperoptics and Openreach to discuss delivery of services when providing for large housing and employment sites
July 2017	Further written consultation with statutory providers e.g. Bristol Water, Wessex Water, Western Power, Wales and West Utilities regarding emerging SDL locations and capacities.
September 2017	Bristol Avon Catchment Partnership meeting held 12th September 2017. Officers from the Joint Spatial Plan team attended this meeting to provide an update on progress and discuss key environmental issues across the region
September 2017	TPCA hosted bespoke workshop for 4 Councils entitled '*How can Councils secure the delivery of more affordable homes? New models, partnerships and innovation.'* The session was held to run through the findings of TCPA nationwide project to understand new innovation in address housing need and facilitate a discussion about how new approaches identified could be relevant in the West of England.

PART 2: 6.0 Summary of Main Issues Arising from Regulation 18 Consultation

This section sets out the main issues raised through consultation on the 2016 Towards the Emerging Spatial Strategy and how these have been used to inform the preparation of the JSP Regulation 19 Publication Plan. In total over 1,500 people representing a wide range of stakeholder groups responded. A more detailed report setting out the consultation responses is contained at pages 30 – 122 of the JSP Towards the Emerging Spatial Strategy and Transport Vision Consultation Report March 2017.

The statement below is a summary of how the questions appeared within the Plan and covers the following:

- Number of respondents to policy;
- Main issues raised;
- How main issues raised have been taken into account by the Council in preparing the 2017 Proposed Submission JSP Plan

Question 1 Does the proposed strategy make adequate provision to address the housing needs of the West of England?

765 people responded to this question.

The majority of respondents felt the number of homes planned for was adequate, this view was mostly expressed by residents (80% of those that responded), local companies/ organisations, local interest groups, development sector respondents and parish/town Councils. The majority of local residents considered the housing needs to have been over estimated but several respondents considered not enough housing was proposed. These respondents were largely from the development sector and business community and their comments included that an uplift in housing numbers is required to meet housing needs and in order to have an impact on overall levels of affordability.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The assessment of need remains robust and is accordance with national guidelines. In light of the identified need, and the comments received, the provision of housing in the Plan has been reviewed. The 4 UAs have concluded that the strategy not only makes provision to meet the assessed need but also provides flexibility to facilitate delivery. Furthermore, a contingency has also been identified if it becomes evident at review that there has been under delivery. Whilst seeking to plan positively and boost the supply of housing, the strategy enables annual delivery rates to be increased by over a third from around 4,000 to 5,127 homes pa, the 4 UAs have been careful to plan for sustainable development, recognising the high quality environment and the need to take account of national Green Belt policy.

Question 2 How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?

Over 700 responses were made to this question

There was acknowledgement of the agreed need for Affordable Housing (AH) as a critical issue and the need to build more AH for young people. Several developers also considered the affordable housing target should be higher, other comments and suggestions on delivery of affordable housing included:

- Enforce a minimum target on a region wide basis to ensure the Affordable Housing need of 32,200 dwellings is delivered.
- Only grant permission where the target AH % is agreed
- Affordable housing requirements must be enforced and developers should not be Allowed to renegotiate provision once permission has been granted;
- The councils should be proactive in challenging viability assessments to ensure that planned levels of affordable housing are achieved.
- The Plan should identify potential ways in which the demand for affordable homes can be met;
- There should be development of homes by public bodies;
- Authority owned land should be used solely for affordable housing.

- The need for affordable rental housing;
- The need for such homes to be high quality and energy efficient.

Most comments (170 responses) suggested reviewing the ways in which the planning process could be utilised and/or amended. Responses to enhance the process included:

- Speeding the planning process up through new policy in the JSP
- Adding a Planning Policy context for the delivery of 'garden villages' considered as capable of delivering housing at high delivery rates.
- The need for developers to set delivery rates.
- Promoting benefits for developers to develop their sites at an increased rate.
- Imposing penalties for failure to deliver
- Focus development in areas where infrastructure investment is already taking place
- Enforcement of planning agreements
- Supported a more diverse mix of development opportunities
- Making better use of existing empty dwellings.
- Addressing the 5-year supply issue,
- Innovative construction solutions (e.g. modular housing) which can be built quickly and efficiently.
- Potential new funding options from the devolution deal

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 are required in the Wider Bristol Housing Market Area and 3,100 in the B&NES Housing Market Area.

The JSP Towards the Emerging Spatial Strategy (TESS) November 2016 recognised the challenge involved in achieving provision to meet this level of need and estimated that some 17,100 traditional Affordable Homes (53%) could be delivered through the planning system against this level of housing need.

This position and the options available to address this were set out in the Officer response to the TESS document

In preparing the Publication Plan and in response to the comments raised, the 4 Councils have focused on two key issues;

a) the need to substantially increase the overall supply of affordable housing from all sources due to the high level of need for Affordable Housing and the shortfall in past delivery rates,

b) the spatial disproportionality of affordable housing needs to address the issue that majority of the Affordable Housing need is derived from Bristol, however this

cannot be provided within Bristol because the scale of the need is too great, the availability of suitable sites is limited, and many residential sites in Bristol have high redevelopment costs due to their brownfield status.

Whilst it is recognised that the identified need for Affordable Housing has not been fully met, the strategy has been to entail a substantial boost in the supply of Affordable Housing for the sub-region and to achieve a step change in provision.

This is given policy framework expression in JSP Policy 3 of the JSP Publication Plan which focuses on:

i. establishing the Affordable Housing Target of 24,500 net new affordable dwellings for 2016-2016.
ii. maximising the provision of Affordable Housing as far as possible, making it a priority in the formulation of the spatial strategy.
iii. in light of the particularly substantial need for Affordable Housing in Bristol, the provision of Affordable Housing on the SDLs and other strategic locations within or well-related to the Bristol urban area must contribute to the affordable housing needs of Bristol via on-site provision with the option of off-site contributions in locations less-well related to Bristol.
iv. Delivery mechanisms will be determined through Supplementary Planning Document(s).

In preparing the JSP it has also been recognised that in order to maximise the delivery of Affordable Housing the four Councils continue to work proactively together and with partners to explore other mechanisms and opportunities in addition to the planning system.

Question 3 Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?

Over 600 responses to this question were received.

Multiple responses (75 comments) agreed the Emerging Spatial Plan makes adequate provision to address economic and employment needs. Reasons for agreement included:

- Recognition of the alignment with the Strategic Economic Plan (SEP), and focus on the Enterprise Zones and Areas and South Bristol.
- Rebalancing of employment growth away from the communities in the North Fringe of Bristol was welcomed in helping to address inequality issues in South Bristol.
- Emphasis on urban living may result in the loss of existing employment sites.

The majority of responses (338) disagreed that the Emerging Spatial Plan makes adequate provisions to address economic and employment needs and suggested that the employment offer was limited locally. Additional comments and challenges to the employment strategy included:

- Lack of employment opportunities in areas proposed for housing
- That the strategy does not address the longstanding economic problems in South Bristol and Weston-super-Mare by focusing investment in both employment and housing in these areas.
- It does not accommodate the economic growth objectives of the Local Enterprise Partnership Strategic Economic Plan (SEP).
- Views that key businesses in the area need to be formally recognised.
- The plan focused more on housing instead of employment opportunities.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The Economic Development Needs Assessment (EDNA) provides evidence that there is existing employment land sufficient to deliver strategic employment needs and the anticipated jobs growth over the period to 2036.

Comments submitted on the distribution and availability of employment land for development have been noted and the 4 Councils have responded by the inclusion of direct reference to the role and strategic significance of:

a) existing town and city centres
b) Enterprise Zones and Areas

In providing for employment growth and additional growth opportunities at key infrastructure locations:

c) the Port, Airport and Oldbury new nuclear power station

Where appropriate, and in relation to scale of development and existing employment provision, the new Strategic Development Locations will also make provision for employment land.

Note that the Local Plans will continue to make provision for employment in local town, district and business centres.

Topic paper x Employment provides further evidence on this issue.

Question 4 Does the preferred strategy and the locations identified meet the plans strategic priories and vision?

There was support for the Vision, the Strategic Priorities and their spatial implications from a number of development sector bodies and government agencies, but with some caveats.

Some respondents considered certain proposed Strategic Development Locations to be unsustainable and contrary to the strategic priorities and vision set out in the Emerging Spatial Strategy. Some respondents stated that the Vision did not highlight the need to

address service and infrastructure requirements or recognise the importance of smaller sites in delivering the whole Vision for the JSP.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

There were a wide range of stakeholder viewpoints, which is evidence that there was not a consensus view on what the Vision or plan priorities should be. However, the comments received have been taken into account and used to make adjustments to the Plan's critical issues and strategic priorities.

These are now presented in a table format in the Publication Plan which emphasises a commitment to set out a policy framework that addresses the following:

- To substantially boost the housing supply, particularly affordable housing of which the need is acute, across the Plan area by establishing an overall housing and affordable housing requirement to be delivered in accordance with the Plan's spatial strategy.
- To promote inclusive economic growth which accommodates the economic growth objectives of the LEP Strategic Economic Plan in accordance with the Plan's spatial strategy and thereby ensures that benefits of economic growth are shared more equally.
- To promote stainable growth the form and function of development should not seek to replicate past patters of development and settlement patterns that are over-reliant on the private car and should be properly aligned with infrastructure and maximise opportunities for sustainable and active travel.
- Through a place making approach promote places of density and scale with a range of facilities, which integrates high quality multi-functional green infrastructure which encourages healthy lifestyles, cultural wellbeing and ensures resilience to the impacts of climate change.
- Delivering economic growth needs to be balanced with recognising that the sub-region benefits from a world class environment. This brings substantial economic and community benefits and contributes to the quality of life of residents, visitors and businesses by enhancing the quality of the natural, built and historic environment and achieving biodiversity gains which are recognised as outcomes as part of achieving sustainable patterns of development.

Question 5 Are there any reasons why this strategy or identified locations could not be delivered?

Approximately 1,400 respondents answered this question.

Many comments on the Strategic Development Locations were strongly steered towards transport issues. Responses on this included:

- Houses need to be located in locations where infrastructure is in place to support development
- The JSP should choose locations with good transport links to employment opportunities.
- Impact on the environment
- References to other infrastructure:
    - Potential pressures added to local schools, hospitals and GP surgeries, which are currently inadequate to support the population and creating an issues for delivery of Strategic Development Locations (SDLs).
    - The need to spread development over more SDLs increasing delivery as fewer 'major' infrastructure improvements would be required.

A further 100 locations were put forward through the call for sites exercise that supported the JSP consultation. From the sites submitted, the majority of these were new and some were resubmitted by respondents from the previous issues and options consultation. These will be considered as part of the next round of technical work to support the preparation of the draft JSP.

In relation to the SDLs it should be noted that the responses were influenced by the interests of those responding. Within consultations of this nature, it is anticipated that the views are not wholly representative of the population and residents of these areas may react more negatively and promote alternative spatial options, in contrast to residents in areas that are not identified for development who are less likely to respond. Furthermore the development industry may promote sites that they own or control and may not provide a balanced view of the location as part of a comprehensive joint spatial strategy.

Green Belt: Views on this subject were mixed, several comments (60 responses) specifically outlined that Green Belt land should not be used however, various comments (50 responses) outlined the need to use more Green Belt land. Respondents from the development sector considered that a Green Belt Review is required and should consider appropriate releases of Green Belt land in and around sustainable settlements, including consideration of the insetting of settlements. Several respondents also raised the issue of Green Belt exchange in relation to development on the edge of Bristol.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The clear message from the consultation, particularly from our communities, was that it was essential that new development was delivered in step with the necessary infrastructure, particularly transport improvements. This is identified as a key element in the Publication version's proposed vision for the West of England and the principle integrated throughout the plan. In particular, the strategic infrastructure requirements policy sets out the broad principles with reference to the role of the Joint Infrastructure

Delivery Programme and the Local Transport Plan in supporting delivery, while the specific SDL policies identify specific infrastructure requirements.

The potential development sites submitted were assessed and informed the evolution of the preferred spatial strategy through the two stages of consultation. The Issues and Options considered broad options which were refined through the Towards the Emerging Spatial Strategy Document. The latter also invited comments on alternative locations not proposed for inclusion in the Plan. For the majority of the proposed locations the development industry response provided reassurance that the SDLs were realistic and deliverable and that they could be taken forward into the Publication version. This engagement with developers and landowners helped to inform the detailed policies proposed for each SDL. The overall conclusion from the consultation was that the JSP needed to present a range of different development opportunities of different types and in a variety of locations to provide flexibility and choice across the plan area.

The Green Belt issue divided opinion with views strongly made in support and against both in respect of affected communities and developers promoting land. This debate has helped to inform the JSP spatial strategy. This maintains the importance and value of the Green Belt as a whole, whilst recognising that exceptional circumstances have been made to warrant land to be released from the Green Belt to support sustainable growth in some specific locations.

Question 6 Is the preferred spatial strategy the most appropriate strategy when considered against the reasonable alternatives?

Over 800 respondents answered this question.

Over half of the respondents thought the Emerging Spatial Strategy presented in this consultation was not the most appropriate strategy or that they had reservations about the strategy. Many of these were in respect of one or more of the strategic development locations as opposed to the overall strategy. Some (70) respondents were in agreement that the preferred spatial strategy was the most appropriate, albeit some with reservations. As noted above some views were clearly influenced by the interests of those responding and by a specific strategic development location as opposed to how the Emerging Spatial Strategy performs as a whole.

The majority of respondents considered there were reasons why the strategy could not (or should not) be delivered. The most common general reasons given for the strategy being considered undeliverable included:

- The resulting pressure on transport infrastructure (mentioned approx 1000 times), including that the necessary transport infrastructure is undeliverable
- Pressure on other infrastructure (mentioned over 700 times).

- An unsustainable strategy (raised nearly 350 times) i.e. would not meet the tests of environmental, and/or economic and/or social sustainability.

How representations to this question have been taken into account in preparing the Publication (Reg 19) Plan

The formulation of and justification for the preferred spatial strategy is set out in Topic Paper 2 and is summarised in the JSP. This explains how the 4 UAs have assessed the evidence and sought to formulate the most appropriate strategy to achieve the agreed priorities. Development is steered to locations which minimise the harm to the environment whilst providing scope for enhancement, and which provide a deliverable strategy. In light of the concerns expressed about delivery of the transport infrastructure needed, particular effort has been directed to ensuring its deliverability, both technically and its funding.

The preferred spatial strategy reflects the need to find as balance; it enables the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure and with flexibility. It enables the retention and enhancement of the sub-region's high quality environment, provides benefits to existing communities and it facilitates the development of exemplar, sustainable new places. This is the most appropriate strategy for the West of England as evidenced through Sustainability Appraisal (SA) testing and in delivering the Plan's spatial priorities.

JOINT SPATIAL PLAN TOPIC PAPER 1
FORMULATION OF THE HOUSING REQUIREMENT V.1

1.0 CONTEXT

Introduction

1.1 The West of England Joint Spatial Plan (JSP) Development Plan Document (DPD) has a purposefully constrained scope, essentially to address the housing, employment and infrastructure needs of the West of England (WoE) sub-region. This paper sets out how the housing needs of the sub-region have been assessed for the purposes of the JSP, how the Housing Requirement for the plan has been derived, for both Market and Affordable Housing. Topic Paper 2 deals with how the four West of England Unitary Authorities (UAs) have responded to this need in formulating the spatial strategy.

National Policy

1.2 Based in the current guidance in NPPF and in the NPPG, the requirements on the UAs in regard to housing needs are, in summary;

Para 14: *to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.*

Para 47 *to boost significantly the supply of housing by ensuring that they meet the full, objectively assessed needs for market and affordable housing in the housing market area (HMA).*

Para 159: to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing, the needs of different groups in the community eg families,*

older people, people with disabilities, service families and self-build; and

- *caters for housing demand and the scale of housing supply necessary to meet this demand.*

1.3 The NPPG provides more detail on assuming housing need, stating that "t*he assessment of needs is an objective assessment based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints*."

1.4 In September 2017, the Government published consultation on a new standard methodology for the assessment of housing need entitled "*Planning for the right homes in the right places*". This addresses the overall need for housing but not affordable housing or the other components of housing need.

1.5 In the consultation paper, the Government has proposed transitional arrangements to set a period of time before which plans would be expected to use the new method for calculating the local housing need. This includes that if the Plan will be submitted for examination on or before 31 March 2018 or before the revised Framework is published, whichever is later, it should continue to be examined and rely on evidence prepared using the current method. The JSP is programmed to be submitted before 31st March 2018 and therefore, under the transitional arrangements, the new methodology will not apply.

1.6 Based on the Government's proposal that there should be a single assessment of housing need (Planning for the right homes in the right places: consultation proposals 2017); and the emerging 2 tier plan approach (Housing White Paper paras A16 & 17) and the requirements in the Town and Country Planning Regulations 2012 (s8)(5) that the policies contained in a local plan must be consistent with the adopted development plan; the housing requirements established in the JSP will apply to the UA local Plans, and the new standard methodology will not apply.

The role of the JSP

1.7 In preparing the JSP therefore, an assessment has been made of;

- The extent of the Housing Market Areas (HMAs) in the sub-region, and
- the objectively assessed needs (OAN) for market and affordable housing in the HMAs (the "policy-off" assessment)
- Other requirements to facilitate delivery and formulate the Housing Requirement (the "policy-on" assessment).

1.8 The role of the JSP is to address the overall quantum of housing need and the Affordable Housing need. It is the role of the UAs in the Local Development Frameworks to address the more detailed breakdown of housing needs referred to in para 159 of the PPG, including the needs of the travelling community and students.

1.9 The primary evidence base for the assessment of JSP housing need constitutes;

- The Wider Bristol Area Strategic Housing Market Assessment (SHMA) parts 1 & 2
- The Bath Area SHMA
- West of England Housing Target (September 2016).

Past Delivery

1.10 Past housing delivery rates in the West of England are set out in Diagram 1. This shows that the annual average delivery rates for the West of England have been around 4,150 dgs p/a between 2006 & 2017

Diagram 1 - WoE Housing Delivery 2006 to 2017

	2006 /07	2007 /08	2008 /09	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014/ 15	2015/16	2016/17	2006-2017
BCC	2,052	2,428	2,574	2,189	1,739	1,746	878	1,287	1,454	1539	1994	19,880
NSC	1,132	1,474	935	772	637	515	527	760	674	569	852	8847
SGC	689	1,003	916	742	714	923	823	1,095	1,224	1107	1630	10,866
B&NES	334	557	386	470	413	463	550	537	667	809	853	6,039
WoE	4207	5462	4811	4173	3503	3647	2778	3679	4019	4024	5329	45,632

1.11 On Affordable Housing in the 11-year period 2006 – 2017, delivery was only 22% against targets of between 30% - 40%.

Diagram 2 - WoE Affordable Housing Delivery 2006 to 2017

	2006 /7	2007 /8	2008 /9	2009/ 10	2010/ 11	2011 /12	2012 /13	2013 /14	2014/ 15	2015 /16	2016/ 17	2006-2017
B&NES	106	80	65	93	-14	244	137	120	185	178	166	1,360
BCC	488	443	583	553	402	365	290	102	240	180	199	3,845
NSC	126	192	266	149	110	42	211	166	154	126	138	1,680
SGC	75	215	291	281	340	269	223	298	326	263	360	2,941
WoE	**795**	**930**	**1205**	**1076**	**838**	**920**	**861**	**686**	**905**	**747**	**863**	**9,826**

2.0 THE EVIDENCE (The 'policy-off' Assessment of need)

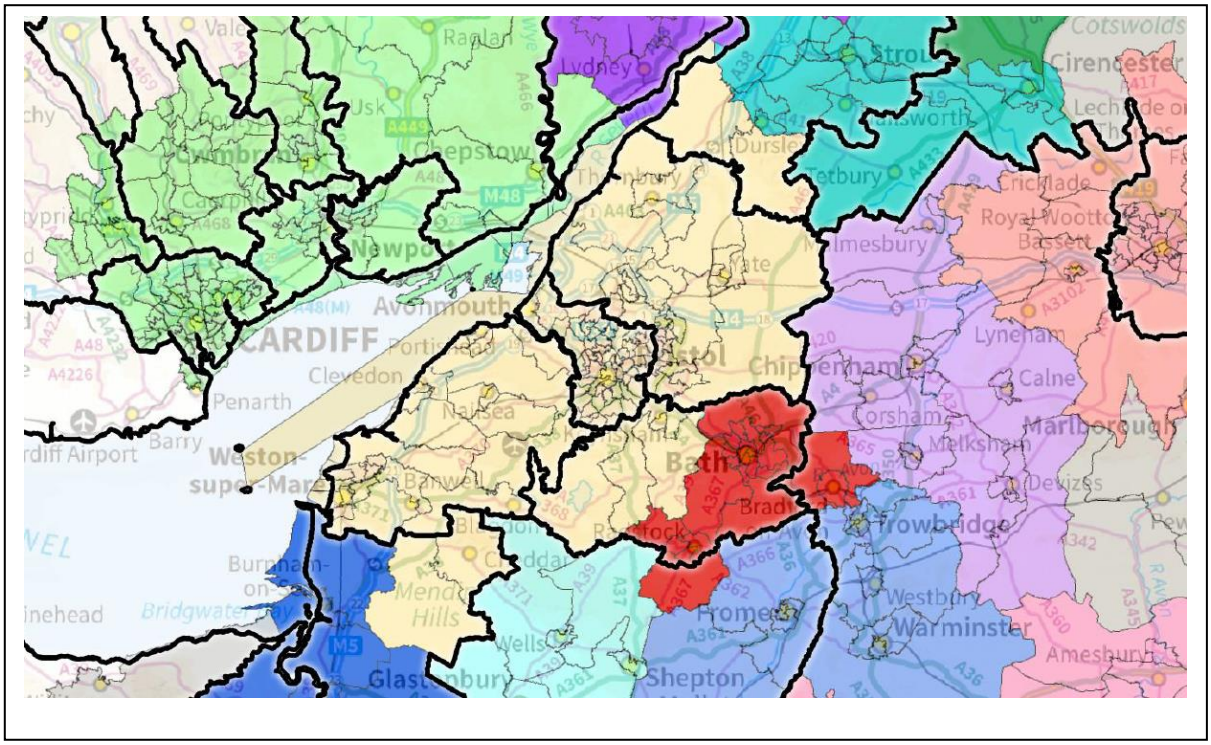
The SHMA Methodology

2.1 The assessment of housing need was undertaken by Opinion Research Services (ORS) for the four UAs. The SHMAs were prepared accordance with the NPPF and PPG and published in 2015. An update was published in September 2016.

Housing Market Areas

2.2 The SHMA identifies two HMAS in WoE, one for the Wider Bristol Area covering Bristol City, North Somerset, South Gloucestershire and limited parts of adjoining districts. It consists of two volumes; and one for Bath covering the eastern parts of the District and limited parts of adjoining districts. The HMAs are shown in Diagram 3 below. Whilst the Actual HMAs cut across District boundaries, the SHMA recommends that for statistical reasons, the proxy for the Wider Bristol HMA comprises the districts of Bristol, South Gloucestershire and North Somerset whereas the Bath HMA comprises the district of B&NES (see Diagram 3b).

Diagram 3a: The Actual Housing Market Areas in WoE



The Objectively Assessed Need (OAN)

2.3 The ORS methodology for assessing housing need is described in the SHMA, (see section 3 of the SHMA), and the outputs are summarised in Diagram 4 below which is an extract from the SHMAs update document "West of England Housing Target" September 2016.

Diagram 3b: The Proxy Housing Market Areas in WoE

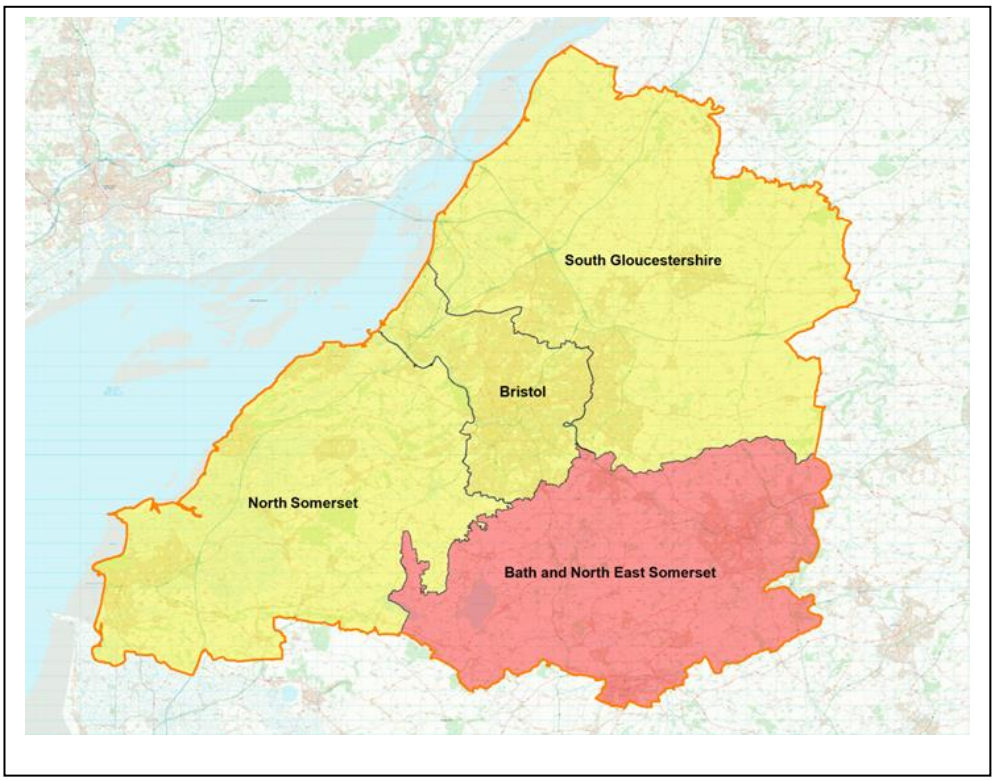


Diagram 4: Establishing the Housing Target

Stage		Wider Bristol HMA	Bath HMA	TOTAL
Housing need based on SHMA household projections		**78,500**	**9,300**	**87,800**
Estimated impact of...	**Changes to migration**	+800	+2,300	+3,100
	Changes to average household size	-2,000	-500	-2,500
Housing need based on updated household projections		**77,300**	**11,100**	**88,400**
Further adjustments needed...	**In response to balancing jobs and workers** Additional dwellings to ensure alignment between planned jobs growth and projected growth in workers	0	400	400
	In response to market signals Dwellings needed (including the specific adjustment for concealed families and homeless households)	**10%** x 77,300 = 7,700	**15%** x 11,100 = 1,700	9,400
Combined impact of the identified adjustments		**7,700**	**1,700**	**9,400**
Updated OAN for the JSP period 2016-36		**85,000**	**12,800**	**97,800**
Allowance for dwellings assumed to be vacated by older people moving into care		3,700	700	4,400
Further uplift to help deliver the identified affordable housing need		The uplift applied in response to market signals will already incorporate this		
Housing Target for the JSP period 2016-36		**88,700**	**13,500**	**102,200**

2.4 Working through its methodology, the SHMA proposes an OAN of 85,000 dgs for the Wider Bristol HMA (WBA) & 12,800 dgs for the B&NES HMA, making a total of 97,800 dgs needed for the sub-region by 2036. This has taken account of demographic projections adjusted for local circumstances, ensuring there will be enough workers for planned jobs, and an adjustment for market signals, 10% for WBA and 15% for B&NES in light of the higher wages to house price ratio.

The overall Housing Target

2.5 An allowance has then been made for dwellings assumed to be vacated by older people moving into care for both HMAs. In response to the NPPG, (Para 029) consideration was given to further increasing overall housing supply to help deliver the affordable housing need but no further additional uplift was considered appropriate (see Annex 1). The overall conclusion is that a Housing Target of 102,200 new dwellings is needed between 2016 and 2036. This is the "policy-off" evidenced need or Housing Target which the JSP should seek to deliver. The need for Affordable Housing is considered in more detail below (see from para 2.7).

2.6 The economic growth aspirations of the sub-region are set out in the Strategic Economic Plan (or the SEP) and have been used to inform the JSP. The four UAs are aware of the uncertainties in economic forecasting, made more difficult by Brexit, but

until further information is available, it is premature to attempt to take account of the implications of Brexit.

Affordable Housing Need

2.7 The SHMA evidences a need of 32,200 affordable homes in the West of England in the period 2016-2036. This equates to 31.5% of the total housing requirement of 102,200 dwellings, and an annual requirement of 1,610 affordable homes. Of the 32,200 affordable homes needed, 29,100 dgs are required in Wider Bristol and 3,100 in B&NES.

2.8 The SHMA uses national policy and guidance for the definition of affordable housing and has regard to local incomes, house prices and rents in arriving at 32,200 figure.

2.9 The four authorities continue to review current and emerging housing products against NPPF definition for Affordable Housing and against local affordability in relation to incomes and housing costs. Any need for products which are not affordable locally have not been included within the 32,200 dg figure.

2.10 The SHMA for Wider Bristol (Vol2) states at para 2.33:

'There may also be a role for LCHO products at higher equity shares targeted at households able to afford private rent but unable to afford home ownership. This would help 'widen opportunities for home ownership' (NPPF para 50) but would be in addition to the need to deliver 29,100 affordable homes in the Wider Bristol HMA'.

2.11 The breakdown of affordable housing need by tenure type has been based on the assumption that up to 35% of gross household income (excluding housing benefit) is available for housing costs.

2.12 The need for affordable housing breaks down between the UAs as follows:

Diagram 5: Breakdown of Affordable Housing need by UA

UA	***Affordable Housing* need 2016-2036**
B&NES	3,100
Bristol	18,800

North Somerset	4,800
South Gloucestershire	5,500
West of England	**32,200**

2.13 In conclusion there are 2 key issues that the JSP needs to respond to for the WoE with regard to affordable housing need evidence;

a) the need to substantially increase the overall supply of affordable housing above past delivery rates
b) the spatial disproportionality of affordable housing need.

Other components of need

2.14 The SHMAs, with updates, explain (see para 6.17 onwards of the WBA SHMA) that the Housing Target includes other components of housing need such as students, older people and the travelling community these households are counted as a component of, and not additional to, the figure identified by the SHMA. In light of the defined remit of the JSP it will be the role of the UA Local Plans to provide the policy response in order to address these more specific components of housing need.

3.0 THE HOUSING REQUIREMENT "POLICY ON"

The Housing Requirement

3.1 The evidence-based need for housing, (the Housing Target) is 102,200 new dgs by 2036. The Housing Requirement is the 'Policy-on figure', ie the number of dwellings that the JSP seeks to deliver having taken into account other policy issues and evidence. In particular para 14 of the NPPF requires that objectively assessed needs must be met;

- with sufficient flexibility to adapt to rapid change, or
- unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits

3.2 Topic Paper 2 on the Spatial Strategy shows that whilst it is a significant challenge in seeking to meet the Housing Target of 102,200 dg, the impacts of doing so would not significantly and demonstrably outweigh the benefits in the West of England. Furthermore, in light of the advice in NPPF para 14, the JSP seeks to provide flexibility by increasing the OAN between 5% to 10% ie around 105,500 new dwellings or around 7.5%. This is in addition to the flexibility in Five year Housing land supply evidenced in Topic Paper 2 on the Spatial Strategy. The locations comprising the supply of 105,500 dwellings represent the most appropriate strategy for the sub-region.

3.3 Furthermore, in the interests of delivery, the four UAs have included in the strategy a housing contingency of around 3,000 dgs. In the event that any of the preferred components of planned supply do not come forward, the contingency could be brought forward as a 'Plan-B.' This would entail a revision of the plan as part of the first review to ensure that these are still an appropriate contingency. The contingency is described in more detail in the Spatial Strategy Topic Paper.

3.4 Therefore the policy-on Housing Requirement for the JSP entails a significant boost to the supply of housing of 102,200 net new dwellings to be delivered between 2016 and 2036 with flexibility taking overall supply to 105,500 dwellings, supported by a further contingency of around 3,000 dwellings if needed, taking potential overall supply to around 10% above the OAN of 97,800 homes.

Alternative Housing Requirement proposals

3.5 Through the process of Plan preparation, a number of alternative, higher Housing Requirements have been proposed. The UAs have considered these but maintain the SHMAs undertaken for the UAs remains robust.

The Affordable Housing Target

3.6 Meeting the full affordable housing need is a significant challenge. This is not unique to the West of England; the nature and scale of issues and policy landscape is national.

The Delivery challenge

3.7 The factors that have and will continue to impact on delivery levels include:

- Changes to national policy and guidance;
  - increased thresholds – from November 2014, sites of 10 units or fewer are not required to deliver Affordable Housing
  - introduction of Vacant Building Credit – reduced Affordable Housing requirement on any site with a vacant existing building
  - sites developed under permitted development rights do not require Affordable Housing, including office to residential schemes
  - no Affordable Housing on sites for student accommodation or Extra-Care developed under Use Class C2
  - introduction of products that are NPPF-compliant but do not meet local affordability criteria, such as starter homes costing 80% of open market value

- Market conditions, particularly in urban areas
  - Viability claims, particularly on brownfield sites, and impact of existing and alternative use value and infrastructure requirements
  - Regeneration schemes that can achieve densification by making better use of existing sites but have the effect of reducing the number of Affordable Homes because the number demolished is greater than the number of new Affordable Homes provided as part of a mixed-tenure development.

- Deliverability
  - Some locations are less attractive to Registered Providers (RPs) and other delivery partners
  - Retirement homes provided in flatted complexes often carry inherent delivery and management issues that result in off-site sums being accepted in lieu of on-site delivery
  - Specific locational issues such as rural sites, sites with restricted access, one-off landowner developments.

Although some sites are developed by RP partners at a higher % of Affordable Housing using grant funding or other subsidy and this goes some way to redress the balance, the numbers are relatively low.

The JSP AH Policy

3.8 In formulating the JSP, the UAs have assessed a range of options to increase the supply of AH as summarised in Annex 3

3.9 The high level of need for Affordable Housing and the shortfall in both past and projected delivery, justifies the need to maximise delivery from all possible sources. Through this process the UAs have therefore formulated a policy framework which gives significant priority to the delivery of Affordable Housing, and this is set out primarily in JSP Policy 3. This entails;

- Making Affordable Housing delivery a priority in the Plan with a challenging requirement of 35% on all new sites;
- requiring policy compliance at nil public subsidy and where a proposal is demonstrably unviable, to provide that public subsidy or other forms of investment will be sought and secured to make up the shortfall;
- requiring small windfall sites to contribute to the supply. Affordable Housing will be required on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower);
- The demographics demonstrate an increasing need for suitable specialist housing for older people, including Affordable Housing. This is an added justification (on top of the imperative to increase delivery from all possible sources) for a requirement for all self-contained housing for older people to contribute towards meeting Affordable Housing need regardless of the level and type of care available, including proposals that come forward as Use Class C2;
- The same approach will be taken for student housing. In Bristol in 2016/17 there were 1994 completions of which 199 were Affordable Housing and 700 were student dwellings (providing 1237 bedspaces). In this context it is entirely justifiable that student housing should contribute towards delivering Affordable Housing;
- The full range of Affordable Housing tenure types and unit mixes to meet the needs evidenced by the SHMAs will be required;
- Affordable homes are to be provided on-site unless robustly justified in exceptional circumstances where an off-site provision or an equivalent financial contribution in lieu of on-site Affordable Housing may be acceptable, to be used for the provision of new Affordable Housing;
- requiring the Affordable Homes to remain at an affordable price in perpetuity or for the subsidy to be recycled for alternative Affordable provision, so that maximum value is generated and future eligible households can also benefit.

Future Affordable Housing Supply

3.10 The JSP spatial strategy (See Topic Paper 2) enables the generation of Affordable Housing as set out below;

a) **Existing commitments -** for the period 2016-2036 61,500 total dwellings are projected to be delivered, of which 13,000 will be Affordable Housing.

b) **Current forecasts for unidentified sites**

c) **Small windfalls** – due to the high level of need for Affordable Housing and the shortfall in past delivery, there is a need to maximise delivery from all possible sources. The policy therefore requires Affordable Housing to be provided on all sites of 5 dwellings or more, or larger than 0.2 hectares (whichever is the lower). It has been assumed that 6,800 dwellings will be delivered from small windfalls of which 1,000 will be Affordable Housing.

d) **Urban Living –** the forecast for delivery of Affordable Housing on unidentified brownfield sites has generally been based on historic outturn using a capacity based assessment rather than individually site based. Delivery at a rate lower than policy level has been assumed because of the likely nature of the sites involved. However delivery will be maximised by increasing densities in urban locations. Current projections assume that Urban Living sites will deliver a total of 16,200 dwellings of which 3,280 are expected to be Affordable Housing.

e) **Non-strategic growth** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on non-strategic growth sites delivering a total of 3,400 dwellings of which 1,190 will be Affordable Housing.

f) **Strategic Development Locations** – the forecast assumes a policy compliant position of 35% Affordable Housing, using developer subsidy where fully viable, and bringing in public subsidy to make up any shortfall where full delivery is unviable. Current projections are based on the current 12 SDLs delivering a total of 17,600 dwellings of which around 6,000 will be Affordable Housing.

3.11 The table below shows the breakdown of expected Affordable Housing delivery between 2016 and 2036.

Diagram 6: Projected Affordable Housing delivery to 2036

Supply Source	***All Homes***	***Affordable Homes***
Commitments in existing Plans	*61,500*	*13,000*
Contribution from Urban Living, non-strategic growth and SDLs	*44,000*	*11,500*
Total	***105,500***	***24,500***

NB Figures rounded up

3.12 As a result the JSP is able to set an ambitious target of 24,500 net new Affordable Homes by 2036, which amounts to 76% of the total need. This is set out in JSP Policy 3.

There is a gap between the level of need and planned number of affordable homes that realistically can be delivered by the development industry based upon the current delivery model. It is clear that it is unrealistic to expect for the Plan alone to meet the full amount of affordable housing identified. Clearly the UAs will need to work with partners and use other mechanisms on top of the planning system to maximise the delivery of affordable homes. The four UAs have worked proactively together to identify additional funding opportunities and delivery mechanisms to boost projected delivery.

3.13 Other areas in the country have experienced the same issues and have therefore set out what can be achieved through their respective Spatial Strategies. For example, The London Plan (see 3.11 Affordable Housing Policy) includes a delivery target of 66% of the affordable housing need. The high level of need for Affordable Housing justifies a policy approach that maximises delivery from all possible sources. The four UAs have reviewed their approaches to ensure they have identified all options within their own control to maximise delivery.

3.14 A high level assessment of the capacity and appetite of Registered Providers to deliver Affordable Housing was carried out in May/June 2017. This demonstrates that there is the capacity locally to deliver the Affordable Housing target of 24,500 homes, and that additional capacity is available to go further towards meeting the total Affordable Housing need in the West of England, if the opportunities are available.

Spatial disproportionality of need

3.15 The Affordable Housing need across the WoE has to be addressed within the Plan. Each UA has had to consider how to meet its own Affordable Housing need but in addition how the overall WoE need can be met.

3.16 The majority of the Affordable Housing need is derived from Bristol, however current projections identify that this cannot be provided within Bristol because the scale of the need is too great, and the availability of suitable sites is limited. Many residential sites in Bristol have high redevelopment costs due to their brownfield status.

3.17 A balance needs achieving of meeting a UA's Affordable Housing need and contributing towards provision of Affordable Homes to also address Bristol's need, some of which will depend on location and spatial strategy.

3.18 In order to achieve this balance the four UAs have identified in the Plan that the Strategic Development Locations (SDLs) and other strategic locations within or well-related to the Bristol urban area must contribute to addressing the Affordable Housing need of Bristol as well as their own local need. The Affordable Housing contribution to assist meeting Bristol's need will be provided through on-site provision with the option of off-site contributions in locations less well-related to Bristol, to be spent on providing Affordable Housing.

3.19 Delivery mechanisms will be determined through Supplementary Planning Document(s) and will include:

- nomination rights in favour of Bristol or other appropriate arrangements for the allocation and sale of the Affordable Housing where Affordable Homes have been provided on a site within another UA area to meet Bristol need;
- details for where and when financial contributions are acceptable and the calculation of any financial contributions in lieu of on-site Affordable Housing;

- Where financial contributions are accepted to address Bristol's need, they should:

  - be held in a West of England Housing central pot
  - be retained for a maximum of ten years or to the end of the JSP period, whichever is the later, in order to maximise the opportunity to spend.

3.20 In order to meet the need, Affordable Housing must be provided that meets the needs as evidenced by the SHMAs (or updated evidence) in the full range of Affordable Housing tenure types and unit mixes. This will be set out in detail in the SPD.

4.0 MONITORING & REVIEW

4.1 The four UAs will continue to co-operate on monitoring arrangements and delivery of the spatial strategy and its Housing Requirement will be reported by the four UAs and through their Authority Monitoring Reports. The outputs will be taken into account in the preparation of the Mayoral Spatial Plan, taking account of the five yearly review proposals and the contingency set out in Policy 2 of the JSP. The Spatial Strategy Topic Paper sets out the approach to monitoring 5 year Housing Land Supply.

Annex 1:

Options to improve supply of affordable housing

The four UAs have reviewed their approach to identify any opportunities to boost the Affordable Housing trajectory since the Workshop on 1st December 2016.

Four categories have been explored in more detail:

Additional subsidy	The UAs have taken a robust approach to identify potential double-counting and have been cautious about assumptions of future public subsidy, as future programmes are unknown. It is reasonable to assume that some additional Affordable Housing may be funded under future Government supported programmes, but this has not been included in the target of 76%. Assumptions about new Government housing related infrastructure programmes (such as Housing Infrastructure Fund) have been excluded at this stage, due to potential overlap with the assumptions already made that subsidy will top-up any unviable Affordable Housing.
Taking control	All four UAs are actively considering ways to take better control of delivery including setting up of Housing Companies. The Affordable Housing target takes account of the current Bristol Housing Company programme.
Increased requirement	Increasing the overall housing requirement by applying an additional uplift above that already included in the assessment was considered in the 2016 consultation. While there may be some effect on increasing affordable housing, this is not in itself the solution. A more radical change was needed than a simple additional uplift. It was agreed through more recent consultation processes that a suite of options will be needed as a pragmatic response to boost the supply of affordable housing alongside the prioritisation of affordable housing provision through the JSP, which involves changes to current policies to maximise supply, as well as the additional flexibility and contingency approach taken on setting the WoE Housing Requirement.
Building partnerships	A Statement of Commitment is being progressed which will set out RPs' commitment to invest in new Affordable Homes in the West of England.

The diagram below identifies the current sources of potential additionality to AH supply that may come forward within the lifetime of the Plan. An additional 1500 Affordable Homes from these sources would boost delivery to at least 80%:

	potential additional AH that has not been included in any previous calculation
1	additional units from LA capital funding programmes
2	potential LA and other publically owned sites not already accounted for (at policy compliant level and potential for developing at higher than 35%AH)

3	potential additional funding from HCA not already included
4	potential for additional units arising from institutional investment
5	additional funding via potential WECA Enabling Fund i.e. infrastructure funding, additionality
7	additional AH that could be delivered by Housing Companies
8	additionality via estate regeneration, in addition to Urban Living

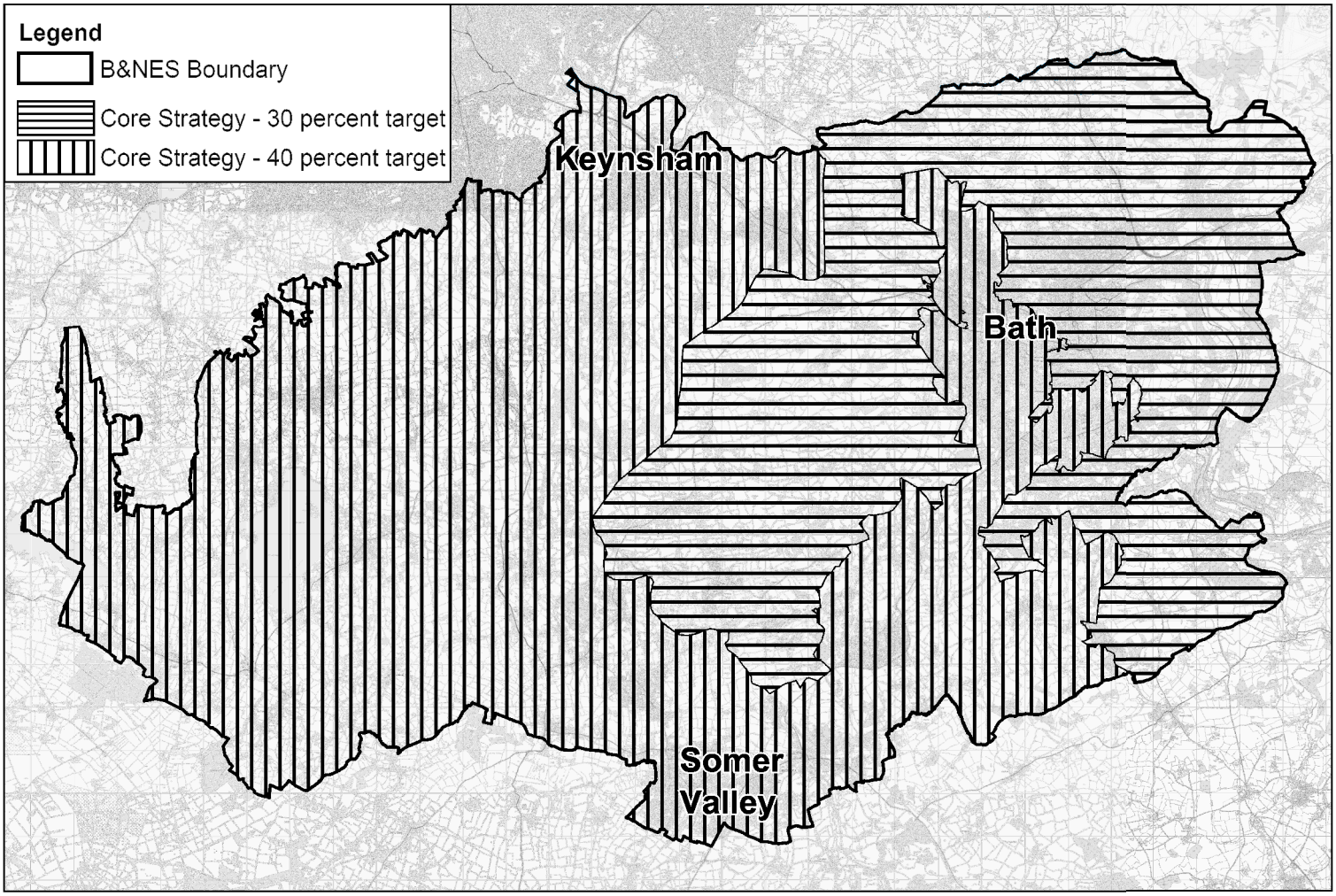
Background Papers

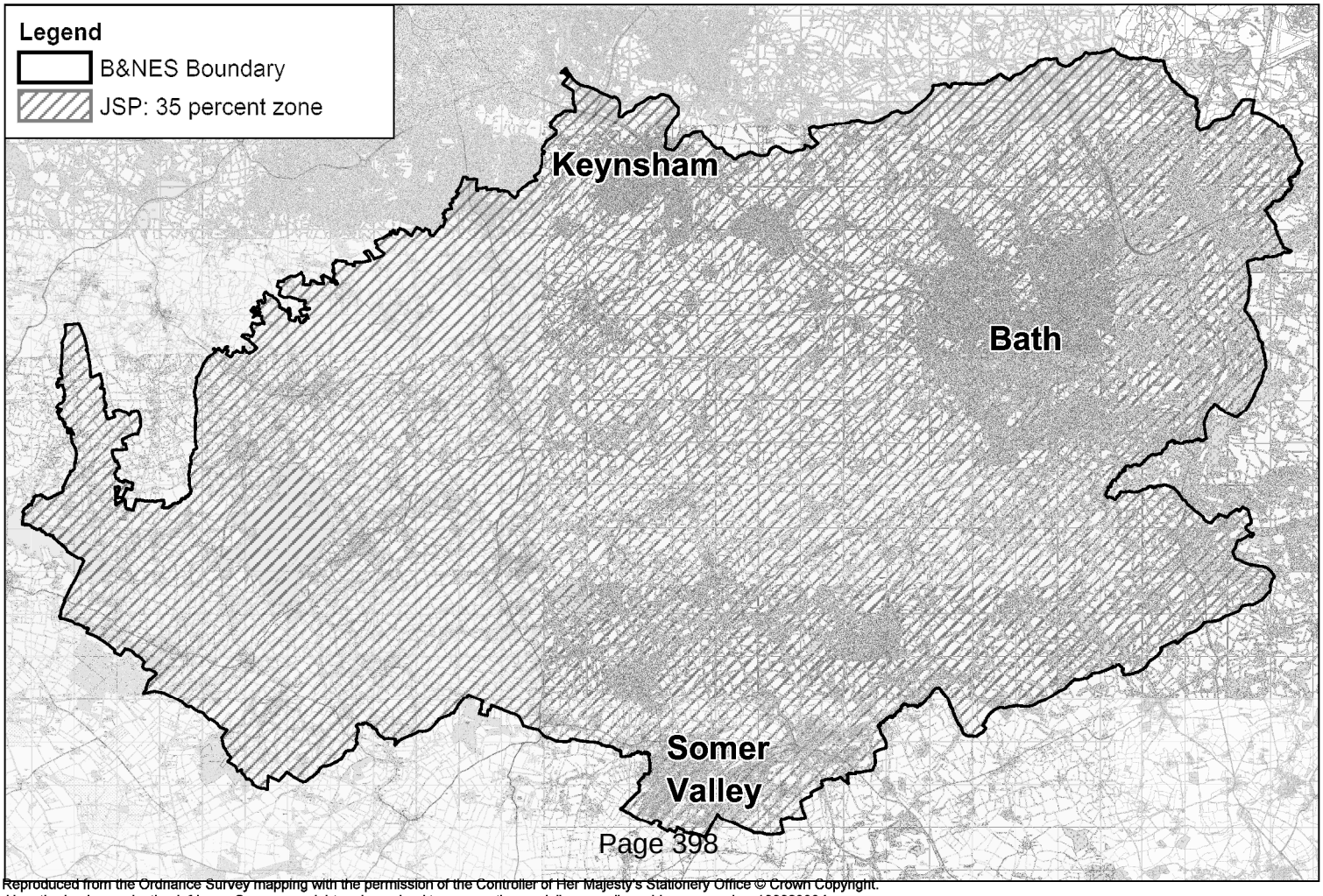
1. National Planning Policy Framework 2012
2. National Planning Practice Guidance
3. Wider Bristol Area SHMA Vol 1
4. Wider Bristol Area SHMA Vol 2
5. Bath & North East Somerset Council SHMA Update
6. Housing White Paper – Fixing our Broken Housing Market 2017
7. Government consultation paper 2017: Planning for the right homes in the right places: consultation proposals

Appendix G
B&NES Policies Map amendment
Affordable Housing Zones: Current and Proposed

Author : Planning Policy
Date : 11/10/2017
Scale: 1:155,000

Bath & North East Somerset Council





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Bath & North East Somerset Council	
METING	**Council**
MEETING DATE:	**9th November 2017**
TITLE:	**B&NES Local Plan 2016-2036, Options document**
WARD:	All
AN OPEN PUBLIC ITEM	
List of attachments to this report: Appendix 1 – B&NES Local Plan Options consultation document	

1 THE ISSUE

1.1 In order to facilitate delivery of the West of England Joint Spatial Plan (JSP), and to ensure an up-to-date planning policy framework for B&NES, the Council needs to prepare a new Local Plan. The Local Plan will:

- review the adopted Core Strategy; and
- provide an opportunity to formally combine the adopted Core Strategy and Placemaking Plan.

1.2 The Local Plan will cover the period from 2016 – 2036. The first stage of preparing the new Local Plan is the options stage. This Report seeks approval to publicise an options document for consultation.

2 RECOMMENDATION

2.1 The Council is asked to:

(1) Consider the comments of the Planning, Housing & Economic Development Scrutiny Panel held on 7th November,

(2) Agree the publication of the options document attached as Appendix 1 for consultation,

(3) To agree the public consultation arrangements in para 8.3 of this report

(4) Delegate to the Divisional Director of Development the authority to make minor changes to the options document in consultation with the Cabinet Member for Development and Neighbourhoods.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 The preparation of the Local Plan will be funded from the LDF budget. Primary costs relate to securing essential evidence and specialist expertise on selected issues and the implementation of a comprehensive and collaborative process. The LDF Budget is funding the preparation of the Local Plan and other necessary planning policy documents and their preparation programmes as set out in the Local Development Scheme.

3.2 External funding sources will be sought to secure the delivery of proposals such as the Housing Infrastructure Fund, Housing Deal and Devolution Funding.

3.3 The cross service nature of the preparation work will require close collaboration between services and the appropriate arrangements are in place to enable this.

3.4 The Local Plan also needs to be prepared in partnership with local communities which will have different capacities to participate.

3.5 The JSP and the Local Plan together will have implications for the development process and hence for the value and use of land. Preparation of the new Local Plan will also require a review of the Community Infrastructure Levy (CIL) and the Planning Obligations Supplementary Planning Document in due course.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The Local Plan will be prepared in compliance with the Planning and Compulsory Purchase Act 2004 ("the 2004 Act") and The Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations"). Once adopted, it will be a statutory Development Plan Document ("DPD").

4.2 Preparation of the Local Plan will also accord with national policy in the National Planning Policy Framework (NPPF) and guidance in the National Planning Practice Guidance (NPPG).

4.3 The Local Plan options document, subject of this Report, marks the start of consultation under Regulation 18 of the Regulations.

4.4 The Local Plan will be subject to a fully integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of the SEA Regulations (Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004). The options document attached as Appendix 1 has been subject to Sustainability Appraisal, which is available as a background paper to this Report.

4.5 Given this options document represents a very early stage of plan-making and does not set out policies or proposals it will not be used for Development Management purposes in the determination of planning applications. Preparation of the new Local Plan will need to take account of legislative changes that may arise from the 2017 Housing White Paper.

5 THE REPORT

5.1 The Core Strategy, adopted in July 2014, includes a commitment to an early review of the housing requirement. This review is being undertaken through the West of England Joint Spatial Plan which will provide a new strategic planning context for all four West of England authorities including Bath & North East Somerset. In late 2016 the Council consulted on the Core Strategy Review commencement document. The review, which is not solely focussed on housing requirements, is being undertaken through the preparation of a new Local Plan for B&NES. This also provides an opportunity to formally combine the adopted Core Strategy and Placemaking Plan into one Local Plan (as now required by national policy).

5.2 The Local Plan is therefore being prepared:

- in the context of and to deliver the Joint Spatial Plan; and
- to respond to changed local circumstances and new national policy and legislation.
- to encompass a development strategy to guide site allocations (including strategic development locations and smaller sites) to meet development requirements, identify and facilitate delivery of associated infrastructure requirements; and
- to include district-wide Development Management policies for determining planning applications.

5.3 It will cover the same period as the Joint Spatial Plan (2016 – 2036).Upon its adoption it will replace the Core Strategy and Placemaking Plan.

5.3 Preparation of the Local Plan will be supported by a range of evidence and the Council will work closely with the local community and other stakeholders through the various stages of the preparation process. Comments received on the commencement document have been considered and issues regarding the scope and nature of this Plan and ensuring statutory requirements are met have been and will be addressed throughout the preparation process.

5.4 The document which is the subject of this Report marks the start of the options consultation. The purpose of the options stage is to facilitate and encourage discussion and comment around the key issues facing B&NES and to test possible solutions to address these issues. The scope of the Local Plan outlined above is broad comprising various inter-related elements. Therefore, in order to expedite the process of testing options relating to a range of policy areas and to help focus discussion the consultation is being divided into phases. The first phase (comprising two periods of consultation) will be a discussion around options and the second phase will be consultation on the preferred approach. The options document covers four main areas:

1. *Vision & Priorities – outlining the key challenges facing B&NES and spatial priorities that the Local Plan should address*
2. *Strategy – within the context of the Joint Spatial Plan starting the conversation about possible alternative approaches to providing additional homes not being provided in strategic development locations*

3. *Strategic Development Locations – presenting the emerging proposed approach to development at the strategic locations at North Keynsham and Whitchurch and raising key questions & issues for discussion*
4. *Student accommodation – as a key element of housing need initial consideration of University expansion and possible approaches to providing student accommodation that will need to be considered within the context of the other development pressures and the strategy for Bath*

5.5 Consultation on these issues will take place over a seven week period in parallel with that on the Joint Spatial Plan, commencing on 22nd November 2017 and ending on 10th January 2018. Consultation will be supported by publication of the options document, a range of publicity and staffed exhibitions/drop-in events at key locations. The options document attached as Appendix A has been subject to Sustainability Appraisal and is supported by a number of Topic Papers which are available as background papers.

5.6 A second Options consultation will be undertaken in the spring of next year. This will be supported by the publication of an options document which will be brought to Members for consideration prior to consultation. It is envisaged this document will cover issues including Development Management policies that require review and place-based strategy issues. Following further evidence based work and consideration of the comments received consultation will take place in the summer of 2018 on the preferred approach (including strategic development sites and smaller site allocations).

5.7 The options/preferred options stage outlined above, which encompasses extensive stakeholder consultation and engagement, will enable reasonable alternatives to be thoroughly tested and will inform the preparation of a Draft Local Plan. The Draft Plan will set out the proposed site allocations and policies. It will be subject to formal consultation prior to submission for Examination by a Planning Inspector. The currently anticipated programme for the preparation and adoption of the Local Plan is summarised below.

Preparation Stage	**Programme**
Options/Preferred Options	November 2017 – May 2018
Draft Plan	Autumn 2018
Examination	Spring 2019
Adoption	Autumn 2019

6 RATIONALE

6.1 The UK Planning system is a Plan-led system. This means that planning applications for development must be determined in accordance with Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework requires that each Local Authority should produce a Local Plan for its area and emphasises the importance of having it up to date. Publication of the commencement document in December last year

marked the start of the process of preparing an updated Local Plan which will be progressed through the publication of and consultation on the options document appended to this Report.

7 OTHER OPTIONS CONSIDERED

7.1 None. Preparation and maintenance of an up-to-date Local Plan is national requirement and the preparation procedures are regulated by statute.

8 CONSULTATION

8.1 Preparation of the Local Plan options document has entailed significant internal consultation, including with Strategic Directors, Cabinet Members and the LDF steering group. The Council's Monitoring Officer and section 151 Officer have had the opportunity to input to this report and have cleared it for publication.

8.2 The Local Plan options document is being published to facilitate discussion with and comments from a wide range of stakeholders across the District, including residents, businesses, various interest groups and statutory consultees. Therefore, both this options document and the Local Plan at key stages in its preparation will be subject to extensive consultation.

8.3 The public consultation arrangements have been designed to be inclusive (in light with the Council's Statement of Community Engagement) but need to be within the scope of the LDF budget. The key elements are as follows;

- Publication of a Local Plan Options consultation document (see attachment 1)
- Two mail-outs to all stakeholders, first giving advance notice of the consultation and then inviting them to comment on the Local Plan Options document
- Four staffed exhibitions in Whitchurch, Keynsham, Bath, Somer Valley with bespoke events on the University Issues
- An item in Council's 'Together - Residents' magazine (replaces Connect Magazine) to reach every household in B&NES
- Continuing with the on-going work with Parishes/Town Councils (including Parish Liaison Meeting - 26 October 2017, bespoke briefings and technical work)
- Publicity and information available at Council Offices and on the website with posters/flyers available for distribution

8.4 In making the above recommendations the officer have had regard to the Equalities Act 2010 and the Human Rights Act 1998.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	*Lisa Bartlett 01225 477550, Simon De Beer, 01225 477616, Richard Daone 01225 477546*
Background papers	*West of England Joint Spatial Plan publication Draft 2017* *Sustainability Appraisal of B&NES Local Plan 2016 – 2036 Options document (part 1)* *B&NES Core Strategy 2014* *B&NES Placemaking Plan 2017*
Please contact the report author if you need to access this report in an alternative format	

Local Plan 2016-2036

Issues & Options Consultation

Winter 2017

Bath & North East Somerset Council

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1. Introduction

Setting the scene

1.01 Bath & North East Somerset Council is preparing a new Local Plan for its area which covers the period up to 2036. The Local Plan is principally concerned with the use and development of land.

1.02 The new Local Plan is being produced alongside the West of England Joint Spatial Plan. This also covers the period from 2016 to 2036, and provides the overarching strategic planning context for the four West of England local authorites of Bath and North East Somerset, South Gloucestershire, Bristol City Council and North Somerset. It focusses on establishing the housing requirement for the wider area and the job growth ambition, as well as a broad spatial strategy for accommodating growth

1.03 Alongside the Joint Spatial Plan the four authorities have prepared a West of England Joint Transport Study to identify key transport infrastructure measures required to support the growth.

1.04 The B&NES Local Plan will enable the delivery of the Joint Spatial Plan, and will respond to changed local circumstances and new national policy/legislation. It will encompass a strategy to guide development, provide a policy framework for specific site allocations and provide district-wide Development Management policies used in the determination of planning applications. The Local Plan is the means by which the Core Strategy review will be undertaken. Upon its adoption, the Local Plan will replace the Council's existing Core Strategy and Placemaking Plan.

1.05 The B&NES Local Plan will be supported by a range of evidence and the Council will work closely with communities and other stakeholders at various stages of the preparation process. Comments received on the Commencement Document, which was published in November 2016, have been considered. The Council's response to the key issues raised is outlined in the consultation statement.

Purpose and scope of Issues & Options

1.06 The purpose and scope of the B&NES Local Plan is broad and so to help focus discussion and comment, and to better align with preparation of the Joint Spatial Plan, the Issues and Options consultation is being divided into two broad phases.

1.07 This document represents the first phase of the Issues and Options consultation (Phase 1a) and covers four broad areas:

1. Vision & Priorities – outlining the key challenges facing B&NES and the spatial priorities that the Local Plan should address

2. Strategy – within the context of the Joint Spatial Plan starting the conversation about possible alternative approaches to providing additional homes over and above those being provided in strategic development locations

3. Strategic Development Locations – presenting the emerging proposed approach to development at the strategic development locations at North Keynsham and Whitchurch and raising key questions & issues for discussion

4. University issues - as a key element of housing need initial consideration of University expansion and possible approaches to providing student accommodation that will need to be considered within the context of the other development pressures and strategy for Bath

1.08 This Issues and Options document is supported by Background Papers explaining the emerging approach for these areas. A number of evidence studies supporting the document have also been published, including a Housing & Economic Land Availability Assessment.

Issues and Options consultation – next steps

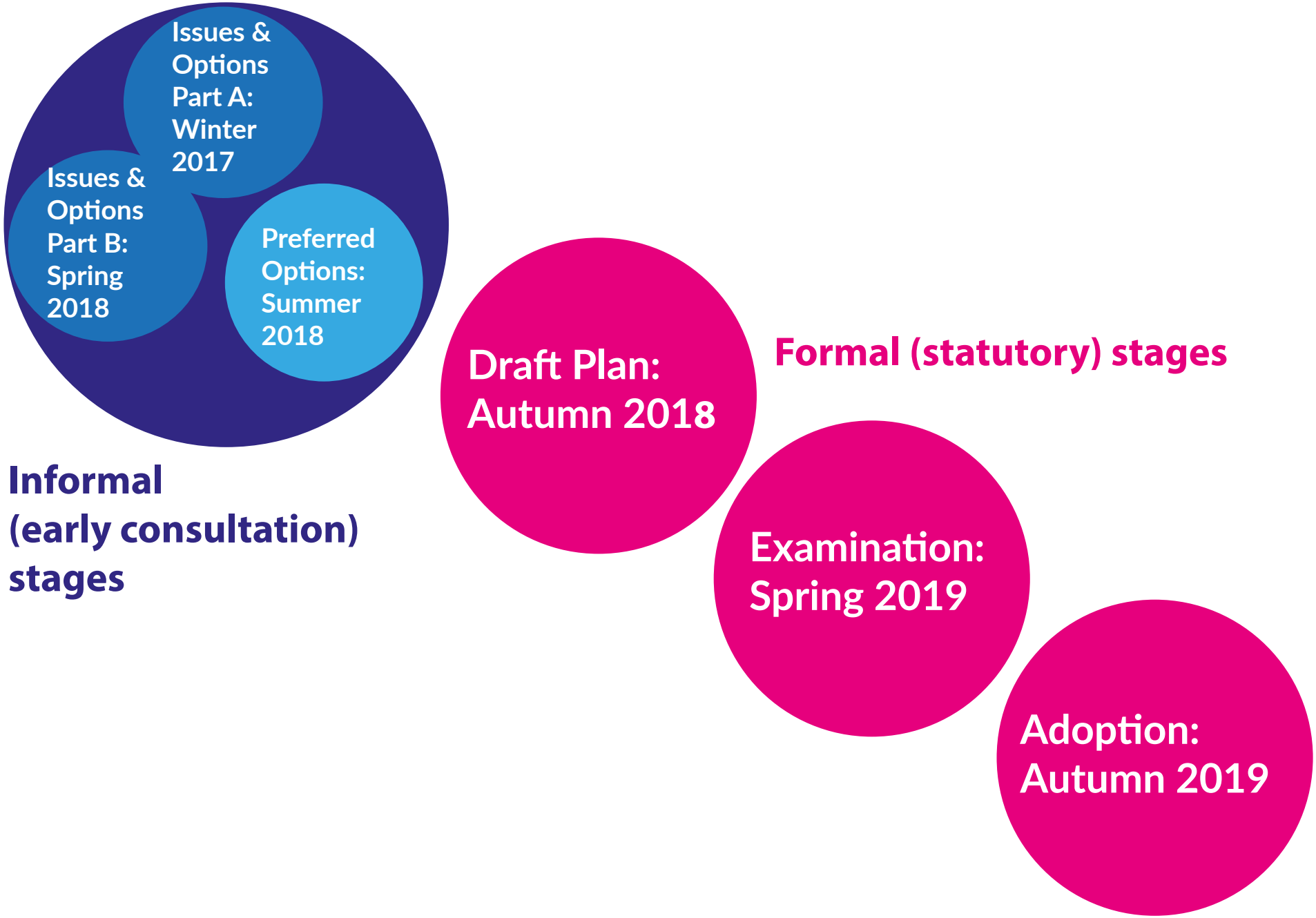
1.09 After this period of consultation there will be a further element of Issues and Options consultation (phase 1b) in spring next year. This will cover other place based issues and Development Management policies. Following consideration of comments on both these consultation phases, as well as further assessment work, the Council will publish its Preferred Options for consultation in summer 2018. This will encompass greater detail on the strategic development locations, as well as smaller site allocations.

1.10 The timetable for these stages of options consultation is represented in diagram 1 below.

Timetable

1.11 Following extensive consultation on and discussion of options the Council will prepare a Draft Local Plan which will set out the proposed site allocations and policies. The Draft Plan will be subject to formal consultation prior to submission for Examination by a Planning Inspector. The currently anticipated programme for the preparation and adoption of the Local Plan is set out in the Diagram 1.

Diagram 1: Local Plan consultation stages



2. Vision & Spatial Priorities

Setting the scene

2.01 In order to ensure an effective strategy, it is necessary to identify the critical issues which the Plan should address and the priorities for responding to these issues.

2.02 The adopted Core Strategy covers the period up to 2029. Its vision and strategic objectives need to be reviewed in light of changed circumstances, including the following:

- Changes in national context: a period of economic recession, followed by relative recovery and a still fragile economy has led to an increasing focus on promoting economic growth, diversity and resilience, as well as delivering new housing. The reduced level of government resources available has also resulted in a changed focus and way of doing things for public sector organisations, including the Council.

- Key challenges facing B&NES: updated information on the key challenges facing the area and its communities now and over the next 20 years.

- Whilst being more specific to B&NES, the Local Plan priorities will need to align with West of England Joint Spatial Plan vision and priorities for the wider sub-region.

- Council corporate strategy & priorities: these reflect the key challenges and changing context within which the Council operates and influence the spatial priorities of the Local plan. The Council's four key priorities (2016-2020) are illustrated in Diagram 2.

A vision for B&NES

2.03 The JSP sets out a vision for the West of England which focusses on the area being a fast growing and prosperous region with a rising quality of life for all. Environmental character is central to this prosperity and the need to ensure that patterns of development and transport are sustainable and resilient to and reduce impact on climate change.

2.04 Within this framework, the Council's corporate 2020 vision is proposed to be taken as the Local Plan vision. This will help to ensure the Local Plan, as a key corporate strategy, helps to deliver the Council's wider aspirations.

B&NES Vision

Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big – a 'connected' area ready to create an extraordinary legacy for future generations.

Diagram 2: Corporate Priorities

Key challenges & spatial priorities

Critical issues

2.05 Drawing on the Sustainability Appraisal Scoping Report and other evidence, the key challenges facing B&NES are suggested in the table opposite.

2.06 As the Local Plan is able to influence spatial outcomes (changes to the use of land and buildings) a set of spatial priorities are suggested below to address these key challenges. The critical issues and priorities identified in the JSP also need to be taken into account and reflected in the Local Plan spatial priorities (see section 3).

2.07 The spatial priorities often inter-relate e.g. prioritising greater walking or cycling helps to address climate change issues, as well as increasing physical activity thereby addressing health priorities. The direct relationship between the spatial priorities outlined below to the Council's four corporate priorities is also referenced to illustrate how the Local Plan and the planning system will help to deliver the Council's broader aspirations.

2.08 The Local Plan's policy framework, including development site allocations, needs to help achieve the identified spatial priorities. In some instances there may be conflict between different priorities and as such 'trade-off' or a balancing process may be necessary. At this stage of Local Plan preparation the Council is a outlining series of options which will need to be tested against the extent to which they achieve one or more of the spatial priorities.

2.09 The Council is seeking your views on the spatial priorities set out.

Suggested Critical Issues

Changing local population & housing needs:

- Housing affordability crisis across B&NES and lack of social housing
- Significant increase projected in younger and older age groups
- Considerable recent & projected student population growth
- Increase in the number of second homes in parts of B&NES

Health

- Health & life expectancy inequalities across B&NES
- 60% of adults over-weight or obese
- Poor air quality in parts of B&NES leads to health problems

Climate change

- Climate change impacts already being felt both globally & locally
- Technological advances create opportunities for low or zero carbon development

Economy

- Below average productivity levels & earnings in B&NES
- Retaining an adequate supply of employment land & premises in key strategic locations
- Inequality of employment opportunities

Environment

- High quality natural, built & historic environment requiring protection and enhancement
- Threat to environment & need for and maintenance of additional green infrastructure arising from development & other pressures

Transport & Infrastructure

- Severe traffic congestion in some parts of B&NES
- Poor accessibility to national/regional transport network
- Difficulties of providing infrastructure capacity to cope with increasing population

Financial changes

- Increased pressure on limited public sector resources to meet current & projected Financial changes
- Increased pressure on limited public sector resources to meet current & projected demands

QUESTIONS

Q1: Have we identified the critical issues facing the District over the next 20 years?

Q2: Are the suggested spatial priorities the right ones?

The Joint Spatial Plan

2.10 The overarching proposals for B&NES arising from the Joint Spatial Plan are illustrated in the key Diagram 4 and the housing requirement in the pie chart to the right.

2.11 The New Local Plan must conform with the Joint Spatial Plan, although it is acknowledged that the Joint Spatial Plan could be amended through the examination process. Therefore the new B&NES Local Plan will not be finalised until the outcome of the examination is clear.

Diagram 3: The JSP Housing Requirement for B&NES

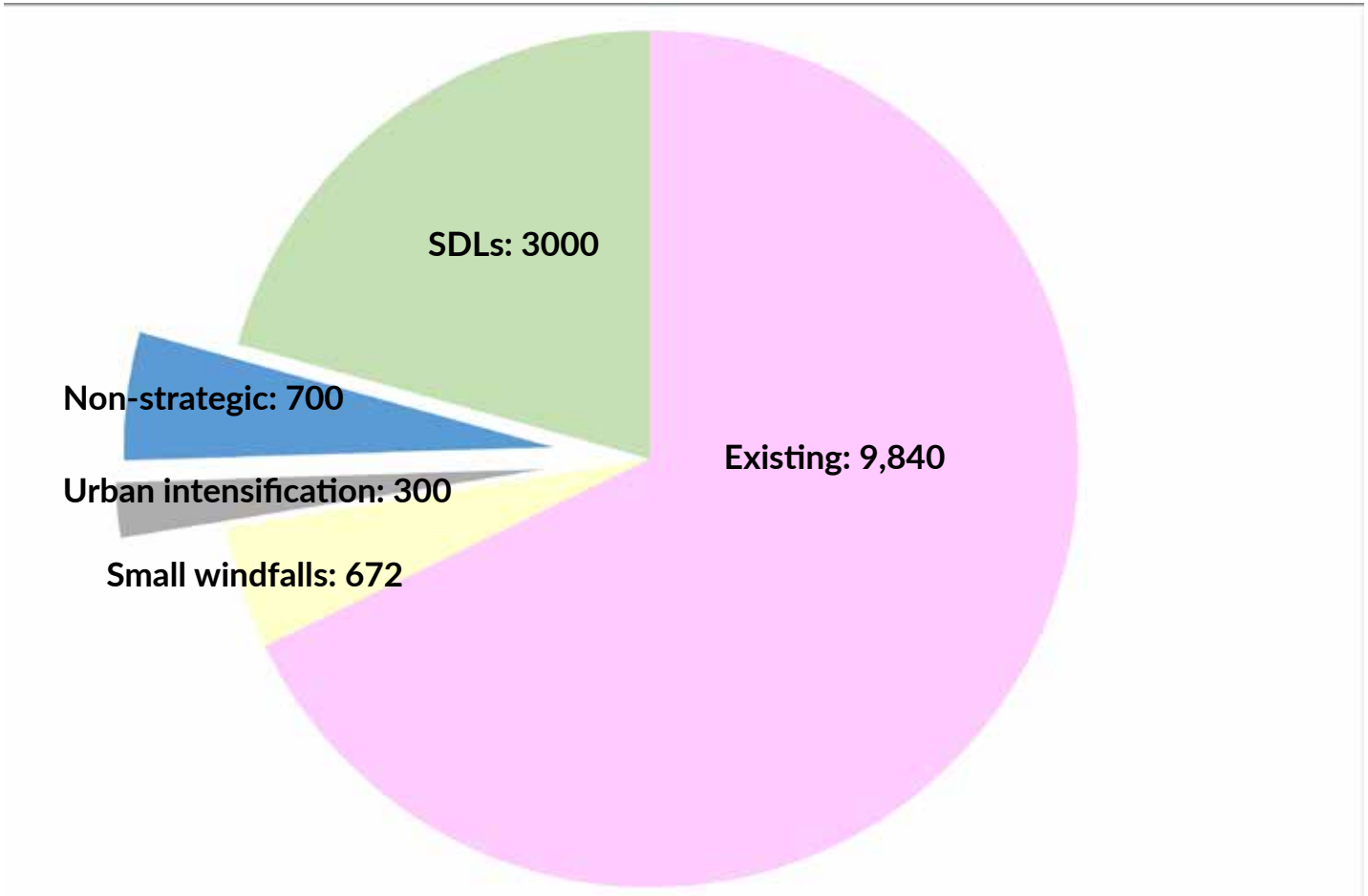
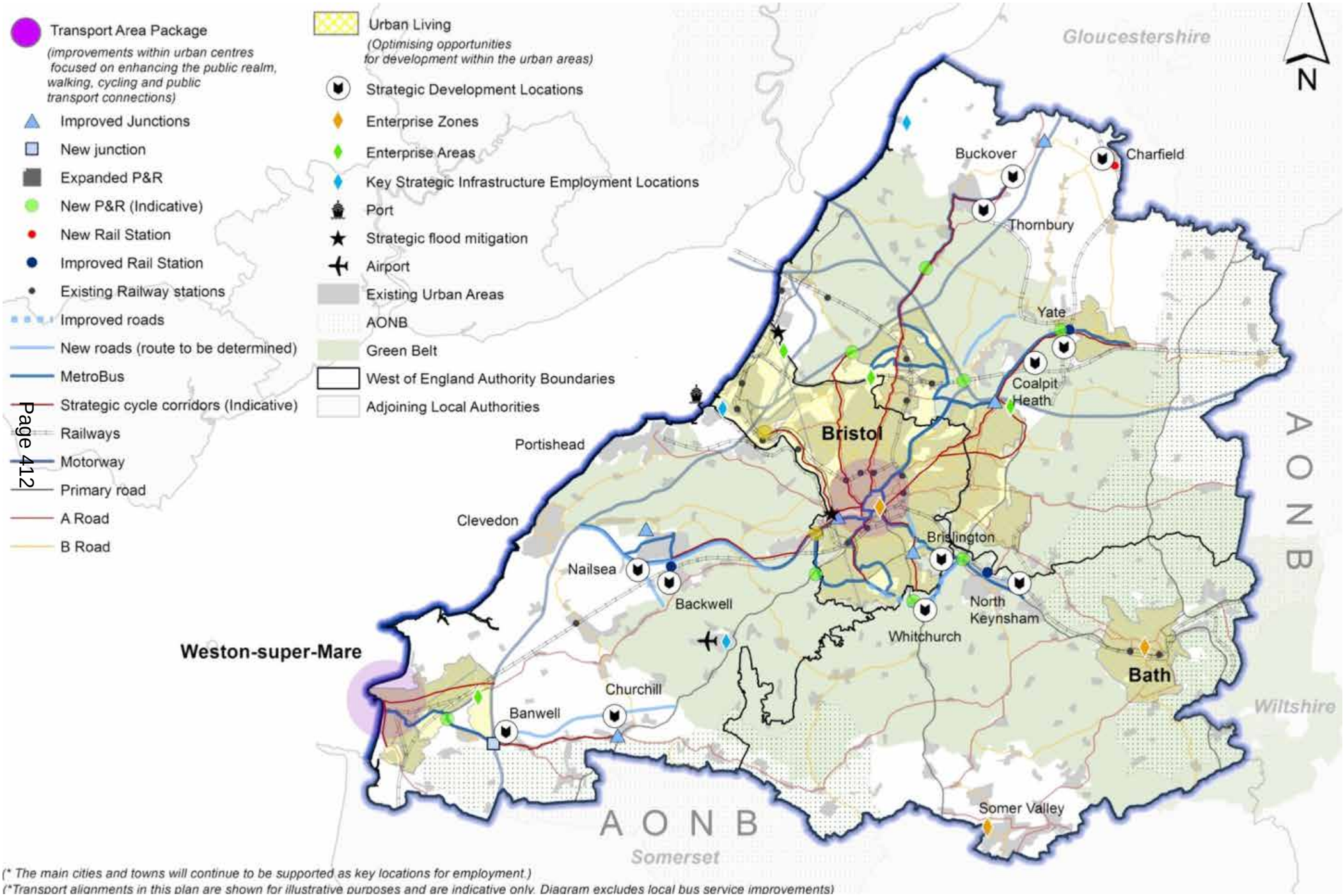


Diagram 4: JSP Key Diagram



(The main cities and towns will continue to be supported as key locations for employment.)*
*(*Transport alignments in this plan are shown for illustrative purposes and are indicative only. Diagram excludes local bus service improvements)*

Spatial Priorities	Council's Corporate Priorities
1) Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate • Reducing the need to travel and encouraging sustainable travel through the location and layout of development • Encouraging increased renewable and low carbon energy generation • Promoting sustainable and energy efficient design & construction • Minimise vulnerability and provide resilience to impacts of climate change e.g. flood risk	1,2
2) Protect and enhance the District's natural, built and cultural environment and provide green infrastructure • Ensuring growth & development takes place within the environmental capacity of the District, including prioritising the optimal use of brownfield sites • Maintain and enhance functional and connected high quality GI networks (helps tackle impacts of climate change, sustainable water management, deliver healthy lifestyles, improve local sense of place and attract investment) • Establish and maintain coherent and resilient ecological networks	1,2,3
3) Facilitate a strong, productive, diverse and inclusive economy • Maintain/plan for an appropriate supply of business land and premises in sustainable locations across B&NES that are suitable for & attractive to businesses, focusing on the Bath & Somer Valley Enterprise Zone • Capitalise on innovation opportunities and facilitate growth in knowledge-based high value added sectors • Maintain & enhance city, town, district and local centres as important and vibrant commercial areas • Maintain a strong visitor economy and a strong & diverse retail sector	1,3,4
4) Meet housing needs arising from a changing and growing population • Plan for the delivery of sufficient new homes to meet evidenced needs arising from demographic changes and to support economic development • Facilitate the sustainable provision of accommodation that meets a range of specific needs e.g. older people, young people and those on lower incomes • Enable the most efficient use of the existing housing stock to meet the range of accommodation needs	1,2,3

5) Plan for development that promotes health and well being • Facilitate healthier lifestyles including active modes of travel • Promote/deliver local employment, training & regeneration opportunities contributing to reducing health & social inequalities • Ensuring access to sufficient health facilities for new development (e.g. through provision of social/physical infrastructure) • Reduce risk of hazards to human health including flood risk, improving air quality and designing out crime	2,4
6) Deliver well connected places accessible by sustainable means of transport • Reduce the need to travel and encourage greater use of public transport, walking and cycling through the location and design of new development • Help to manage congestion through the location and form of development • Ensure development helps to provide high quality and attractive public transport and walking & cycling routes • In conjunction with strategic plans/initiatives covering the wider area facilitate enhanced accessibility to and within the District, including rural areas	1,2
7) Ensure the timely and efficient provision of infrastructure to support growing communities • Direct development to those locations well served or capable of being well served by infrastructure in a cost-effective & efficient manner • Ensure the alignment of the development of new housing with the provision of all necessary infrastructure • Facilitate investment in improving social & recreational infrastructure	1,2,3,4

Note Council's Corporate Priorities: 1 = A strong economy and growth; 2 = Focus on prevention; 3 = A new relationship with customers & comunities; and 4 = An efficient business

3. Spatial Strategy Options

Setting the scene

3.01 Alongside the existing commitments, much of the housing growth will be accommodated in the Strategic Development Locations at Whitchurch and North Keynsham and through Urban Intensification in Bath. However, the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered. This figure is in addition to the existing Core Strategy growth requirement and effective from 2016 (the start of the new Local Plan period).

3.02 The approach to development outside Bath and the two JSP Strategic Development Locations will relate to the sustainability of locations in terms of access to employment opportunities, facilities and services, as well as to public transport and the ability to meet infrastructure requirements effectively.

3.03 The Green Belt is a significant constraint on the location of development in the District. Exploring most sustainable locations will also mean considering whether exceptional circumstances exist to warrant removing land from the Green Belt to meet local needs. Options to avoid the loss of Green Belt must be considered first.

3.04 The level of development that rural settlements will be asked to accommodate will therefore depend on a number of factors including access to local schools, services, facilities, employment opportunities, public transport, and infrastructure and environmental constraints as well as Green Belt policy (see above).

Sites and locations

3.05 As part of reaching a preferred approach for accommodating non-strategic growth, the following issues are being investigated:

- The availability of suitable and deliverable brownfield sites in Keynsham, the Somer Valley and other sustainable locations

- Whether there are any available suitable and deliverable greenfield sites on the edge of the Somer Valley settlements and the rural villages not subject to Green Belt policy

- Whether there is scope and the exceptional circumstances to release land from the Green Belt: from the inner Green Belt boundary at Bath, Keynsham and other Green Belt insets settlements e.g. Saltford, Batheaston, Bathampton, Bathford and Farmborough.

3.06 Investigations are ongoing and iterative. Work on investigating suitable sites and locations is being undertaken in collaboration with Town and Parish Councils. This will be informed by the assessment of the sites in Housing and Economic Land Assessment (HELAA). Following consultation on the strategy options the Council will consult on potential site allocation options next year.

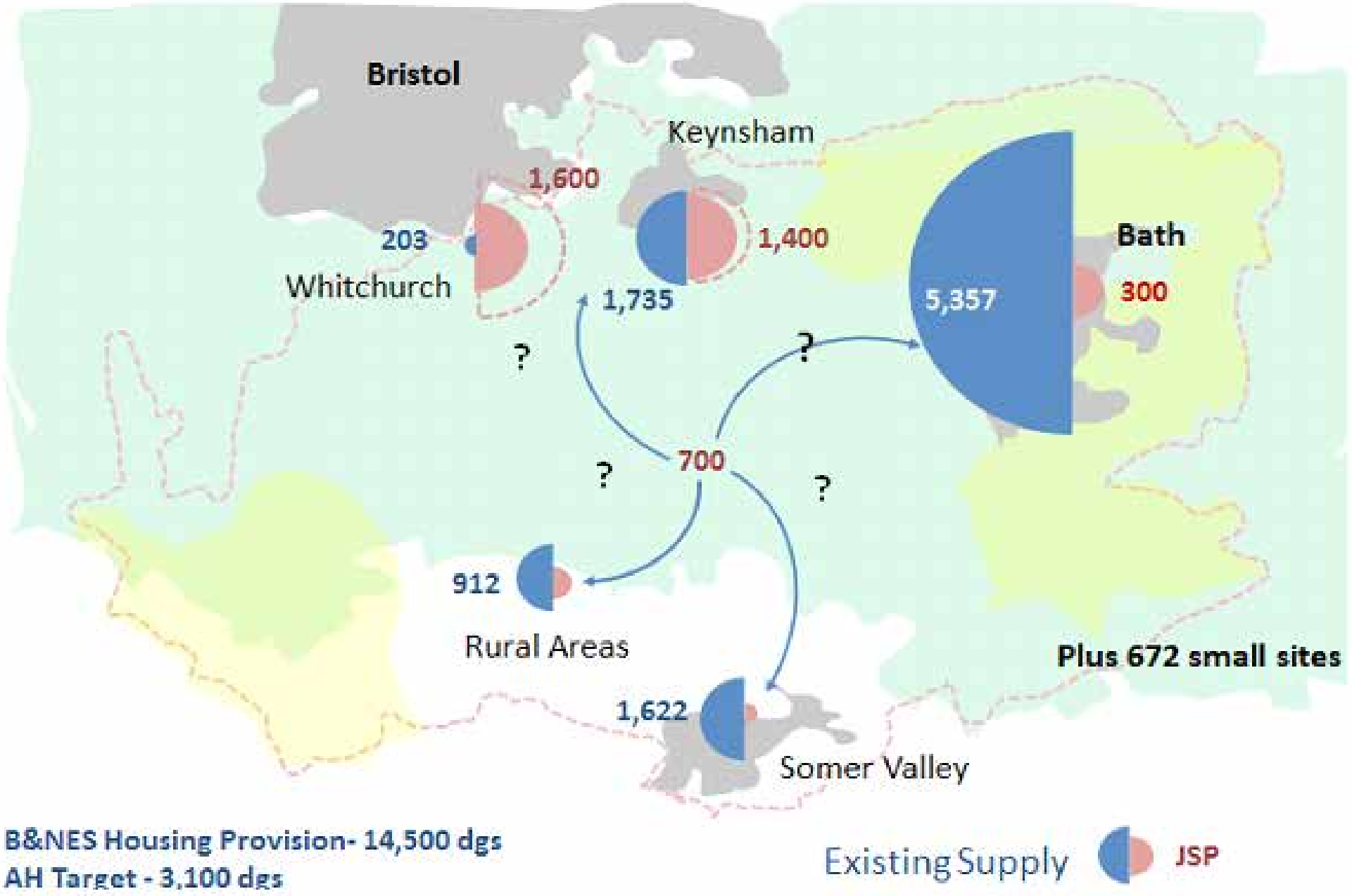
3.07 Diagram 6 illustrates the current level of key services and facilities at each settlement outside the main urban areas including access to local schools, employment opportunities, and public transport provision. This indicates that whilst some settlements are located on or near routes with a good public transport service, much of the District is inadequately served and largely car dependent for access to key services and facilities.

3.08 Given that one of the key sustainability related and infrastructure requirements for housing proposals in villages outside the Green Belt is the existence of a primary school (as reflected in current policy), diagram 6 provides a snap-shot of which schools are currently at capacity and/or have no physical scope to extend plus those schools predicted soon to be at capacity (spaces to be filled with children arising from approved residential proposals) and with no further physical scope to expand. This is likely to have an impact on whether further residential development can be accommodated even in those settlements with a good level of services and facilities.

3.09 Diagram 7 indicates the physical extent of the Green Belt in B&NES. There are currently five villages 'inset within the Green Belt' (Bathampton, Batheaston, Bathford, Saltford, Farmborough and Whitchurch). It should be noted that Whitchurch is identified as a Strategic Development Location and therefore will not be expected to contribute to the non-strategic growth requirement.

3.10 There are also a number of villages 'washed over' by the Green Belt which have a 'good' or 'reasonable' level of key facilities and services and in other circumstances could be considered as potentially suitable locations for more than just limited infill.

Diagram 5: Existing Housing Commitments and JSP Requirements



Planning for non-strategic growth – the options

3.12 There are a number of broad spatial scenarios to be explored before agreeing the preferred approach for accommodating non-strategic growth. Such scenarios will be driven by the outcomes sought in the Vision and Spatial Priorities.

3.13 In all the scenarios presented below no sites would be allocated in the Green Belt (including in villages washed over by the Green Belt) unless it can be demonstrated that exceptional circumstances exist to justify removing land from the Green Belt and there is not sufficient capacity in sustainable locations on land outside Green Belt.

3.14 Provision of housing under any of the suggested approaches will include affordable housing to meet demonstrated needs. The approach to rural affordable housing will be considered through the next stages of Local Plan preparation.

3.15 Three broad options have been identified but others, or a mixture of these three, might constitute the preferred strategy.

Option 1 - Continue the existing hierarchical approach

3.16 This is where new development will be directed to the most sustainable locations outside the Green Belt where access to employment opportunities, facilities and services, as well as to public transport is best.

3.17 This could include locations on the edge of Bath; and at Keynsham; Midsomer Norton, Radstock and Westfield in the Somer Valley, then the larger villages (with a primary school with capacity/scope to expand).

3.18 Beyond that, certain larger settlements outside the Green Belt with access to key facilities and services (including a primary school with capacity/scope to expand) and public transport could also be accommodate a proportion of the growth with other smaller non-Green Belt villages accommodating a lower proportion of the growth.

3.19 The drawback of this approach is that it can lead to some dispersal of development resulting in increased commuting and difficulties in providing infrastructure.

Option 2 - Focussed approach

3.20 In this scenario, all non-strategic development could be focussed at a few key locations, such as on the edge of the towns; or at two or three of the larger villages. These could act as the focal points for future housing development without the need to allocate sites at the smaller less sustainable settlements.

3.21 The benefits of this approach are that it could help to facilitate investment in infrastructure such as schools or open space. However the impact of these levels of growth on a village could be relatively significant.

Option 3 - Dispersed approach

3.22 A more dispersed approach would mean allowing a range of smaller sites across the District at a greater range of settlements, large and small. This could include sites at all settlements outside the main urban areas. However, this approach is likely to result in increased levels of travel by car, placing additional pressure on an already congested transport network and additional school transport costs.

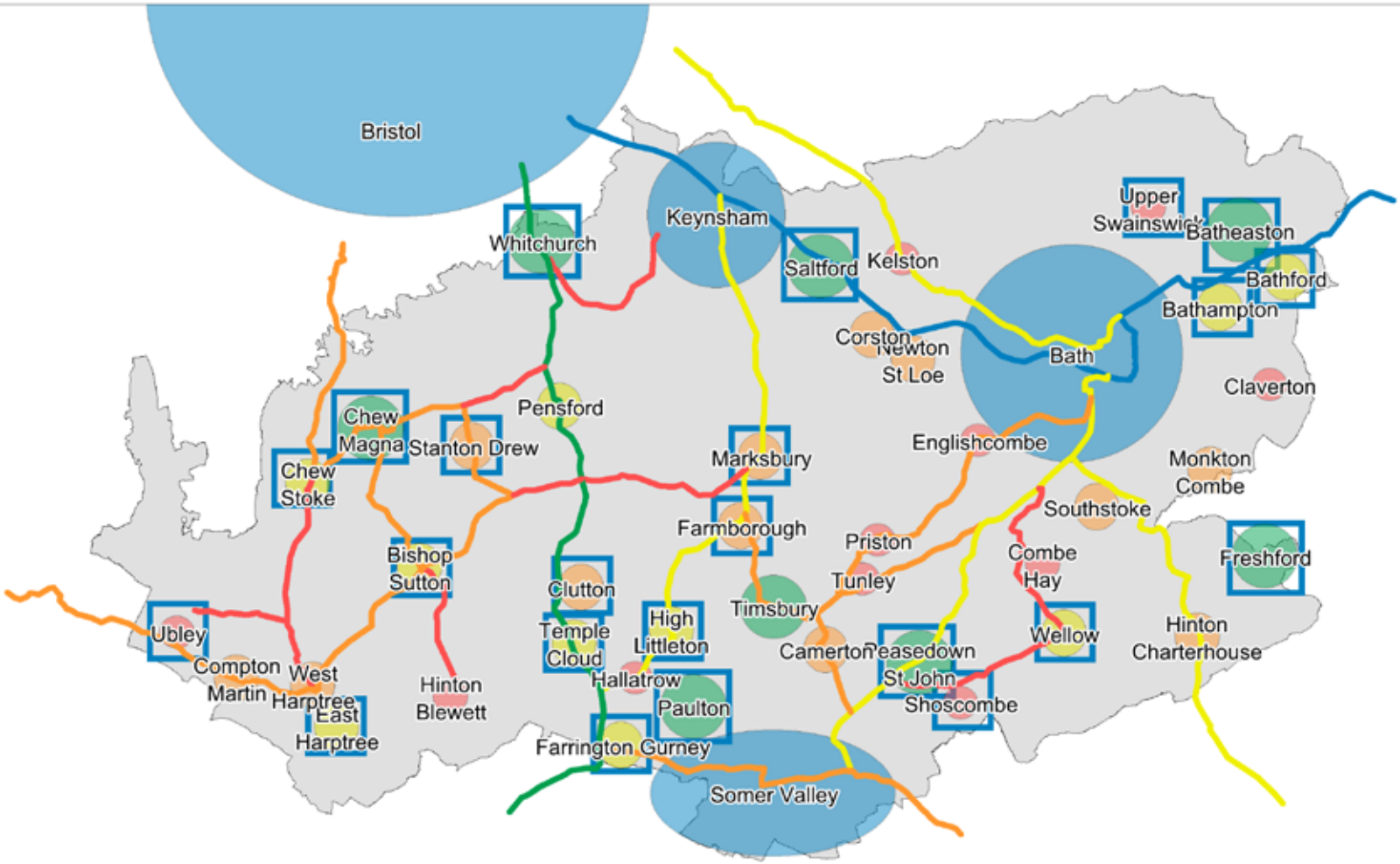
3.23 Diagrams 8 illustrates examples of what such strategies could entail. Please note these are illustrative and are not the Council's strategy. The Council will consider the evidence and comments received and formulate the most appropriate strategy at a later stage in the process

QUESTIONS:

Q1: Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? Please give reasons for your answer.

Q2: Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES? Please give reasons for your answer.

Diagram 6: Services and Facilities in Rural Settlements and Public Transport Provision



The diagram illustrates the current situation and circumstances in individual villages may change.

Legend

Bath & North East Somerset boundary

Primary Schools:

At capacity and no scope to extend

Access to key services and facilities:

- Main urban areas
- Broad range
- Moderate range
- Limited range
- Very limited range

Public transport provision:

- Very frequent
- Frequent
- Moderate
- Limited
- Very limited

Diagram 7: Green Belt Villages

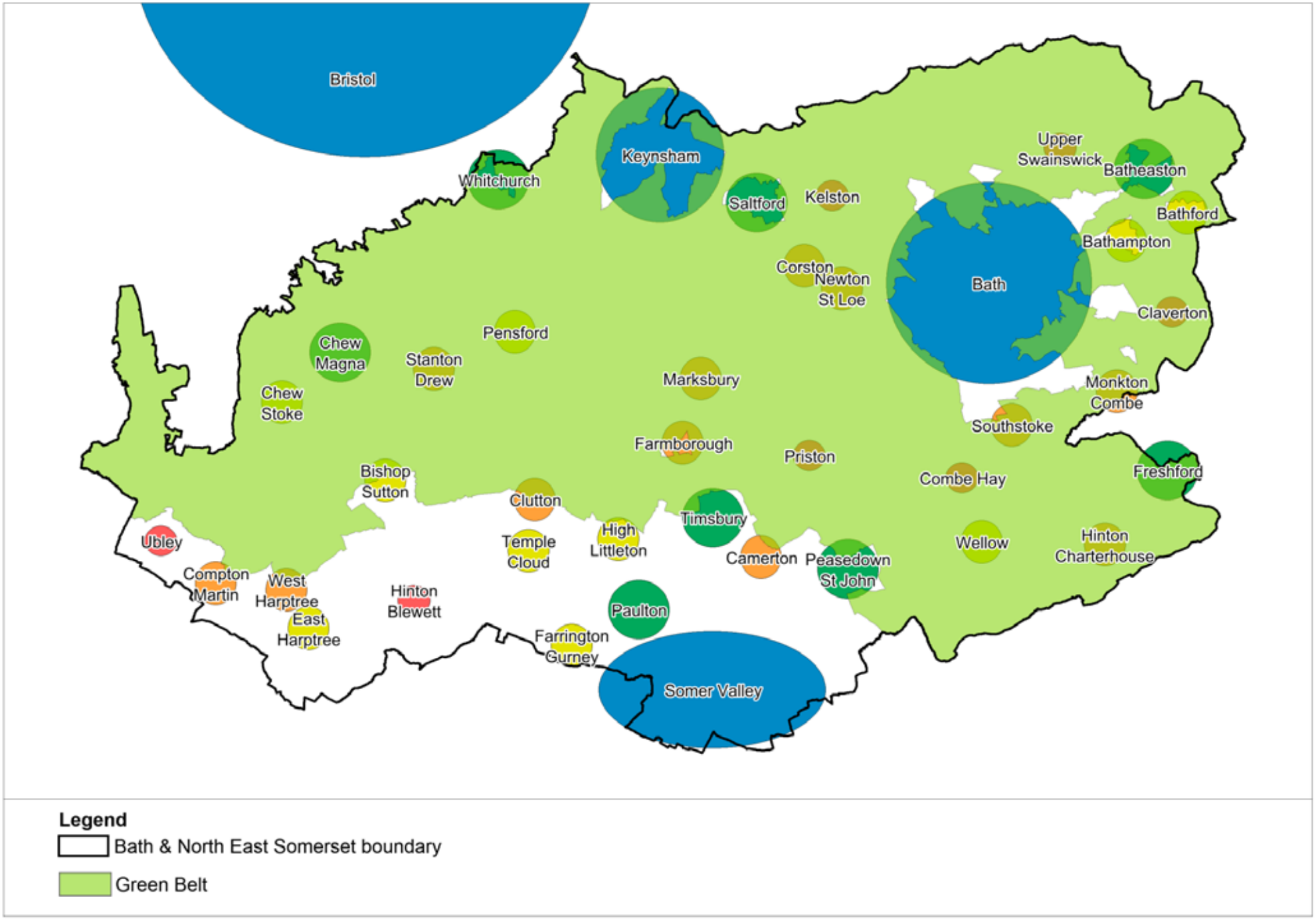
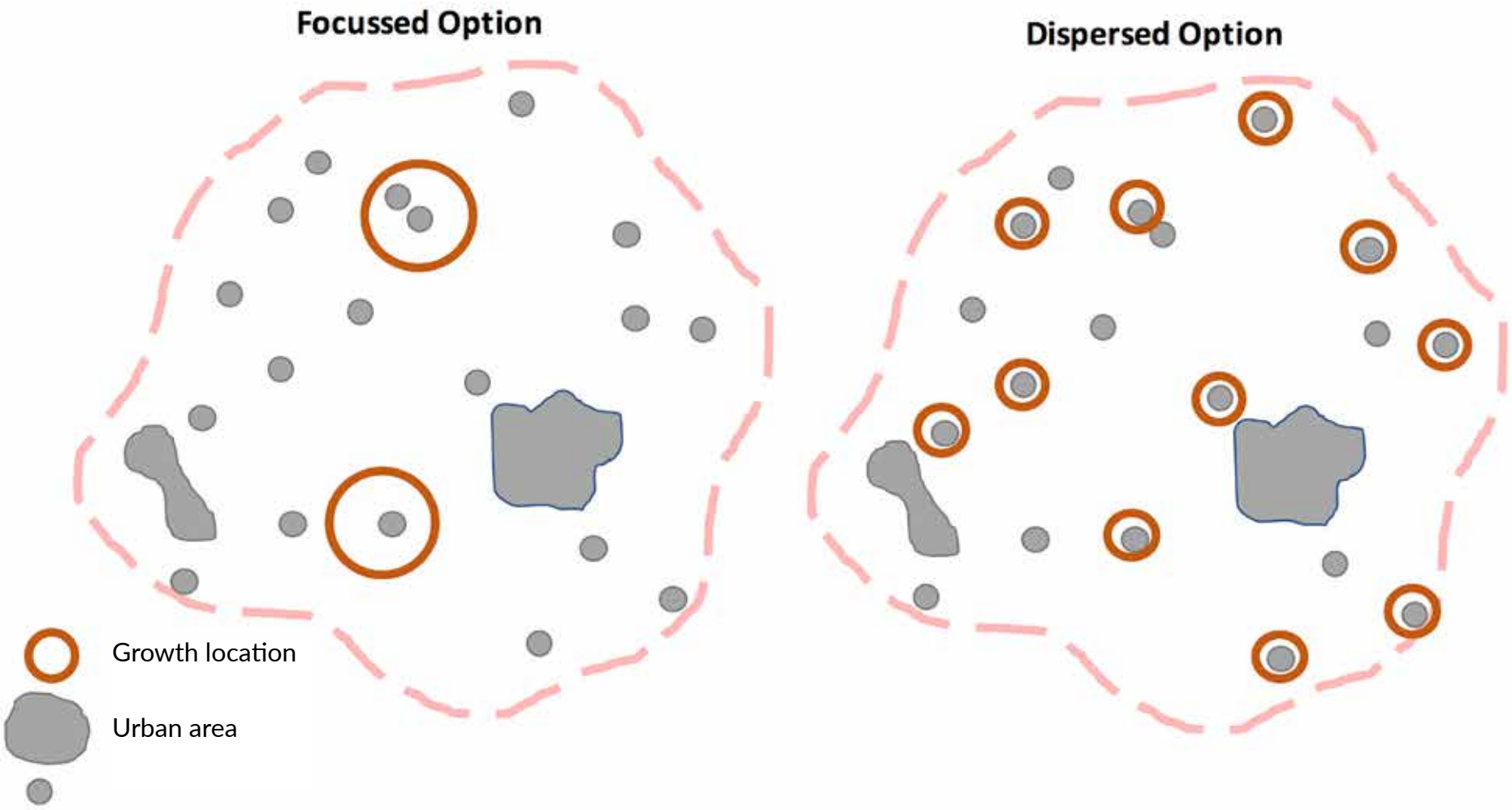


Diagram 8: Example Spatial Strategy Options



4. STRATEGIC DEVELOPMENT LOCATION: NORTH KEYNSHAM

INTRODUCTION

Site context

4.01 The site lies to the north-east of Keynsham, between the town and the River Avon, and also includes the land at East Keynsham that was safeguarded for future development in the Core Strategy. The majority of the site is currently within the Green Belt. The western end of the site lies within 500m of the train station and extends for 2km eastwards towards Saltford. It lies close to the urban fringe of the town but the main part of the site is isolated due to severance caused by the railway line. The site is largely level, sloping downwards to the floodplain and river. It is largely undeveloped but includes a range of uses including Broadmead Lane Industrial Estate, Wessex Water Sewage Treatment Works and Avon Valley Wildlife and Adventure Park. The site lies in close proximity to the A4 providing direct access to Bath and Bristol by car and public transport, and close to the Bristol and Bath cycle path to the east.

Joint Spatial Plan context

4.02 The site is identified within the Joint Spatial Plan as a Strategic Development Location, one which is capable of delivering large scale development which supports the spatial strategy in a sustainable way. Policy 7.1 of the Joint Spatial Plan sets out the bespoke requirements for the site. This forms the starting point for detailed assessment and allocation within the Local Plan.

4.03 In summary the Joint Spatial Plan for North Keynsham requires the development of **1,500 new homes** (including affordable housing provision), **50,000sqm of employment floorspace** (which could provide around 1,600 jobs), **a new school, local centre** and potential for a new **marina**. The development will require the completion of **key transport** infrastructure before the housing development starts including the **North Keynsham multi modal link road** from Avon Mill Lane to the A4, **Keynsham rail station improvements** and a **Metrobus** (high quality public transport) route from Bristol to Keynsham on the A4 corridor. Other transport requirements include **pedestrian and cycle connections** (including to the Bristol to Bath cycle path), a **high frequency local bus service** through the site and off site junction improvements.

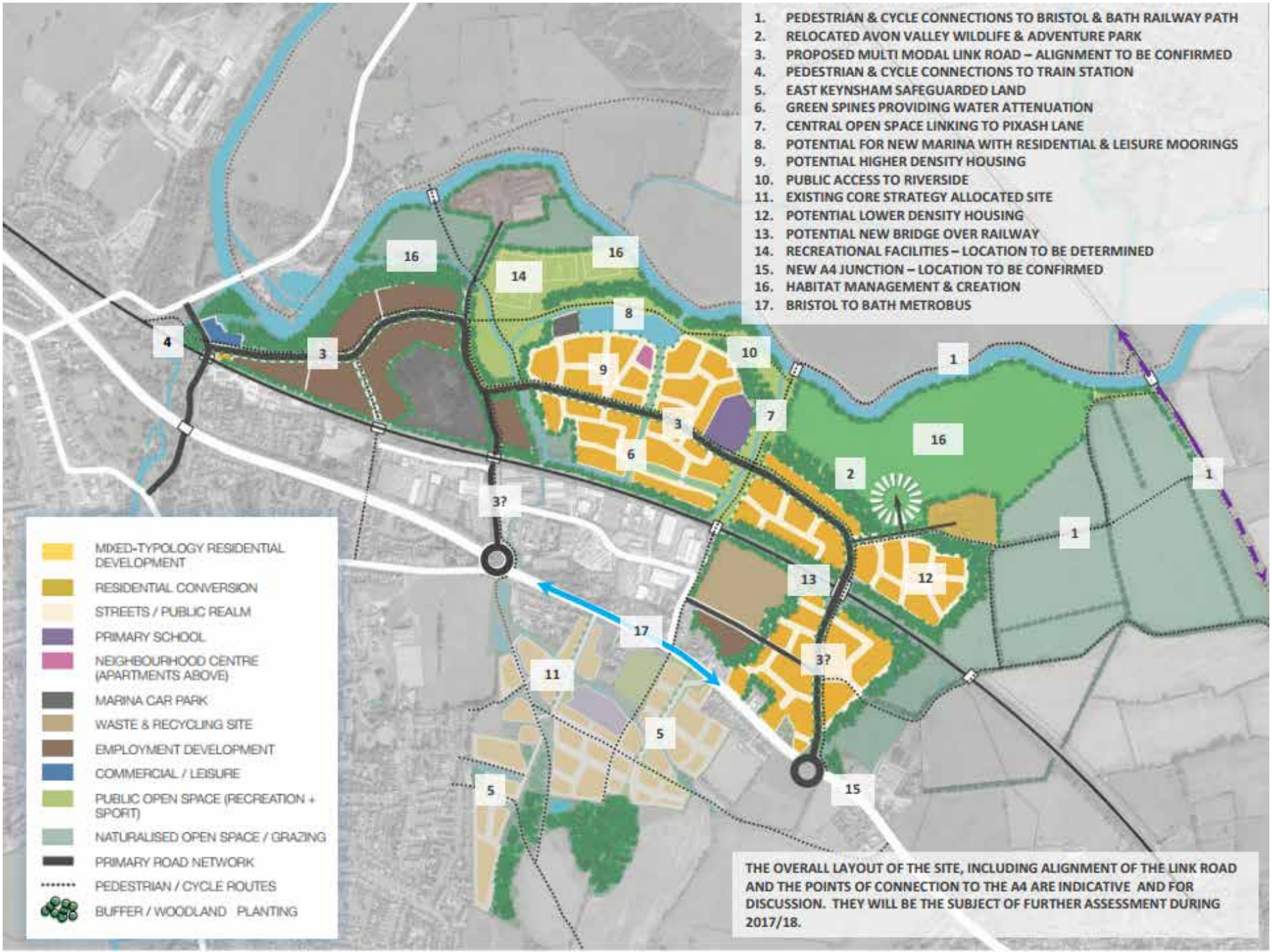
4.04 The development is also required to incorporate a layout and form that produces a **high quality of design**, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network.

View from Cotswolds

View from Pixash Lane Bridge

View of Paper Mill

Diagram 9: North Keynsham



EVIDENCE BASE

4.05 The Council has produced a Strategic Planning Framework for the location. This is the primary piece of evidence that underpins the identification of the site as a Strategic Development Location and should be read in conjunction with this consultation document. It demonstrates the potential for a high quality extension to Keynsham which responds to the strong landscape setting. This includes residential-led development focused around a new marina with supporting neighbourhood centre and primary school. Mixed employment development is included with extensive green infrastructure across the site. Diagram 9 is a Concept Diagram based on the Strategic Planning Framework in conjunction with the existing masterplan for the East Keynsham Safeguarded Land. Other pieces of evidence have been completed or are ongoing, including transport infrastructure, landscape, development viability and odour assessments. Your input will inform the next stages of policy formulation.

QUESTION

1a Have we considered all the issues?

1b What other evidence do you think we need to consider?

VISION AND OBJECTIVES

4.06 It is important to create a vision for North Keynsham as this will form the foundation of the Local Plan allocation and the subsequent development and type of place that is created. The vision describes the kind of place the area should become and what is needed physically, economically and socially. It will help to shape what happens on the site, giving it coherence and a real sense of identity and place. The vision is accompanied by a set of objectives which are set out in the Strategic Planning Framework.

Proposed vision

The vision for North Keynsham is to open up this currently isolated area to its environs in a sensitive way, creating a new sustainable urban neighbourhood with increased access to the River Avon and connecting Keynsham to strategic walking and cycle routes.

This will be a lively, safe, sustainable and healthy place which reinforces the distinctive character of Keynsham, improves connectivity, enhances our understanding and respect of nature and creates spaces around which a new community can start to form.

The community will thrive and develop within a well-integrated and multifunctional green infrastructure network of new wetland features, restored floodplain meadows and new woodland

QUESTION

The vision will be tested and expanded through the plan making process, particularly as the needs of stakeholders and partners are understood with increasing clarity.

2a What are your views on the vision and objectives?

2b What type of place should be created here?

THE CONCEPT DIAGRAM

4.07 The Concept Diagram (Diagram 9) has been developed from site analysis, the proposed vision and objectives and key urban design principles. It has been adapted from the Strategic Planning Framework and the existing East Keynsham masterplan to illustrate the possible extent of where development might take place (and where it might not). It provides a high level layout and an indication of site capacity. It has been structured to optimise residential and employment development, balanced against the flood risk, landscape sensitivity constraints and the limitations of buffer zones surrounding major utility pipelines. **The Concept Diagram is indicative at this stage**. The point of this Local Plan consultation phase is to explore potential options and encourage and stimulate further discussion and debate. We value your feedback on the Concept Diagram and key issues that it raises.

KEY ISSUES AND OPTIONS

4.08 The Concept Diagram and Strategic Planning Framework raise a number of key issues that we would like to test through this public consultation:

Link road alignment

4.09 Access to the northern part of the site is significantly constrained by the railway, the River Avon and by associated capacity constraints on the A4 and connecting roads. Existing lanes through the site are narrow and have constrained crossings of the railway. At present there is no public transport connectivity to the northern part of the site with the nearest services running along the A4 and Keynsham Road. While the site is close to Keynsham Rail Station, pedestrian and cycle access from the site is poor and indirect. The JSP Policy requires a series of strategic infrastructure improvements to be made to the transport network, including the highway, public transport, cycling and walking networks.

4.10 The key part of this strategy is the Avon Mill Lane to A4 Multi Modal Link Road which is required to be built before any dwellings are complete. **The Link Road has to serve two purposes**: it is needed in order to help reduce traffic currently travelling through Keynsham Town Centre, and it also has to access and serve the new development. **The Concept Diagram shows an indicative alignment** through the middle of the site which includes a new railway crossing east of Pixash Lane and options to join the A4 at a new junction and at Broadmead roundabout. **The road alignment and the points at which it joins the A4 are subject to further assessment work which will be complete by spring 2018.**

4.11 Through the site the route should be of an appropriate nature for a mixed-use environment and be designed to passively restrict vehicle speeds while working as a public transport and cycle corridor. Subject to where and how the link road connects to the A4 the Strategic Planning Framework proposes that some of the existing crossings over the railway line could be downgraded for use of pedestrians and cyclists.

QUESTION

3a What do you think of the proposed road alignment?

3b Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?

Internal street network and wider connections

4.12 The development proposes to adopt a simple, permeable and highly connected street network based on a strong street hierarchy. This would support sustainable and healthy transport options by providing a walkable neighbourhood, strong safe links to the pedestrian and cycle network (including the Bristol to Bath cycle path) schools and facilities and to local public transport connections on the A4 and Keynsham Rail Station. There is potential for new bridge connections across the river to South Gloucestershire.

QUESTION

4a What do you think of the proposed approach to the street network and wider connections?

4b Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Landscape impact

4.13 The site is visible from the Cotswolds and in Landscape and Visual Assessment is considered to be part of a continuous swathe of open countryside from the Avon Valley towards the hills. The eastern and riverside areas of the site are considered to be the most visible and least appropriate for development. We propose to respond to this by requiring lower density housing at the eastern edges where the visual impact will be greatest , with the edges of the developed areas also planted up with bands of woodland to around 30m depth to provide visual screening and privacy for residents. The riverside area would remain undeveloped and has significant potential to be made more publicly accessible and enhanced as both and amenity and environmental asset, linked into a wider green infrastructure network across the site. There is significant potential across the site to restore and re-create habitats and biodiversity, including new wetland features, restored floodplain meadows and new woodland.

QUESTION

5a What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?

5b How can we improve the Green Infrastructure network through the site?

Housing mix

4.14 In line with National Planning Policy Framework expectations we propose to plan for a mix of housing needs, including for older and disabled people, affordable housing and self-build and custom build development. This could help establish a strong and unique identity for the site.

QUESTION

6a What should the housing mix comprise of?

6b Is there any scope for other forms of housing, for example student accommodation?

Zero carbon development

4.15 Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy infrastructure. The NPPF states that we should actively plan for new development in ways which reduce greenhouse gas emissions. In response, the JSP requires all new development to minimise energy demand and maximise the use of renewable energy, and where viable meeting all demands for heat and power without increasing carbon emissions. Through the production of the Local Plan, we will be investigating the potential for development at North Keynsham to be built to a Zero Carbon standard (net zero emissions from regulated and unregulated heat and power). If this is achievable, North Keynsham could become a beacon for sustainable development, and in the process provide a healthy environment and a low cost of living for its future residents.

QUESTION

7a Do you agree with the principle of aiming for a Zero Carbon development?

7b How ambitious should we be? How do you think this aim could be achieved?

Avon Valley Wildlife & Adventure Park

4.16 As an important local business and tourist attraction, an enhanced Wildlife and Adventure Park will be an integral part of the site. The main facilities are proposed to be relocated to the north-eastern end adjacent to Avon Valley Farm. These should be laid out to minimise visual impact on views from sensitive locations. Larger buildings and structures and any features such as parking should be appropriately screened using planting. Delivering access to the Bristol to Bath cycle path will be a key requirement.

QUESTION

8a How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?

8b What opportunities are there to minimise visual impact from the Cotswolds?

8c Do you agree with the requirement to link with the Bristol to Bath cycle path?

5. STRATEGIC DEVELOPMENT LOCATION: WHITCHURCH

INTRODUCTION

Joint Spatial Plan

5.01 As explained in the introduction to this document, the Joint Spatial Plan is the strategic overarching planning framework for the West of England up to 2036. It sets out how the development needs of the area, particularly for housing, jobs and infrastructure are to be met, alongside protecting and enhancing our unique and high quality built and natural environment.

5.02 The Whitchurch site has been identified as a Strategic Development Location, one which is capable of delivering large scale development which supports the spatial strategy in a sustainable way.

5.03 The Joint Spatial Plan contains a number of key policies that will apply to all development within the West of England area. It also contains a strategic policy for each of the Strategic Development Locations. Policy 7.1 relates to Whitchurch and can be viewed on the website.

5.04 In summary the Joint Spatial Plan Policy for Whitchurch requires the development of 2,500 homes (including affordable housing), the provision of new schools, local centres, employment space, and the completion of key transport infrastructure such as a link road connecting the A37 to the A4.

5.05 The development is also required to be of high quality design that promotes active travel, incorporates green infrastructure and responds appropriately to the setting of Maes Knoll, the Wansdyke and Queen Charlton Conservation Area, and protects the landscape character of Stockwood Vale.

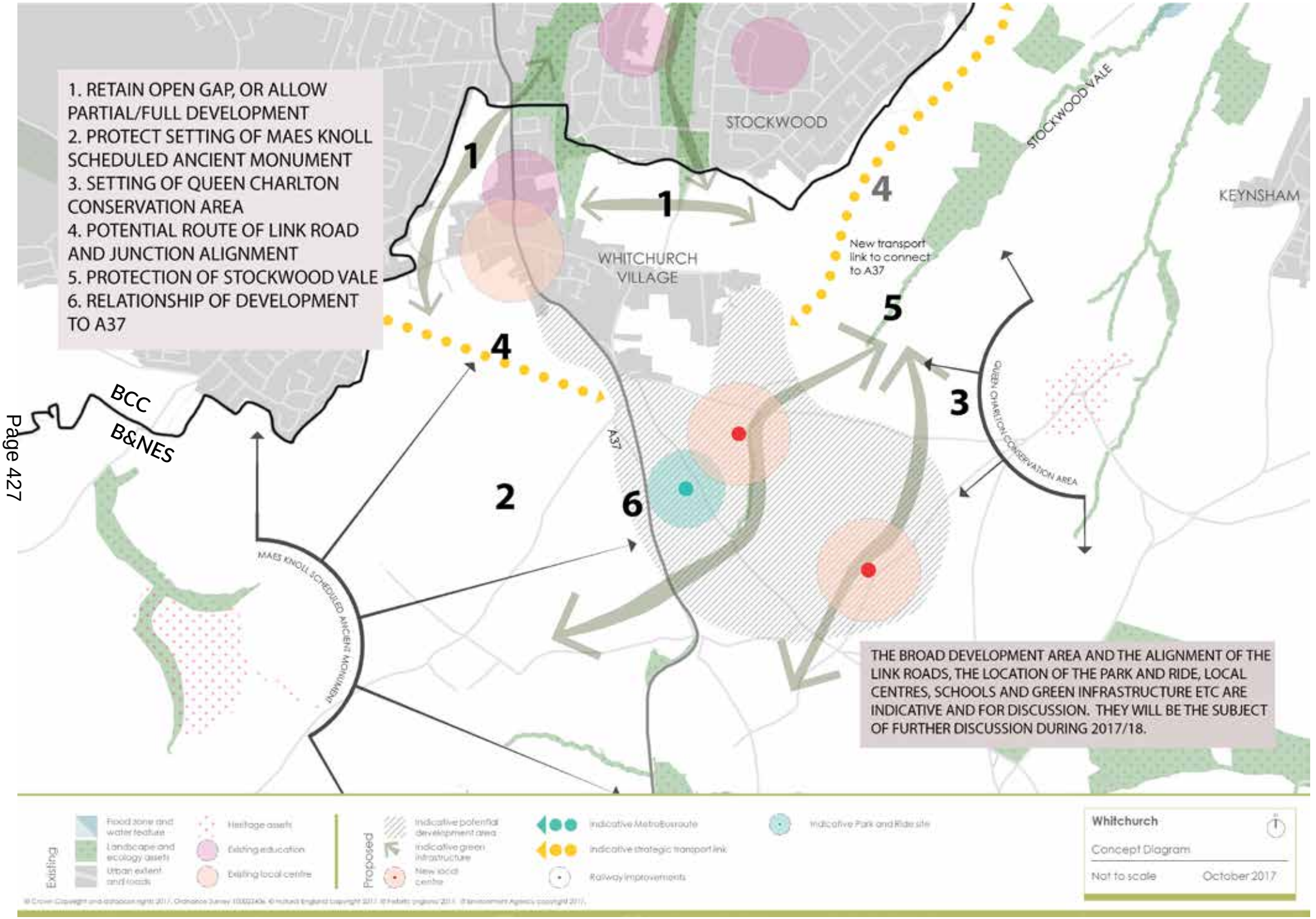
A new link road between A37 and A4

5.06 It is imperative that a new road that links the A37 and A4 is completed before the housing development is started.

5.07 A transport study is currently underway that is exploring the nature of this new link road and a preferred route for it to follow – the alignment of the road has not been identified as yet (although broad options are indicated in the Joint Transport Study). The study now underway will also assess technical deliverability, environmental impact and deliverability in terms of funding. Further consultation will take place on this after Spring next year.

St Nicholas' Church & views from Maes Knoll

Diagram 10: Whitchurch Concept Diagram



Local Plan – Issues & Options document

5.08 The next task following the Joint Spatial Plan, is to explore the vision and detailed policy for the development area, ensuring that the right conditions are established that delivers an exemplary new development that responds to its sensitive environmental context.

5.09 The following vision is put forward to encourage and to stimulate debate:

- What sort of place should this new development be?
- How can we make it as sustainable as possible, for example in encouraging active travel?
- What are the most important elements that need to be delivered?
- How can we begin to recognise the positive aspects of development?
- And how do we ensure that high quality development happens?

Proposed vision

'The new community to the south east of Whitchurch village will be an exemplar sustainable development and an inspirational place; a high quality, people centred environment that feels safe, sociable and attractive for all. The design of the new development will respond positively to its sensitive and important environmental, landscape and historic context, and will be at least zero carbon.

It will be a residential led community, and will include local centres, two new primary schools and a secondary school, new health and community facilities, a variety of employment workspaces, all integrated with new parks, open space and green infrastructure.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most trips. The existing network of walking and cycle routes will be extended, public transport will be significantly improved, and a new multi-modal link road connecting the A4 to the A37, and onwards to the South Bristol Link Road, will be constructed prior to development.'

Questions

9a What additional aspirations would you have here?

9b How can this vision be delivered?

KEY ISSUES AND OPTIONS

5.10 The Concept Diagram shown above is an indication of what could happen, and the point of this Local Plan consultation phase is to explore the potential options for development. The following questions are intended to encourage and stimulate further discussion and debate. What kind of place could this be? How do we make sure that the impacts of new development are off-set by the creation of a great place?

5.11 In identifying land for new homes and related transport infrastructure at Whitchurch, the Council is suggesting a broad development location that is responsive to landscape and heritage sensitivities, and provides opportunities to enhance green infrastructure provision. This approach is in line with that set out in the National Planning Policy Framework (NPPF).

Heritage and landscape assets

5.12 This includes responding to the setting of Maes Knoll, the setting of the Queen Charlton Conservation Area, and the valued landscape character of the area such as Stockwood Vale. This approach is informed by evidence which is available on the website.

QUESTION

10a Is this the right approach?

10b Could some development take place in other areas outside of this broad development location? For example:

- In Stockwood Vale?
- Within the setting of Queen Charlton?
- Within the setting of Maes Knoll?

10c What would be the benefits of this?

10d What evidence is available to support development in these areas?

QUESTION

10e What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

i. Continue to protect the Green Belt gap & keep the village separate?

ii. Allow some development, but keep a smaller gap?

iii. Close the gap with development, and potentially have less elsewhere?

Local facilities

5.13 An important aspiration is to enhance the role of the existing village centre, and to provide for new local centres, schools and community facilities to support the new residential communities.

QUESTION

12a How could the existing village centre be enhanced to cater for the needs of an increased population?

12b How do we best integrate new local centre and facilities with the existing communities?

Green infrastructure

5.14 The provision of green infrastructure such as park and open spaces, allotments, as well as natural environments is very important for our health and wellbeing, and essential for biodiversity to flourish. It is a vital aspect to ensure that the new development becomes a successful place.

QUESTION

13a How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities and to the natural environment?

13b How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could they form part of a new strategic parkland for the area?

Sustainable and active travel

5.15 A key emphasis of the Joint Spatial Plan and of the Local Plan is to ensure the delivery of places that enable a greater shift to more sustainable modes of travel and for more active travel.

QUESTION

14a How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?

14b How can we encourage greater use of public transport?

14c How can we encourage people to be more active, more often?

14d What other ideas could be explored to achieve these objectives?

Employment

5.16 The area has been identified in the Joint Spatial Plan as one that needs to provide for employment, and for this to be determined through the Local Plan.

QUESTION

15 What sort of employment would be suitable as part of the new development and how much?

DEVELOPMENT PRECEDENTS

QUESTIONS The following images from elsewhere are only for illustrative purposes, but can be used as ideas for the kind of development that we might like to see in the Strategic Development locations of Keynsham and Whitchurch.

16a What are the qualities of these places that could be used in either of the new development areas?

16b What aspects should we seek to avoid? 16c What other precedents would you use?

ACTIVE FRONTAGE TO OPEN SPACES | STRONG BELT OF PLANTING AROUND EXPOSED EDGES OF THE SITE TO MITIGATE IMPACT ON SENSITIVE VIEWS

STRONG NEIGHBOURHOOD CENTRE AS FOCUS FOR COMMUNITY © GOOGLE 2017

OPPORTUNITY FOR SHARED AND COMMUNITY GARDENS AND ALLOTMENTS ALONGSIDE PRIVATE PROVISION AND PLAY / RECREATION SPACE

DEVELOPMENT PRECEDENTS (continued)

MIX OF HOUSING TYPOLOGIES AND TENURES - POTENTIAL FOR DIVERSITY THROUGH ALTERNATIVE HOUSING MODELS AND CUSTOM-BUILD

PEDESTRIAN AND CYCLE FRIENDLY ENVIRONMENT WITH CONVENIENT, SAFE AND ATTRACTIVE MOVEMENT ROUTES

POTENTIAL TO USE THE MARINA AND SURFACE WATER MANAGEMENT AS A DEFINING FEATURE OF THE SITE, CREATING CHARACTER WHILE BEING FUNCTIONAL AND SUSTAINABLE (KEYNSHAM ONLY)

DEVELOPMENT PRECEDENTS (continued)

Images showing a range of energy efficient housing types with green spaces, and sustainable urban drainage.

DEVELOPMENT PRECEDENTS (continued)

Images showing a range of energy efficient housing types with green spaces, and sustainable urban drainage.

6. Housing needs and student accommodation

Setting the scene

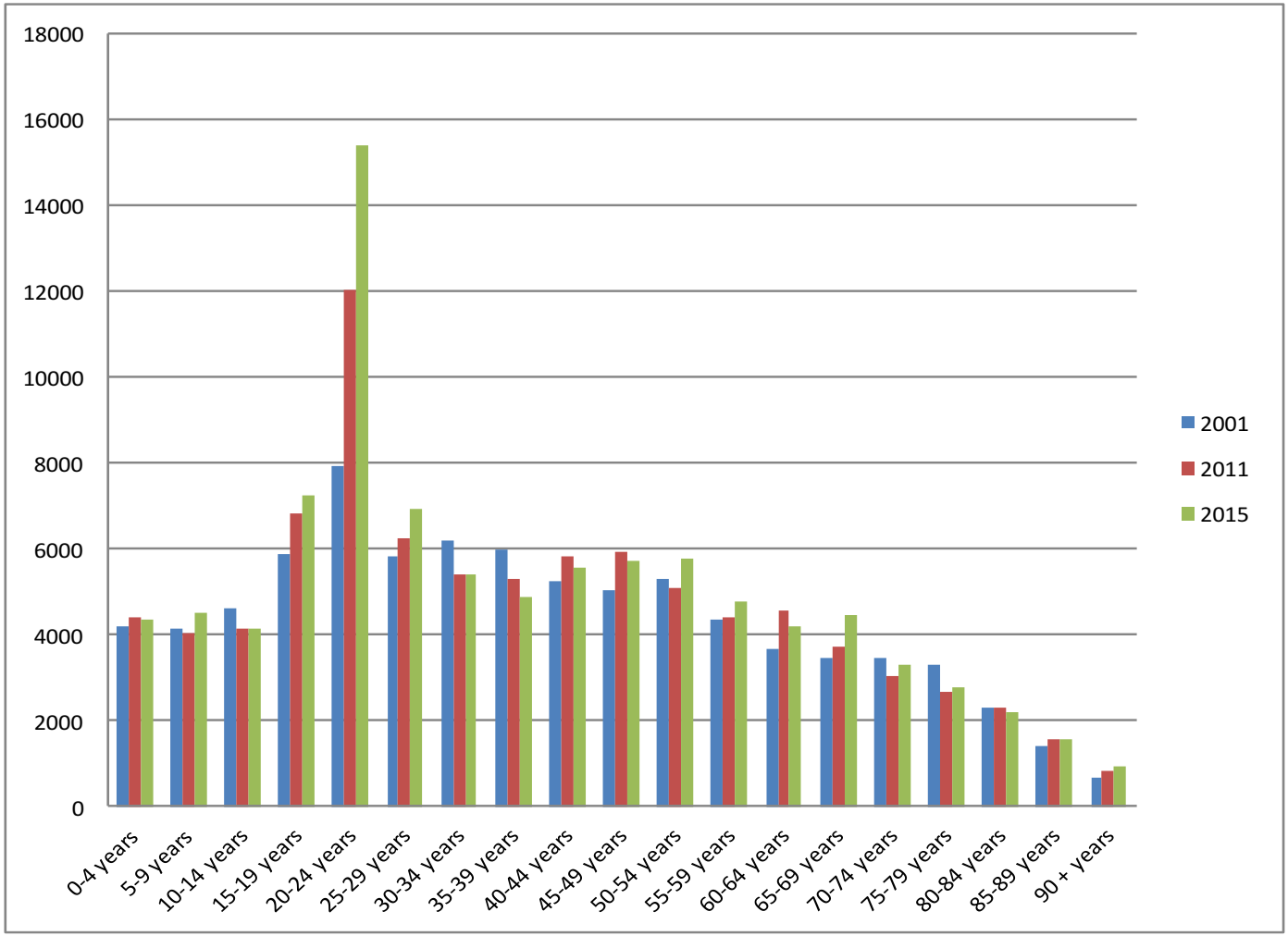
6.01 The JSP requires that provision is made for around 14,500 additional homes between 2016 & 2036. Other sections of this document consider the spatial strategy for accommodating this housing.

6.02 The overall amount of housing to be provided will address a range of specific needs. There is significant growth of population expected in the older and younger age groups within B&NES. As such housing needs relate not only to new family housing, but also focus on those of older persons and younger persons, including students.

6.03 The Council is undertaking further work to quantify specific housing needs and consider how these needs should be met. Options will be further explored in the next stage of consultation. However, given the significant implications of student accommodation pressure this issue is initially considered here.

6.04 The University of Bath and Bath Spa University both play an important role in the economy and life of the city. Whilst both Universities are beneficial to the city their recent growth and future aspirations have significant implications for the city e.g. in terms of the pressure placed on the existing housing stock through the creation of Houses in Multiple Occupation (HMOs); impact on the communities where HMOs are concentrated; and demand for the limited supply of land which is available

Diagram 11: Bath population change



for development within the city, including the impact on employment land.

6.05 Bath is the main centre of population and jobs in the District and therefore is the primary focus for development for a range of uses and activities. The Joint Spatial Plan requires that, in addition to housing planned for through the Core Strategy, further new homes are provided in the City. Both the JSP and the Local Plan are also facilitating significant job growth, which will to a large extent be focussed on the city, as a strategic employment location for the sub-region, and specifically the Bath Riverside Enterprise Zone. In addition there is pressure for the city to accommodate growth in shops and hotels as a regional shopping and international tourism destination.

6.06 Therefore, the strategy for addressing the academic space and student accommodation requirements associated with both Universities needs to be considered alongside these other development pressures and ensuring the city is able to continue fulfilling its strategic economic role.

6.07 The current strategy set out in the adopted Core Strategy and Placemaking Plan is to prioritise meeting the needs for general housing and employment uses (mainly office space), whilst also seeking to meet forecast demand for additional hotel space. It accepts that longer term retail growth will not be accommodated and the provision of additional purpose built student accommodation is restricted, particularly within the City Centre and Enterprise Zone. The strategy for Bath will be reviewed through the Local Plan and will be considered further in the next stage of the options consultation.

6.08 The Houses in Multiple Occupation SPD seeks to ensure further high concentrations of HMOs development in the City are avoided.

6.09 There was an estimated population increase of 15,832 between 2001 to 2015 (census mid-year estimate) in Bath and North East Somerset, of which 8,547 is estimated to be from the age group of 20 – 24 years old in Bath, over 50% of the total increase in the District (Diagram 11). If these trends continue, there will be significant changes in the population profile resulting in a more student led mix in Bath.

Table 1: Student housing and HMOs

Factor	2016/2017	2020/2021	Change 2016/17-20/21
Total student forecast	25,308	29,742	4,434
Total student housing need	17,918	20,836	2,917
Total PBSA bedspaces	6,673	7,633	526
Residual demand 2016/17 baseline	11,245	13,203	1,957
Bedspaces demand from 2016/17 assumed baseline			1,496
HMO equivalent needed (1 dwellings =4 bedspaces)			374

Universities' growth & student accommodation

6.10 Set out in Diagram 12 below is initial consideration of University growth aspirations and the associated student accommodation requirements, in order to start the process of considering potential alternative approaches moving forward.

6.11 It shows that about 1,496 bedspaces, (equivalent to 374 dwellings based on 1 dwelling = 4 bedspaces), are needed to realise the Universities' growth aspirations published in May 2016. The universities 5 year plans are under review and will inform the Local Plan Preferred Options stage.

6.12 Since that time national trends indicate a changing context. University student applications in 2017/18 from 'Home/EU' are 5% lower than the previous year. There are a range of factors contributing to this decrease such as increased fee level, availability of apprenticeships and Brexit (uncertainty regarding the fee for EU students).

6.13 In addition to levels of growth in student numbers the following issues are important:

- The affordability of student accommodation is becoming a big issue. Recently Purpose Built Student Accommodation has been coming forward as studio units, rather than cluster flats. Significantly higher prices are charged for studio units putting it out of reach for many domestic under graduates.

- Ensuring the needs of 2nd and 3rd year students are met – can and should these needs be met through Purpose Built Student Accommodation focussed on providing cluster flats?

- Student housing is seen as an attractive investment worldwide. Bath is listed in the top tier (high occupancy and rental growth) in the student housing development league table. (Savills 2017)

6.14 Within the changing national context and issues set out above understanding Bath's universities revised 5 Year Plans and the development capacities on campus is essential in reviewing and formulating the strategy for Bath. For example if both Universities maintain admissions numbers at or around their current level, less additional accommodation may be needed. However, even in these circumstances it may be sensible to plan for the provision of further Purpose Suilt Student Accommodation because providing the right type of accommodation in terms of rental levels, form and the students served may help to take some pressure off the private rented sector and the increasing numbers of HMOs.

6.15 The information above focusses on student accommodation numbers and provision. However, there are links between providing additional academic space as Universities expand and the need or demand for further student accommodation. In some University cities and towns e.g. Oxford, policies are in place that only allow additional academic space to be built if further student accommodation is also provided on campus or other land controlled by Universities. The introduction of such an approach in Bath needs to be considered.

6.16 Set out below are some options to help stimulate discussion.

Please see Student Numbers and Accommodation Topic Paper for details.

Options for responding to the universities' growth and student accommodation demand

Options	Pros	Cons
Option 1 Current approach: Prioritises homes and jobs in the City Centre/Enterprise Zone No specific Purpose Built Student Accommodation (PBSA) allocations	• Some protection for key employment and housing land • Flexibility as applications for PBSA will be considered on their own merits	• Market-led development likely to lead to loss of employment and 'normal' housing land. • Market-led development is likely to lead to a predominance of studio type expensive PBSA. • Does not encourage on-campus development • Pressure on new HMOs continues potentially resulting in dispersing families outside Bath
Option 2 Identify and allocate sites in or outside Bath (on and off campus) to meet need for PBSA	• Better management of new development • Allows greater protection of employment and housing land • Further academic space will need to be matched with provision of additional student accommodation	• Land suitable for student accommodation is often suitable for residential – could lead to loss of land that could be developed for 'normal' housing. • Does not necessarily encourage/prioritise on-campus development • Bath University: campus capacity not specifically identified. A masterplan is in preparation. • Bath Spa University – limited on campus capacity
Option 3 PBSA to meet need (including that linked to new academic space) only allowed on campus, with policies to refuse elsewhere	• Enables strong protection of employment and housing land • Additional academic space will need to be matched with student accommodation provision on campus	• Potentially limit or constrain university growth • Bath University: campus capacity not specifically identified. A masterplan is in preparation. • Bath Spa University – limited on campus capacity
Option 4 Option 3 plus releasing further Green Belt land to facilitate more PBSA (subject to exceptional circumstances)	• Enables strong protection of employment and housing land • Academic space will need to be matched with student accommodation provision on campus or on land released from Green Belt	• Bath University: campus capacity not specifically identified. A masterplan in preparation. • Bath Spa University – limited on campus capacity • Exceptional circumstances to release land from the Green Belt would need to be demonstrated • Loss of Green Belt land and environmental constraints such as AONB, WHS.

QUESTIONS

17a Which of the options should be the preferred approach?

17b Are there any other options?

How to get involved

7.01 The purpose of this document is to facilitate discussion and comment on some of the critical issues facing B&NES and to start to test potential approaches to addressing these issues. We want you to be involved in this process.

7.02 Consultation will commence on 22nd November 2017 with the opportunity to send us your comments up to 10th January 2018. There will be further opportunities to be involved in later stages of the Local Plan preparation and to consider other issues not addressed in this document.

7.03 This consultation will be supported by four staffed exhibitions listed below where you will have the opportunity to come and ask questions and discuss issues with us. The four exhibitions listed will be supplemented by bespoke sessions at the Universities and sessions with town/parish councils and the Bath City Forum.

Consultation exhibitions

Venue	Date
SOMER VALLEY The Board Room, Bath College Somer Valley Campus	Tuesday 28th November (3pm - 8pm)
WHITCHURCH United Reform Church Hall	Thursday 30th November (3pm - 8pm)
KEYNSHAM Civic Centre Community Space	Monday 4th December (3pm - 8pm)
BATH Brunswick Room, Guildhall	Friday 8th December (3pm - 8pm)

Your comments...

You are encouraged to submit comments online at

www.bathnes.gov.uk/localplan

or you can send them via email to

local_plan@bathnes.gov.uk

or by post to: Local Plan Consultation, Planning Policy, Bath & North East Somerset Council, Manvers Street, Bath, BA1 1JG.

Bath & North East Somerset Council		
MEETING:	**Council**	
MEETING DATE:	**9th November 2017**	EXECUTIVE FORWARD PLAN REFERENCE:
TITLE:	**Efficiency Strategy**	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Efficiency Strategy		

1 THE ISSUE

1.1 The Efficiency Strategy was presented to Cabinet on the 11th October 2017 as part of the Medium Term Financial Strategy. The Efficiency Strategy is a key component in the delivery of that overall strategy and requires Council approval.

1.2 As part of mitigating the budget gap to bring forward savings from Commercial Property investment, a request to bring forward capital budget of £12.3m to deliver part of the £825,000 2018/19 income target in the 2017/18 financial year, should suitable opportunities become available.

2 RECOMMENDATION

The Council is asked to;

2.1 Approve the attached Efficiency Strategy, and associated changes in the Prudential Indicators as set out in Appendix A.

2.2 To approve an increase in the 2017/18 borrowing limits of £12.3m by bringing forward approved borrowing from 2018/19, to facilitate the acceleration of revenue savings from Commercial Property investment.

2.3 To approve the associated adjustments to the capital programme to reflect the revised profile of budget for Commercial Property investment with £12.3m brought forward to 2017/18 from 2018/19.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 The Strategy seeks to utilise capital receipts to finance spend that results in long term savings for the Council. The target is to release £10m by the end of 2018/19. This means that those receipts will not be available to fund the capital programme. The effects of this have been factored into the Medium Term Financial Strategy. The notional impact on Prudential Indicators is contained within the report.

3.2 In addition to this to mitigate in-year pressures it may be possible to bring forward a Commercial Property purchase from 2018/19 into this financial year to earn additional income. This requires the borrowing limit to be increased by £12.3m in this financial year and re-profiling of capital budgets to reflect this change. There will be no overall impact on borrowing levels as is shown within the Prudential Indicators contained within the Efficiency Strategy.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The strategy as outlined is part of the preparation for budget and Council Tax setting for 2018/19 that will be considered by this Council in February 2018.

5 THE REPORT

5.1 Central Government outlined in December 2015 that local authorities could under certain circumstances utilise capital receipts for revenue expenditure to release long term savings. The flexibility will cease in March 2019. The Efficiency Strategy therefore forms a key part of the Medium Term Financial Strategy in delivering the savings required.

5.2 The Directorate Plans for 2018/19 include an additional £825,000 for Commercial Income. It may be possible to accelerate a purchase from next year to this year to mitigate some of the current year financial pressures. This will require the borrowing limit to be increased by £12.3m in 2017/18. There is no long term impact on overall borrowing levels by agreeing this, just a re-profiling from 2018/19 into 2017/18.

6 RATIONALE

6.1 The rationale for the recommendations is contained in the supporting paper to this report.

7 OTHER OPTIONS CONSIDERED

7.1 The only other option would be to utilise Non-Earmarked reserves which would take those reserves below the required minimum to meet the Council's financial risks.

8 CONSULTATION

8.1 A consultation plan has been prepared as part of the Medium Term Financial Strategy to ensure stakeholder engagement for the strategy, followed by consultation on individual budget proposals with a wide range of stakeholders before the budget is considered for approval in February 2018. A special meeting of PDS Resources Forum took place on October 31st 2017 to which all

elected members of the Council were invited. The consultation will include the November Community Forums.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	*Donna Parham, Divisional Director – Business Support (01225) 477468*
Background papers	*Medium Term Financial Strategy – Cabinet agenda October 2017*
Please contact the report author if you need to access this report in an alternative format	

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1. Flexible Use of Capital Receipts

Central Government outlined in December 2015 that local authorities will be able under certain circumstances to utilise capital receipts for revenue expenditure for certain purposes. These include for example:-

- Sharing back-office and administrative services with one or more other council or public sector bodies;
- Investment in service reform feasibility work, e.g. setting up pilot schemes;
- Funding the cost of service reconfiguration, restructuring or rationalisation (staff or non-staff), where this leads to ongoing efficiency savings or service transformation;
- Collaboration between local authorities and central government departments to free up land for economic use;
- Sharing Chief-Executives, management teams or staffing structures;
- Aggregating procurement on common goods and services where possible, either as part of local arrangements or regional procurement hubs;
- Driving a digital approach to the delivery of more efficient public services and how the public interacts with constituent authorities where possible;
- Setting up commercial or alternative delivery models to deliver services more efficiently and bring in revenue (for example, selling services to others).
- Integrating public facing services across two or more public sector bodies to generate savings or to transform service delivery;
- Improving systems and processes to tackle fraud and corruption;

Further guidance was released in March 2016 which outlined a simpler approach to allow authorities to utilise receipts if the spend resulted in an ongoing saving. The guidance is clear however that expenditure should be once-off and the flexibility cannot be utilised for ongoing expenditure.

The requirement the strategy should list each project that plans to make use of the capital receipts flexibility and that on a project by project basis details of the expected savings/service transformation are provided. A link has been provided to those projects in section 2 of this report. The Strategy should report the impact on the local authority's Prudential Indicators for the forthcoming and subsequent years.

The strategy in future years will monitor the performance of projects approved in previous years. The Strategy must be approved by Full Council. A revised strategy may be replaced by another during the year.

2. Savings Projects Which Meet the Criteria

The flexibility is currently only available for 2017/18 and 2018/19 and therefore will be utilised to fund the once-off revenue costs such as redundancy and legal costs allowable under the criteria to achieve the Directorate Savings Plans agreed as part of the 2017/18 budget link: https://democracy.bathnes.gov.uk/documents/g4630/Public%20reports%20pack%2014th-Feb-2017%2018.30%20Council.pdf?T=10 Appendix 3. This will release once-off budgets and reserves such as the Transformation Reserve to fund other costs that do not meet the criteria.

3. The Capital Receipts to be Used this Purpose

Capital receipts from the disposal of property, plant, and equipment received in the years in which the flexibility is offered can be used for this purpose. Right to Buy Receipts are excluded. The remaining flexibility spans the remainder of 2017/18 and 2018/19 only.

Individual receipts have not been listed but the target range for financial planning purposes is between £7m and £10m of receipts to be available for use. This will impact on the amount of borrowing required and has been factored into this strategy.

It is proposed that the decision for the use of each receipt is delegated to the S151 Officer unless it results in an unplanned impact on the overall budget for 2017/18 or 2018/19.

4. Impact on B&NES' Prudential Indicators

If the Council utilises this flexibility it impacts on the level of capital receipts that can be utilised to fund the capital programme. If it is assumed that B&NES utilises £7m receipts already factored in to finance the capital

programme plus a further £3m of new receipts. The impact on the Council's Prudential Indicators can be demonstrated as follows:-

Current Indicators Excluding Flexible Use

PRUDENTIAL INDICATOR	2018/19	2019/20	2020/21
Estimate of Capital Expenditure (£'000s)			
Estimates of capital expenditure	182,667	79,844	26,272
Net Increase in council tax (band D per annum) Figures in £'s (not £'000's) Note 1			
The implied estimate of incremental impact of the new capital investment decisions on the council tax	£3.02	£1.86	£0.51
Cumulative totals:	£3.02	£4.88	£5.39
Capital Financing as % of Net Revenue Stream			
Estimates of the ratio of financing costs to net revenue stream	11.05%	16.53%	18.91%
Memo: estimates of the ratio of financing cost to gross revenue stream	*3.72%*	*5.38%*	*6.17%*
Borrowing Limits (£m)			
Operational boundary – borrowing	£306m	£350m	£361m
Operational boundary – other long-term liabilities	£2m	£2m	£2m
Operational boundary - total	**£308m**	**£352m**	**£363m**
Authorised limit - borrowing	£338m	£382m	£3.92m
Authorised limit – other long-term liabilities	£2m	£2m	£2m
Authorised limit – total	**£340m**	**£384m**	**£394m**
Capital Financing Requirement (£'000s) (as at 31 March)			
Estimate of capital financing requirement	338,311	381,541	391,669

1. This is an indicator of affordability that shows the implied impact of capital investment decisions on Council Tax levels. The incremental impact is the difference between the total revenue budget requirement of the current approved capital programme and the revenue budget requirement arising from the proposed capital programme.
2. The figures show borrowing limits but it is important to note that the Council is utilising cash flow efficiency wherever possible.
3. £105m of borrowing is linked to investments that provide an ongoing income stream to the Council

Indicators if £10m of flexible Capital Receipts are used:-

PRUDENTIAL INDICATOR	2018/19	2019/20	2020/21
Estimate of Capital Expenditure (£'000s)			
Estimates of capital expenditure	187,667	84,844	26,272
Net Increase in council tax (band D per annum) Figures in £'s (not £'000's)			
The implied estimate of incremental impact of the new capital investment decisions on the council tax	£4.19	£4.56	£1.36
Cumulative totals:	£4.19	£8.75	£10.11
Capital Financing as % of Net Revenue Stream			
Estimates of the ratio of financing costs to net revenue stream	11.11%	16.72%	19.14%
Memo: estimates of the ratio of financing cost to gross revenue stream	*3.74%*	*5.46%*	*6.26%*
Borrowing Limits (£m)			
Operational boundary – borrowing	£311m	£357m	£368m
Operational boundary – other long-term liabilities	£2m	£2m	£2m
Operational boundary - total	**£313m**	**£359m**	**£370m**
Authorised limit - borrowing	£343m	£389m	£399m
Authorised limit – other long-term liabilities	£2m	£2m	£2m
Authorised limit – total	**£345m**	**£391m**	**£401m**
Capital Financing Requirement (£'000s) (as at 31 March)			
Estimate of capital financing requirement	343,311	388,469	398,493

1. The Capital Programme will continue to be reviewed to minimise the impact on Prudential Indicators. A further report will be made updating the indicators in February 2018.

Bath & North East Somerset Council

MEETING:	**Council**	
MEETING DATE:	**9 November 2017**	
TITLE:	**Treasury Management Monitoring Report to 30th September 2017**	EXECUTIVE FORWARD PLAN REFERENCE:
WARD:	All	

AN OPEN PUBLIC ITEM

List of attachments to this report:

Appendix 1 – Performance Against Prudential Indicators
Appendix 2 – The Council's Investment Position at 30th September 2017
Appendix 3 – Average monthly rate of return for 1st 6 months of 2017/18
Appendix 4 – The Council's External Borrowing Position at 30th September 2017
Appendix 5 – Arlingclose's Economic & Market Review Q2 of 2017/18
Appendix 6 – Interest & Capital Financing Budget Monitoring 2017/18
Appendix 7 – Summary Guide to Credit Ratings

1 THE ISSUE

1.1 In February 2012 the Council adopted the 2011 edition of the CIPFA Treasury Management in the Public Services: Code of Practice, which requires the Council to approve a Treasury Management Strategy before the start of each financial year, review performance during the year, and approve an annual report after the end of each financial year.

1.2 This report gives details of performance against the Council's Treasury Management Strategy and Annual Investment Plan 2017/18 for the first six months of 2017/18.

2 RECOMMENDATION

The Council agrees that:

2.1 the Treasury Management Report to 30th September 2017, prepared in accordance with the CIPFA Treasury Code of Practice, is noted

2.2 the Treasury Management Indicators to 30th September 2017 are noted.

3 RESOURCE IMPLICATIONS

3.1 The financial implications are contained within the body of the report.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 This report is for information only.

5 THE REPORT

Summary

5.1 The average rate of investment return for the first six months of 2017/18 is 0.26%, which is 0.10% above the benchmark rate.

5.2 The Council's Prudential Indicators for 2017/18 were agreed by Council in February 2017 and performance against the key indicators is shown in **Appendix 1**. All indicators are within target levels.

Summary of Returns

5.3 The Council's investment position as at 30th September 2017 is given in **Appendix 2**. The balance of deposits as at 30th June 2017 and 30th September 2017 are also set out in the pie charts in this appendix.

5.4 The Council was the accountable body for the West of England Revolving Investment Fund (RIF) and Local Growth Fund. This function has now transferred to the West of England Combined Authority (WECA) and all balances also transferred.

5.5 Gross interest earned on investments for the first six months totalled £44k. Net interest, after deduction of amounts due to Schools, Local Growth Fund and other internal balances, is £31k. **Appendix 3** details the investment performance, showing the average rate of interest earned over this period was 0.26%, which was 0.10% above the benchmark rate of average 7 day LIBID +0.05% (0.16%).

Summary of Borrowings

5.6 The Council's external borrowing as at 30th September 2017 totalled £167.5million and is detailed in Appendix 4. £9.5m of new borrowing was arranged during the quarter to the fund the acquisition of an investment property, being £7m long term PWLB annuity borrowing and £2.5m at 0.41% for 12 months pending capital receipt.

5.7 The Council's Capital Financing Requirement (CFR) as at 31st March 2017 was £200.1 million with a projected total of £338 million by the end of 2017/18 based on the capital programme approved at February 2017 Council. This represents the Council's underlying need to borrow to finance capital expenditure, and demonstrates that the borrowing taken to date relates to funding historical capital spend.

5.8 The CFR represents the underlying need to borrow and the difference from the current borrowing of £167.5m, represents re-investment internal balances of reserves, reducing the in-year borrowing costs in excess of the potential investment returns. Therefore, in-year use of reserves will lead to higher borrowing.

5.9 Following Local Government Reorganisation in 1996, Avon County Council's residual debt is administered by Bristol City Council. All successor Unitary Authorities make an annual contribution to principal and interest repayment, for which there is a provision in the Council's revenue budget. The amount of residual debt outstanding as at 31st March 2017 apportioned to Bath & North East Somerset Council is £12.86m. Since this borrowing is managed by an external body and

treated in the Council's Statement of Accounts as a deferred liability, it is not included in the borrowing figures referred to in paragraph 5.6.

5.10 The borrowing portfolio as at 30th September 2017 is shown in **Appendix 4**.

Strategic & Tactical Decisions

5.11 As shown in the charts at **Appendix 2**, the investment portfolio has been mainly diversified across Money Market Funds and Local Authorities. The Council uses AAA rated Money Market funds to maintain very short term liquidity and has £18.3M as at 30th September 2017.

5.12 The Council does not hold any direct investments with banks in countries within the Eurozone reflecting both on the underlying debt issues in some Eurozone countries and the low levels of interest rates. The Council's investment counterparty list does not currently include any banks from Portugal, Ireland, Greece, Spain and Italy.

5.13 The Council's current average investment return is in broadly line with the budgeted level of 0.30%.

Future Strategic & Tactical Issues

5.14 Our treasury management advisors economic and market review for the second quarter 2017/18 is included in **Appendix 5**.

5.15 The Bank of England base rate was reduced to 0.25% on 4th August 2016. In the opinion of the Council's treasury advisors there is unlikely to be a rate rise until Q3 2020, with the risks to this forecast remain weighted to the downside. In their September "Mid Year Report 2017/18" their view is that, whilst the Bank of England MPC has changed its 'rhetoric' recently, they are not 'convinced the UK outlook justifies' a rate increase 'at this stage'. We are aware the MPC will be meeting on 2nd November and will be monitoring the outcome.

5.16 The benefits of the Council's current policy of internal borrowing are monitored regularly against the likelihood that long term borrowing rates are forecast to rise in future years. The focus remains on the rate of increase and the medium-term peak.

Budget Implications

5.17 A breakdown of the revenue budget for interest and capital financing and the forecast year end position based on the period April to September is included in **Appendix 6** and shows that the forecast is on target

5.18 This position will be kept under review during the remainder of the year, taking into account the Council's cash-flow position and the timing of any new borrowing required.

6 RATIONALE

6.1 The Prudential Code and CIPFA's Code of Practice on Treasury Management requires regular monitoring and reporting of Treasury Management activities.

7 OTHER OPTIONS CONSIDERED

7.1 None.

8 CONSULTATION

8.1 Consultation has been carried out with the Cabinet Member for Community Resources, Section 151 Finance Officer and Monitoring Officer.

8.2 Consultation was carried out via e-mail.

9 RISK MANAGEMENT

9.1 The Council's lending & borrowing list is regularly reviewed during the financial year and credit ratings are monitored throughout the year. All lending/borrowing transactions are within approved limits and with approved institutions. Investment and Borrowing advice is provided by our Treasury Management consultants Arlingclose.

9.2 The CIPFA Treasury Management in the Public Services: Code of Practice requires the Council nominate a committee to be responsible for ensuring effective scrutiny of the Treasury Management Strategy and policies. The Corporate Audit Committee carries out this scrutiny.

9.3 In addition, the Council maintain a risk register for Treasury Management activities, which is regularly reviewed and updated where applicable during the year.

Contact person	*Giles Oliver - 01225 477022; Andrew Stanton - 01225 477209 Gary_Adams@bathnes.gov.uk; Andrew_Stanton@bathnes.gov.uk;*
Background papers	*2017/18 Treasury Management & Investment Strategy*
Please contact the report author if you need to access this report in an alternative format	

APPENDIX 1
Performance against Treasury Management Indicators agreed in Treasury Management Strategy Statement

1. Authorised limit for external debt
These limits include current commitments and proposals in the budget report for capital expenditure, plus additional headroom over & above the operational limit for unusual cash movements.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	£'000	£'000
Borrowing	338,000	167,555
Other long term liabilities	2,000	0
Cumulative Total	**340,000**	**167,555**

2. Operational limit for external debt
The operational boundary for external debt is based on the same estimates as the authorised limit but without the additional headroom for unusual cash movements.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	£'000	£'000
Borrowing	306,000	167,555
Other long term liabilities	2,000	0
Cumulative Total	**308,000**	**167,555**

3. Upper limit for fixed interest rate exposure
This is the maximum amount of total borrowing which can be at fixed interest rate, less any investments for a period greater than 12 months which has a fixed interest rate.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	£'000	£'000
Fixed interest rate exposure	**306,000**	**147,555***

* The £20m of LOBO's are quoted as variable rate in this analysis as the Lender has the option to change the rate at 6 monthly intervals (the Council has the option to repay the loan should the Lender exercise this option to increase the rate).

4. Upper limit for variable interest rate exposure
While fixed rate borrowing contributes significantly to reducing uncertainty surrounding interest rate changes, the pursuit of optimum performance levels may justify keeping flexibility through the use of variable interest rates. This is the maximum amount of total borrowing which can be at variable interest rates.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	£'000	£'000
Variable interest rate exposure	**206,000**	**20,000**

5. Upper limit for total principal sums invested for over 364 days

This is the maximum amount of total investments which can be over 364 days. The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	£'000	£'000
Investments over 364 days	**50,000**	**0**

6. Maturity Structure of borrowing

This indicator is set to control the Council's exposure to refinancing risk.

	Upper Limit	**Lower Limit**	**Actual as at 30th September 2017**
	%	%	%
Under 12 months	50	Nil	25.4*
12 months and within 24 months	75	Nil	0
24 months and within 5 years	75	Nil	6.0
5 years and within 10 years	100	Nil	0
10 years and above	100	Nil	68.6

* The CIPFA Treasury management Code now requires the prudential indicator relating to Maturity of Fixed Rate Borrowing to reference the maturity of LOBO loans to the earliest date on which the lender can require payment, i.e. the next call date (which are at 6 monthly intervals for the £20m of LOBO's). However, the Council would only consider repaying these loans if the Lenders exercised their options to alter the interest rate.

7. Average Credit Rating

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the weighted average credit rating of its investment portfolio. A summary guide to credit ratings is set out at **Appendix 7**.

	2017/18 Prudential Indicator	**Actual as at 30th September 2017**
	Rating	Rating
Minimum Portfolio Average Credit Rating	**A-**	**AAA-**

APPENDIX 2

The Council's Investment position at 30th September 2017
The term of investments, from the original date of the deal, are as follows:

As per Weekly	**Balance at 30th September 2017**
	£'000's
Notice (instant access funds)	18,980
1 month to 3 months	10,000
Over 3 months	0
Total	**28,980**

The investment figure of £28.7 million is made up as follows:

	Balance at 30th September 2017
	£'000's
B&NES Council	24,147
Schools	4,833
Total	**28,980**

The Council had a total average net positive balance of £33.902m during the period April 2017 to September 2017.

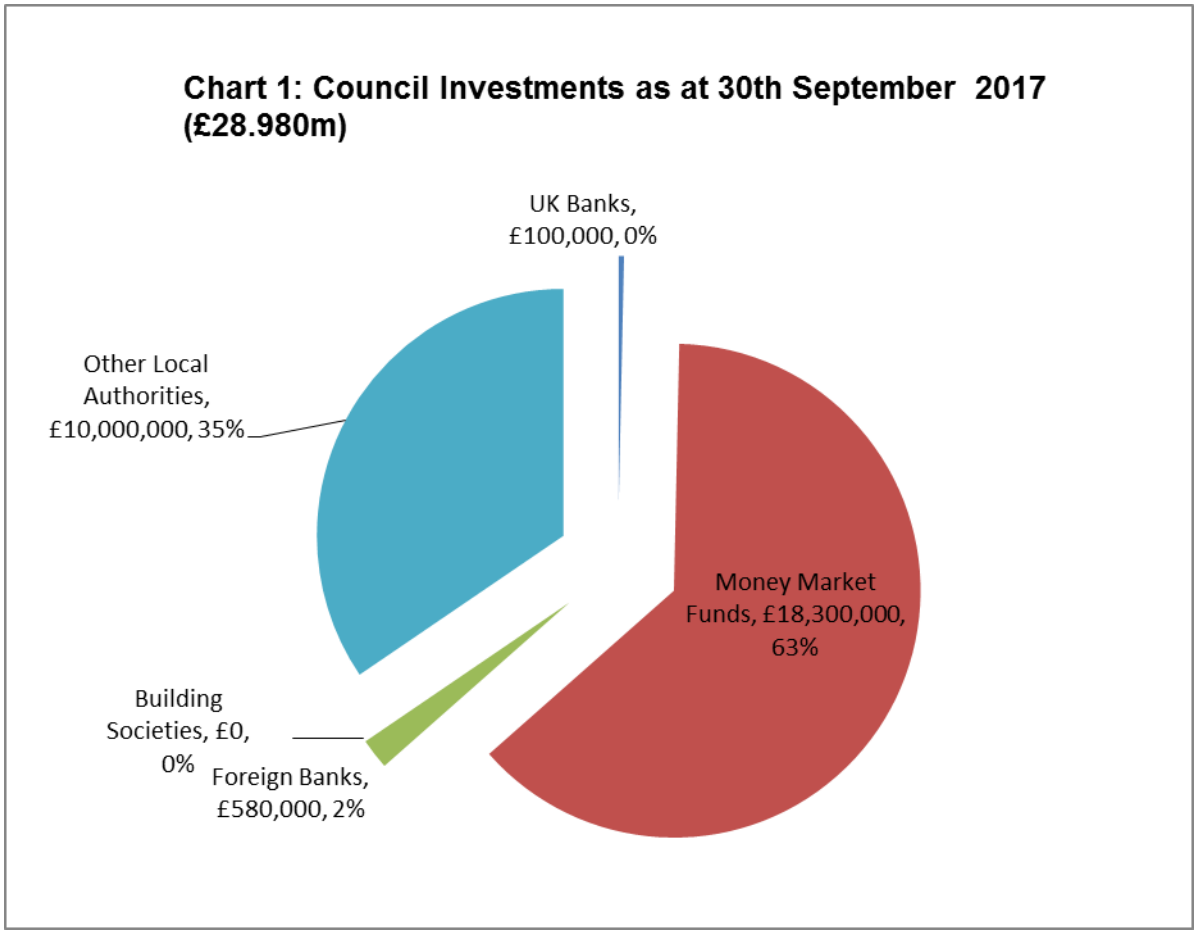


Chart 2: Council Investments as at 30th June 2017 (£28.7m)

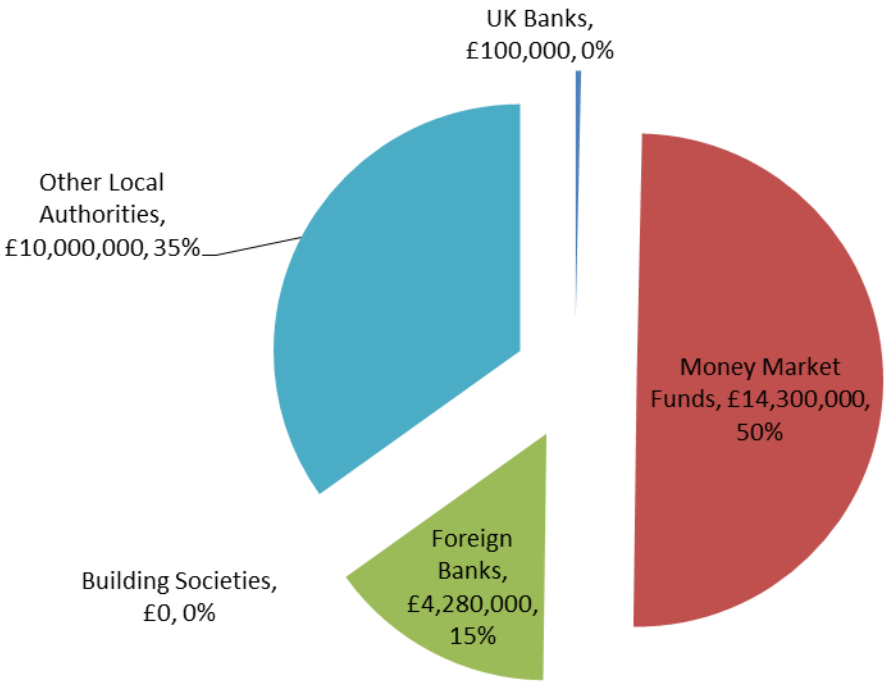
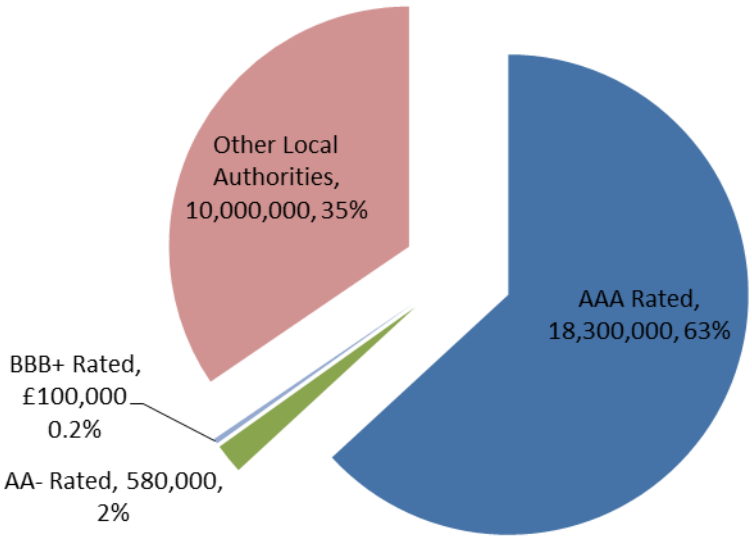
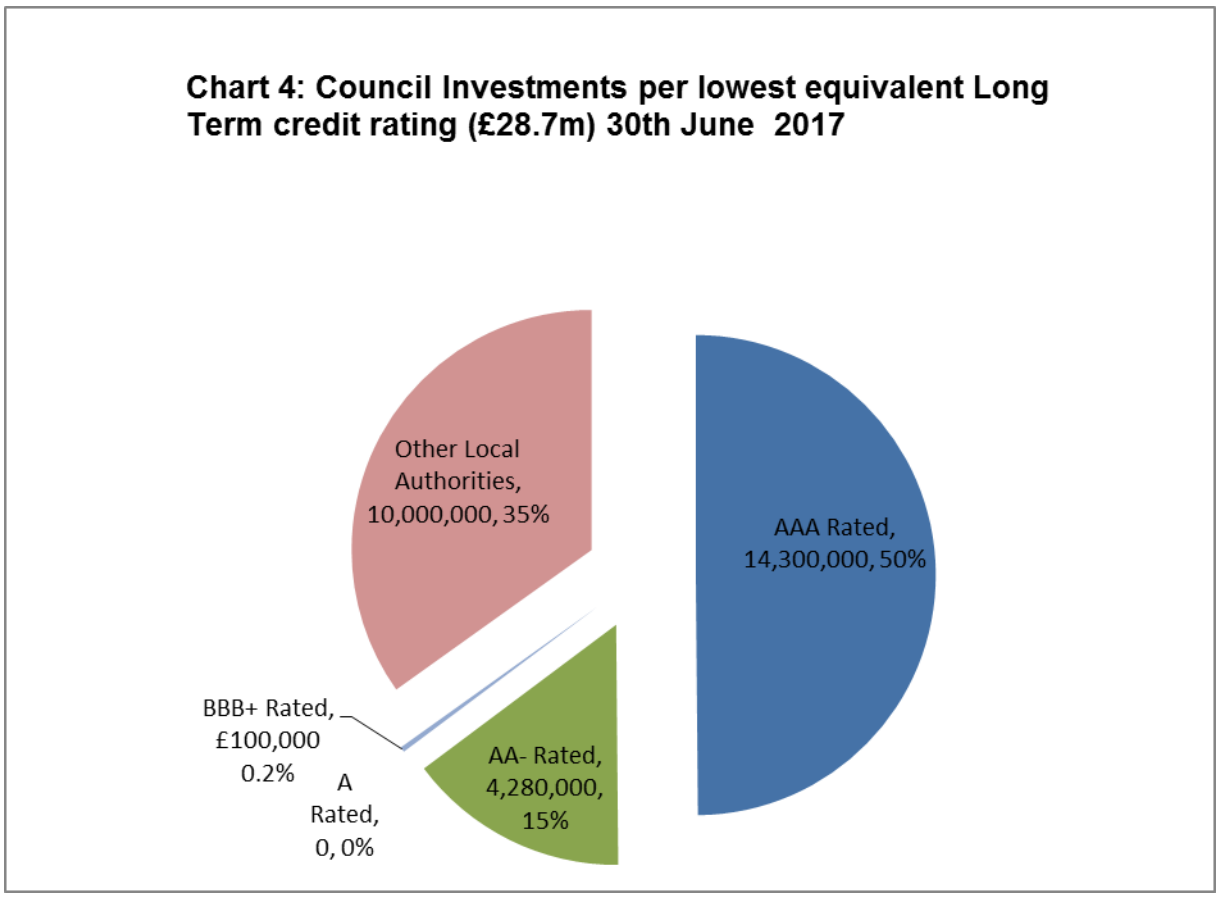


Chart 3: Council Investments per lowest equivalent Long Term credit rating (£28.980m) 30th September





APPENDIX 3

Average rate of return on investments for 2017/18

	April %	May %	June %	July %	Aug %	Sept %	Average for Period
Average rate of interest earned	0.34%	0.24%	0.24%	0.22%	0.24%	0.24%	**0.26%**
Benchmark = Average 7 Day LIBID rate +0.05% (source: Arlingclose)	0.16%	0.16%	0.16%	0.16%	0.16%	0.16%	**0.16%**
Difference %	0.18%	0.08%	0.08%	0.06%	0.08%	0.08%	**+0.10%**

APPENDIX 4

Councils External Borrowing at 30th September 2017

	Amount (£)	Start Date	Maturity Date	Interest Rate
LONG TERM				
PWLB	10,000,000	15/10/04	15/10/34	4.75%
PWLB	5,000,000	12/05/10	15/08/35	4.55%
PWLB	5,000,000	12/05/10	15/02/60	4.53%
PWLB	5,000,000	05/08/11	15/02/31	4.86%
PWLB	10,000,000	05/08/11	15/08/29	4.80%
PWLB	15,000,000	05/08/11	15/02/61	4.96%
PWLB	5,300,000	29/01/15	08/04/34	2.62%
PWLB	5,000,000	29/01/15	08/10/64	2.92%
PWLB	19,704,175	20/06/16	20/06/41	2.36%
PWLB	9,828,688	24/02/17	15/02/41	2.28%
PWLB	9,880,109	04/04/17	15/02/42	2.26%
PWLB	8,372,424	08/05/17	15/02/42	2.25%
PWLB	7,000,000	10/08/17	10/04/67	2.26%
KBC Bank N.V*	5,000,000	08/10/04	08/10/54	4.50%
KBC Bank N.V*	5,000,000	08/10/04	08/10/54	4.50%
Eurohypo Bank*	10,000,000	27/04/05	27/04/55	4.50%
Gloucestershire County Council	5,000,000	25/11/14	19/12/19	2.05%
Gloucestershire County Council	5,000,000	19/12/14	19/12/19	2.05%
Total	**145,055,396**			
TEMPORARY				
East Dorset DC	2,000,000	20/03/17	19/03/18	0.50%
Christchurch Borough Council	2,000,000	20/03/17	19/03/18	0.50%
Tameside Metropolitan	6,000,000	25/04/17	20/04/18	0.49%
West of England Combined Authority	10,000,000	25/04/17	24/04/18	0.55%
PCC for Hampshire	2,500,000	28/07/17	27/07/18	.41%
TOTAL	**167,555,396**			

*All LOBO's (Lender Option / Borrower Option) have reached the end of their fixed interest period and have reverted to the variable rate of 4.50%. The lender has the option to change the interest rate at 6 monthly intervals. Should the lender use the option to change the rate, then at this point the borrower has the option to repay the loan without penalty.

APPENDIX 5

Economic and market review for April to September 2017 (provided by Arlingclose)

Economic backdrop: Commodity prices fluctuated over the period with oil falling below $45 a barrel before inching back up to $58 a barrel. UK Consumer Price Inflation (CPI) index rose with the data print for August showing CPI at 2.9%, its highest since June 2013 as the fall in the value of sterling following the June 2016 referendum result continued to feed through into higher import prices. The new inflation measure CPIH, which includes owner occupiers' housing costs, was at 2.7%.

The unemployment rate fell to 4.3%, its lowest since May 1975, but the squeeze on consumers intensified as average earnings grew at 2.5%, below the rate of inflation. Economic activity expanded at a much slower pace as evidenced by Q1 and Q2 GDP growth of 0.2% and 0.3% respectively. With the dominant services sector accounting for 79% of GDP, the strength of consumer spending remains vital to growth, but with household savings falling and real wage growth negative, there are concerns that these will be a constraint on economic activity in the second half of calendar 2017.

The Bank of England made no change to monetary policy at its meetings in the first half of the financial year. The vote to keep Bank Rate at 0.25% narrowed to 5-3 in June highlighting that some MPC members were more concerned about rising inflation than the risks to growth. Although at September's meeting the Committee voted 7-2 in favour of keeping Bank Rate unchanged, the MPC changed their rhetoric, implying a rise in Bank Rate in "the coming months". The Council's treasury advisor Arlingclose is not convinced the UK's economic outlook justifies such a move at this stage, but the Bank's interpretation of the data seems to have shifted.

In contrast, near-term global growth prospects improved. The US Federal Reserve increased its target range of official interest rates in June for the second time in 2017 by 25bps (basis points) to between 1% and 1.25% and, despite US inflation hitting a soft patch with core CPI at 1.7%, a further similar increase is expected in its December 2017 meeting. The Fed also announced confirmed that it would be starting a reversal of its vast Quantitative Easing programme and reduce the $4.2 trillion of bonds it acquired by initially cutting the amount it reinvests by $10bn a month.

Geopolitical tensions escalated in August as the US and North Korea exchanged escalating verbal threats over reports about enhancements in North Korea's missile programme. The provocation from both sides helped wipe off nearly $1 trillion from global equity markets but benefited safe-haven assets such as gold, the US dollar and the Japanese yen. Tensions remained high, with North Korea's threat to fire missiles towards the US naval base in Guam, its recent missile tests over Japan and a further testing of its latent nuclear capabilities.

Prime Minister Theresa May called an unscheduled General Election in June, to resolve uncertainty but the surprise result has led to a minority Conservative government in coalition with the Democratic Unionist Party. This clearly results in an enhanced level of

political uncertainty. Although the potential for a so-called hard Brexit is diminished, lack of clarity over future trading partnerships, in particular future customs agreements with the rest of the EU block, is denting business sentiment and investment. The reaction from the markets on the UK election's outcome was fairly muted, business confidence now hinges on the progress (or not) on Brexit negotiations, the ultimate 'divorce bill' for the exit and whether new trade treaties and customs arrangements are successfully concluded to the UK's benefit.

In the face of a struggling economy and Brexit-related uncertainty, Arlingclose expects the Bank of England to take only a very measured approach to any monetary policy tightening, any increase will be gradual and limited as the interest rate backdrop will have to provide substantial support to the UK economy through the Brexit transition.

Financial markets: Gilt yields displayed significant volatility over the six-month period with the appearing change in sentiment in the Bank of England's outlook for interest rates, the push-pull from expectations of tapering of Quantitative Easing (QE) in the US and Europe and from geopolitical tensions, which also had an impact. The yield on the 5-year gilts fell to 0.35% in mid-June, but then rose to 0.80% by the end of September. The 10-year gilts similarly rose from their lows of 0.93% to 1.38% at the end of the quarter, and those on 20-year gilts from 1.62% to 1.94%.

The FTSE 100 nevertheless powered away reaching a record high of 7548 in May but dropped back to 7377 at the end of September. Money markets rates have remained low: 1-month, 3-month and 12-month LIBID rates have averaged 0.25%, 0.30% and 0.65% over the period from January to 21st September.

Credit background: UK bank credit default swaps continued their downward trend, reaching three-year lows by the end of June. Bank share prices have not moved in any particular pattern.

There were a few credit rating changes during the quarter. The significant change was the downgrade by Moody's to the UK sovereign rating in September from Aa1 to Aa2 which resulted in subsequent downgrades to sub-sovereign entities including local authorities. Moody's downgraded Standard Chartered Bank's long-term rating to A1 from Aa3 on the expectation that the bank's profitability will be lower following management's efforts to de-risk their balance sheet. The agency also affirmed Royal Bank of Scotland's and NatWest's long-term ratings at Baa1, placed Lloyds Bank's A1 rating on review for upgrade, revised the outlook of Santander UK plc, and Nationwide and Coventry building societies from negative to stable but downgraded the long-term rating of Leeds BS from A2 to A3.

S&P also revised Nordea Bank's outlook to stable from negative, whilst affirming their long-term rating at AA-. The agency also upgraded the long-term rating of ING Bank from A to A+.

Ring-fencing, which requires the larger UK banks to separate their core retail banking activity from the rest of their business, is expected to be implemented within the next year. In May, following Arlingclose's advice, the Authority reduced the maximum duration of unsecured investments with Bank of Scotland, HSBC Bank and Lloyds Bank from 13 months to 6 months as until banks' new structures are finally determined and published, the different credit risks of the 'retail' and 'investment' banks cannot be known for certain.

The new EU regulations for Money Market Funds were finally approved and published in July and existing funds will have to be compliant by no later than 21st January 2019. The key features include Low Volatility NAV (LVNAV) Money Market Funds which will be permitted to maintain a constant dealing NAV, providing they meet strict new criteria and minimum liquidity requirements. MMFs will not be prohibited from having an external fund rating (as had been suggested in draft regulations). Arlingclose expects most of the short-term MMFs it recommends to convert to the LVNAV structure and awaits confirmation from each fund.

Regulatory Updates : MiFID II: Local authorities are currently treated by regulated financial services firms as professional clients who can "opt down" to be treated as retail clients instead. But from 3rd January 2018, as a result of the second Markets in Financial Instruments Directive (MiFID II), local authorities will be treated as retail clients who can "opt up" to be professional clients, providing that they meet certain criteria. Regulated financial services firms include banks, brokers, advisers, fund managers and custodians, but only where they are selling, arranging, advising or managing designated investments. In order to opt up to professional, the authority must have an investment balance of at least £10 million and the person authorised to make investment decisions on behalf of the authority must have at least one year's relevant professional experience. In addition, the firm must assess that that person has the expertise, experience and knowledge to make investment decisions and understand the risks involved.

The main additional protection for retail clients is a duty on the firm to ensure that the investment is "suitable" for the client. However, local authorities are not protected by the Financial Services Compensation Scheme nor are they eligible to complain to the Financial Ombudsman Service whether they are retail or professional clients. It is also likely that retail clients will face an increased cost and potentially restricted access to certain products including money market funds, pooled funds, treasury bills, bonds, shares and to financial advice. The Authority has declined to opt down to retail client status in the past as the costs were thought to outweigh the benefits.

The Council meets the conditions to opt up to professional status and intends to do so in order to maintain its current MiFID status.

CIPFA Consultation on Prudential and Treasury Management Codes: In February 2017 CIPFA canvassed views on the relevance, adoption and practical application of the Treasury Management and Prudential Codes and after reviewing responses launched a further consultation on changes to the codes in August with a deadline for responses of 30th September 2017.

The proposed changes to the Prudential Code include the production of a new high-level Capital Strategy report to full council which will cover the basics of the capital programme and treasury management. The prudential indicators for capital expenditure and the authorised borrowing limit would be included in this report but other indicators may be delegated to another committee. There are plans to drop certain prudential indicators, however local indicators are recommended for ring fenced funds (including the HRA) and for group accounts. Other proposed changes include applying the principles of the Code to subsidiaries.

Proposed changes to the Treasury Management Code include the potential for non-treasury investments such as commercial investments in properties in the definition of "investments" as well as loans made or shares brought for service purposes. Another proposed change is the inclusion of financial guarantees as instruments requiring risk management and addressed within the Treasury Management Strategy. There are also plans to drop or alter some of the current treasury management indicators.

CIPFA intends to publish the two revised Codes towards the end of 2017 for implementation in 2018/19, although CIPFA plans to put transitional arrangements in place for reports that are required to be approved before the start of the 2018/19 financial year. The Department of Communities and Local Government (DCLG) and CIPFA wish to have a more rigorous framework in place for the treatment of commercial investments as soon as is practical. It is understood that DCLG will be revising its Investment Guidance (and its MRP guidance) for local authorities in England; however there have been no discussions with the devolved administrations yet.

Outlook for the remainder of 2017/18

The UK economy faces a challenging outlook as the minority government continues to negotiate the country's exit from the European Union. Both consumer and business confidence remain subdued. Household consumption growth, the driver of UK GDP growth, has softened following a contraction in real wages. Savings rates are at an all-time low and real earnings growth (i.e after inflation) struggles in the face of higher inflation.

The Bank of England's Monetary Policy Committee has changed its rhetoric, implying a rise in Bank Rate in "the coming months". Arlingclose is not convinced the UK's economic outlook justifies such a move at this stage, but the Bank's interpretation of the data seems to have shifted.

This decision is still very data dependant and Arlingclose is, for now, maintaining its central case for Bank Rate at 0.25% whilst introducing near-term upside risks to the forecast as shown below. Arlingclose's central case is for gilt yields to remain broadly stable in the across the medium term, but there may be near term volatility due to shifts in interest rate expectations.

APPENDIX 6

Interest & Capital Financing Costs – Budget Monitoring 2017/18 (Apr to September)

April to September 2017	YEAR END FORECAST			ADV/FAV
	Budgeted Spend or (Income) £'000	Forecast Spend or (Income) £'000	Forecast over or (under) spend £'000	
Interest & Capital Financing				
- Debt Costs	6,194	6194	0	
- Internal Repayment of Loan Charges	-8,391	-8,391	0	
- Ex Avon Debt Costs	1,190	1,190	0	
- Minimum Revenue Provision (MRP)	5,278	5,278	0	
- Interest on Balances	-141	-141	0	
Sub Total - Capital Financing	**4,130**	**4,130**	**0**	

APPENDIX 7

Summary Guide to Credit Ratings

Rating	Details
AAA	Highest credit quality – lowest expectation of default, which is unlikely to be adversely affected by foreseeable events.
AA	Very high credit quality - expectation of very low default risk, which is not likely to be significantly vulnerable to foreseeable events.
A	High credit quality - expectations of low default risk which may be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
BBB	Good credit quality - expectations of default risk are currently low but adverse business or economic conditions are more likely to impair this capacity.
BB	Speculative - indicates an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time.
B	Highly speculative - indicates that material default risk is present, but a limited margin of safety remains. Capacity for continued payment is vulnerable to deterioration in the business and economic environment.
CCC	Substantial credit risk - default is a real possibility.
CC	Very high levels of credit risk - default of some kind appears probable.
C	Exceptionally high levels of credit risk - default is imminent or inevitable.
RD	Restricted default - indicates an issuer that has experienced payment default on a bond, loan or other material financial obligation but which has not entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, and which has not otherwise ceased operating.
D	Default - indicate san issuer that has entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, or which has otherwise ceased business.

Bath & North East Somerset Council		
MEETING	**Council**	
MEETING DATE:	**9 November 2016**	
TITLE:	**Avon Pension Fund Annual Report**	
WARD:	**All**	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Appendix 1 – The Avon Pension Fund Committee's Annual Report to Council 2017 Appendix 2 – Local Pension Board – Annual Report 2017		

1 THE ISSUE

1.1 The Avon Pension Fund Committee discharges the responsibilities of the Council in its role as the administering authority of the Avon Pension Fund in accordance with the Local Government Pension Scheme Regulations 2013 (as amended).

1.2 The Committee reports annually to Council on the work it has undertaken in the previous twelve months and reference is also made in the report to the future work programme. This report is for the 12 months to 31 March 2017.

1.3 As background to this report it may be worth reminding members that Bath & North East Somerset Council has a dual interest in the Avon Pension Fund, firstly as administering authority and secondly as one of the employing bodies. This report focuses entirely on the Council's role as administering authority.

2 RECOMMENDATION

2.1 The Council is asked to note this report.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 The costs of administering the Avon Pension Fund are recharged to the employing bodies through the employer contribution rates which are set by the actuary every three years as part of the valuation.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The Council is required to put in place arrangements for the effective discharge of its business.

5 THE REPORT

5.1 The Annual Report is attached as Appendix 1 to this report. It relates to the financial year April 2016 to March 2017. The document is primarily for the Council's purposes. However, the report will be circulated to the employing bodies within the Fund to improve transparency about the Committee's activities and the decisions taken.

5.2 The Public Service Pensions Act 2013 required the Council to establish a local pension board to assist the administering authority with the effective and efficient management and administration of the scheme. The Avon Fund Pension Board has published its annual report detailing the work undertaken by the Board in its inaugural year. This report is included in Appendix 2 for completeness.

6 RATIONALE

6.1 This report is for information only

7 OTHER OPTIONS CONSIDERED

7.1 None

8 CONSULTATION

8.1 The draft report was considered by the Avon Pension Fund Committee at the committee meeting on 22 September 2017.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	Tony Bartlett, Head of Business Finance & Pensions x 7302
Background papers	Avon Pension Fund Committee/Investment Panel reports and minutes; Avon Pension Fund Pension Board reports and minutes
Please contact the report author if you need to access this report in an alternative format	

Appendix 1

AVON PENSION FUND COMMITTEE
ANNUAL REPORT TO COUNCIL
(April 2016 - March 2017)

1 BACKGROUND TO THE AVON PENSION FUND

The Avon Pension Fund is a statutory scheme regulated by the Local Government Pension Scheme Regulations 2014 (as amended) and the Local Government Pension Scheme Regulations (Management and Investment of Funds) Regulations 2016 (as amended). Bath & North East Somerset Council ("the Council") administers the Fund on behalf of approximately 300 employing bodies including the four unitary authorities (of which c. 180 are academies). The Fund has approximately 107,000 members and the value of the Fund as at 31 March 2017 was £4.4 billion. In 2016/17 the Fund received £146m in pension contributions and paid out £164m in pension payments and transfers.

The Local Government Pension Scheme is going through a period of rapid and challenging change. The pressure on administrators has increased exponentially with the accelerated growth in scheme employers and membership. Benefit calculations have to be made separately to reflect different periods of service accrual and a further layer of complexity has been introduced with the advent of the career average revalued earnings structure requiring all member data to be captured accurately on an annual basis.

2 GOVERNANCE

The scheme is heavily regulated and now overseen by the Pensions Regulator. Other bodies and agencies undertake key roles, particularly the LGPS Advisory Board, the Department for Communities and Local Government, and CIPFA, which sets the accounting standards

The Council has delegated responsibility for the Fund to the Avon Pension Fund Committee (the "Committee") which is the formal decision-making body for the Fund. The Committee's role is strategic in nature, setting policy framework and monitoring implementation and compliance within that framework. Due to the wide scope of the Committee's remit it is supported by the Investment Panel (the "Panel") which considers the investment strategy and investment performance in greater depth. The Committee has delegated authority to the Panel for specific investment decisions. The Terms of Reference, agreed by the Council, for the Committee and Panel are set out in Appendix A to this report.

The Pensions Committee and administering authority are scrutinised by the Local Pension Board ensuring that the governance surrounding the scheme is remains robust and fit for purpose.

Committee Membership

The Committee structure is as follows:

Voting members (12)	5 elected members from B&NES (subject to the rules of political proportionality of the Council) 2 independent trustees 1 elected member nominated from each of the other 3 West of

	England unitary councils 1 nominated from the Higher and Further education bodies 1 nominated by the trades unions
Non-voting members (4)	1 nominated from the Parish Councils Up to 3 nominated from different Trades Unions

The Committee meets quarterly. In 2016-17 two extra committee meetings were held. An informal pooling update followed by a formal approval on the joint submission from the Brunel Pension Partnership (BPP) and a meeting to formalise and approve the Responsible Investment Policy (R.I.). Attendance at these meetings was 93% for the voting members and 72% for the non-voting members.

Ad hoc workshops are arranged as necessary reflecting the Committee's meeting agendas. During the last twelve months four workshops were arranged covering:

- Two updates on pooling of the investment assets
- Two reviewing the Responsible Investing Policy

Investment Panel

The Panel consists of up to six voting members from the Committee and meets at least quarterly ahead of Committee meetings.

The Panel met formally four times during the year with attendance at 96%.

3 TRAINING

The Fund provides training to committee members to ensure they possess an appropriate level of knowledge, skill and understanding to discharge their fiduciary duties. The administering authority must ensure:

- that decisions are taken by persons or organisations with the skills, knowledge advice and resources necessary to make them effectively and monitor implementation; and
- those persons or organisations have sufficient expertise to be able to evaluate and challenge the advice they receive, and manage conflicts of interest.

The Fund has in place a training framework which is based on CIPFA's (Chartered Institute of Public Finance and Accounting) Knowledge and Skills Framework for LGPS funds, which identifies six areas of knowledge as follows:

i. Legal and governance context
ii. Pensions Auditing and Accounting Standards
iii. Procurement and Relationship Management
iv. Investment Performance and Risk Management
v. Financial Markets and Product Knowledge
vi. Actuarial Methods, Standards and Practices

Committee training is delivered in a variety of formats, reflecting the strategic importance of the subject matter to the Committee's agenda and the differing level of knowledge and understanding across the Committee. Much of the training is delivered through detailed Committee and Panel reports and workshops where the topic is explored greater in detail.

In addition, members attended a number of seminars and conferences which broaden their understanding of investments and topics of relevance to the LGPS.

4 REVIEW OF THE YEAR

a) INVESTMENTS

- The Fund's assets increased by £618m to £4,355m at 31 March 2017. The Fund generated an investment return of 17.2% during the year, with a return of 9.2% p.a. over the last three years.
- The investment return was primarily driven by the significant rise in equity markets which account for 50% of the fund assets and further falls in UK government and corporate bond yields following the EU referendum, although all the assets in the portfolio contributed positively. The depreciation of sterling meant that the impact of hedging the foreign currency exposure within the portfolio detracted from the overall return. Excluding the foreign currency hedge the returns were 20.2% over one year and 10.8% per annum over three years.
- During the year the investment in infrastructure was implemented, funded by a reduction in the equity allocation. A review of the currency hedging strategy concluded that the strategic decision to hedge foreign currency exposure to protect the value of the assets in sterling terms should be maintained. The Responsible Investing Policy was reviewed and further developed especially with regard to risks arising from climate change. Lastly, significant work was undertaken to put in place a framework to manage the liability risks more effectively within the investment portfolio to provide greater protection against changes in the values of the liabilities. The development of the liability risk management framework is a large piece of work and marks an important development in the Fund's investment strategy.

b) POOLING OF ASSETS

- Since 2015 when the government announced that the assets of the LGPS funds should be pooled to reduce costs and increase the capacity across the LGPS to invest in infrastructure, the Fund has been participating in the Brunel Pension Partnership (BPP), a collaboration of 10 LGPS funds.
- Initial proposals where submitted to government in February 2016, with a more detailed proposal submitted in July 2016. The partnership developed a full business case which was approved by all 10 authorities early in 2017. This milestone enabled work to start on setting up the FCA (Financial Conduct Authority) company that will manage the assets on behalf of the funds in the partnership.
- Under these new arrangements, the Avon Pension Fund will retain responsibility for setting its investment strategy (or asset allocation), as well as the funding and administration strategies. The FCA company will implement the investment strategy for each fund within the pool; it will be responsible for appointing and monitoring the investment managers. The FCA company BPP Ltd, was established on 18 July 2017 and it is expected to be operating as an FCA authorised company by 1 April 2018.

- The governance arrangements for the pool are in place. The Committee member will represent the Fund on the Oversight Board. The Investments Manager will represent the Fund on the Client Group.
- Officers and appropriate members of the Committee have dedicated significant time and effort in supporting the development of BPP and the necessary governance and oversight bodies required to represent client interests.

c) FUNDING LEVEL

- The funding level at 31 March 2017 is estimated to have risen to 95% (from 86% a year earlier) and the deficit to have narrowed to £230m million from £618m a year earlier. This improvement reflects the significant increase in asset values over the period. The Fund will review its investment strategy during 2017/18 which will take account of the improvement in the funding position.
- Each valuation the increase in and diversity of the employer base increases the complexity of the valuation process. The 2016 valuation, completed during the year, was no exception and entailed significant resource in agreeing and applying the funding strategy to individual employers. Fortunately, the increases in contribution rates were lower than anticipated; however, employers face significant financial pressures and taking affordability in to account was a key element of the funding strategy. The 2016 valuation sets the contribution rates for employers from 1 April 2017 to 31 March 2020.

d) PENSIONS ADMINISTRATION

(i) Budget

- During the year to 31 March 2017, total administration costs (excluding governance and investment management costs) were £1.8 million, a saving of £0.2m (12%) on the budget.
- Total costs including Investment Management, custody and governance costs, but excluding transaction costs deducted at source and performance fees that are not yet due for payment, were £20.6 million, £0.4 million below budget. Investment management fees were slightly higher than expected (£0.1m) due to the rise in asset values during the year. Governance costs were slightly lower than expected (£0.3m) due to lower than anticipated expenditure on consultants.
- The investment management and custody fees of £19.6 million equates to 0.45% of the Fund's assets.

(ii) Chartered Institute of Public Finance & Accountancy (CIPFA) Benchmarking (Benefits Administration)

- The Fund participates in the annual CIPFA Pensions Administration Benchmarking Club. This compares administration costs and performance indicators against other participating LGPS funds and against a group of funds of similar size. The results are used to identify areas for improvement in the Service Plan, to understand the specific service pressures that the

Fund faces and to help the Fund operate as efficiently and effectively as possible. In addition it provides an indication of relative operational costs.

- The latest available report for 2015/16 identifies the cost per member for the Fund as £15.79 compared with £16.55 in 2014/15. This is significantly less than the cost for the average fund which is £18.58 per member. The Fund's own performance targets are set out in the SLAs it has in place with employers, covering over 80% of the active membership. In many cases these targets are more challenging than the industry standard. Regular SLA review meetings are held with these employers to review each party's performance. The Fund also publishes a Customer Charter on its website. This includes its targets (in working days) for completion of processing of member benefits.

(iii) Pensions Administration Strategy

- The Administration Strategy sets out how the administering authority and scheme employers will work together to provide an improving quality level of service to Fund members.

- The strategy ensures the Fund can continue to deliver a high quality pension service at a time when the operating environment is becoming more complex: the employer base has fragmented, especially with the creation of academies, furthermore the increase in the number of third party HR and payroll providers (favoured by a number of local education authority (LEA) schools) has added a further layer to the process and provision of data. The tables overleaf show how the Fund's employer and membership base has changed over time.

- The Fund revised its Administration Strategy in 2015 to include a more detailed ICT Strategy and also to ensure the governance and administration requirements of the Pension Regulator are properly addressed as they fall to the Fund and employers. The Administration Strategy will be further reviewed in 2017/18 to ensure it remains focussed on the Funds key objectives and challenges ahead.

5 COMMITTEE ACTIVITY TO MARCH 2017

a) Investment Strategy

In March 2017 the Fund published its first Investment Strategy Statement (ISS), which replaced the Statement of Investment Principles. The LGPS (Management and Investment Funds) Regulations 2016 require funds to produce an ISS which sets out the principles that guide the decision making for investing the Fund's assets. It also sets out the framework for investing the Fund's assets to ensure consistency with the Funding Strategy Statement. A wide range of investments are permitted to ensure the Fund achieves an optimal risk/return profile and that assets are sufficiently diversified. The LGPS regulations no longer list restrictions in particular types of investments but instead seek to transfer decisions and their considerations more fully to the Fund within a new prudential framework.

The ISS replaces the Statement of Investment Principles and sets out the Fund's core beliefs that underpin the investment strategy, the process for ensuring the

suitability of investments and the key risks the Fund is exposed to, and how these risks are managed.

Key elements include:
- Investment objective
- Management of the main sources of risk
- Responsible Investing: environmental, social and environmental (ESG) considerations
- Exercise of voting rights
- The Fund's approach to pooling it assets with other funds (Brunel Pension Partnership)
- Compliance with the Investment Governance Principles

During the year the Fund reviewed specific aspects of its investment strategy, namely the currency hedging policy, liability risk management and the Responsible Investing policy.

- **Currency Hedging Policy:**

The passive currency hedging strategy was reviewed following the sharp devaluation of sterling following the result of the EU referendum. It was concluded that the rationale for putting the currency hedge in place remained valid and that the Fund should continue to protect the value of the assets in sterling terms. The suitability of the Fund's currency hedging programme will be reassessed as part of the triennial investment strategy review in July 2017.

- **Liability risk management Policy:**

The Fund invests in assets such as fixed interest bonds to provide some matching to the value of the liabilities, in order to reduce the volatility in the funding position. To improve the effectiveness of the "matching" assets" the Committee agreed that a liability risk management framework should be implemented. The framework should increase the certainty of the Fund's assets achieving the cash flows required to meet the pension payments as they fall due.

The initial step was to switch the fixed interest gilts into index-linked gilts. The next phase being implemented in 2017/18 is to include synthetic instruments designed to more closely match the Fund's inflation linked cash flows and increase the certainty of asset returns in line with the assumed strategic return. Significant time and resource was required to design, develop and set-up the framework, and the future implementation of the framework will form a large part of the workplan of Committee, Panel and Officers going forwards.

- **Responsible Investing Policy**

This was policy was reviewed with a focus on the risks to the portfolio from climate change and investing in sustainable equities and infrastructure. The revised policy was published in 4Q16.

The Fund has continued to support the Local Authority Pension Fund Forum (LAPFF) as part of its Responsible Investing Policy, with members and officers attending quarterly meetings. LAPFF act on behalf of local authority funds to promote best practice in governance in investee companies either on its own or in collaboration with other organisations with similar objectives.

b) Funding Strategy

Following the 2016 valuation the Fund implemented a captive ill health insurance scheme within the und to assist the smaller/medium sized employers to manage the cost of early retirements due to ill health. The scheme is deigned to be cost neutral over time and will be reviewed at each triennial valuation.

c) Approval of the 3-year Service Plan and Budget 2017/20

The forward looking three year Service Plan 2017/20 sets out the key service objectives and milestones. It also reviews the achievement against the previous year's plan. The main focus of the plan is:

- To fully engage in the development and implementation of pooled funds in the interest of the Avon Pension Fund; ensure local governance arrangements are in place to accommodate pooling
- To continue implementation of the IT strategy to achieve a digital step change in service delivery and to mitigate service demand growth.
- Undertake a review of investment strategy to ensure it is consistent with updated cash flows post the valuation and investment returns expectations.
- To continue to support the requirements of the Local Pension Board.

The later years will focus on consolidation, realising efficiencies and embedding partnership working with stakeholders.

The budget approved for Administration in 2017/18 is £2.706m.

The increased expenditure budgeted for 2017/18 reflects the Funds response to the increasing pressure of dealing with the continued growth in the number of employers and the importance of maintaining accurate and up to date data. Savings have been made through changes in working arrangements and the adoption of digital technology to promote efficiency while maintaining the level of service. Ongoing savings made in 2015/16 continue to be invested in the IT Strategy that will realise further savings and or mitigate cost pressures in future years. Wherever possible the effect of inflation has been absorbed.

d) The Pension Regulator – Code of Practice 14

- The Pension Regulator's (TPR) Code of Practice 14 and the Public Service Pensions (Record Keeping & Miscellaneous Amendments) Regulations 2014 set out the requirements for public sector pension funds to maintain comprehensive and accurate data on their members and their member's pension contributions.
- The Fund has undertaken a detailed review of its core data and processes and assessed its level of compliance with regulation requirements in respect of:
    - Scheme record keeping
    - Maintaining contributions
    - Providing information to members

- The regulations require 100% completeness of data across a number of core areas. In 2015, the Fund tested 102,000 membership records through a series of analytical reports and measured the overall level of completeness of data accuracy at 92%. A data improvement plan was produced to address the issues identified over a two year period. Accordingly, the data improvement plan will be further reviewed and updated in 2017/18 following the Local Pension Boards next annual review of compliance.
- To ensure continued compliance the Fund has also undertaken to review its existing procedures relating to the monitoring of late payment of monthly contributions from employers and its Internal Dispute Resolution Procedure (IDRP).
- Detailed reports on compliance and the data improvement plan are presented to both Pensions Committee and Local Pensions Board on a quarterly basis.

e) Treasury Management Policy and Cash Management Policy

- The Committee approves the Fund's Treasury Management Policy annually. The policy sets out how the Fund's cash is invested to meet its day-to-day requirements. The cash managed under this policy at any time is c. £25 million, which represents less than 1% of the Fund's value.
- The management of this cash is delegated to the Council's Treasury Management Team. However, the Fund's cash is invested separately (via separate bank account) to the Council's and the Fund has a bespoke Treasury Management Policy.

f) Administration

- During the year the fund undertook a restructure of its Administration function to create specific member and employer focussed services. The key drivers for change being:
    - Continued growth in employer base
    - Compliance with the Pension Regulators Code of Practice no. 14 and associated record keeping requirements.
    - Compliance with increased scrutiny from Scheme Advisory Board and Local Pension Board.
- The Pensions Committee in recognising these challenges agreed a package of investment in the service to strengthen resources, enhance employer services and create new and enhanced roles.
- The restructure and its success will shape the future of the Avon Pension Fund administration and ensure it can deal adequately with significant challenges of its expanding employer portfolio whilst ensuring compliance with the requirements of the Pensions Regulator and Scheme Advisory Board.

g) Workplans

- Separate workplans are prepared for the Committee and Panel detailing the forthcoming areas of work relating to the investment and funding strategies

and to the administration of benefits to give the Committee and officers the opportunity to review the workload and accommodate issues that may arise.

6 FUTURE ACTIVITY

The Committee and Panel's focus over the next twelve months will be as follows:

a) Investments

- Conclude on the options to more effectively manage the liabilities through hedging the interest rate and risks and implement.
- Review the investment strategy following the 2016 valuation with particular focus on meeting updated cash flow requirements and implementing decisions arising from the review of the Responsible Investing Policy.
- Pooling of assets – agree the allocation of assets to the portfolios set up by BPP and monitor the transition of assets.

The work required to progress the implementation of a revised investment strategy and the implementation of asset pooling is significant and the increase in the workload required of officers is considerable.

b) Funding Strategy

- Explore investment options for improved matching of liabilities funded on the corporate bond basis.

c) Benefits Administration

- Continue to ensure maintained compliance with stringent requirements of The Pensions Regulator (TPR).
- Review the AVC Strategy on the number and types of funds to be offered to members to assist them in saving towards retirement.

d) Governance of the LGPS

- Work closely with the (Shadow) Oversight Board of Brunel Pension Partnership to establish the FCA company and monitor the preparation to transfer assets to the company.
- Understand the significance and impact of the pooling proposals on the Avon Pension Fund own internal governance arrangements and put forward recommendations to Council as required.
- Engage with and respond to government consultations or consultations from the LGPS Scheme Advisory Board. It is expected that the focus will be on the outcome of the 2016 valuation and the administration of academies across the LGPS.

Avon Pension Fund
September 2017

Appendix A

Terms of Reference for the Avon Pension Fund Committee and Investment Panel

1 Avon Pension Fund Committee

Bath and North East Somerset Council, in its role as administering authority, has executive responsibility for the Avon Pension Fund. The Council delegates its responsibility for administering the Fund to the Avon Pension Fund Committee which is the formal decision making body for the Fund.

Function and Duties

To discharge the responsibilities of Bath and North East Somerset Council in its role as lead authority for the administration of the Avon Pension Fund. These include determination of all Fund specific policies concerning the administration of the Fund, investing of Fund monies and the management of the Fund's solvency level. In addition, the Committee is responsible for all financial and regulatory aspects of the Fund. At all times, the Committee must discharge its responsibility in the best interest of the Avon Pension Fund.

The key duties in discharging this role are:

1. Determining the investment strategy and strategic asset allocation.
2. Determining the pensions administration strategy.
3. Making arrangements for management of the Fund's investments in line with the strategic policy.
4. Monitoring the performance of investments, investment managers, scheme administration, and external advisors.
5. Approving and monitoring compliance of statutory statements and policies required under the Local Government Pension Scheme Regulations.
6. Approving the Pension Fund's Statement of Accounts and annual report.
7. Approving the annual budget for the Pension Board subject to the approval of Pension Board's workplan.
8. Commissioning actuarial valuations in accordance with the provisions of the Local Government Pension Scheme Regulations.
9. Making representations to government as appropriate concerning any proposed changes to the Local Government Pension Scheme.
10. Nominating a representative from the Committee to represent the Committee on the Oversight Board for Brunel Pension Partnership.

Delegations

In discharging its role the Committee can delegate any of the above or implementation thereof to the Sub-Committee (referred to as the Investment Panel) or Officers. The current delegations are set out in Sections 2 & 3 below.

Membership of the Committee

Voting members (12)	5 elected members from B&NES (subject to the rules of political proportionality of the Council) 2 independent members 1 elected member nominated from each of Bristol City Council, North Somerset Council and South Gloucestershire Council 1 nominated from the Higher and Further education bodies 1 nominated by the trades unions
Non-voting members (4)	1 nominated from the Parish Councils Up to 3 nominated from different Trades Unions

The Council will nominate the Chair of the Committee.

Meetings

Meetings will be held at least quarterly. Meetings will be held in public, though the public may be excluded from individual items of business in accordance with the usual exemption procedures.

Quorum

The quorum of the Committee shall be 5 voting members, who shall include at least one Member who is not a Bath & North East Somerset Councillor.

Substitution

Named substitutes to the Committee are allowed.

2 Investment Panel

The role of the Avon Pension Fund Committee Investment Panel shall be to consider, in detail matters relating to the investment of the assets within the strategic investment framework and performance of investment managers in achieving the Fund's investment objectives.

The Investment Panel will:

1. Review strategic and emerging opportunities outside the strategic asset allocation and make recommendations to the Committee.
2. Review the Statement of Investment Principles and submit to Committee for approval.
3. Report regularly to Committee on the performance of investments and matters of strategic importance

and have delegated authority to:

4. Approve and monitor tactical positions within strategic allocation ranges.
5. Approve investments in emerging opportunities within strategic allocations.
6. Implement investment management arrangements in line with strategic policy, including the setting of mandate parameters and the appointment of managers.
7. Approve amendments to investment mandates within existing return and risk parameters.

8. Monitor investment managers' investment performance and make decision to terminate mandates on performance grounds.
9. Delegate specific decisions to Officers as appropriate.

Panel Membership

The Panel shall comprise a maximum of 6 voting Members of the Avon Pension Fund Committee, of which 3 shall be Bath and North East Somerset Councillors. The membership shall include the Chairman of the Committee and /or the Vice- Chair and 4 other Members (or 5 if the Chair or Vice-Chairperson is not a member of the Panel).

Note: The appointment of Bath and North East Somerset Councillors to the Panel is subject to the rules of political proportionality of the Council.

Members shall be appointed to the Panel for a term of one year.

The Council will nominate the Chair of the Panel.

Panel Meetings

Though called a "Panel", it is an ordinary sub-committee of the Committee. Accordingly, meetings must be held in public, though the public may be excluded from individual items of business in accordance with the usual exemption procedures.

The Panel shall meet at least quarterly ahead of the Committee meeting on dates agreed by Members of the Panel.

Panel Quorum

The quorum of the Panel shall comprise 3 Members, who shall include at least one Member who is not a Bath & North East Somerset Councillor.

Panel Substitution

Substitutes for the Panel must be members of Committee or their named Committee substitute.

Panel Minutes

Minutes of Panel meetings (whether or not approved by the Panel) shall appear as an item on the next agenda of the meeting of the Committee that follows a meeting of the Panel.

3 Officer Delegations

Officers are responsible for:

1. Day to day implementation and monitoring of the investment, administration, funding strategies and related policies.
2. Appointment of specialist advisors to support the Committee in discharging it functions.
3. The Section 151 Officer has authority to dismiss investment managers, advisors and 3rd party providers if urgent action is required (does not refer to performance failures but to their inability to fulfil their contractual obligations or a material failing of the company).

4. The Section 151 Officer has authority to suspend policy (in consultation with the Chairs of Committee and Panel) in times of extreme market volatility where protection of capital is paramount
5. Under its wider delegated powers, the Section 151 Officer has delegated authority to effectively manage the liabilities of the Fund including the recovery of debt.
6. Exercising the discretions specified in the Local Government Pension Scheme Regulations in connection with deciding entitlement to pension benefits or the award or distribution thereof.
7. Through delegations from Council, the S151 Officer has authority to progress the development of Brunel Pension Partnership pool.

Approved by Avon Pension Fund Committee 24 March 2017

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Avon Pension Fund – Local Pension Board – Annual Report 2016/17

1. Introduction

Welcome to the second Annual Report of the Local Pension Board (LPB) of Avon Pension Fund.

The Board was established in 2015 arising from the Public Sector Pension Act 2013 and Local Government Pension Scheme (Governance) Regulations 2015.

The purpose of the Board is to assist the Administering Authority (Bath and North East Somerset (BANES) Council) of the Avon Pension Fund (APF) secure compliance with the LGPS regulations and the requirements of the Pensions Regulator (TPR) and ensure efficient and effectiveness of the governance and administration of the fund.

This report covers the period 1st August 2016 to 31st July 2017 within which the Board has held four formal meetings. During this period the members of the LPB have continued to develop their knowledge and understanding of the LGPS and TPR requirements as required by law.

The second year of operation of the LPB was focussed on its statutory responsibilities with a core agenda of key governance themes around the fund's legal compliance, risk management, best practice, and benchmarking.

It has also actively monitored the fund's involvement in the Brunel Pensions Partnership (BPP) that is being established in 2017 to facilitate the pooling of the fund's assets with 9 other LGPS funds in 2018.

I am pleased to say that with the support of the officers and advisors to the APF; the LPB has made good progress in fulfilling its terms of reference and continuing to support the LGPS administering authority (BANES) fulfil its statutory duties.

The LPB has reviewed a wide range of LGPS regulations and TPR requirements and made a number of recommendations to the administering authority (see page 8 and Appendix 1). The LPB has also reviewed the draft new statutory Investment Strategy Statement (ISS) for its compliance against the DCLG statutory guidance and recommended a small number of amendments. These were accepted by the Pensions Committee and incorporated in the published ISS.

One of the most important reviews the LPB has undertaken is the funds compliance with TPR Code of Practice 14 (see page 6). The LPB welcomed the actions being implemented by the fund to ensure it fully complies with the Codes before the LPB carries out its next annual review of compliance.

The LPB has also reviewed the APF communication strategy and stressed the need for all scheme information to be kept up to date, and the importance of the fund website to fund employers and members.

Looking ahead the LPB will seek to assist and support the APF in respect of minimising potential governance and other risks arising from creation of the BPP in 2017 and the pooling of the funds assets with nine other LGPS funds in 2018.

Last but not least could I thank my fellow Board members for their commitment to their roles on the LPB and I commend this report to you.

Howard Pearce
Independent Chair

2. Legal basis of Local Pension Board

Background

At the request of central government Lord Hutton conducted a review into public service pensions in 2010 and published his findings in March 2011 which recommended significant change to the governance of the pensions '*to make…schemes…more transparent'*.

Subsequently legislation was introduced in the form of the Public Sector Pension Act 2013 along with the Local Government Pension Scheme (Governance) Regulations 2015. These require each Local Government Pension Scheme (LGPS) administering authority to establish a new body known as a Local Pensions Board (LPB) to assist the Council (LGPS Administering Authority).

One of the key aims of the reform was to raise the standard of management and administration of public service pension schemes and to achieve more effective representation of employer and employee interests. The LPB must have equal representation of scheme members and scheme employers.

The APF LPB is a separate legal entity from the APF Pensions Committee (Section 101 committee) to which as administering authority (BANES Council) has delegated its functions in relation to the administration of the LGPS.

Specific Role and Purpose

The Public Sector Pension Act 2013 sets out the requirements for the establishment of a LPB with the responsibility for assisting the LGPS local scheme manager (BANES) in relation to the following:

a) Securing compliance with the regulations, any other legislation relating to the governance and administration of the Scheme, and requirements imposed by the Pensions Regulator in relation to the Scheme and:

b) To ensure the effective and efficient governance and administration of the Scheme.

The LPB will assist the 'scheme manager' by monitoring and advising on compliance with the pension scheme regulations, along with all other legislation and the requirements imposed by the Pensions Regulator to ensure the effective and efficient governance and administration of the scheme.

The role of the LPB can be likened to that of a "critical friend" but is not a decision making body. It has an important advisory role for the APF and works with the Pensions Committee to scrutinise its decision making processes and to ensure the Fund's compliance with all its legislative requirements.

The Pension Regulator (TPR)

From April 2015, the Pension Regulator had responsibility for the LGPS. Therefore one focus for the LPB is ensuring the fund's compliance with TPR Codes of Practice. This is split into a number of areas which covers governance, risk management and resolving issues.

The LPB as part of their work plan has needed to consider these areas, to ensure the Fund is compliant and if not to make recommendations to the APF Pensions Committee to address these requirements.

Terms of Reference

Terms of Reference for the LPB are available through the following link.

http://www.avonpensionfund.org.uk/.

3. Establishment of Local Pension Board

The requirement for an Independent Chair and Board Membership was outlined in the terms of reference to the LPB which were agreed by full BANES Council on the 15th January 2015.

Adverts for the role of Chair were placed on the Fund's website, Western Daily Press, Jobsgopublic.com, Local Government Chronicle online and the Council's job vacancy website.

All applicants were then reviewed against the five published criteria in the person specifications and a shortlist of four candidates drawn up for interview with the Strategic Director of Resources, Head of Business, Finance and Pensions and the Head of Audit West.

Interviews were held in June 2015 and a preferred candidate – Howard Pearce (former Head of Pension Fund Management, Environment Agency) – was identified and recommended to the LPB for an appointment of four years.

The process for the appointment of Board Members followed a similar path with adverts placed on the Fund's website and pro-actively distributed through the many employee and employer communications and conferences.

Interviews for Board Membership were held from June 2015 through to May 2016 and as at May 2016 a full complement of employer and employee members are now in post.

Details of the Local Pension Board Members

Independent Chairman:
Howard Pearce. Appointed 1st July 2015. 4 year term of office to 30 June 2019.

Employer Member Representatives:
Gaynor Fisher, active member. Appointed 1st July 2015. 4 year term of office to 30 June 2019.
Steve Harman, active member. Appointed 1st July 2015. 4 year term of office to 30 June 2019.
Tony Whitlock, active member. Appointed 1st May 2016. 4 year term of office to 30 April 2020.

Scheme Member Representative:
David Yorath, retired member. Appointed 1st July 2015. 4 year term of office to 30 June 2019.
Tom Renhard, deferred member. Appointed 1st July 2015. 4 year term of office to 30 June 2019.
Mark King, active member. Appointed 1st May 2016. 4 year term of office to 30 April 2020.

In total the Board has well over 100 years experience of the LGPS. Details of each Board members experience, LPB training log, and register of interests for are available through the following link.

http://www.avonpensionfund.org.uk/.

Attendance at Local Pension Board Meetings – August 2016 – July 2017

Role	Board Member	Attendance (to be updated please)
Independent Chairman	Howard Pearce	4/4
Employer Representative	Gaynor Fisher Steve Harman Tony Whitlock	2/4 2/4 3/4
Member Representative	David Yorath Tom Renhard Mark King	3/4 3/4 3/4

4. Training

Background

In accordance with the Pension Regulator (tPR) Code of Practice 14 every individual member of a LPB must in summary:

- Be Conversant with the rules of the local government pension scheme (LGPS) &

- Have knowledge and understanding of the law relating to pensions:

These responsibilities begin from the date the LPB member takes up their role. These knowledge and understanding requirements apply to every individual member of a LPB rather than as a collective group.

Degree of Knowledge and Understanding

The legal requirement is that members of the LPB must be conversant with the rules of the LGPS and any document recording policy about the administration of the fund. This is implied as a working knowledge so that members are aware of which legislation/policies to refer to when carrying out their role.

Areas of Knowledge and Understanding

LPB Members should be conversant with, but not limited to the following areas:

a) Scheme approved policies

b) Risk assessment/management

c) Scheme booklets/members communications

d) Role of LPB Members and the scheme manager

e) Policies in relation to discretions

f) Communications with scheme members and employers

g) Key policy documents on administration, funding and investment

Training Undertaken

During the year on-going technical training was provided to LPB members by officers from or advisors to the APF on a full range of topics covering the LGPS framework and TPR requirements.

All 7 members of the LPB have completed the TPR public sector pension toolkit certification. In addition three members attended the LGE LGPS Fundamentals Course.

The LPB training plan is a topic at each board meeting and all Board Members maintain a training log, which is also submitted annually to assist in the identification of on-going training needs.

Details of the LPB training plan and members training logs are available through the following link –

https://democracy.bathnes.gov.uk/ieListMeetings.aspx?CommitteeId=563

5. Local Pension Board Code of Conduct and Conflicts of Interest Policy

Code of Conduct

All LPB members have signed up to an LPB Code of Conduct in which emphasises that as a holder of public office there is an expectation that LPB members will comply with the 'seven principles of public life', also known as the 'Nolan Principles'.

Conflicts of Interest

All LPB members have also signed up to the LPB Conflicts of Interest Policy. This requires all members to notify BANES Democratic Services team of any potential conflict of interest arising as a result of their position on the Board.

All meetings of the LPB include a standing item titled 'Declaration of Interests' at the start of the meeting where any declaration in relation to the items on the agenda should be made.

All LPB members have formally completed their declaration of interest forms and at the 4 formal meetings which have been held during the year no 'conflicts' have been declared. For more information on conflicts of interest and declarations at each meeting please use the following link –

https://democracy.bathnes.gov.uk/mgCommitteeDetails.aspx?ID=563

6. Pension Board Costs & Budget

In meeting the requirements of the Public Sector Pension Act (2013) and establishing a Local Pensions Board, Bath & North East Somerset approved terms of reference and necessary supporting arrangements at its meeting of its full Council on the 15th January 2015.

The LPB agrees a budget on an annual basis to enable the Board to perform its duties and a summary of the costs is included below –

Summary Financial Table

Budget Area	Actual Costs 2015-16	Budget 2016/17	Actual Costs 2016-17
LPB Members Allowances	6,024	£12,000	£7,067.27
LPB Members Training Costs	3,485	£3,000	£1,500.00
LPB Meeting & Democratic Services Costs	5,514	£8,000	£3,245.00
Central Recharges & Officer Costs	9,420	£17,000	£11,800.00
Total	**£24,443**	**£40,600**	**£23,612.27**

As with all elements of the public sector there is exceptional pressure to ensure value for money can be demonstrated and the Board will continue to consider this in its future operations.

7. Local Pension Board Compliance with the Pension Regulator's Code of Practice No.14

As part of assessing both the effectiveness and compliance of the Board with its key requirements, the APF carried out a self-assessment of the LPB's current arrangements against TPR Code of Practice No. 14. The full results of this exercise were reported initially in May 2016 and revisited in November 2016 and are available via the following link.

https://democracy.bathnes.gov.uk/documents/s44211/LocalPensionBoardTPRCOP14UpdateNov2016.pdf

In summary the LPB and the fund were compliant with the Code 14 and identified only a small number of recommended actions for the APF to achieve best practice, including –

- Monitoring of the data improvement plan
- Managing overdue contributions
- Records of investigations and correspondence
- Production of Annual Benefit Statements in required formats
- Provision of basic scheme information to new entrants
- Review the funds Dispute Resolution procedures
- Review the funds employer obligations re: IDRP Procedures
- Review the funds employer obligations re: TPAS and Pensions Ombudsman Procedures

The Board has agreed that the compliance exercise should be revisited periodically to ensure it can continue to evaluate the APF compliance and advice on actions and improvements where necessary.

As part of this process Internal Audit carried out independent reviews of compliance against the Code in 2016/17 and their findings were reported to the Board in February 2017 along with their other reviews of the Pension Fund and overall Plan –

https://democracy.bathnes.gov.uk/documents/s45651/LocalPensionBoardAuditUpdateFeb2017.pdf

8. Pension Fund Communications

Effective member and employer communications form a core part of the role of the APF. During the year the Board was represented at the Employers conference and also reviewed the APF's communications strategy and website.

The Board welcomed the website which had been refreshed and simplified the way information on the APF could both be located and sought and commended the actions of the fund. Reviewing the strategy and how the fund communicates to its many stakeholders will remain a key element of the work plan of the Board on a rolling basis.

9. Risk Management

Risk management processes for the APF follow the framework laid down by the LGPS administering authority (BANES Council). The APF Risk Register identifies the significant risks that could have a material impact in terms of value, reputation, compliance or provision of service and sets out the mitigating action taken to manage down each risk.

The Register is reviewed regularly and the key risks fall into one of the following categories –

(i) Failures in the fund administration & control of operational processes and strategic governance processes and TPR compliance;

(ii) Service delivery partners not delivering in line with their contracts or SLAs;

(iii) Financial loss due to payments in error, loss of assets due to investment strategy and/or managers failing to deliver required return, fraud or negligence of investment managers or custodian

(iv) Changes to the LGPS nationally and increasing political pressure to reform the scheme structure, governance frameworks and to centrally direct investment decisions

The LPB's ongoing review of the risk register concurred with the Pensions Committee that the top risks facing the fund revolve around –

- The creation of the Brunel Pension Partnership (BPP) in 2017 and asset pooling in 2018
- Significant growth of new employers, especially Academies
- Delivering the future funding strategy
- Recruitment and Retention

The Fund continues to invest significantly in systems and resources to ensure the risks are managed effectively and resilience is built into the service and the arrangements in place are supported by external and internal audit reviews.

The LPB will continue to ensure that a review of the funds risk register will remain a regular agenda item at each meeting.

10. Summary Review of Areas Covered in 2016/17 & Recommendations Made

The second year of operation of the LPB was focussed on key governance themes of legal compliance, risk management, and best practice as well as monitoring the significant developments connected to asset pooling and creation of the Brunel Pensions Partnership. A summary of the areas covered and recommended is detailed as follows (**Full Details at Appendix 1**) –

Review of LPB Arrangements
Review of LPB Terms of Reference, Code of Conduct, Conflicts of Interest, Breaches Review of Training Requirements Review of Work Plan
Review of Pension Fund Activities
Review of Avon Pension Fund Committee & Investment Panel Minutes Review of Project Brunel Review of Investment Strategy Statement Review of Valuation & Funding Review of Transparency Code
Review of Pension Fund Administration
Review of Compliance Reports Review of Risk Register Review of Service Plan Review of Annual Report Review of Communication Strategy
Independent Assurance
Review of TPR, SAB & CIPFA external benchmarking exercises Review of External Audit plan and reports Review of Internal Audit plan and reports

11. Draft Forward Plan for 2017-18

The draft work plan for the next 12 months is detailed as follows and will be kept under regular review.

AGENDA ITEM	07/11/17	15/02/18	24/05/18	19/07/18
Conflicts of Interest Declarations	**X**	**X**	**X**	**X**
Training & Work Plan Update (Incl. Annual Plan)	**X**	**X**	**X**	**X**
APF Committee & Investment Panel Minutes	**X**	**X**	**X**	**X**
LGPS Developments & Updates	**X**	**X**	**X**	**X**
Risk Register Update	**X**	**X**	**X**	**X**
Project Brunel Ongoing Review (Governance etc)	**X**	**X**	**X**	**X**
Review of Pension Fund Annual Report and Accounts	**X**			
Review of Administration Strategy		**X**		
Avon Pension Fund Compliance Report	**X**	**X**	**X**	**X**
Internal Audit Plans & Update (Incl. COP 14 Update)		**X**		
External Audit Plans, Accounts & Governance Report	**X**		**X**	
Pension Board Budget		**X**		
Benchmarking Update (CIPFA/SAB etc)	**X**		**X**	
Avon Pension Fund Service Plan 17/18			**X**	
Pension Board Annual Report			**X**	**X**
Review of Communications Strategy				**X**
Review of Statutory Investment Strategy Statement		**X**		
Review of Valuation & Funding Strategy				**X**
Review of Data Integrity & Action Plans		**X**		
Review of GDPR (Data Protection) & IT Security		**X**	**X**	
Review of Complaints/IDRP Procedures			**X**	
Review of Governance Compliance Statement				**X**

Appendix 1 – Local Pension Board – Actions & Decisions

	Area	Action
2nd November 2016		Resolved:
	Pension Committee and Investment Panel Minutes	Noted
	LGPS Developments	Noted report & latest developments
	Project Brunel	Note the update
	Compliance Report	Noted Performance Indicators and Customer Satisfaction feedback for 3 months to 30 September 2016 & Data Improvement Plan. To recommend to the Fund that: a) poorly performing employers, whether they undertake training or not, should be required to sign an improvement action plan; b) a letter should be sent to poorly performing employers advising them that they could be reported to The Pensions Regulator.
	Code of Practice 14 Update	To note the outcome of the review of the TPR's Code of Practice No 14 and latest position against best practice.
	Actuarial Valuation Update	Note the Update
	GAD Section 13 Update on LGPS Funds	Note the Report
	Risk Management Update	Note the Report
	Training & Workplan Update	Note the report and endorse the high-level training and work plans outlined and that a table of LPB members training from appointment to the end of 2016 would be presented at the next meeting
16th February 2017		Resolved:
	Pension Committee and Investment Panel Minutes	Noted
	LGPS Developments	Note the report
	Project Brunel Update	Note the report

	Investment Strategy Statement Update	To request the Head of Business, Finance and Pensions to circulate the investment strategy statement to Pension Board members to enable them to comment on its compliance with DCLG statutory guidance. The statement will then be submitted to the Pensions Committee for consideration along with any comments received.
	Valuation Update Report	Note the outcome of the actuarial valuation 2016
	Compliance Report	To Note a) the membership data, employer performance and Avon Pension Fund performance for the 3 months to 31 December 2016. (b) Progress and reviews of the TPR Data Improvement Plan.
	Benchmarking Update	Note the Report
	Risk Management	To note the report and to receive the full risk register including the top 10 risks at the next meeting.
	Internal Audit Update	To note the report and outcomes from Internal Audit work. To request that the following areas be included in the B&NES Council Audit Plan for 2017/18: a) Pensions Investments b) Pensions Administration – System Calculations c) Pensions Administration – Employer Contributions d) Pensions Governance (COP 14) e) Pensions Payroll
	Training, Work Plan & Budget Updates	To note the report and to endorse the high level Training and Work Plans outlined in Appendices 1 and 2 of the report and the indicative budget at Appendix 3. To receive future training as a group on the governance relating to the Brunel Project.
23rd May 2017		Resolved:
	Pension Committee and Investment Panel Minutes	Noted
	LGPS Developments	To note the report and latest developments

	Project Brunel Update	Note the update and that a future board meeting will receive a briefing on the proposed future governance framework of the Avon Pension Fund and Brunel Pensions Partnership
	External Audit Update	Note the Audit Plan for year ended March 2017
	Investment Strategy Statement	Note the Investment Strategy Statement To welcome the positive response of the Pension Committee to comments from the Pension Board regarding the Investment Strategy Statement, and the plans for future updates To note the assessment of current compliance with the Investment Strategy Statement with the regulations
	Pension Fund Service Plan	Note the three year service plan and budget for 2017-20 for the Avon Pension Fund
	Compliance Report	To Note a) the membership data, employer performance and Avon Pension Fund performance for the 3 months to 31 March 2017. (b) Progress and reviews of the TPR Data Improvement Plan. c) That the compliance report and improvement plan be afforded greater scrutiny at future meetings
	Risk Register	Note the report and Board recommendations regarding the risk register
	Annual Report	To delegate authority to the Chairman of the Board to finalise details of the report to enable key messages to feed into the annual report of the Avon Pension Fund and the final document will be considered at the Board's next meeting.
	Training & Work Plan Updates	To note the report and endorse the high level training and work plans outlined To hold a workshop regarding the compliance report immediately prior to the next meeting
27th July 2017		Resolved:
	Pension Committee and Investment Panel Minutes	Note the public and exempt minutes
	LGPS Developments	Recommended that the APF review the wording

		of its ISS to ensure it was compliant with the amended DCLG statutory guidance
	Project Brunel Update	A "wiring diagram" showing the governance relationships between the components (national SAB, BPP, APF Committee and the LPB) and the respective decision-making, consultation, reporting and communication with each body should be produced for the next meeting
	Transparency Code Update	Board welcomed the APF adoption of the Code and hoped that the cost information might start to appear in the APF accounts from 2018
	SAB Survey	Approved the submission
	Compliance Report	To Note a) the membership data, employer performance and Avon Pension Fund performance for the 3 months to 31 June 2017. (b) Progress and reviews of the TPR Data Improvement Plan. c) Future compliance reports should state the statutory and internal target and show performance against statutory as well as internal APF targets, and the LPB should focus on those employers with repeated poor performance. d) The fund should develop and implement a hierarchy of measures for dealing with repeated poor performance by employers which would include additional training, the imposition of administrative charges, or ultimately reporting them to the TPR.
	Risk Register	That the workload impact and resource consequences of rising numbers of employers joining the fund should be reviewed by the Administering Authority.
	GDPR Update	Noted and a further update will be provided at the February 2018 meeting of the board with an action plan for outstanding tasks.
	LPB Annual Report	Approve the report subject to the amendments noted.
	Training & Work Plan Updates	Noted

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Bath & North East Somerset Council		
MEETING:	**Council**	
MEETING DATE:	**09 November 2017**	
TITLE:	Report on outcome of Regulatory Investigations Powers Act (RIPA) Inspection and update to policy	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: **Appendix 1 2017 OSC Inspection report** **Appendix 2 Draft Action Plan** **Appendix 3 Schedule 5 to be added to the Policy**		

1 THE ISSUE

1.1 This report updates Council on the Office of Surveillance Commissioner Inspection of the Council's Regulation of Investigatory Powers policies and procedures in June 2017.

2 RECOMMENDATION

The Council is asked to:

2.1 Note the OSC Inspector's report for 2017 at Appendix 1

2.2 To consider and approve the draft action Plan for 2017-2020. at Appendix 2

2.3 Agree the inclusion of Schedule 5 to the Council's RIPA Policy at Appendix 3

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 There are limited financial implications arising from this report. Although the Council is an infrequent user of RIPA powers, the Chief Commissioner requires the Council's procedures to remain in a good state of readiness should these need to be implemented. Consequently, the financial implications are limited to the cost of periodic refresher training for officers in the use of RIPA powers.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The Regulation of Investigatory Powers Act came into force in 2000. The Act permits Councils to carry out covert (secret) surveillance of alleged offenders for the prevention and detection of crime and the protection of public health. This is undertaken by either the use of Directed Surveillance or the use of a Covert Human Intelligence Source (CHIS). The Act also allowed the Council to apply to telecommunications providers for information about individuals who are suspected of committing crimes. When RIPA is followed it ensures that the actions taken by the Council comply with the Human Rights Act 1998, in particular the right to privacy and the right to a fair trial, when evidence is gathered in preparing cases for court.

4.2 The use of RIPA powers is subject to oversight by the Chief Surveillance Commissioner (OSC) who reports annually to the Prime Minister. All Councils are subject to inspection by the Officers from the OSC. The Council was last subject to inspection in 2017 and this paper reports the outcome of that inspection.

4.3 In light of the intrusive nature of the use of RIPA powers and the potential for Human Rights breaches, oversight by both the OSC and internally, ensures that abuses do not take place, and, if they do, that they are quickly identified and reported to the OSC and remedial action taken. The OSC places high importance on training: clear policies and procedures: quality assurance processes and ongoing internal scrutiny, even where there is no use of the RIPA powers.

5 THE REPORT

5.1 The Chief Surveillance Commissioner in his letter to the Council's Chief Executive dated 18 July 2017 did not make any recommendations to the Council following the inspection and report undertaken by his Surveillance Inspector, Alex Drummond. The Chief Surveillance Commissioner highlighted the observations of the Inspector at para 11.3 of the report summarising the importance of periodic reviews to ensure that the processes continue, as they are at present, to be in a good state of "readiness".

5.2 The Council has previously been inspected in May 2014 and June 2017. The Chief Surveillance Commissioner in his 2015-2016 report to parliament indicated that the frequency of inspection for Local Authorities is every 3

years. The likelihood is that the Council will be inspected again in May 2020 if the current 3 year review process continues.

5.3 Although the report attached as Appendix 1 is very positive in that it makes no recommendations, it is nevertheless necessary to undertake certain actions to maintain the Council's state of readiness for the use of RIPA powers and the Council's next inspection in 2020. The action plan at Appendix 2 and the inclusion of the procedure agreed with Bath Magistrates court to obtain magistrates approval, at Appendix 3, in the Council's RIPA Policy, will ensure the Council continue to be ready to implement the use of RIPA powers should these prove necessary.

6 RATIONALE

6.1 The Surveillance Commissioner requires that the Council have oversight of its use of RIPA powers and its readiness for implementation. This report provides an update of the OSC Inspection in 2017.

7 OTHER OPTIONS CONSIDERED

7.1 None

8 CONSULTATION

8.1 None

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	Michael Hewitt tel: 01252 395125
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

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Appendix 1

Office of Surveillance Commissioners

OFFICE OF SURVEILLANCE COMMISSIONERS

INSPECTION REPORT

Bath and North East Somerset Council

June 2017

Surveillance Inspector:
Mr Alex Drummond

DISCLAIMER

This report contains the observations and recommendations identified by an individual surveillance inspector, or team of surveillance inspectors, during an inspection of the specified public authority conducted on behalf of the Chief Surveillance Commissioner.

The inspection was limited by time and could only sample a small proportion of covert activity in order to make a subjective assessment of compliance. Failure to raise issues in this report should not automatically be construed as endorsement of the unreported practices.

The advice and guidance provided by the inspector(s) during the inspection could only reflect the inspectors' subjective opinion and does not constitute an endorsed judicial interpretation of the legislation. Fundamental changes to practices or procedures should not be implemented unless and until the recommendations in this report are endorsed by the Chief Surveillance Commissioner.

The report is sent only to the recipient of the Chief Surveillance Commissioner's letter (normally the Chief Officer of the authority inspected). Copies of the report, or extracts of it, may be distributed at the recipient's discretion but the version received under the covering letter should remain intact as the master version.

The Office of Surveillance Commissioners is not a public body listed under the Freedom of Information Act 2000, however, requests for the disclosure of the report, or any part of it, or any distribution of the report beyond the recipients own authority is permissible at the discretion of the Chief Officer of the relevant public authority without the permission of the Chief Surveillance Commissioner. Any references to the report, or extracts from it, must be placed in the correct context.

Office of Surveillance Commissioners

OSC/INSP/075

The Rt. Hon. Lord Judge
Chief Surveillance Commissioner
Office of Surveillance Commissioners
PO Box 29105
London
SW1V 1ZU

26th June 2017

OSC INSPECTION – Bath and North East Somerset Council

1 Inspector

Alex Drummond

2 Introduction

2.1 Bath and North East Somerset Council is a unitary authority in the South West of England providing a single tier of local government for a population of around 180,000. At its heart is the historic city of Bath, one of the principal cities in the South West and a prime destination for international tourism. The Authority covers an area of 220 square miles of predominantly green belt land including the settlements of Keynsham, Midsomer Norton, Radstock and the Chew Valley.

2.2 The Chief Executive, Ashley Ayre, who has been in post since August 2016, leads a team of three Strategic Directors who together make up the corporate management structure. The Divisional Director for Legal and Democratic Services, Maria Lucas, acts as the Senior Responsible Officer for matters relating to the Regulation of Investigatory Powers Act 2000 (RIPA) and has provided the information and comprehensive supporting documentation from which this report has been compiled.

2.3 The report provides an evaluation of compliance, policies, procedures, operations and administration in respect of the Council's use of directed surveillance and covert human intelligence sources (CHIS).

2.4 The address for correspondence is The Chief Executive, Bath & North East Somerset Council, The Guildhall, High Street, Bath, BA1 5AW or by email to maria_lucas@bathnes.gov.uk.

3 Progress against Recommendations

3.1 The Council was last inspected in May 2014 when a single recommendation was made:

PO Box 29105 London SW1V 1ZU Tel 020 7035 8127 Fax 020 7035 3114
Web: https://osc.independent.gov.uk email:oscmailbox@osc.gsi.gov.uk

The Authority should revise its policy and procedures to include advice and guidance on the use of the Internet and Social Media in investigations.

3.2 It is pleasing to report the Council accepted the recommendation and has developed an appendix to its surveillance policy to provide relevant guidance to investigators. This is discussed in more detail below and the recommendation is discharged.

4 RIPA Structure and Policy

4.1 Although the Council does make some use of the powers available under RIPA Part I for the acquisition of communication data, the Council is not a prevalent user of the powers available under RIPA Part II for the use of directed surveillance or CHIS. The last authorisation for directed surveillance was granted in February 2012 and no use has ever been made of CHIS. In recent years the loss of the Council's Benefit Fraud investigators to the Department of Work and Pensions single fraud investigation service, has reduced this need further and reduced the level of capability and resource the Council has available to conduct covert investigations.

4.2 Despite the infrequent use, the Council has maintained a comprehensive policy and procedural guide that covers the process for the application, authorisation and oversight of directed surveillance and use of CHIS. The policy has been regularly updated since the last OSC inspection including the observations that were made during that assessment and provides a very useful guide and source of reference.

4.3 The policy provides a straightforward explanation on the requirements of RIPA and an overview of the legislation. It directs readers to seek further information from the relevant Codes of Practice and the OSC Procedures and Guidance document for which hyperlinks are provided in the electronic version.

4.4 A schedule to the policy now provides guidance to investigators on the use of the Internet and social media. Advice is given on the overt use of the Internet during investigations and also conducting general research for which an authorisation is not required. The schedule explains the triggers at which the need for authorisation of directed surveillance should be considered such as the requirement to by-pass privacy settings, or when the use becomes 'systematic' through repeated viewings that build up a profile of a subject's lifestyle.

4.5 Applications for activity under RIPA and subsequent authorisations are completed in hard paper copy with the details and a unique reference number held on the electronic central record which contains all the information required by the Code of Practice.

5 Reports to Members

5.1 The Senior Responsible Officer provides an annual report on the use of RIPA powers to the Full Council and Group Leaders. More frequent reports are provided to Group Leaders if RIPA powers are exercised.

6 The Protection of Freedoms Act 2012

6.1 The requirement for endorsement of an authorisation by a magistrate under the Protection of Freedoms Act 2012 is included within the Council's RIPA policy, but as there has not yet been a requirement to seek such endorsement, no formal process is in place. However the Senior Responsible Officer is currently in communication with the local courts to agree a formal procedure for when the need arises.

7 Training

7.1 Although the Council has not had cause to use its powers under RIPA since the last OSC inspection, it has continued to provide training and awareness commensurate with needs of the organisation. This has included training to the Senior Responsible Officer, a new Authorising Officer and training to investigators on the use of the Internet.

8 Directed Surveillance

8.1 Although no recent use has been made of directed surveillance, if the procedures set out in the policy document are followed by applicants and Authorising Officers it should result in authorisations that are granted in compliance with the legislation.

8.2 The Council does not have access to specific surveillance equipment but does have a small stock of cameras that are used with overt signage by waste enforcement officers to deal with fly tipping. In April 2017 a small stock of body worn video cameras was acquired for use by enforcement officers. These cameras are for overt use and a separate policy and procedural guide covers their use. The guide does include advice on the limitations and restrictions that need to be applied during operation, including the caution that should be exercised if operated within dwellings, and a reminder on the principles of RIPA.

9 Covert Human Intelligence Sources (CHIS)

9.1 The Council has not made any use of CHIS and is unlikely to do so in the foreseeable future. The information provided within the policy document as to what constitutes a CHIS is acceptable for current needs, but further training would be required in areas such as risk assessment and steps to protect true identities of CHIS if the Council was ever to consider the use of this tactic.

9.2 The Council's surveillance policy does recognise that should there be a need for one of its staff to establish and maintain a covert relationship, for example between a Trading Standards officer and a trader in counterfeit goods, an authorisation for CHIS would be required. The

policy also usefully explains when contact would not amount to a relationship such as simple test purchase. With the exponential use of the Internet and social media for illicit trading, the use of Trading Standards officers acting as a CHIS in an 'on-line undercover' capacity is becoming more frequent across local authorities. Should the Council embark on this route it would be beneficial to develop some separate bespoke guidance and training for its investigators undertaking such tasks and those managers that would be required to provide oversight to investigations by virtue of Section 29(5) RIPA.

10 CCTV

10.1 The Council operates an overt CCTV system within the City and district in accordance with a code of practice. The Council has completed the Surveillance Camera Commissioner's self assessment tool which has been submitted for certification and regular checks on compliance are undertaken by the Council's in house audit team. Although not used for directed surveillance a process is in place to ensure any requirement for covert use of the system would be done under the provisions of RIPA.

11 Conclusion

11.1 Bath and North East Somerset Council is unlikely to be more than an occasional user of the powers available under RIPA. Such infrequent use does not allow its staff to become proficient and confident in the use of covert powers, however, the Council has maintained a good state of 'readiness' with the policy and procedures in place and the level of training provided. Consequently a follow up physical inspection is not considered necessary on this occasion.

11.2 The Council has recognised that increasing use of the Internet and social media has presented new opportunities for conducting both overt and covert investigations, but also recognised the need to provide guidance to its staff to ensure investigations are conducted in compliance with RIPA.

11.3 In this digital age these opportunities will continue to increase and as a result the need for local authorities to remain vigilant to the extent of activity being undertaken has never been greater, not just the traditional activity conducted by enforcement officers, but the increasing need to use these methods across all roles, for example housing, education and children's services. The Council should continue to keep this in mind and could perhaps make use of its internal audit team to conduct periodic reviews.

12 Recommendations

12.1 No recommendations are required.

Alex Drummond

Surveillance Inspector

Appendix 2

2017 OSC INSPECTION

ACTION PLAN

Background

The Chief Surveillance Commissioner in his letter to the Council's Chief Executive dated the 18 July 2017 did not make any recommendations to the Council following the inspection, undertaken by his Surveillance Inspector Alex Drummond, and submission of his report dated the 26 June 2017. Nevertheless, the Chief Surveillance Commissioner highlighted the observations of the Inspector at para 11.3 of the report summarising the importance of periodic reviews to ensure that the processes continue, as they are at present, to be in a good state of "readiness"

This action Plan is intended to ensure the council remains in a state or readiness and periodically reviews its policy and procedures and implements any relevant matters or suggestions made in the Inspectors report.

The Council has previously been inspected in May 2014 and June 2017. The Chief Surveillance Commissioner in his 2015-2016 report to parliament indicated that the frequency of inspection for Local Authorities is very 3 years. The likelihood is that the Council will be inspected again in May 2020 if the current 3 year review process continues.

Matter	Action	Para in report	Owner	Timescale
Policy & Procedure	Annual review of appropriateness of policy & procedures and review against Annual report of the OSC to Parliament	General good practice	DRO	CSC Reports are usually laid before parliament in the summer. Consequently the next review will be in Spring 2018
Report to members	Report to full Council the 2017 OSC Inspection outcome and this action Plan Annual report on statistics	5	SRO	September 2017 Annually in May each Year
Magistrates	Agree process	6.1	DRO	September

Process	with Bath Magistrates Court Chief Clerk for Judicial Approval			2017
Training	Refresher training	7.1	SRO	2017 and 2019 and thereafter bi-annually
CHIS	CHIS training and bespoke guidance and training especially around Social Media and on line undercover investigations by trading standards	9.2	Trading Standards Team manager	Spring 2018
CCTV suite and Body worn Enforcement Cameras	Audits to be undertaken against both policies	10.1,11.3,8.2	Internal Audit	Autumn 2018

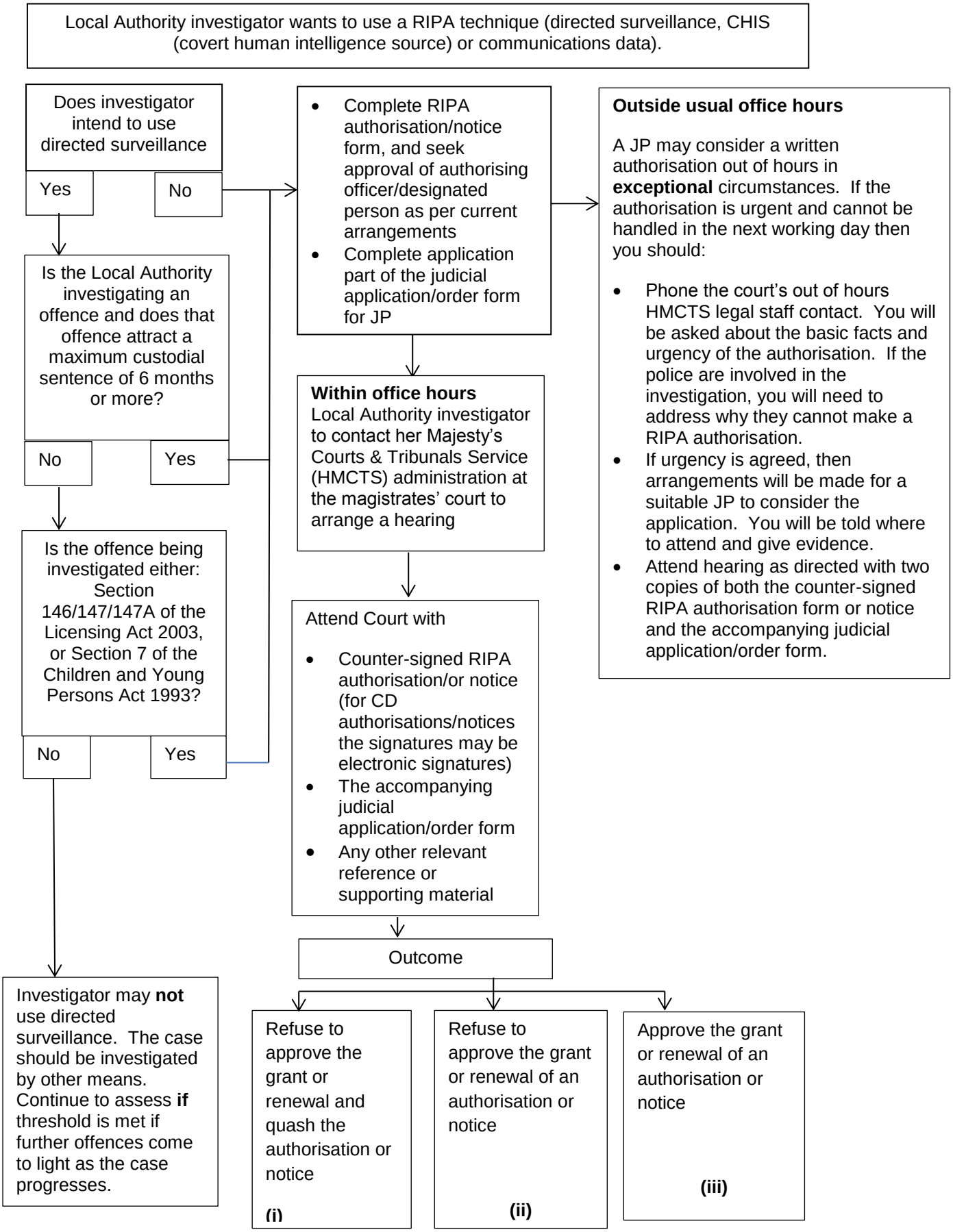
Next Steps

The SRO should convene a meeting of the relevant departments to include enforcement officers, CCTV operations manager, Internal Audit, Authorising and Reviewing officers to agree this action plan and review implementation in accordance with the timescales above and report on an annual basis to members of progress made or corrective action required

Dated 9 August 2017

Schedule 5

LOCAL AUTHORITY PROCEDURE: APPLICATION TO A JUSTICE OF THE PEACE SEEKING AN ORDER TO APPROVE THE GRANT OF A RIPA AUTHORISATION OR NOTICE



(i)	(ii)	(iii)
This may be appropriate if the JP considers that an application is fundamentally flawed. The Local Authority must be given at least 2 business days in which to make representations before the authorisation is quashed. In these circumstances, a Local Authority cannot use the technique and will need to seek fresh authorisation internally before applying.	The grant or renewal of the RIPA authorisation or notice will **not** take effect and the Local Authority may not use the covert technique. Local Authority may wish to address, for example, a technical error and reapply.	Technique may be used in this case. Investigator to resubmit to the JP any renewal or authorisation for the use of a different technique in this case.

Obtain signed order and retain original RIPA authorisation/notice.
For CD authorisations or notices, Local Authority Investigator to provide additional copy of judicial order to the SPoC.
If out of hours, a copy of the signed order to be provided to the court the next working day.

Application for judicial approval for authorisation to obtain or disclose communications data, to use a covert human intelligence source or to conduct directed surveillance Regulation of Investigatory Powers Act 2000 sections 23A, 23B, 32A, 32B.

Local Authority	
Local Authority Department	
Offence under investigation	
Address of premises or identity of subject	
Covert technique requested: (tick one and specify details)	

Communications Data ☐

Covert Human Intelligence Source ☐

Directed Surveillance ☐

Summary of Details	

Note: This application should be read in conjunction with the attached RIPA authorisation/RIPA application or notice.

Authorising Officer	
Officer/Designated appearing before JP	
Address of applicant and department	

Contact telephone number	
Contact email address (optional)	
Local Authority reference	
Number of pages	

Order made on an application for judicial approval for authorisation to obtain or disclose communications data, to use a covert human intelligence source or to conduct directed surveillance. Regulation of Investigatory Powers Act 2000 sections 23A, 23B, 32A, 32B.

Magistrates' Court	

Having considered the application, I (tick one)

☐	Am satisfied that there are reasonable grounds for believing that the requirements of the Act were satisfied and remain satisfied, and that the relevant conditions are satisfied and I therefore approve the grant or renewal of the authorisation/notice
☐	Refuse to approve the grant or renewal of the authorisation/notice
☐	Refuse to approve the grant or renewal and quash the authorisation/notice
Notes	
Reasons	

Signed:

Date:

Time:

Full Name:

Address of magistrates' court:

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Bath & North East Somerset Council	
MEETING:	Council
MEETING DATE:	9 November 2017
TITLE:	**Appointment of Chief Executive and designation as Head of Paid Service**
WARD:	ALL
AN OPEN PUBLIC ITEM	
List of attachments to this report: None	

1 THE ISSUE

1.1 This report seeks Council's approval of the appointment for a fixed term to 30 May 2020 of the Chief Executive and the designation of the post holder as Head of Paid Service.

2 RECOMMENDATION

Council is asked to agree:

2.1 The appointment of Chief Executive be offered to Ashley Ayre on a fixed term basis ending on 31 May 2020 at a spot salary of £153,015 pa within the approved range.

2.2 The designation of the postholder as Head of Paid Service under section 4 of the Local Government & Housing Act 1989.

3 FINANCIAL IMPLICATIONS

3.1 The recurring costs associated with the post of Chief Executive/Head of Paid Service will be met from within the existing Budget provision for pay and related employer on-costs. There will be no additional costs at the end of the Fixed term as a result of this proposal.

4 CORPORATE PRIORITIES

4.1 The Council's senior management structures are targeted to allow the Council the maximum opportunity to deliver on its vision in an environment where the scale of the financial challenge is great and accepting there will be changes in terms of when and how priorities are delivered. This proposal recognises that the Council faces a period of change and needs to have appropriate officer leadership in this period to ensure this change can be delivered and that the Councils services and responsibilities are met.

5 THE REPORT

5.1 Following the resignation of Dr Jo Farrar as Chief Executive in 2016, Ashley Ayre was seconded for one year to the role of Chief Executive and Head of Paid Service from his substantive post of Strategic Director – People and Communities.

5.2 The Restructuring Implementation Committee met on the 5 October 2017 and agreed a proposal to attempt to fill the post on a fixed term basis until 31 May 2020. The purpose of this timescale is to allow the Council to manage the level of organisational change required in the next two years whilst offering the Council flexibility around its future management structure.

5.3 In order to maintain pace and contain costs, the Committee agreed that the applications for the fixed term appointment be sought from amongst the existing Strategic Directors. Following the Committee on the 5 October 2017, invitations were sent out in accordance with this agreement.

5.4 The Restructuring Implementation Committee met on the 17th October 2017 to consider applications made and to carry out interviews and assessments. The Committee was assisted by an independent Human Resources professional and the interviews conducted using assessment based on the competencies in the role profile for the post agreed by the Committee.

5.5 After careful consideration of all of the assessment information, the Committee's unanimous decision was to recommend the offer of appointment on a fixed term to 31 May 2020 to Ashley Ayre. The Committee considered that he demonstrated the necessary vision, strategic skills and experience to meet the future needs of the Council and challenges ahead. In accordance with the guidance from the HAY Group, it further recommends that the appointment be offered on a spot salary of £153,015 per annum with other conditions of employment being in accordance with those determined for Chief Executives nationally by the Joint Negotiating Committee for Local Authority Chief Executives as supplemented by locally agreed terms and conditions where agreed from time to time.

5.6 In accordance with its statutory obligations under section 4 of the Local Government and Housing Act 1989, the Council is required to formally designate a senior officer as Head of Paid service and the committee recommends that this should also be the Chief Executive, Ashley Ayre.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has not been undertaken. Section 4 of the The Local Government and Housing Act 1989 requires all local authorities to appoint a Head of Paid Service.

7 EQUALITIES

7.1 An impact assessment has not been carried out. The recruitment and selection of the candidate was conducted in accordance with the Council's recruitment and selection procedures and taking account of its Equalities Policy.

8 CONSULTATION

8.1 Recognised trade unions were formally consulted as part of the Council decision making process regarding the process proposed for a fixed term appointment.

9 ISSUES TO CONSIDER IN REACHING THE DECISION

9.1 Human Resources; Corporate; Impact on Staff; Other Legal Considerations.

10 ADVICE SOUGHT

10.1 The Council's Monitoring Officer (Divisional Director – Legal and Democratic Services) and Section 151 Officer (Strategic Director – Resources) have had the opportunity to input to this report and have cleared it for publication.

Contact person	David Trethewey Divisional Director Strategy and Performance, tel 01225 396353
Background papers	*Restructuring Implementation Committee 5 October 2017 – Appointment of Chief Executive and Head of Paid Service* *Restructuring Implementation Committee 17 October 2017 – Appointment of Chief Executive and Head of Paid Service – Next steps*
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Bath & North East Somerset Council		
MEETING	**Council**	
MEETING DATE	**9th November 2017**	
TITLE	**PROPOSED AMENDMENTS TO THE CONSTITUTION**	
WARD	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: None		

1 THE ISSUE

1.1 The Constitution is a single point of reference which contains the principal governance structures and procedures of the authority. It sets out how the Council operates, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people.

1.2 This report sets out various proposed amendments to the Constitution, which have been agreed with the Constitution Working Group.

2 RECOMMENDATION

The Council is asked to agree the following to be incorporated into the Council's Constitution:

2.1 Set a financial threshold for key decisions at £250k as set out in section 5.1;

2.2 Agree the proposed rules for managing Petitions for Debate as set out in section 5.2;

2.3 Amend the 'Closure Motions' section as set out in section 5.3;

2.4 Amend Part 3, Section 3, to update the references to the West of England Combined Authority, as set out in section 5.4; and

2.5 Make the deadline for submission of questions from members of the public to Cabinet and Council the same as the deadline for councillor question submission as set out in section 5.5.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

3.1 There are no financial, property or people implications directly arising from this report.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 The Constitution must be in compliance with the terms of the Local Government Act 2000, Local Government and Public Involvement in Health Act 2007 and Local Democracy, Economic Regeneration and Construction Act 2009, Localism Act 2011 and any other relevant statutory acts or guidance.

5 THE REPORT

5.1 Key Decision – Financial Threshold (Part 2, Article 3.4)

(1) The Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2000 set out a definition of a 'key decision' for executive decision making which requires all such proposed decisions to be published in a forward plan 28 days before being taken. The current definition of a 'key decision' is;

"A 'key decision' is defined in law as one which is likely to:

(a) result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or

(b) be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the local authority."

(2) It is the practice in this Council for all proposed executive decisions, whether deemed 'key' or not, to be published in advance in the Executive Forward plan.

(3) The Council has never set a financial limit above which items are deemed 'significant'. A limit would assist officers in determining if a decision is significant and a key decision, and therefore required to be published in the Forward plan. For the sake of comparison with neighbouring Authorities, Bristol City Council's limit is set at £500k, as is South Gloucestershire. The Section 151 Officer has been consulted and recommended £250k.

5.2 Petitions for debate (suggest new rule 4A, rule 34a)

(1) As petitions are becoming more common at Council, some rules and operating principles for handling debate on these items are proposed;

a) Chair to explain the process at the outset;

b) Recognise that the Council does not need to form a resolution arising from the debate;

c) Establish a convention that the largest party is offered the first opportunity to present a motion, followed by amendments in the order of the size of group;

d) A maximum time limit of one hour for the debate is set.

[NB: for clarification - the time limit in rule 34 (Statements from the Public) does not apply to this item. Rule 34 refers to the one hour limit for the entirety of the 3 minute public statements. This is a separate agenda item so would need its own time limit.]

5.3 Closure motions and standing to vote for 'the question to be put'

(1) A clarification is proposed to rule *4A, 43 - Closure Motions* to reflect current practice regarding moving to the vote without a summing up from the mover, as shown in point (b) of the extract below (new text in bold);

(2) A suggestion has been made that it would be clearer to the public, and those in the Chamber, that if members are voting specifically that 'the question be put', this is done so by a clear majority standing, where possible*. The substantive vote would then be taken by counting hands as normal – making an obvious distinction between the vote on a closure motion and the vote on a substantive motion.

[*If a Member is unable to or prefers not to stand, a raised hand will count.]

"RULE 43 - CLOSURE MOTIONS

A member who has not spoken in a debate may move without comment at the conclusion of a speech of another member;

- *"That the meeting proceed to the next business",*
- *"That the question be now put" (in effect "That the vote be now taken"),*
- *"That the debate be now adjourned", or*
- *"That the meeting do now adjourn",*

on the seconding of which the Chair shall proceed as follows:-

*(a) On a motion "to proceed to next business": unless in her/his opinion the matter before the meeting has been insufficiently discussed, the Chair shall first give the mover of the ~~original~~ **substantive** motion a right of reply, and then put to the vote the motion "to proceed to the next business";*

*(b) On a motion "that the question be now put": unless in her/his opinion the matter before the meeting has been insufficiently discussed, the Chair shall first put to the vote the motion "that the question be now put". If that motion is passed, the Chair ~~will invite the mover of the original motion to exercise her/his right of reply under Rule 38 before putting that original motion to the vote~~ **shall put the substantive motion to the vote without giving the mover of the original motion a right of reply**;*

*(c) On a motion "to adjourn the debate or the meeting": if in her/his opinion the matter before the meeting has not been sufficiently discussed and cannot reasonably be sufficiently discussed on that occasion, the Chair shall put the adjournment motion to the vote without giving the mover of the ~~original~~ **substantive** motion a right of reply.*

Votes on closure motions to be taken by Members standing. If a Member is unable to or prefers not to stand, a raised hand will be counted.

5.4 Responsibility for Functions & Delegations schemes - Part 3, Section 3

(1) This section needs to be amended to update the references to the West of England Combined Authority, as set out below;

~~West of England Partnership Joint Waste and Joint Transport Committees and Planning, Housing & Communities board~~ West of England Combined Authority and any bodies/groups it appoints	~~Relevant Cabinet Member (plus an Executive Member from each of the Authorities covered by the West of England Partnership)~~ Leader, plus relevant Cabinet Members on Advisory Boards	To enable joint governance arrangements via delegated powers to take executive decisions on behalf of the 3 participating Authorities	Detail contained within the Terms of Reference
West Of England Joint Committee	Leader	To enable joint governance arrangements via delegated powers to take executive decisions on behalf of the 4 participating Authorities	Detail contained within the Terms of Reference

5.5 Question deadline for Council & Cabinet

Currently, Councillors submitting questions to Council and Cabinet must do so by the deadline of 4 working days before the meeting, whereas the public only need to give 2 clear working days' notice. As the time spent by officers and Cabinet Members in preparing responses is the same regardless of who submitted the question, it is proposed that the deadlines are made the same.

6 RATIONALE

6.1 Council is requested to agree the amendments to ensure that the Constitution is up to date with best practice and provides robust arrangements to facilitate effective debate and decision making. An updated Constitution will ensure the Council is less likely to be challenged on its procedures and processes.

7 OTHER OPTIONS CONSIDERED

7.1 If the Constitution is not amended, it will not be robust enough to support effective decision making processes at Council, or reflect the correct legal position.

8 CONSULTATION

8.1 Member Working group, Group Leaders, the Monitoring Officer and the Chief Executive.

9 RISK MANAGEMENT

9.1 Considered as part of the formulation of proposals.

Contact person	*Jo Morrison, Democratic Services Manager*

	jo.morrison@bathnes.gov.uk 01225 394358
Background papers	The Constitution
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Bath and North East Somerset Council

Full Council meeting, Thursday 9 November 2017

Liberal Democrat Motion on Virgin Care: Patient Safety

To be proposed by Councillor Will Sandry

Council:

1. Notes recent media reports suggesting that Virgin Care asked managers to 'hold off' from contacting the Care Quality Commission (CQC) about safety concerns arising from IT problems.

2. Notes that the Council takes its safeguarding responsibilities very seriously and will ensure its suppliers comply with legal requirements.

3. Notes that the Council has robust monitoring arrangements in place with Virgin Care and the Council are ensuring they are kept informed.

4. Affirms its intention to work with the NHS B&NES Clinical Commissioning Group to ensure that effective reporting and whistle blowing procedures are in place at Virgin Care and to manage continual improvement by contractual mechanisms.

5. Requests that the Executive Member for Adult Care, Health and Wellbeing ensure issues of concern are reported through the appropriate Council bodies so as to ensure full transparency.

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Bath and North East Somerset Council

Full Council meeting, Thursday 9 November 2017

Liberal Democrat Motion on Refugees

To be proposed by Councillor Dine Romero

The Council notes that:

1. Since becoming involved in the Syrian Vulnerable Persons Resettlement Programme, B&NES has welcomed 37 people from 8 families to the local area, as of July 2017.

2. B&NES has also agreed to take in 23 Unaccompanied Asylum Seeking Children, of whom 9 have already arrived and are now living with foster families, as of July 2017. The Council has actively sought to recruit additional foster carers from the local community.

3. Councils and the LGA have urged the Government to put in place long-term funding arrangements to ensure that individuals starting a new life in the UK are properly supported.

4. It has been a year since the Council has discussed the situation of refugees who have been welcomed into the B&NES community and so an update is timely.

The Council resolves to:

1. Reiterate its willingness to be involved in the Government's national resettlement schemes and receive an update from officers on the Council's involvement to date.

2. Welcome the partnership working between the Council, charities, faith groups, and local voluntary organisations, including Bath Welcomes Refugees and Julian House, the Genesis Trust, Developing Health & Independence, and The Nest.

3. Commend the work of the Connecting Families team, social workers and other Council officers who are involved in supporting refugees in B&NES; and commend the work of charities, faith groups, and local voluntary organisations who are fundraising and giving practical support to refugees in B&NES.

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Bath and North East Somerset Council

Full Council meeting, Thursday 9 November 2017

Liberal Democrat Motion on Recycling

To be proposed by Councillor Paul Crossley

Council notes:

1. Single use consumer packaging is a generally wasteful use of scarce natural resources; packaging often ends up as litter and may make its way to the sea. Millions of tonnes of plastic enter the oceans every year, with most coming from the land[1].

2. Awareness is growing about the negative effect of sea plastic particularly on marine life, sea birds and contamination of the food chain.

3. The Government is consulting[2] on a deposit return scheme for drinks containers, aimed at reducing litter and ocean pollution.

4. The report by a consortium of litter campaigners, which suggests that a deposit return scheme for drinks containers could save individual Councils between £60,000 and £500,000 through reduced costs associated with litter and landfill charges, even after any loss of income from kerbside recycling[3].

5. The inquiry[4] by Parliament's Environmental Audit Committee, which recently heard that 2.5 billion disposable cups are thrown away annually in the UK, equivalent to almost 7 million cups a day, of which only 1% are recycled.

6. The dramatic success of the 5p plastic bag charge, which has reduced use by 80% according to Defra figures and has raised millions for charities.

Council resolves to:

1. Reaffirm its commitment to the long-term goal of Zero Waste previously established by the Council as a target to encourage innovation.

2. Commend the work of officers, local voluntary organisations and the Environmental Sustainability Network in promoting recycling.

3. Request that the Leader write to the Government and local MPs expressing this Council's support for a deposit return scheme for plastic bottles and other drinks containers, support for the introduction of a 5p charge on non-recyclable, disposable coffee cups, and interest in being informed about joining any pilot scheme.

4. Request that the Cabinet member for Development and Neighbourhoods work to encourage local businesses to participate in schemes to refill drinking bottles with tap water for free on request.

[1] https://goo.gl/MMCSM1

[2] https://goo.gl/HvJB1m

[3] https://goo.gl/2ocChq and https://goo.gl/7zahDN

[4] https://goo.gl/v73hMS

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Council 9 November, 2017

University of Bath

Labour Group to move:

Council:

1. Notes that the University of Bath is an independent academic institution, whose autonomy must be respected.

2. Further notes, though, that the University of Bath does not operate in isolation, and does impact on the Council. The University of Bath main campus is situated on land owned by the Council, it is the second largest employer in the authority area, and impacts on the planning and housing policy of the Council.

3. Notes that some officers and councillors from the Council sit as ex-officio members of the University of Bath Court.

4. Recognises the immense positive impact that the University of Bath has on the local economy, and recognises how successful it has been in recent years.

5. Notes that Home students at the University of Bath are now paying tuition fees of £9,250 per year.

6. Notes that staff paid according to the Higher Education single pay spine have suffered a real terms pay cut of over 16% since 2009.

7. Notes that the latest available figure for the Vice Chancellor (Chief Executive Officer) of the University of Bath is £451,000 for 2015-16 year. This was an 11% rise, compared to a 1% rise in that year for staff paid according to the national pay spine.

8. Notes that the figure of £451,000 is the highest for any Vice Chancellor in the UK.

9. Notes that the pay ratio between the highest and lowest paid member of staff at the University of Bath is approximately 30:1.

10. Notes that the Vice Chancellor of the University of Bath also occupies a grace and favour house in the city, for which the University pays approximately £20,000 each year for running costs including: Council Tax, utility bills, and a housekeeper with such responsibilities as ironing bed linen and towels.

11. Notes that the University of Bath provided its Vice Chancellor with an interest free loan of £31,489 with which to buy a car.

12. Further notes that the University of Bath has confirmed that no other member of staff has been eligible to receive such a loan.

13. Further notes that students of the University of Bath can expect to pay interest rates of 6% on their tuition fee and maintenance loans.

14. Notes that the 2017 meeting of the University of Bath Court included a vote on whether to express concern about the decisions of and transparency of the Remuneration Committee – which sets the pay of the most senior managers at the University. This vote was defeated by 33 votes to 30.

15. Further notes that the Higher Education Funding Council for England are conducting an inquiry into the University of Bath's governance surrounding remuneration of senior managers, since several members of the Remuneration Committee, or people whose pay is set by the committee, voted against the Court motion without declaring an interest.

16. Notes that Conservative MP for South West Wiltshire, Dr Andrew Murrison, has resigned from the University of Bath Court in protest at the high pay and perks of the Vice Chancellor.

17. Notes that Dr Murrison has also led an adjournment debate in the House of Commons about the pay of Vice Chancellors, which revolved primarily around the pay of the University of Bath Vice Chancellor.

18. Notes that three further MPs from the region have resigned from the University of Bath Court: Kerry MCarthy (Bristol East, Labour), Dr David Drew (Stroud, Labour), and Darren Jones (Bristol North West, Labour).

19. Notes that the Liberal Democrat MP for Bath, Wera Hobhouse, has been critical of the high pay and perks of the Vice Chancellor and has called for governance arrangements to be reformed.

20. Notes that the pay of the Vice Chancellor of the University of Bath has been referenced in the House of Lords by Lord Adonis (Labour), and that in response Lord Bates (Conservative) stated that he thought 'the House will have been in some state of shock' at the figures quoted.

21. Notes that the University of Bath has been at the forefront of a national debate about the issue of Vice Chancellor pay over the past year.

22. Notes this national debate has led to the Minister of State for Universities and Science (Jo Johnson, Conservative) to announce that the new Office for Students will require universities to publish justifications for any pay over £150,000. This has followed repeated calls for the sector to show restraint in setting levels of senior pay.

23. Believes that the year of constant negative press attention for the University of Bath, and the reputational damage this has caused to the University, is of concern to the Council, as the University of Bath is the second biggest employer in the area.

24. Believes that the success of the University of Bath can be credited to its leadership as well as the work of the staff and students across the institution.

25. Expresses concern at the levels of pay inequality at the University of Bath and at the governance arrangements which have led to this pay inequality.

Council 9 November, 2017

Universal Credit

Labour Group to move:

Council notes that:

1 Bath and North East Somerset is a Full Service area for the roll out of Universal Credit and has been since May 2016.

2 By 2020, it is expected that 7,500 people will be in receipt of Universal Credit in Bath and 7,000 in North East Somerset.

3 Between April and September 2017, Citizens Advice advised 274 different people with new problems concerning Universal Credit from every ward in Bath and North East Somerset.

4 People approaching Citizens Advice mainly had problems with the delays in receiving their first payment, inability to pay for essential items such as food and utilities before receiving their first payment, getting into rent arrears because of the initial delay or because the Department for Work and Pensions had not paid their landlord as arranged and using the digital service.

5 Citizens Advice has produced a report *Delivering on Universal Credit* which sets out some of the issues and makes recommendations including the need to pause the roll-out of Universal Credit until the problems with it have been addressed.

This Council believes that:

6 The aim of Universal Credit – to simplify the benefits system and to offer people the security and support they need to move into and progress in work - is right, but Universal Credit is already failing many people, forcing them into debt and leaving them without the means to make ends meet.

7 Some of these problems are the result of the flaws in the current design of Universal Credit whilst others are the result of problems with implementation, but Government needs to address all the issues with Universal Credit before the roll-out speeds up and many more people are affected.

8 The Government's decision to make the Universal Credit helpline free of charge is to be welcomed.

9 It is important that the new welfare benefits system is fair, works properly and does not disadvantage residents either now or in the future.

Council resolves therefore:

10 To call immediately on our two MPs to make urgent representations to Government to:

a) Halt the roll out of Universal Credit until the problems have been resolved;
b) Seek assurances from the Prime Minister and the Secretary of State for Work and Pensions that the lessons learnt from the experience of Universal Credit in Bath and North East Somerset will be used to amend both the design and the implementation of the scheme where necessary; and
c) Ensure that changes made as a result of addressing the problems with Universal Credit are implemented first in existing Full Service areas such as B&NES.

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Council 9 November, 2017

Social Care: Ethical Care Charter

Labour Group to move:

Council notes that:

1 A survey of homecare workers undertaken by UNISON, entitled *Time to Care*, found a committed but poorly paid and treated workforce doing its best to maintain good levels of quality care in a system that is in crisis and that poor terms and conditions for workers can contribute towards lower standards of care for people in receipt of homecare services.

2 In light of these findings, UNISON has called on local authorities to commit to becoming Ethical Care Councils by commissioning services which adhere to its Ethical Care Charter (attached). To date, at least 28 councils and a number of social care companies have signed up to the Charter.

Council believes that:

3 By adopting minimum standards as set out in the Ethical Care Charter, homecare services will improve and the dignity and quality of life of vulnerable people and the workers who care for them will be protected.

4 Better quality homecare will reduce demand both for expensive residential care and A&E admissions. It will also help to address bed blocking.

5 The Ethical Care Charter will improve the working conditions of homecare workers and increase the retention of skilled and experienced staff thereby ensuring that vulnerable people will be more likely to have a regular care worker with whom they can develop a trusting relationship.

Council resolves therefore:

6 To ask the Cabinet to:

a) investigate how B&NES might commit to becoming an Ethical Care Council that commissions its homecare services in accordance with the Ethical Care Charter; and
b) report back to Council in time for budget setting for 2018/19.

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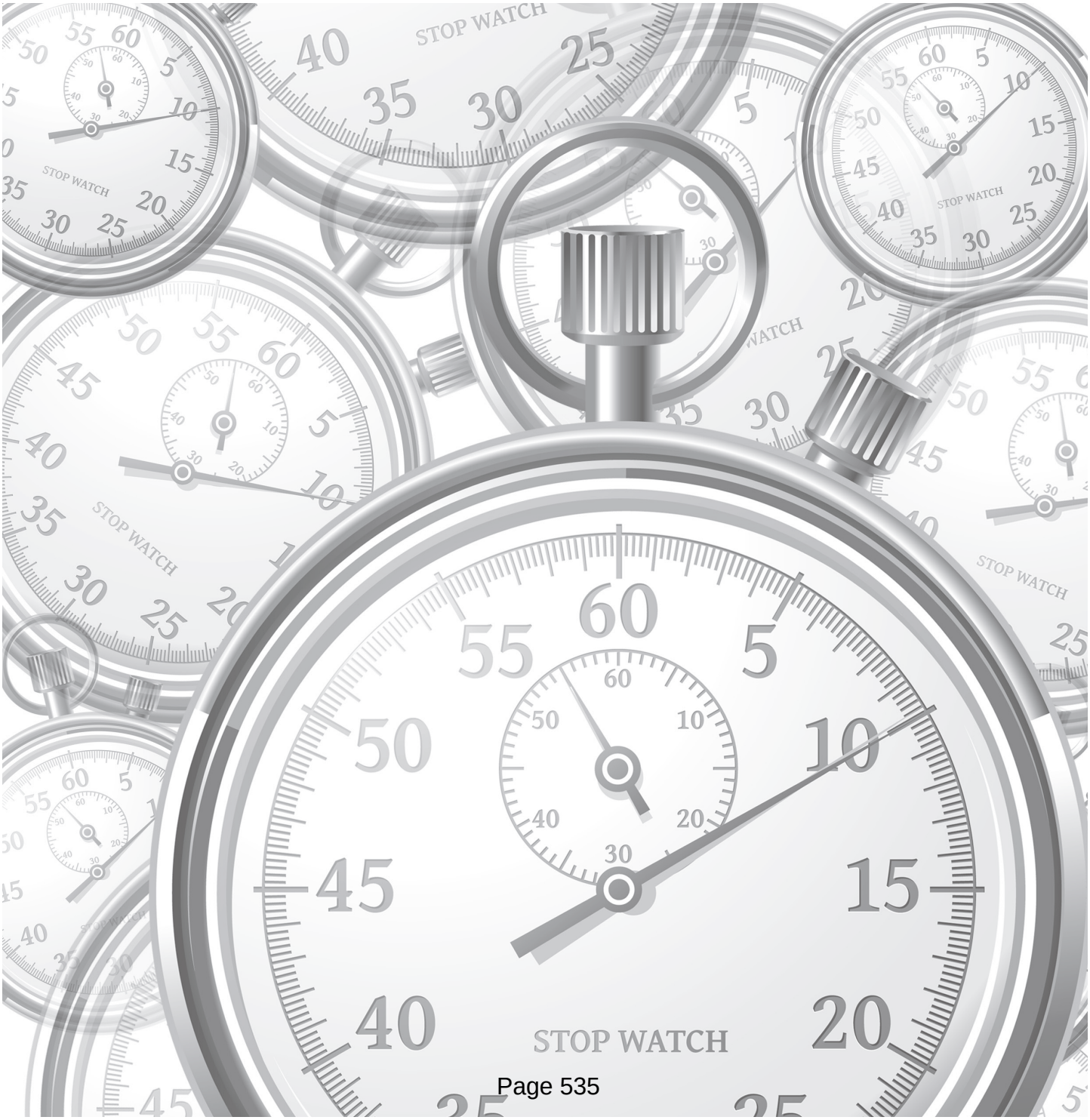
UNISON
the public service union

UNISON's ethical care charter



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Introduction

A number of reports from client organisations, consumer groups, and homecare providers have recently been produced which have been highly critical of the state of homecare services in the UK. Little consideration however has been given to the views of homecare workers themselves as to why there are so many problems in this sector.

UNISON, the largest public service union, conducted a survey of homecare workers entitled “Time to Care” to help address this imbalance and to illustrate the reality of homecare work. The online survey which was open to homecare workers who were either UNISON members or non-members attracted 431 responses between June and July of 2012.

The responses showed a committed but poorly paid and treated workforce which is doing its best to maintain good levels of quality care in a system that is in crisis. The report highlights how poor terms and conditions for workers can help contribute towards lower standards of care for people in receipt of homecare services.

Key findings

- 79.1% of respondents reported that their work schedule is arranged in such a way that they either have to rush their work or leave a client early to get to their next visit on time. This practice of 'call cramming', where homecare workers are routinely given too many visits too close together, means clients can find themselves not getting the service they are entitled to. Homecare workers are often forced to rush their work or leave early. Those workers who refuse to leave early and stay to provide the level of care they believe is necessary, also lose out as it means they end up working for free in their own time.
- 56% of respondents received between the national minimum wage of £6.08 an hour at the time of the survey and £8 an hour. The majority of respondents did not receive set wages making it hard to plan and budget. Very low pay means a high level of staff turnover as workers cannot afford to stay in the sector. Clients therefore have to suffer a succession of new care staff.
- 57.8% of respondents were not paid for their travelling time between visits. As well as being potentially a breach of the minimum wage law, this practice eats away at homecare workers' already low pay.
- Over half the respondents reported that their terms and conditions had worsened over the last year, providing further evidence of the race to the bottom mentality in the provision of homecare services.

  56.1% – had their pay made worse
  59.7% – had their hours adversely changed
  52.1% – had been given more duties
- 36.7% of respondents reported that they were often allocated different clients affecting care continuity and the ability of clients to form relationships with their care workers. This is crucial, especially for people with such conditions as dementia.
- Whilst the vast majority of respondents had a clearly defined way of reporting concerns about their clients' wellbeing, 52.3% reported that these concerns were only sometimes acted on, highlighting a major potential safeguarding problem.
- Only 43.7% of respondents see fellow homecare workers on a daily basis at work. This isolation is not good for morale and impacts on the ability to learn and develop in the role.
- 41.1% are not given specialist training to deal with their clients specific medical needs, such as dementia and stroke related conditions.

The written responses to our survey paint a disturbing picture of a system in which the ability to provide some companionship and conversation to often lonely and isolated clients is being stripped away. Some recounted the shame of providing rushed and insufficient levels of care because of the terms and conditions of their job, whilst many detailed insufficient levels of training that they had been given to carry out the role. Others made the point that rushed visits are a false economy leading to a greater likelihood of falls, medication errors and deterioration through loneliness.

However the survey also showed the selflessness and bravery of homecare workers who, to their own personal cost, refused to accept the imposition of outrageously short visits and worked in their own time to ensure that their clients received good levels of care. Some homecare workers were doing tasks and errands for their clients in their spare time, despite the seemingly best efforts of the current care model to strip away any sense of personal warmth or humanity.

Homecare workers are personally propping up a deteriorating system of adult social care, but they are being pushed to breaking point. That they are still willing to deliver good levels of care in spite of the system is nothing short of heroic. For the system to work it needs to be underpinned by adequate funding and a workforce whose terms and conditions reflect the respect and value they deserve. Crucially they must be given the time to care.

“ I never seem to have enough time for the human contact and care that these people deserve. ”

“ A lot of the people I care for, are old and lonely, they are not only in need of physical support, but they are also in need of company and someone to talk to. The times given to these people are the bare minimum to get the job done, no time for a chat, just in and out. ”

“ People are being failed by a system which does not recognise importance of person centred care. ”

“ We are poorly paid and undervalued except by the people we care for! ”

“ I have worked as homecare worker for 15 years. Things have to change but not at the expensive of clients. It’s appalling the care they receive now. ”

Ethical care councils

In light of UNISON's findings, we are calling for councils to commit to becoming Ethical Care Councils by commissioning homecare services which adhere our Ethical Care Charter.

The over-riding objective behind the Charter is to establish a minimum baseline for the safety, quality and dignity of care by ensuring employment conditions which a) do not routinely short-change clients and b) ensure the recruitment and retention of a more stable workforce through more sustainable pay, conditions and training levels. Rather than councils seeking to achieve savings by driving down the pay and conditions that have been the norm for council – employed staff, they should be using these as a benchmark against which to level up.

Councils will be asked to sign up to the Charter and UNISON will regularly publish the names of councils who do.

Ethical care charter for the commissioning of homecare services

Stage 1

- The starting point for commissioning of visits will be client need and not minutes or tasks. Workers will have the freedom to provide appropriate care and will be given time to talk to their clients
- The time allocated to visits will match the needs of the clients. In general, 15-minute visits will not be used as they undermine the dignity of the clients
- Homecare workers will be paid for their travel time, their travel costs and other necessary expenses such as mobile phones
- Visits will be scheduled so that homecare workers are not forced to rush their time with clients or leave their clients early to get to the next one on time
- Those homecare workers who are eligible must be paid statutory sick pay

Stage 2

- Clients will be allocated the same homecare worker(s) wherever possible
- Zero hour contracts will not be used in place of permanent contracts
- Providers will have a clear and accountable procedure for following up staff concerns about their clients' wellbeing
- All homecare workers will be regularly trained to the necessary standard to provide a good service (at no cost to themselves and in work time)
- Homecare workers will be given the opportunity to regularly meet co-workers to share best practice and limit their isolation

Stage 3

- All homecare workers will be paid at least the Living Wage (as of November 2015 it is currently £8.25 an hour for the whole of the UK apart from London. For London it is £9.40 an hour. The Living Wage will be calculated again in November 2016 and in each subsequent November). If Council employed homecare workers paid above this rate are outsourced it should be on the basis that the provider is required, and is funded, to maintain these pay levels throughout the contract.
- All homecare workers will be covered by an occupational sick pay scheme to ensure that staff do not feel pressurised to work when they are ill in order to protect the welfare of their vulnerable clients.

Guidance for councils and other providers on adopting the charter

Seeking agreements with existing providers

1. Convene a review group with representation from providers, local NHS and UNISON reps to work on a plan for adopting the charter – with an immediate commitment to stage 1 and a plan for adopting stages 2 & 3

2. Start by securing agreement for a review of all visits which are under 30 minutes. The review will include getting views of the homecare workers and client (and/or their family) on how long the client actually needs for a visit and what their care package should be

Looking for savings

3. Are providers' rostering efficiently – for example are there cases of workers travelling long distances to clients when there are more local workers who could take over these calls?

4. How much is staff turnover costing providers in recruitment and training costs?

5. How much are falls and hospital admissions amongst homecare clients costing the NHS and could some of these be prevented by longer calls and higher quality care?

6. Are there opportunities for economies of scale by providers collaborating around the delivery of training and networking/mentoring for workers?

7. Are there opportunities for collaboration between providers to achieve savings on procurement of mobile phones, uniforms and equipment for workers?

The commissioning process

1. UNISON's evidence, along with that of other bodies such as the UKHCA, shows that working conditions are intrinsically bound up with the quality of care.

2. When councils are conducting service reviews and drawing up service improvement plans, the Charter will provide a helpful benchmark for ensuring service quality – whether for an improved in-house service or in relation to externally commissioned services.

3. Where a decision has been taken to commission homecare externally, identify how the elements of the charter will be included as service delivery processes, contract conditions or corporate objectives in the invitation to tender documents. It must explain how these are material to the quality of the service and achieving best value.

Service monitoring

1. Work with providers and trade unions to agree how service quality will be monitored and compliance with the Charter assured

2. Build regular surveys of homecare workers into this process to gain their views and consider establishing a homecare workers panel from across local providers who can provide feedback and ideas on care delivery

The provisions of this charter constitute minimum and not maximum standards. This charter should not be used to prevent providers of homecare services from exceeding these standards.

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