Bath & North East Somerset Council

# Annex G

Core Strategy amendments appraisal matrices

Bath and North East Somerset Draft Placemaking Plan

Date December 2015

Policy No. & Title	Core Strategy B1					
SA Objectives	ST	MT	LT	Commentary		
Objective 1: Improve the health and well- being of all communities	N/A	N/A	N/A	Not applicable to the purpose of this policy		
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	0	0	0	The amendments to the policy have a neutral effect on this objective.		
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+	+	+	The policy enables the development of a significant quantum of office floorspace to plan for the growth in the knowledge intensive and creative employment sectors. The policy helps facilitate a sustainable balance between job creation, the concerns of communities and overall functioning, performance and environmental quality of the city and its setting.		
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	++/?	++/?	++/?	The policy enables the development of a significant quantum of office floorspace to plan for the growth in the knowledge intensive and creative employment sectors. It allows for a contraction in industrial floorspace, yet recognises the importance of maintaining a mixed economy within the city and therefore retains industrial land in the Newbridge Riverside area.  The net outcome figures for B1 office floorspace has not changed but a further 10,000 sqm gross will be needed to achieve it. Given that the Plan is planning not to accommodate the full assessed retail capacity, nor student accommodation or teaching space in the Central Area or River Corridor, there is some negative consequences for these uses. The negative consequence of finding an addition 10,000 of office space are assessed as greater in respect of the retail impact as it represent a more significant element for what is needed and is within the same 'sequentially preferable' spatial area. For Higher Education, it is a smaller effect, as much of the demand from this this sector can be met elsewhere.  The decision to prioritise the delivery of office floorspace over retail has been made by the Council.  Mitigation  Progress of development in the Enterprise Area will be monitored and reviewed as part of the Plan review process.		
Objective 5: Ensure everyone has access to high quality and affordable public transport and	++	++	++	The policy deals with an area that is well served by public transport, and with increasing levels or walking and cycling. Reference is made to delivering the measures identified in the Council's Transport Strategy.		

Policy No. & Title	Core S	Strategy	B1	
SA Objectives	ST	MT	LT	Commentary
promote cycling				•
and walking				
Objective 6:	0	0	0	The amendments to the policy have a neutral effect on this
Protect and				objective.
enhance local				
distinctiveness				
Objective 7:	0	0	0	The amendments to the policy have a neutral effect on this
Protect and				objective.
enhance the				
district's historic,				
environmental				
and cultural				
assets				
Objective 8:	0	0	0	The amendments to the policy have a neutral effect on this
Encourage and				objective.
protect habitats				
and biodiversity				
and geodiversity				
(taking account of				
climate change)				
Objective 9:	0	0	0	The amendments to the policy have a neutral effect on this
Reduce land,				objective.
water, air, light,				
noise pollution				
Objective 10:	N/A	N/A	N/A	Not applicable to the purpose of this policy
Reduce				
vulnerability to,				
and manage flood				
risk (taking				
account of climate				
change)	N/A	N/A	N/A	Not applicable to the purpose of this policy
Objective 11 Increase	IN/A	IN/A	IN/A	Not applicable to the purpose of this policy
resilience to				
climate change				
Objective 12:	0	0	0	It is considered that the amendments to the policy have a
Encourage careful		ľ		neutral effect on this objective.
and efficient use				Theatrai effect of this objective.
of natural				
resources				
including energy				
and encourage				
sustainable				
construction				
Objective 13:	N/A	N/A	N/A	Not applicable to the purpose of this policy
Promote waste				
management				
accordance with				
the waste				
hierarchy				
(Reduce, Reuse				
and Recycle)				

**SUMMARY:** The amendments to Policy B1 makes positive contributions to objective 5 making reference to the measures identified in the Council's Transport Strategy. The amendments make a positive effect on objective 4

The policy enables the development of a significant quantum of office floorspace to plan for the growth in the

Policy No. & Title	C	Core St	rategy	B1	
SA Objective	s S	ST	ТМ	LT	Commentary

knowledge intensive and creative employment sectors. It allows for a contraction in industrial floorspace, yet recognises the importance of maintaining a mixed economy within the city and therefore retains industrial land in the Newbridge Riverside area. Therefore a major effect on objective 4 'Build a strong, competitive economy and enable local businesses to prosper'. However an uncertainty effect is recorded on objective 4. By accommodating further B1 office floorspace, the policy does not facilitate to meet the full assessed retail capacity, nor student accommodation or teaching space in the Central Area or River Corridor. The decision to prioritise the delivery of office floorspace over retail has been made by the Council.

#### Mitigation and enhancement

Progress of development in the Enterprise Area will be monitored and reviewed as part of the Plan review process.

Policy No. & Title	Core Strategy B2				
SA Objectives	ST	MT	LT	Commentary	
Objective 1: Improve the health and well- being of all communities	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	0	0	0	The amendments to the policy have a neutral effect on this objective.	
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0	0	0	The amendments to the policy have a neutral effect on this objective.	
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	+	+	The only amendment to this policy is a change to the quantity of additional hotel bedrooms needed to reflect updated evidence base which has a positive effect on this objective. However overall effects considering various land uses are assessed as part of Policy B1 assessment.	
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	0	0	0	The amendments to the policy have a neutral effect on this objective.	

Policy No. & Title	Core S	Strategy	B2	
SA Objectives	ST	MT	LT	Commentary
Objective 6: Protect and enhance local distinctiveness	0	0	0	The amendments to the policy have a neutral effect on this objective.
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	0	0	0	The amendments to the policy have a neutral effect on this objective.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	0	0	0	The amendments to the policy have a neutral effect on this objective.
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	The amendments to the policy have a neutral effect on this objective.
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	N/A	N/A	N/A	Not applicable to the purpose of this policy
Objective 11 Increase resilience to climate change	N/A	N/A	N/A	Not applicable to the purpose of this policy
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	0	0	0	It is considered that the amendments to the policy have a neutral effect on this objective.
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	Not applicable to the purpose of this policy

### SUMMARY:

The only amendment to this policy is a change to the quantity of additional hotel bedrooms needed to reflect updated evidence base which has a positive effect on this objective. However the overall effects considering various land uses are assessed as part of Policy B1 assessment.

Policy No. & Title	Core S	trategy	B3	
SA Objectives	ST	MT	LT	Commentary
Objective 1: Improve the health and well- being of all communities	N/A	N/A	N/A	Not applicable to the purpose of this policy
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	0	0	0	The amendments to the policy have a neutral effect on this objective.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+	+	+	The amendments to the policy have a positive effect on this objective as they improve the connections to local centres and improve the environmental quality of the area.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+	+	+	The amendments to the policy have a positive effect on this objective as they improve the connections to local centres and improve the environmental quality of the area, improving its locational attributes as a place to do business. The policy also requires a net increase in business space, and the provision of lower cost workspace is encouraged to support the broader economic offer of the central area.
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	+	+	+	The amendments to the policy have a positive effect on this objective as they improve the connections to local centres, improve the environmental quality of the area, and encourage walking and cycling.
Objective 6: Protect and enhance local distinctiveness	+	+	+	The amendments to the policy have a positive effect on this objective as they improve the connections to local centres and improve the environmental quality of the area, including biodiversity
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	+	+	+	The amendments to the policy have a positive effect on this objective as they improve the connections to local centres and improve the environmental quality of the area.
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	+	+	+	The amendments to the policy have a positive effect on this objective as they improve biodiversity.  It includes measures to restore and enhance the biodiversity value of the river and the river edge, including the retention of a dark corridor for bats, and the riverside as a green setting and context for the area.

Policy No. & Title	Core S	Core Strategy B3			
SA Objectives	ST	MT	LT	Commentary	
Objective 9: Reduce land, water, air, light, noise pollution	0	0	0	The amendments to the policy have a neutral effect on this objective.	
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	0	0	0	The sequential approach to site layout is required to be informed by a site specific FRA. As a minimum, the floor levels of new developments have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.	
Objective 11 Increase resilience to climate change	0	0	0	The sequential approach to site layout is required to be informed by a site specific FRA. As minimum, the floor levels of new developments have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.  Other polices also apply to this area.	
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	0	0	0	The amendments to the policy have a natural effect on this objective.	
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	Not applicable to the purpose of this policy	

## SUMMARY:

The amendments to the policy seek to reinforce the important role that this area plays as a business destination, and to encourage economic growth. It requires development to undertake environmental improvements to the local area, including improving access to the riverside environment, and requires opportunities to improve access to local centres to be achieved.

Policy No. & Title	Core Strategy B5 Strategic Policy for Bath's Universities and their impacts on the Housing Market				
SA Objectives	Short term	Med term	Long term	Commentary	
Objective 1: Improve the health and well- being of all communities	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	+/-	+/-	+/-	The management of the higher education footprint within the city will enable sufficient land to be protected and developed for normal housing. The inclusion of teaching space as well as student accommodation enables the management of an additional source of conflict re achieving other objectives.  The prioritisation of other housing types could result in shortages for students against the growth aspirations of universities (although the University of Bath could do much to correct this on-campus) and HMOs are still able to increase in certain places.  The replacement of student HMO stock with normal housing will enable the retention of workers within the district. However, it is unlikely that replacement stock could be sourced on the edge of Bath itself.  Mitigation and enhancement The policy requires that between 2011 and full Plan review the number of C3 dwellings converted to C4 Houses in multiple occupation(exempt from Council tax) to be monitored and compensatory provision will be made if the achievement for 7,000 net additional dwellings for the city is at risk.	
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	+	+	+	The draft plan helps facilitate a sustainable balance between the aspirations of each university, the concerns of communities and overall functioning, performance and environmental quality of the city and its setting. PMP Policy on HMOs and Article Direction related.	

Policy No. & Title	Core Strategy B5 Strategic Policy for Bath's Universities and their impacts on the Housing Market				
SA Objectives	Short term	Med term	Long term	Commentary	
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	+/?	+/?	+/?	The intent is to enable the universities to meet their objectives, as far as possible subject to sustainable development caveats. This will generate skilled workers for the sub-region.  The management of the higher education footprint within the city will enable sufficient land to be protected and developed for various economic sectors. The inclusion of teaching space as well as student accommodation enables the management of an additional source of conflict re achieving other objectives.  The universities themselves are not regarded as local businesses in themselves, but the policy approach could have a negative effect on the institutions growth potential, and this will have and gross economic impact. However, the net economic impact depends on what land is used for if not for the higher education sector.  The replacement of student HMO stock with normal housing will enable the retention of workers within the district. However, it is unlikely that replacement stock could be sourced on the edge of Bath itself.	
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	0	0	0	It is considered that the amendments to the policy have a neutral effect on this objective.	
Objective 6: Protect and enhance local distinctiveness	+	+	+	The draft plan helps facilitate a sustainable balance between the aspirations of each university, the concerns of communities and overall functioning, performance_and environmental quality of the city and its setting. Policy SB.20 and 21 provide further guidance.	
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	+	+	+	The draft plan helps facilitate a sustainable balance between the aspirations of each university, the concerns of communities and overall functioning, performance_and environmental quality of the city and its setting. Policy SB.20 and 21 provide further guidance.	
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	0	0	0	It is considered that the amendments to the policy have a neutral effect on this objective.	
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 10:	N/A	N/A	N/A	Not applicable to the purpose of this policy	

Policy No. & Title	Core Strategy B5 Strategic Policy for Bath's Universities and their impacts on the Housing Market				
SA Objectives	Short term	Med term	Long term	Commentary	
Reduce vulnerability to, and manage flood risk (taking account of climate change)					
Objective 11 Increase resilience to climate change	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	0	0	0	It is considered that the amendments to the policy have a neutral effect on this objective.	
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	Not applicable to the purpose of this policy	

### Summary

The references to the University campuses in adopted Policy B5 were included prior to the Placemaking Plan preparation process, which has enabled site specific issue to be fully explored and polices set out. For the sake of the logical flow of the Development Plan and to avoid duplication and ambiguities, there is justification for removing campus references in CS Policy B5 –given the proposed SB19 and SB20.

However, removing campus references also removes part of the purpose of CS Policy B5 (which was a strategic acknowledgement of the Universities and their needs /aspirations/ requirements). That would leave the Plan's text and policy framework, as a whole, deficient. Therefore, the amended policy includes a supportive policy approach to meeting the objectively assessed needs of Higher Education, qualified to acknowledge the prioritisation of other land uses that took place in the Core Strategy in relation to The Enterprise Area, City Centre and MoD sites, and environmental constraints (and thus reflecting an already adopted part of Policy B5). New wording is therefore proposed in amended Policy B5 to 'set the context for the remainder of Policy B5 and the campus specific policies that follow. This enhance the policies sustainability with regard to SA Objective 4.

Also appraised is adjusted wording on the University related uses that are not to be prioritised in the Enterprise Area, City Centre and on MoD sites. Not only student accommodation has the potential to squeeze out other uses/objectives prioritised in these areas. Reference is therefore also proposed to be made to academic space as this reflects the full footprint of HE on the city. University B1(a) office space would not be included in this definition. This enhances the policies sustainability regarding SA Objectives 2 and 4. There may be some negative effect in relation to SA Objective 2.

Finally, it is proposed that Policy B5 embeds within it the approach already set out in paragraph 1.26D of the Core Strategy (supporting text to CS Policy DW.1) re the need to compensate for normal houses that are permitted to change to HMOs where this would put at risk the achievement of a net additional 7,000 dwellings of the city. This is not made explicit in Policy in DW.1. Logically it fits within Policy B5. This will address SA

Policy No. & Title	Core Strategy B5 Strategic Policy for Bath's Universities and their impacts on the Housing Market			
SA Objectives		Long term	Commentary	

objective 2.

**Mitigation and enhancement**The policy requires that between 2011 and full Plan review the number of C3 dwellings converted to C4 Houses in multiple occupation (exempt from Council tax) to be monitored and compensatory provision will be made if the achievement for 7,000 net additional dwellings for the city is at risk.

Policy No. & Core	Strategy	SV1		
SA Objectives	ST	MT	LT	Commentary
Objective 1: Improve the health and well-being of all communities	N/A	N/A	N/A	Not applicable to the purpose of this policy
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	++	++	++	The Housing Development Boundary was reviewed to reflect existing commitments. The policy gives a clear guidance to facilitate the housing requirements for the Somer Valley contributing well to this objective.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime	0	0	0	The policy has a neutral effect on this objective.
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	0	0	0	The policy has a neutral effect on this objective.
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	0	0	0	The policy has a neutral effect on this objective.
Objective 6: Protect and enhance local distinctiveness	0	0	0	The policy does support development outside the HDB therefore it avoids development on the Landscape Setting Area.
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	0	0	0	The policy has a neutral effect on this objective.
Objective 8: Encourage and protect habitats and biodiversity and	0	0	0	The policy has a neutral effect on this objective.

Policy No. & Co	Core Strategy SV1				
SA Objectives	ST	MT	LT	Commentary	
geodiversity (taking account of climate change)					
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 10: Reduce vulnerability to, and manage flood risk (takin account of climate change)	N/A g	N/A	N/A	Not applicable to the purpose of this policy	
Objective 11 Increase resilience to climate change	N/A	N/A	N/A	Not applicable to the purpose of this policy	
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	0	0	0	It is considered that the amendments to the policy have a neutral effect on this objective.	
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	Not applicable to the purpose of this policy	

# SUMMARY:

The policy has a major positive effect on objective 2 as it gives a clear guidance to facilitate meeting identified needs for housing in the Somer Valley.

Policy No. & Title	CORE STRATEGY POLICY RA1			
SA Objectives	Short term	Med term	Long term	Commentary
Objective 1: Improve the health and well-being of all communities	++	++	++	By requiring a settlement to have a primary school with sufficient capacity (or ability to expand) the Plan will ensure the educational needs of the existing population and those arising from a residential development proposal in that settlement can be accommodated. This should result in a major positive impact on this objective.
Objective 2: Meet identified needs for sufficient, high quality and affordable housing	+	+	+	The policy change to require a primary school with sufficient capacity (or ability to expand) will help ensure the overall aim of the policy is achieved i.e. to allow residential development in the more sustainable settlements, and that sufficient, high quality and affordable housing is accommodated in sustainable locations.
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and	++	++	++	It has emerged through the preparation of the Placemaking Plan and consideration of planning applications that some primary schools are at or reaching capacity. In some cases, such as at High Littleton, there is currently no scope for any physical expansion. This means that some villages, whilst

Policy No. & Title	CORE S	TRATEGY	POLICY	RA1
SA Objectives	Short	Med	Long	Commentary
	term	term	term	
the fear of crime	term	term	term	meeting the RA1 criteria, may have primary schools which do not have the capacity to meet the pupil needs arising from even small-scale windfall developments. In these cases sites for residential development will not be allocated in the Placemaking Plan. This also has implications for the RA2 settlements which also rely on rural primary schools in the larger villages to accommodate the pupil needs arising from new housing development. The cumulative impact on nearby primary schools of allowing successive even small-scale windfall residential schemes also needs to be taken into account.  By requiring a settlement to have a primary school with sufficient capacity (or ability to expand) will help to secure and maintain balanced and more self-contained communities and reduce the need to travel, accommodate the primary education needs of the existing population and those arising from a residential development proposal (as expected by Placemaking
				Plan Policy LCR3A).
Objective 4: Build a strong, competitive economy and enable local businesses to prosper	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 6: Protect and enhance local distinctiveness	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 7: Protect and enhance the district's historic, environmental and cultural assets	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 9: Reduce land, water, air, light, noise pollution	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 11 Increase resilience to climate	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy

Policy No. & Title	CORE STRATEGY POLICY RA1			
SA Objectives	Short term	Med term	Long term	Commentary
change				
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)	N/A	N/A	N/A	This SA Objective is not applicable to the change to this policy

# Summary

The policy, by requiring a settlement to have a primary school with sufficient capacity (or ability to expand) will ensure the educational needs of the existing population and those arising from a residential development proposal in that settlement can be accommodated. This should result in a major positive impact on Objectives 1 (health and well-being) and 3 (stronger more vibrant and cohesive communities) and a minor positive impact on Objective 2 by helping ensure housing is accommodated in sustainable locations.