

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

Interim SA Report (accompanying Regulation 18 consultation re-run)

Non-Technical Summary

Bath and North East Somerset Council

October 2025

Quality information

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1. Non-Technical Summary

1.1 Introduction to Sustainability Appraisal (SA)

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Bath and North East Somerset Local Plan. SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and alternatives, against a framework of sustainability objectives, with a view to avoiding and mitigating *adverse* effects, and maximising the positives. SA of Local Plans is a legal requirement.¹
- 1.1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004. This identifies that a report (known as the SA Report) must be published for consultation alongside the Draft Plan that “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan and reasonable alternatives*”.² The SA Report must then be considered, alongside consultation responses, when finalising the plan.
- 1.1.3 This Interim SA Report (2025) has been prepared to accompany the Local Plan Options Document, under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Options Document sets out revised approaches to development across Bath and North East Somerset, including updated site options and policy directions. This is a re-run of the Regulation 18 consultation held in Spring 2024, recognising some key changes to national policy that have affected the growth strategy for the Local Plan. This is discussed in the sections below.
- 1.1.4 In December 2024 changes were made to national planning policy, including changes to the way housing needs are calculated and how the Green Belt is defined. The Options Document focuses on options providing for the additional development now required within Bath and North East Somerset, and policy approaches to help deliver healthy, sustainable places.
- 1.1.5 This Interim SA Report and the Local Plan Options Document are the subject of a focussed Pre-Submission consultation, due to take place over a period of six weeks from **Friday 3rd October** to **Friday 14th November 2025**.
- 1.1.6 AECOM has structured this report specifically in a way that is designed to meet the regulatory requirements and be accessible to readers. The report is structured in three parts which aim to answer the following questions:
1. What has plan-making/ SA involved up to this point? (focusing on what reasonable alternatives have been appraised)
 2. What are the SA findings at this stage? (focusing on appraising the Options Document)
 3. What happens next? (what comes next in terms of plan-making and SA)

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

² Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

1.2 The Local Plan context

- 1.2.1 The emerging Bath and North East Somerset Local Plan is at a relatively early stage of preparation. An initial Options Consultation took place in Spring 2024, with an [Interim SA Report \(2024\)](#) accompanying the Local Plan 2022-2042 Options Document for public consultation (Regulation 18).
- 1.2.2 Later in 2024 the government introduced a new mandatory housing need (known as the standard method figure of housing need³) for the Council. This was for more than double the number of homes than previously being planned for, at around 1,500 homes per year. Alongside doubling the housing need for Bath and North East Somerset, the government also published some important changes to national policy. As a result of the increased housing need and national policy changes, the Council decided to reset the local plan so that it could undertake further evidence work and assess further options for providing increased levels of development. In response to this, an Options Document has been produced. This primarily focusses on options for providing the additional development now required.
- 1.2.3 This Interim SA Report (2025) accompanies the Local Plan Options Document for a re-run of Regulation 18 consultation. Once adopted, the Bath and North East Somerset Local Plan will set out the framework to guide and shape development in the district up to 2042. It will replace the existing Core Strategy (2014), Placemaking Plan (2017), and Local Plan Partial Update (2023) that form the current local planning policy framework for the district.

1.3 The scope of the SA

- 1.3.1 The SEA Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁴ As such, these authorities were consulted on the SA scope in March 2023. Since that time, the SA scope has evolved as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2023.
- 1.3.2 The SA Framework is provided in **Table 1.1** in the main body of the Report. Updated scoping information is presented in **Appendix B** of the Report.

³ [Housing and economic needs assessment - GOV.UK](#)

⁴ In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

1.4 Part 1: What has plan making / SA involved up to this point?

Establishing reasonable alternatives

- 1.4.1 Part 1 in the main body of the Interim SA Report explains how the policy context and evidence base for the emerging Local Plan has informed the development of reasonable alternatives for appraisal at this current stage of plan making. Ultimately, the aim of Part 1 is to present “*an outline of the reasons for selecting the alternatives dealt with*”, in accordance with regulatory requirements.⁵
- 1.4.2 Part 1 is structured to answer the following questions:
- How much growth needs to be delivered?
 - Where are the key locations to deliver this growth?
 - What are the growth delivery challenges?
 - What alternatives have been explored to date? and
 - What reasonable alternatives can be identified at this stage?
- 1.4.3 As plan making evolves, it is anticipated that the options will be refined and updated as appropriate during the subsequent stages of the SA.

How much growth needs to be delivered?

- 1.4.4 The Local Plan needs to align with the NPPF (2025), which, since 2018, requires the use of a standard method for calculating housing needs as a starting point in planning for growth. Recently, the standard method was updated in the revised NPPF (2025) which has meant that Local Planning Authorities across England have had to consider new housing needs for their Local Plans.
- 1.4.5 For Bath and North East Somerset Council the housing need has essentially doubled. Using the standard method for calculating housing needs and the latest affordability data, the current indicative housing need for the district is **1,501 dwellings per annum**, or a **total of 27,018 homes** over the updated plan period of 2025 to 2043. This will be the housing need for the Local Plan, which will seek to identify enough land in the district to deliver this many homes in the period up to 2043.
- 1.4.6 Existing commitments are expected to contribute a **total of 7,097 new homes**, broken down as follows: 4,444 new homes in Bath, 602 new homes in Keynsham, 1,052 new homes in the Somer Valley, and a further 999 homes across the rural areas.
- 1.4.7 Alongside the established economic issues and priorities (including those reported through the previous Interim SA Report 2024), the Council have had to consider the likely economic impacts of the increased housing need. The Council have sought to update the evidence base in this respect to maintain the current balance between jobs and homes within the district.

⁵ There is a requirement for the SA Report to present an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’.

This analysis suggests that an additional **25,000 jobs** would need to be created and accommodated within the district. The Local Plan Options Document (2025) recognises that if job growth is below this figure and housing is delivered to meet the increased housing need, it is likely that increased out-commuting will occur.

Where are the key locations to deliver this growth?

Sensitive locations: Bath World Heritage Site

- 1.4.8 There are key sensitive locations across the district that will influence any given future growth strategy, and these are summarised as a starting point.
- 1.4.9 Firstly, the City of Bath is exceptional in having two UNESCO inscriptions. The entire city is covered by the status, and the former municipal city boundary forms the site boundary (see **Figure 3.1** in the main body of the report). The Council have also identified a buffer around the boundary, where development will likely impact upon its setting.
- 1.4.10 The NPPF (2025) identifies that World Heritage Sites are of highest significance and an irreplaceable resource (Para 202). It states that “*great weight should be given to the asset’s conservation*” (Para 212). Furthermore, any substantial harm to or loss of World Heritage Sites should be “*wholly exceptional*” (Para 213).
- 1.4.11 Additionally, UNESCO has its own guidance for assessing impacts⁶ which operates independently of any individual country’s planning system. What this means is that UNESCO will also consider the impact of a development (planned or built) on the World Heritage Site, and should any future development undermine the Outstanding Universal Value⁷ of the site, the status may be revoked. This can happen regardless of whether the development was considered acceptable in terms of the NPPF and local plan policies.
- 1.4.12 This ultimately means for the Local Plan that whilst Bath is the largest and most well-connected urban area in the district, its opportunities for strategic growth are significantly constrained by its heritage values.

Sensitive locations: Internationally designated sites for biodiversity

- 1.4.13 Additional sensitive locations in the district include sites that are internationally designated for their ecological significance. Notably, within the district is the Chew Valley Lake Special Protection Area (SPA) and the Bath & Bradford-on-Avon Bats Special Area of Conservation (SAC) (multiple small sites) – see **Figure 3.2** in the main body of the report. A small portion of the North Somerset and Mendip Bats SAC is within the south of the district but predominantly lies nearby in Somerset.
- 1.4.14 A Habitats Regulations Assessment (HRA) is being undertaken to support the Local Plan and will inform the significance of effects in relation to the integrity of internationally designated sites for biodiversity and propose any necessary mitigation. This evidence has (and will continue to) informed the

⁶ [Guidance and Toolkit for Impact Assessment in a World Heritage Context](#)

⁷ Outstanding universal value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site.

SA. Specifically, the findings within the first draft of the HRA Screening Note (which accompanies this current stage of plan making) have been considered within the appraisal of the Local Plan Options Document (2025), presented in **Chapter 7** in the main body of the report.

Sensitive locations: National Landscapes

- 1.4.15 Alongside the internationally designated sites for heritage and biodiversity values identified above, National Landscapes, formerly known as Areas of Outstanding Natural Beauty (AONBs), are nationally important sites designated for conservation due to their significant landscape value. The recent name change to National Landscapes has sought to elevate the sites to place them alongside their larger and more well-known counterpart National Parks. The district forms part of two National Landscapes: Cotswolds in the north and east, and Mendip Hills in the south-west – see **Figure 3.3** in the main body of the report.
- 1.4.16 The NPPF (2025) identifies that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and that *“great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads, and National Landscapes which have the highest status of protection in relation to these issues”* (NPPF Para 189). When considering major development within these areas, permission should be refused other than in exceptional circumstances (NPPF Para 190).

Planning constraints: Green Belt land

- 1.4.17 Designated Green Belt land surrounds Bristol, Bath, and Bradford-on-Avon, covering nearly 70% of the district and washing over most of the settlements – see **Figure 5.4** in the main body of the report.
- 1.4.18 The NPPF (2025) identifies that *“The Government attaches great importance to Green Belts”* and that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”* (Para 142). It goes on to state that *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”* (Para 145).
- 1.4.19 The Green Belt in B&NES has remained largely unchanged, although land was removed principally on the edge of Bath, Keynsham, and Whitchurch for development through the B&NES Local Plan (2007), Core Strategy (2014), and Local Plan Partial Update (2023).
- 1.4.20 The West of England Combined Authority, and the Council are respectively undertaking a strategic and local Green Belt Assessment which will inform the next stage of plan-making and SA.

Land availability

- 1.4.21 The Housing and Economic Land Availability Assessment (HELAA) has taken all identified sites in the district, including those from the most recent call for sites in 2025, and assessed their suitability, availability and achievability for development. Those sites identified as suitable, available, and achievable over the plan period have been considered further by the Council as they refine options for the Local Plan Options Document (2025) and have been considered separately as alternatives for the purposes of SA.
- 1.4.22 All suitable, available, and achievable HELAA sites have been subject to a high-level 'quantitative' GIS analysis in relation to SA objectives. The outcomes of this assessment were reported in the Interim SA Report (2024) (made available as a separate Technical Annex). This analysis does not seek to assess the potential significance of effects for each of the sites but rather is intended to indicate potential high-level constraints and opportunities that should be scrutinised further in assessment of growth alternatives ('qualitative' analysis).
- 1.4.23 A total of 103 new and revised sites came forward through the 2025 call for sites process. New and revised sites have been subject to the same analysis and the method for this assessment and the assessment outcomes are presented in **Appendix D** in the main body of the report.

Key settlements/ sub-areas

- 1.4.24 Key settlements are those settlements that are likely to be the focus for most of the growth over the plan period. These settlements are the most well-connected areas in the district that provide good access to local services and facilities to support a growing population.
- 1.4.25 Key settlements have been explored through the SA to date (as reported within the Interim SA Report 2024) in terms of any strategic opportunities for significant growth in these areas. The most recent call for sites in 2025 has meant that new opportunities have arisen in some of the key settlements, and the options for these settlements have been revisited. Revised appraisals for growth options in Bath City and its environs, Keynsham, Whitchurch, Midsomer Norton & Radstock, and Paulton are provided in **Appendix C** in the main body of the report. These are options identified for the purposes of SA and do not necessarily match those options being presented in the Local Plan Options Document 2025 (e.g., in some areas a full 'points of the compass' approach has been taken identifying options for development that surround the settlement).
- 1.4.26 Whilst it is expected that the increased housing need will mean more homes being directed to key settlements, no new strategic growth options are identified at Saltford or Hicks Gate, and on this basis the settlements are not revisited in Appendix C and the findings in the Interim SA Report 2024 for these settlements are carried forward. Aside from this it is notable that there are early discussions around the potential to deliver a new rail station at Saltford which could improve the sustainable transport connections at this settlement and make additional areas of the settlement suitable for future growth. However, given the preliminary stages of the potential infrastructure upgrade it is considered likely that this will be a growth opportunity to explore in the next plan period.

Rural settlements

- 1.4.27 Rural B&NES accounts for over 90% of the district's land area and is a diverse group of towns, villages, and hamlets. The rural economy is largely based on farming, self-employment, and small businesses, but relatively poor public transport and in some areas poor digital connectivity act as barriers to business and home working. This can contribute to social isolation and continued high levels of commuting by car and thus transport emissions.
- 1.4.28 Rural development requires more local employment and sustainable transport options for rural communities, but strategic growth is largely inappropriate in these settings (as it is not proportionate). Furthermore, high house prices and a lack of affordable housing threaten social sustainability, and some rural settlements are washed over by the Green Belt.
- 1.4.29 Considering the significant increase in the housing need for the Local Plan, the growth strategy has had to consider in more detail the potential contributions of rural development. However, given the constraints outlined above, growth is expected to remain proportionate to the local setting and will be predominantly informed by the HELAA outcomes.

Non-strategic sites and windfall allowances

- 1.4.30 The HELAA will continue to be the main evidence behind the progression/non-progression of non-strategic (small and medium sites). Expected small windfall sites (sites that will provide less than 10 homes and will be granted planning permission without being specifically allocated for development) have been forecasted and their potential contribution to housing needs has been included within existing commitments.

What are the growth delivery challenges?

Meeting growth targets

- 1.4.31 The increased housing need places increased pressure for development within areas of constraint. It is now likely that more Green Belt land may come under pressure for development along key transport corridors, though this will be informed further by the emerging Green Belt Review. Additionally, growth pressures are increased at the key settlements and within rural areas.

Duty to Cooperate

- 1.4.32 Alongside the increased housing need, the Council continues to assess the potential for development within the district to contribute to the unmet housing needs of neighbouring authorities, in line with the Duty to Cooperate – namely this is Bristol City Council's unmet housing needs.

What alternatives have been explored to date?

- 1.4.33 The Interim SA Report 2024 brought together the evidence to arrive at district-wide options for growth over the plan period. Four options were identified that tested varying levels of growth (low growth, growth that met the needs identified by the standard method at that time, and a higher level of growth that exceeded local needs and could contribute to Bristol's unmet

housing needs) and varying levels of reliance on Green Belt releases (from no Green Belt release to significant Green Belt release). No preferred approach was identified in the previous Interim SA Report (2024) or Local Plan Options Document (2024), recognising that options for the Green Belt should continue to be explored.

What alternatives are identified at this stage?

- 1.4.34 The evidence updates that have been considered through this part of the report require the SA to revisit and refine the district-wide alternatives for the Local Plan's spatial strategy.
- 1.4.35 With regards to choices, the options continue to explore the overall level of growth recognising the range of choices that could either limit growth and reduce the pressures on the Green Belt or maximise growth to exceed the increased housing need and contribute to Bristol's unmet housing needs (requiring significant Green Belt releases). Key sites that differentiate these options include large sites at the west of Bath and at Whitchurch.
- 1.4.36 Bringing together the settlement options and existing commitments, **Table 3.1** in the main body of the report outlines the district-wide options and variables within them. The options are summarised as follow:
- **Option 1a:** Low growth excluding West of Bath
 - **Option 1b:** Low growth including West of Bath
 - **Option 2a:** Green Belt focus including West of Bath, excluding south east Whitchurch
 - **Option 2b:** Green Belt focus excluding West of Bath, including south east Whitchurch
 - **Option 3:** High growth to exceed standard method and potentially meet some of Bristol's unmet need
- 1.4.37 As previously noted, the main differences in the options relate to the progression or non-progression of large sites to the west of Bath and at Whitchurch. Options 1a and 1b would limit the levels of development at Keynsham and Saltford, avoid any additional growth at Whitchurch, and remove larger allocation sites at some of the rural villages. Option 1a does not include any additional large sites, whilst Option 1b includes the large site at the west of Bath. These options fail to meet the housing need (falling around 5-6,000 homes short). Options 2a and 2b would include one of the large sites at either west of Bath or at Whitchurch, alongside additional growth at Keynsham, Saltford, and Whitchurch. Whilst Option 2a does not quite meet the housing need, the shortfall is relatively minor (around 750 homes). Option 2b would meet the housing need. Option 3 is an option to maximise growth by delivering all the sites identified within the options, as well as some additional growth within the rural villages of Clutton, Farmborough, Bishop Sutton, and Temple Cloud. Option 3 would exceed the housing need and potentially contribute towards Bristol's unmet housing needs.
- 1.4.38 Notably, growth in the Somer Valley is maximised across all options. This reflects the lower sensitivity associated with development in this part of the district (recognising that the proposed growth areas fall outside of the Green

Belt) and the potential for strategic growth to improve infrastructure provisions and support regeneration aims in these areas.

- 1.4.39 Additional development areas that are considered ‘constants’ across the options include Hicks Gate, areas of Keynsham, and west Saltford. These areas contain strategic development sites that are relatively well progressed in terms of their potential to deliver new homes and/ or are well located to maximise upon strategic transport connections. Development at Hicks Gate would be an extension to existing new development in this area and incorporates cross-boundary joint planning at Bristol City Council’s urban edge. Additional smaller sites are also considered constant across the options, recognising that the options seek to differ in terms of strategic choices. The progression or non-progression of small and medium sites will continue to be determined by the HELAA outputs.

Appraising reasonable alternatives

Methodology

- 1.4.40 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping as a methodological framework.
- 1.4.41 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario).
- 1.4.42 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference.
- 1.4.43 The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. For example, if an option is ranked as 1 then it is judged to perform better against that SA theme compared to an option that is ranked 2. ‘=’ has been used to highlight where options perform equally and cannot be differentiated between.
- 1.4.44 A summary of the appraisal findings is presented in **Table NTS1** below. Detailed appraisal findings are presented in **Chapter 4** in the main body of the report.

Table NTS1: Summary of appraisal findings

SA topic		Option 1a	Option 1b	Option 2a	Option 2b	Option 3
Health and wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	5	4	3	2	1
Housing	Significant effect?	Yes - negative	Yes - negative	No	Yes – positive	Yes – positive
	Rank	5	4	3	2	1
Communities	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	5	4	3	2	1
Economy	Significant effect?	No	No	Yes – positive	Yes – positive	Yes – positive
	Rank	5	4	3	2	1
Transportation	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	5	4	3	2	1
Landscape	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	2	3	4	5
Historic environment	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	3	4	2	5
Biodiversity	Significant effect?	No	No	No	No	No
	Rank	1	2	3	4	5
Natural Resources	Significant effect?	Yes – negative	Yes – negative	Yes – negative	Yes – negative	Yes – negative
	Rank	1	2	3	4	5
Climate change	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	=1	=1	=1	=1	=1
Waste	Significant effect?	No	No	No	No	No
	Rank	1	2	3	4	5

Developing the preferred approach

- 1.4.46 At this stage, the Council are not identifying a preferred approach for the Local Plan and are consulting on a range of spatial and policy options. It is intended that consultation will inform the development of the preferred approach, which will be presented at the next stage of plan-making. Further consultation on the full draft plan and preferred approach will occur at this stage (i.e., Regulation 19 consultation), which is scheduled to take place between March and May 2026.
- 1.4.47 At this point in time, the SA has sought to explore a range of spatial options that can inform consultation and stimulate conversation and feedback on the options for future growth in the district. The SA does not identify a preferred approach and has only identified a range of options that can inform consultation whilst remaining concise and accessible. The development of these options will be informed by feedback through the consultation stage.

1.5 Part 2: What are the SA findings at this current stage?

Appraising the Options Document

- 1.5.1 In the 2024 Local Plan Options document the Council set out options for Development Management (DM) policies. These DM policy options were assessed through the SA process, with findings presented in the [Interim SA Report](#) (2024). The Council are not reconsulting on these policy approach options in the 2025 Options Document. Instead, a more limited range of DM policy approach options have been set out, focussing only on new policy areas or where policies being changed in light of updated evidence (including the new NPPF (2025)).
- 1.5.2 The aim of Part 2 is therefore to present an appraisal of the new DM policies and options as set out within the 2025 Options Document, whilst recognising the existing suite of policy options (rolled over from 2024) that will also influence outcomes in relation to each SA objective.
- 1.5.3 Within the detailed appraisal narrative in **Chapter 7** in the main body of the report, specific policies are referred to only as necessary and relevant to each SA theme (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).
- 1.5.4 It is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered where appropriate, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.
- 1.5.5 A summary of the appraisal findings is presented below for each SA theme.

Summary of appraisal findings

Health and wellbeing

- 1.5.6 The 2024 Interim SA Report predicted significant positive effects from embedding health and wellbeing within the policy framework. In light of the new standard method figure, it is considered that significant growth across the district could enhance these effects further, ensuring that policy contributes to a healthier population across B&NES. This includes through safeguarding existing community infrastructure, facilitating opportunities to increase the provision of services, facilities and amenities alongside housing, and applying positive place-making principles through the design of new development areas. However, a level of uncertainty exists at this stage, reflective of the constraints across the district and that the spatial strategy is undetermined.

Housing

- 1.5.7 The 2024 Interim SA Report predicted significant positive effects under this SA theme, and it is considered that new/ revised policies (and options) proposed are likely to lead to further enhanced positive effects.

Communities

- 1.5.8 The 2024 Interim SA Report predicted significant positive effects under this theme. In light of the new standard method figure, it is considered that significant growth across the district could enhance these effects further, ensuring that policy contributes to the sustainable growth of communities across B&NES. However, a level of uncertainty exists at this stage, reflective of infrastructure constraints across the district and that the spatial strategy is undetermined.

Economy

- 1.5.9 The 2024 Interim SA Report concluded significant positive effects are likely overall. In light of the new standard method figure, it is considered that significant housing and employment growth across the district will deliver further positive effects in relation to this SA theme.

Transportation

- 1.5.10 Overall, it is recognised that the 2024 Interim SA Report concluded uncertainty against this theme. However, it is recognised that the revised housing method figure for development in the district presents an opportunity to deliver positive transport effects at the strategic level. Evidence is emerging locally and regionally that will enable strategic decisions to be made, informing the Local Plan and its spatial strategy. Conclusions therefore remain uncertain at this stage.

Landscape

- 1.5.11 While the 2024 Interim SA Report concludes mixed effects on the landscape, taking a precautionary approach, minor negative effects are concluded at this stage. This reflects the potential for conflict between accommodating the standard method's increased housing figure, and safeguarding sensitive landscapes, particularly around Bath and in areas constrained by National

Landscapes and the Green Belt. However, it is acknowledged that proposed amendments to policies help to provide improved safeguards and greater clarity to manage these pressures. The sustainability performance of the Local Plan with respect to the Landscape theme will also be influenced by the extent to which policies and proposals address any key challenges or opportunities for the National Landscapes as highlighted in their most recent Management Plans. This may help to deliver longer-term positive cumulative and in-combination effects. However, a level of uncertainty also exists, given that the preferred reflecting the absence of a confirmed spatial strategy at this stage of plan making.

Historic environment

- 1.5.12 Overall, the 2024 Interim SA Report concluded that the likely effects on the historic environment as a result of the Options Document were mixed. Taking a precautionary approach, minor negative effects are concluded at this stage. This is reflective of the significantly increased standard method housing figure inevitably introducing additional pressures on the districts internationally to locally important heritage assets. Merit is nonetheless given to the strengthened framework providing clearer safeguards and new opportunities for enhancement. A level of uncertainty also exists at this stage, reflecting the absence of a spatial strategy.

Biodiversity

- 1.5.13 The 2024 Interim SA Report concluded minor positive effects in relation to biodiversity, providing that opportunities were maximised and recommendations set out through the HRA were adopted; in consultation with Natural England. However, to deliver the significantly increased (doubled) housing need figure, it is recognised that growth at this scale requires increased risks of adverse impacts, particularly on sensitive international sites. Given cumulative effects on Habitat Sites remain uncertain, pending a full HRA, the SA also concludes uncertain effects at this stage. It is nonetheless recognised that strengthened policy on BNG, the integration of the Greener Places Plan, and opportunities to link Green Belt changes with nature recovery create the potential for positive effects in the long term.

Natural resources

- 1.5.14 The 2024 Interim SA Report identified significant negative effects under this theme. Given the constraints of the district, meeting the new standard need figure will inevitably lead to significant loss of greenfield (and a level of BMV) land. As such significant negative effects are concluded. Effects in relation to the wider natural resources theme come with much more uncertainty at this stage. However, the revised and consolidated policy options proposed through the Options Document seek to minimise impacts on air quality, water resources, and minerals and waste.

Climate change

- 1.5.15 Building on the position of the 2024 Interim SA Report, the updated policies and options set out a stronger and more integrated framework for mitigation and adaptation. Positive effects are anticipated through the introduction of new policies, alongside the refinements to existing policies. However, as in

2024, there remains uncertainty around delivery, viability, and the evolving national policy context, including forthcoming guidance on wind energy and community benefit, and the capacity of infrastructure to support ambitious targets for renewables.

Waste

- 1.5.16 The 2024 Interim SA Report identified neutral effects under this theme, however minor negative effects are predicted at this stage due to the increased amount of waste that will be an inevitable byproduct of growth. The revised and consolidated policy options presented through the Options Document positively support waste management.

1.6 Part 3: What happens next?

- 1.6.1 This Interim SA Report (2025) will accompany the Local Plan Options Document (2025) for public consultation (Regulation 18) for a period of six weeks from **Friday 3rd October** to **Friday 14th November 2025**. The consultation will be hosted via the Council's dedicated website:
- <https://bathnesplaces.co.uk>
- 1.6.2 Any comments received will be reviewed and then considered as part of the iterative plan-making and SA process.
- 1.6.3 The representations received, as well as ongoing engagement and further evidence base work, including further SA work, will be used to help shape the Draft Local Plan before further consultation (at the Regulation 19 stage). An SA Report will accompany the draft Local Plan for consultation at the Regulation 19 stage. Reflecting the Council's latest Local Development Scheme (2024-2027), Regulation 19 consultation is scheduled to take place between March and May 2026.
- 1.6.4 Once the period for representations on the Regulation 19 version of the Local Plan document / SA Report has finished, the main issues raised will be identified and summarised by BaNES Council, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination (Regulation 22), alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it. This is anticipated to take place in Summer 2026.
- 1.6.5 At Examination, the Inspector will consider representations (alongside the SA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (and undergo SA) and will then be subject to consultation (with an SA Report Addendum published alongside).
- 1.6.6 Once found to be 'sound', the Local Plan will be formally adopted by BaNES Council. At the time of adoption, an SA 'Statement' must be published that sets out (amongst other elements) 'the measures decided concerning monitoring the Plan'.

