

Freshford and Limpley Stoke Neighbourhood Plan

Sustainability Appraisal Report 2013

Contents:

1.0 Introduction and Methodology

2.0 Policy Context

3.0 Sustainability Context

4.0 Key Environmental and Sustainability Issues

5.0 Draft Sustainability Framework

6.0 Next Steps

1.0 Introduction and Methodology

1.1 About this Report

- 1.1.1 The purpose of this scoping report is to identify the sustainability issues within the Freshford and Limpley Stoke Parishes and to set objectives for the Sustainability Appraisal of the Neighbourhood Plan that can be used to determine how the Neighbourhood Plan will address these issues.
- 1.1.2 Legislation at both a European and national level sets out the requirement to achieve sustainable development. In 2004 the European Directive on Strategic Environmental Assessment (SEA) set out the requirement for SEA, which has been incorporated into the Sustainability Appraisal process in the UK. UK planning law also places a requirement on local development plan documents to ensure a contribution to sustainable development through Sustainability Appraisal.
- 1.1.3 This report will be the subject of consultation with Bath and North East Somerset (B&NES) Council, Wiltshire Council, the Environment Agency, Natural England, and English Heritage.

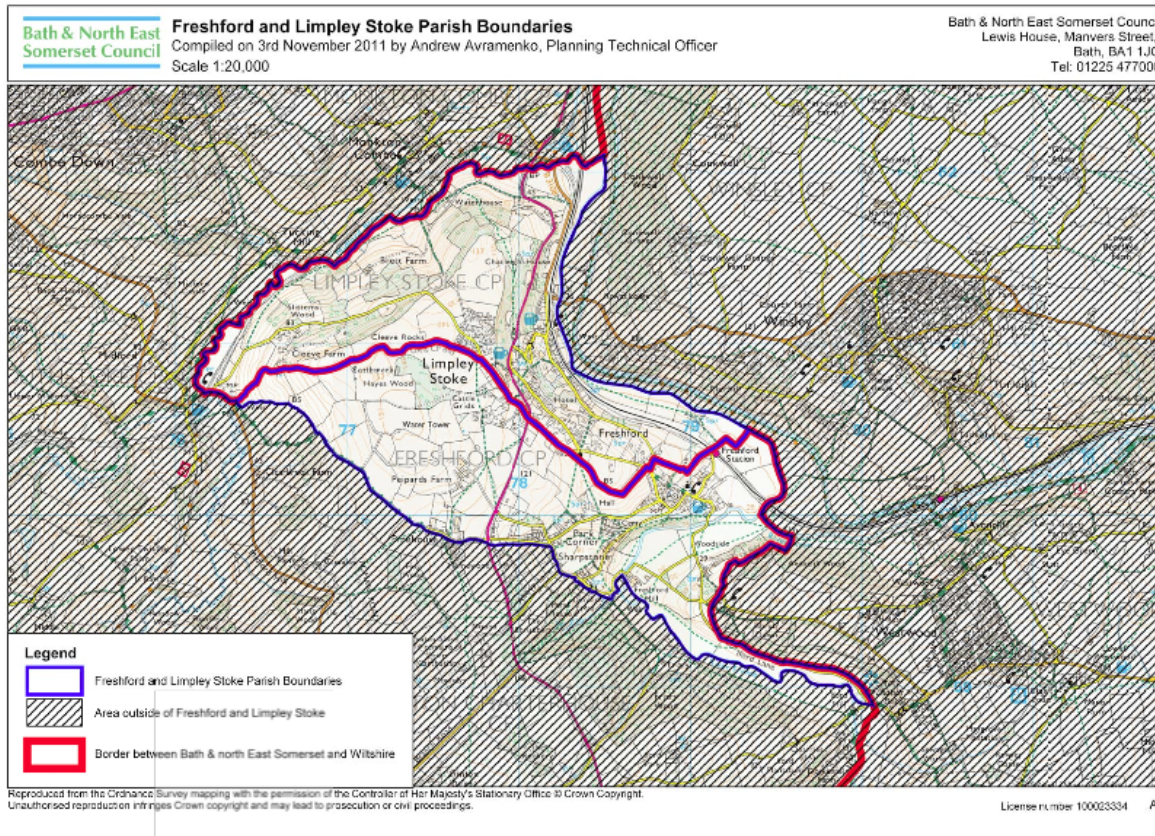
1.2 Sustainable Development

- 1.2.1 Sustainable Development has been defined by the Government as ‘a better quality of life for everyone, now and for generations to come’. It is about considering the long-term environmental, social and economic issues and impacts. A set of shared UK principles provide the guidance to achieve the purposes of sustainable development. These principles form the basis for policy in the UK:
- Living within environmental limits
 - Ensuring a strong, healthy and just society
 - Building a strong, stable and sustainable economy
 - Promoting good governance
 - Using sound science responsibly
- 1.2.2 The land use planning process is a key tool in the delivery of sustainable development. The Freshford and Limpley Stoke Neighbourhood Plan, which is currently being prepared, will need to be in conformity with the Local Development Plans of Wiltshire and B&NES, as it will (if passing examination and referendum) comprise part of a hierarchy of the development plan documents that make up the planning policy framework for the council areas. The Neighbourhood Plan can help to achieve sustainable development in the parishes, whilst at the same time helping to ensure that any adverse environmental impact is minimised.

1.3 Freshford and Limpley Stoke

Though Freshford Parish lies in Bath and North East Somerset and Limpley Stoke in Wiltshire the two parishes are in effect one community divided by a county border.

Fig 1. Freshford and Limpley Stoke Parish Boundaries



1.4 Neighbourhood Plan Scope and Main Objectives

- 1.4.1 The Freshford and Limpley Stoke Neighbourhood Plan will be a neighbourhood development plan for the two parishes. The ability to produce neighbourhood plans is a function of the new Localism Act, enabling communities to proactively plan for future development and growth needs in their neighbourhood. Over the last few years both Parish Councils have developed Parish Plans (2009) and have worked to deliver actions and projects identified in the plans. The two Councils also continue to work together to improve road safety on local roads and the A36 trunk road and to find suitable land for affordable housing. Alongside many others in the community the Councils have given support to help bring forward development proposals and community-led projects including the Galleries Shop and Café, the establishment of the Freshford and Limpley Stoke Community Association and the Pre-School.
- 1.4.2 The Parish Councils are motivated to continue to build on the successes of the recent community-led plans and projects towards the delivery of buildings and services that needed in the area to sustain growth and development. Four key areas are being explored in the preparation of the plan: Transport and Movement / Facilities and Services / Planning and Development / Environment, Greenbelt and Landscape.

1.5 Methodology

- 1.5.1 This report has been produced by consultants Place Studio for the Freshford and Limpley Stoke Neighbourhood Plan Steering Group, together with input from the four Neighbourhood Plan Working Groups. Place Studio drafted the structure of the report, undertook initial desktop analysis of policy context, gathered baseline environmental evidence, identified key issues and problems and engaged with both B&NES and Wiltshire Councils. The Neighbourhood Plan working groups and management group then reviewed, edited and validated this and added information to refine the scoping report.
- 1.5.2 The methodology for this initial scoping stage of the sustainability appraisal was developed in accordance with the following guidance:
- *A Practical Guide to the Strategic Environmental Assessment (SEA) Directive* (ODPM, 2005)
 - Planning Advisory Service (PAS) Sustainability Appraisal online guidance at: <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>
- 1.5.3 This report meets the scoping requirements of the SEA Directive. See attached appendices for an overview of how SEA requirements incorporated in this report.
- 1.5.4 Government guidance outlines a five stage process for undertaking a SA:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- Stage B: Developing and refining alternatives and assessing effects
- Stage C: Preparing the SA
- Stage D: Consulting on the draft plan and the SA
- Stage E: Monitoring implementation of the plan

1.5.5 This scoping report is Stage A in above process and consists of five tasks:

1.5.6 **Task A1:** Identifying other relevant policies, plans and programmes and sustainable development objectives. The development of the Neighbourhood Plan (NDP) may be influenced by other plans or programmes and by external environmental objectives such as those laid down in policies or legislation. This stage outlines that policy context, ensuring compliance and highlighting any issues or constraints that may apply to Freshford and Limpley Stoke NDP.

1.5.7 **Task A2:** Collecting baseline information.

The description of the baseline environment and elements within it establishes information on the current context and highlights sensitive elements within the plan area. The information that has been collected is relevant to SEA objectives and is relevant to the characteristics of the plan to provide the evidence base against which its potential effects can be measured and assessed.

1.5.8 **Task A3:** Identifying sustainability issues and problems.

Within the parishes, certain sustainability issues are more significant than others, e.g. high house prices could be a particular socio-economic constraint. These issues will need to be highlighted as areas of concern within the sustainability appraisal. Issues are identified through:

- the review of relevant regional and local plans and programmes.
- identification of baseline characteristics.
- Sustainability issues known locally.

The key sustainability issues have been divided into environmental, social and economic and set out in a table.

1.5.9 **Task A4:** Developing the SA framework. The sustainability framework will be used during the next stage to test options and the draft plan. The starting point for identifying a set of draft objectives specific to the two parishes are those objectives considered in the Sustainability Appraisal of the two authority's Core Strategies. These objectives may be refined further during the process of developing the neighbourhood plan.

1.5.10 **Task A5:** Consulting on the scope of the Sustainability Appraisal. This

report will be sent to statutory consultees and others with an interest in sustainability issues. Feedback from the consultation will be considered and – where appropriate – taken on board in the ongoing SA process.

1.6 Report Structure

- Chapter 2 describes the policy context (Schedule 2(a) and (e) of the Environmental Assessment of Plans and Programmes Regulations 2004)
- Chapter 3 describes the environmental context (Schedule 2(b) – 2(d))
- Chapter 4 identifying issues and problems
- Chapter 5 sets out the sustainability framework
- Chapter 6 describes next steps

2.0 Policy Context (task A1)

2.1.1 This section provides a summary of key relevant plans and programmes which could influence the Freshford and Limpley Stoke Neighbourhood Plan.

2.1.2 The purpose of sustainability appraisal is to ensure that the principles of sustainable development are incorporated into all levels of planning policy. The Freshford and Limpley Stoke Neighbourhood Plan will sit within a hierarchy of national and local planning policies and will need to be in ‘general conformity’ with the local development plans. It is therefore, this scoping report does not propose to review all international, national and regional policies other than the new National Planning Policy Framework (NPPF), as the Sustainability Appraisal of the B&NES Core Strategy and Wiltshire County Council Core Strategy reviewed all programme, policies, strategies and guidance that were taken into account in drafting these documents.

2.1.3 National Planning Policy Framework (NPPF)

The NPPF sets out a presumption in favour of sustainable development, so that it is clear that development which is sustainable can be approved without delay. Local and Neighbourhood Plans policies guide how this presumption will be applied at a local level, in line with 12 core planning principles. Of particular relevance to the parishes are direct references to rural economies and communities, and also the continued importance placed on the protection of the Green Belt and AONB.

2.1.4 **B&NES Local Plan 2007 - 2011**

Until the Core Strategy is adopted, the Local Plan remains the adopted plan for B&NES. It contains “saved policies” applicable to Freshford. For example, the centre of Freshford has a defined housing development boundary within which, the principle of infill development is acceptable. However, outside this boundary the principle of development is not unacceptable except in very special circumstances.

2.1.5 **B&NES Draft Core Strategy**

The Draft Core Strategy sets out the policy framework for the location and level of new housing and other development and is the key development plan document for the next 15-20 years.

The B&NES Core Strategy examination has been suspended in order to undertake further work in response to concerns made by the Examination Inspector. B&NES expects to consult on the revised plan in late spring 2013, with resumed examination for summer and adoption at the end of 2013. Note: Submitted draft policy relating to the B&NES rural communities and protection of landscape and heritage assets is aligned with national policy. This scoping report will therefore treat these policies with significant weight.

2.1.6 **West Wiltshire District Plan 1st Alteration (2004)**

Until the Core Strategy is adopted this is the current local development plan for the West Wiltshire area of the county. It contains “saved policies” applicable to Limpley Stoke, eg establishing a buffer zone around the sewage treatment works within which any proposal for housing or other development which is sensitive to odours will not be permitted.

2.1.7 **Wiltshire Draft Core Strategy**

The Wiltshire Core Strategy Development Plan Document (DPD) will cover the whole of Wiltshire for the next 15 – 20 years (excluding Swindon) replacing the four local plans covering Wiltshire. The Wiltshire Core Strategy examination has been paused as the Examination Inspector requested that the Council undertake further focussed consultation, The consultation will run between 05/09/12 to 01/11/12. Examination will resume with adoption expected early next year. Note: Submitted draft policy relating to the rural communities and protection of landscape and heritage assets is aligned with national policy. This scoping report will therefore treat these policies with significant weight.

2.1.8 **Biodiversity Action Plan (BAP)**

- WILDthings Biodiversity Action Plan for Bath and North East Somerset (2006)
- Wiltshire Biodiversity Action Plan (2008)

The BAP is a strategic framework for the conservation and enhancement of habitats and species. The BAP includes a series of Habitat Action Plans each covering a priority habitat and species. There a number of sensitive habitats within the neighbourhood plan area.

2.1.9 Flood Risk Assessment

- West Wiltshire Level 1 Strategic Flood Risk Assessment 2008
- Bath and North East Somerset Level 1 Strategic Flood Risk Assessment 2008 evidence base document used to inform the production of the local authority's Local Development Framework. The studies provide a summary of flood risk in the two local authority areas, along with how development and allocations may be affected by flooding. A functional flood plain within the neighbourhood plan area places a significant constraint on development.
- Regard has been had to the Bristol Avon Catchment Flood Management Plan, Summary Report – June 2012. http://www.environment-agency.gov.uk/static/documents/Leisure/CFMP_Bristol_Avon_2012.pdf
- Any application site within Flood Zone 3 & 2 (see EA Freshford and Limpley Stoke Flood Plane map below) as defined by NPPF will require applicants for planning permission to submit a Flood Risk Assessment when development is proposed in such locations. Further, sustainable drainage systems should be used for any development to reduce run off, improve water quality and benefit biodiversity and aesthetics.

Map: Freshford & Limpley Stoke Flood Zones



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2.1.10 Landscape Character Assessment (LCA)

- West Wiltshire District Council LCA (2006)
- Rural Landscapes of Bath North East Somerset LCA Supplementary Planning Document (2003).

The assessments identify and describe the component features and characteristics of the landscape, and guide the maintenance and enhancement of landscape character and local distinctiveness. The neighbourhood plan area is set within a sensitive rural landscape. Information included in the assessments should be used to inform the location of sites of development and the type of development along with a reference for conservation and enhancement activities.

2.1.11 Cotswold AONB Management Plan (2008)

The parishes are set within the Cotswold Area of Outstanding Natural Beauty. The action plan operates alongside other statutory plans and programmes, especially community strategies, and development plans. The plan provides the vision for a 20-25 year period. The plan has two main statutory purposes:

1. To conserve and enhance the natural beauty of the AONB
2. To increase the understanding and enjoyment of the special qualities of the AONB.

The Conservation Board adopted the 2013-18 AONB Management Plan on 21st March 2013 – this link takes you to the text version – full publication version should be available by the end of the month. <http://www.cotswoldsaonb.org.uk/?page=management-plan-review>

2.1.12 Community-Led Plans

Both Freshford and Limpley Stoke have recently completed Parish Plans (2008) which the Parish Councils actively promote to deliver identified actions and use in forward planning. Priorities identified in both parish plans are:

- To maintain and enhance the beautiful rural environment of the villages.
- To maintain and develop the friendly community spirit in the villages.

2.1.12 Next Steps

Appendix A at the end of this report provides a summary of the local programmes, plans and other documents which influence the Neighbourhood Plan. Key objectives and indicators have been identified from the emerging local authority plans and other key plans. These have been incorporated into the sustainability framework and used to inform baseline data and the identification of key issues. Note that the policy context for the Freshford and Limpley Stoke Neighbourhood Plan Sustainability Appraisal is not static. Therefore, as further relevant plans or programmes are developed, they should be reviewed and incorporated within the assessment at future stages of publication of this Sustainability Appraisal report.

3.0 Sustainability Context (task A2)

3.1.1 A collection of information on environmental, social and economic characteristics of the parishes is required to provide a basis for predicting and monitoring the effects of the policies of the Neighbourhood Plan. The topic areas considered by this scoping report encompass those required by sustainability appraisal guidance and SEA Regulations, and have been informed by the topics included in the Core Strategy Sustainability appraisals of the local authorities.

Table: Baseline Information Topics

Topic	SEA regulation topic	Sustainability theme ¹	
1. Biodiversity	Biodiversity	Environmental	
	Fauna		
	Flora		
Landscape	Landscape		
Heritage and Character	Cultural Heritage including architectural and archaeological heritage		
Water	Water		
Soil	Soil		
Climatic Factors	Climatic Factors		
Roads, Transport and Movement			Economic
The Local Population	Education and Employment		
	Housing	Social	
	Health		
Air quality	Transport	Environmental	
Material Assets	Housing and Facilities	Social/Economic	

3.1.2 Security and Crime

- 3.1.3 Crime figures for both villages are low and include incidences of house and garden shed theft, car theft, unwanted doorstep and telephone callers, and anti-social behaviour.
- 3.1.4 In the last three years a comprehensive Neighbourhood Watch scheme has been developed in Freshford with thirty volunteers coordinating crime and crime prevention activities for over 250 houses, the pre-school and primary school, community shop, church, surgery and pub.
- 3.1.5 Limpley Stoke is served by Wiltshire Police and Freshford by Avon and Somerset Constabulary. With the recent establishment of a Neighbourhood Watch Scheme in Limpley Stoke, crime information for the two villages is freely shared.
- 3.1.6 With increased focus on safe walking and cycling, some areas of the villages require improved security lighting. Measures are also proposed to reduce vehicle speeds, to provide safer 'walking to school' routes and for pedestrian crossing points on the A36

3.2 Biodiversity

The plan area supports a wide range of habitats and a diverse flora and fauna. Designations along with plans and programme that cover the area aim to provide protection and management to protect habitats. The local BAPs – Wiltshire and Bath and North East Somerset, give greater priority to habitat action plans rather than species actions plans. This is because, in the majority of cases, the main threats to wildlife are associated with the loss, degradation or fragmentation of the place in which it lives, and no species can exist in the wild independently of its habitat (Wiltshire Core Strategy Scoping Report Biodiversity Topic Paper 2010).

3.2.1 International Designations - Natura 2000 site – Bath and Bradford on Avon Bats SAC

Natura 2000 sites are Special Areas of Conservation (SACs) designated under the Habitats Directive. Disused mines in the areas adjacent to the plan area provide habitats for a number of bat species including the greater horseshoe bat *Rhinolophus ferrumequinum*. (Source: DEFRA <http://jncc.defra.gov.uk/ProtectedSites/SACselection/sac.asp?EUCode=UK0012584>)

NOTE: The proximity of the SAC may trigger the need for an Appropriate Assessment, (Habitat Regulation Assessment HRA).

There is a need to establish if the neighbourhood plan is proposing anything over and above the scope of the two Core Strategies. If not, the conclusion of the respective HRA Reports could be applicable.

3.2.2 National Designations

Site of Special Scientific Interest (SSSI)

Midford Valley Woods in Limpley Stoke Parish is on a moderate to steep north-west facing slopes of the Midford Brook - Midford Valley Woods and comprises some of the best examples of southern calcareous ash-wych elm woods. (Source: English Nature)

3.2.3 Regional and Local Priority Habitats

At regional and local levels Biodiversity Action Plans (BAPs) provide a strategic framework for the conservation and enhancement of habitats and species. Strategic Nature Areas (SNAs) and priority habitats are identified to improve habitat networks and to sustain wildlife within them. Within the plan are a number of BAP identified priority habitats, some of which are within SNA area 15 Bathford – Limpley Stoke:

- Traditional orchards (Limpley Stoke - identified as Bath 0789)
- Ancient & Semi-Natural Woodland (Short Wood / Hayes Wood)
- Ancient replanted (Short Wood)
- Lowland meadows
- Lowland calcareous grassland

(Source: Natural England <http://www.natureonthemap.naturalengland.org.uk/map.aspx?m=bap> South West Regional Biodiversity Partnership Nature Map SNA 15 Bathford – Limpley Stoke <http://www.biodiversitysouthwest.org.uk/getsnanum.php> Cotswold AONB Biodiversity Planning Position Statement <http://www.cotswoldsaonb.org.uk/?page=position>)

3.3 Landscape

3.3.1 Designations

The plan area sits with the Cotswold Area of Outstanding Natural Beauty (AONB) and also falls within Bristol and Bath Green Belt (Freshford) and the Western Wiltshire Green Belt (Limpley Stoke). Both designations highlight the sensitive and outstanding nature of the setting of the parishes. The AONB Management plan (and accompanying topic papers) highlights fundamental principles that should inform approaches to development in this sensitive landscape.

3.3.2 Character

The parishes sit within the deep Limpley Stoke Valley, They each occupy sloping ground on the sides of the valleys. The valley sides are steep and wooded with a strong sense of enclosure. In contrast extensive views are presented across and along the valley. Landscape Character Assessments (LCA) have been prepared by both local authorities. B&NES identifies the area as “character area 18”, Bathford and Limpley Stoke Valley. Wiltshire identifies “Character Area D1”, Limpley Stoke and Westwood Limestone River Valley. The condition of the landscape is judged as good with a high degree of intactness and a number of quality landscape features.

Conservation of the landscape is a priority, with housing development, pylons and loss of hedgerows noted as pressures on the character.

3.3.3 Tranquility and dark skies

The AONB setting and high quality landscape contribute to the tranquility of the area and is described by the AONB Management Plan as a 'special quality' of the area.

The Campaign for the Protection of Rural England (CPRE) has developed 'Tranquility' and 'Dark Skies' maps which show comparative levels across England and are intended to inform planning policy development and planning applications decisions. CPRE research highlights regional upwards trends in areas disturbed by noise and visual intrusion (roads / buildings / powerlines).

(Source: CPRE <http://www.cpre.org.uk/what-we-do/countryside/tranquil-places>

Cotswold AONB Management Plan <http://www.cotswoldsaonb.org.uk/userfiles/file/managementplan-review/second-draft-oct-12/2nd-consultation-draft-2012.pdf>)

3.4 Heritage and Character

The two villages are traditional in character and contribute to the local distinctiveness of the AONB.

3.4.1 Designations

There is one Conservation area within the plan area, the Freshford and Sharpstone Conservation Area. A Conservation Area Character Assessment was undertaken by B&NES in 2007.

3.4.2 Listed Buildings and Structures

There are 26 listed buildings and structures in Limpley Stoke and all are Grade II apart from the Church of St Mary which is listed Grade 2*. There are 59 listed buildings in Freshford, 54 of which are Grade II. The parish Church of St Peter, Manorthorpe and Gardethorpe, Iford Bridge and Freshford Manor are Grade 2* listed.

3.4.3 Scheduled Ancient Monuments and Archaeology

Iford Bridge is a Scheduled Ancient Monument.

The area has important industrial archaeology, particularly Freshford Mill and Dunkirk Mill. The remains of the deserted village of Woodwick in the parish of Freshford survives as a complex of earthworks adjacent to the Warminster Road.

(Source: English Heritage / Cotswolds AONB Partnership Local Distinctiveness Study 2003-
http://www.cotswoldsaonb.org.uk/local_distinctiveness_landscape_change/index.html)

3.5 Water

3.5.1 River systems and Waterways

The principal river system in the area is the Avon which is joined by the Frome and other smaller tributaries. The river enters the area from the south-east corner at Freshford and flows northwards. The Avon can be crossed at Limpley Stoke.

The Kennet and Avon Canal runs parallel to the River Avon from Freshford where it enters the area and continues through to join the River Avon at Widcombe. A canal towpath runs along the canal and residential and non-residential boats are moored along it.

3.5.2 Flooding

Fluvial flooding is brought about by the narrowing of the River Avon, as it flows through the confined river valley. The West Wiltshire District Council Level 1 Strategic Flood Risk Assessment (SFRA), and the B&NES Level 1 SFRA identifies areas that are at risk of flooding. Within the plan area a functional floodplain is identified - defined as land where water has to flow or be stored in times of flood.

3.6 Soils

3.6.1 The main soils are calcareous clayey soils typically used for grazing with the beef cattle and sheep, and the growth of grass for hay or silage. Fine well-drained calcareous loamy soils occur over limestone. The agricultural land quality around the built areas is a mix of Grade 3 (good to moderate quality) and Grade 4 (poor quality).

3.6.2 Agricultural land use is a key characteristic of the area. Consultation and neighbourhood plan workshops have highlighted a need to find potential ways that the community and farmers can work together to support the local agriculture and maintain the rural landscape. Work on this has begun with local farmers.

(Source: B&NES LCA & Magic.gov.uk)

3.7 Climatic factors

3.7.1 It is now widely recognised that climate change is an inescapable fact and that its causes and consequences must be addressed. Climate change measures are planned for at a local, national and international level. Both local authorities highlight the need to encourage lower electricity and gas consumption in light of evidence to indicate that national and international carbon reduction targets are not being met at a local level.

3.7.2 A reduction in carbon footprint accompanies policies and corporate objectives aimed at encouraging renewable energy and waste management initiatives. For example, increases in renewable energy capacity in Wiltshire have been slow and are below regional targets and the ecological footprint (a measurement technique for calculating global sustainability for the local authority area) is 5.25 global hectares per person. 2.7 times greater than a 'sustainability' footprint target of 1.9.

(Source: Wiltshire Core Strategy Scoping Report Climate Topic Paper 2010)

3.7.3 The plan area is on the edge of the Climate Friendly Bradford on Avon initiative and the community are working with Wiltshire to take forward learning and incorporate into planning aspirations re existing building stock. Advice and guidance is provided by Cotswold AONB Management Board and English Heritage.

3.8 Roads, Transport and Movement

3.8.1 In 2009 Freshford Parish Council prepared a report, "*Getting About*", for the local authority which set out various issues facing the community and ambitions to achieve the right balance between people and vehicles with an improved public realm.

3.8.2 Road Network

The A36 (Bath-Salisbury) is the main road serving the parishes. Smaller roads, including the B3108 connect nearby Bradford on Avon and Winsley. The A36 geographically divides the Parishes of Limpley Stoke and Freshford. While most villagers live to the east of the main road the two hamlets of Pipehouse and Midford Lane lie on the west side of the road and residents feel physically isolated from the remainder of the village. It is difficult to cross the road, and traffic speed is perceived as a safety issue.

Narrow roads also present a variety of issues, especially with large vehicles. This point is highlighted against a background of seeing an increase in traffic as vehicles seek to find alternative routes from the A.36 to Bath, Bradford on Avon and beyond avoiding the traffic lights at the Viaduct.

The Parish Plans identify insufficient parking as an issue.

3.8.3 Public Transport

In 2006 the local community adopted Freshford Station highlighting a local commitment to maintain the station and encourage train journeys, helping to address issues of accessibility and reduce the local carbon footprint from travel. The Heart of Wessex railway line (Bristol-Weymouth) currently provides a half-hourly peak and hourly off-peak service. The Heart of Wessex Rail Partnership report 2011 presents figures to indicate a steady increase in numbers of passengers along the line.

(Source: Heart of Wessex Partnership Report 2011)

3.8.4 Bus service 94 runs Monday to Saturday between Trowbridge and Bath via Freshford and Limpley Stoke. Route 95/96 operates between Limpley Stoke, Freshford and Bradford-on-Avon once a week. There is also a school bus for children attending the primary school along with a local community run transport scheme, Link a charitable organisation for the villagers of Limpley Stoke and Freshford to enable people to get around when public transport is unavailable or inconvenient.

3.8.5 Cycle

The closest cycle link to Freshford is NCN4, which runs between South Wales and London. Following this route, Bath is an eight mile journey away along the Kennet and Avon Canal towpath. Access to the network of routes could be improved via a new footbridge and

cycle way across the river Avon. A key new route which will be accessible from the canal, is the Two Tunnels Route. This is currently under construction with completion due in early 2013. It is anticipated that the circular route will be an important visitor attraction.

3.8.6 **Walking**

There are a number of public footpaths in the area along with a number of long distance walking routes including the Macmillan Way and the Kennet and Avon Walk that run through the Cotswold AONB. Within the villages, narrow roads and, in places, a lack of pavements contribute to concerns about the safety of pedestrians. Improvements are needed to crossing the road on foot both by the school and on the road up to the Memorial Hall.

3.9 **The Local Population – facts and characteristics**

3.9.1 The two parishes have active and interlinked communities. In 2008 both parishes published Parish Plans, the findings of which has led to a number of community initiatives: A new community shop, The Galleries Shop & Café, has attracted national recognition and praise. Profits are directed back into the community through the establishment of a charitable trust fund, The Freshford and Limpley Stoke Community Association.

- Limpley Stoke has a population of 637 according to the 2001 census, comprising of 242 households.
- Freshford has a population of 530 according to the 2001 census, comprising of 225 households.

3.9.2 When measured against national statistics the parishes are not within deprived areas (The information available relates to the neighbourhood level statistics or 'Lower Layer Super Output Areas' (LSOAs). However not all residents necessarily enjoy the same levels of prosperity, health and access to housing and services.

Source: www.neighbourhood.statistics.gov.uk

3.9.1 **Health**

The Freshford Surgery provides health services for Freshford and the surrounding villages, through daily sessions attended by doctors and /or practice nurses. It is a satellite of a main doctors surgery in Beckington. Both in B&NES and Wiltshire the health of people is generally better than the England average and life expectancy for men and women is higher than the national average

3.9.3 The 2001 Census asked people to describe their health over the preceding 12 months as 'good', 'fairly good' or 'not good'. Freshford's ward data results show a higher than national average percentage of people rating their health as 'good' and in Limpley Stoke's ward the results are slightly lower than the national average.

(Source: NHS 2012 Bath and North East Somerset Health Profile www.banes.nhs.uk

NHS 2012 Wiltshire Health Profile www.wiltshire.nhs.uk and www.neighbourhood.statistics.gov.uk)

3.9.4 Housing

The quality of the landscape has made the Cotswolds a desirable place to live, as a result, the housing market does not reflect the income of those living and working locally. In 2006, the ratio of average house price to average gross income in Cotswold District was over 16:1, the third highest in the South West Region. 2001 census figures show second homes in Freshford's ward area, Bathavon south as 1.90% compared to the authority area and national figure of 0.9%.

(Source: Cotswold AONB Management Plan based on Figures from the Annual Survey of Hours and Earnings 2006 and HM Land Registry data 2006)

3.9.5 In March of 2009 The Rural Housing Enabler (RHE) carried out a housing needs survey at the request of the Parish Councils to establish if there was a proven need for affordable housing in the parishes of Limpley Stoke & Freshford. In 2011 a further report was produced by Wiltshire Council for Limpley Stoke.

These reports indicate a higher than national and local average of owner-occupiers in Limpley Stoke & Freshford and highlighted a shortage of properties in Limpley Stoke & Freshford for affordable rent or shared ownership especially smaller properties. The 2009 joint report recommended a minimum need of 11 dwellings over the following three year period for affordable housing development in the parish.

(Source: RHE 2009 Parish Housing Needs Survey / 2011 Wiltshire Limpley Stoke Parish Housing Needs Survey)

3.9.6 There are some empty properties in the plan area, significantly Freshford Mill, an important historical asset of the area, awaiting conservation and development.

3.10 Education and Employment

3.10.1 A Pre-School staffed by volunteers alongside professional staff is located in Freshford where there is also a Primary School (Freshford C of E) with approximately 150 children in attendance. Both B&NES and the School Governors indicate that the size of the school is appropriate in relation to demand. Census 2001 data indicates high attainment level at key stage 1, 2 and 3 in both areas.

3.10.2 Unemployment rates for both local authority areas were lower than the national average in 2010-2011. In terms of socio-economic classification, a higher than national average number of the local population in both areas had Managerial and Professional roles.

3.10.3 Survey results from the Freshford Parish Plan (2009) illustrate that more than 20% (of the 356 respondents) worked in Freshford, any many of those were home workers working either for themselves or for major companies from home. 26% worked locally in Bath and just under 20% worked outside of the local area.

3.10.4 With the increasing numbers of “work at home” residents, fast and reliable broadband connection is becoming increasingly important. The Limpley Stoke exchange covers Limpley Stoke, Freshford and parts of Winsley (including the Dorothy House hospice). Broadband speed and reliability is inadequate and needs improving. (Source: ESHA Report January 2011)

3.11 Key Neighbourhood Facilities

3.11.1 The two parishes share key facilities including:

Freshford

- Primary School
- Pre-school
- Freshford Playing field
- Cemetery
- The Tynning Village Green
- The Old Bakery Meeting Rooms
- St Peters Church
- Freshford Railway station
- Browns Playing Field – Tennis and football clubs (Hinton Charterhouse)
- Surgery & Dispensary
- Shop and Post Office
- Memorial Hall (Freshford)

Limpley Stoke

- Limpley Stoke Village Hall
- St Marys Church
- King George V play park
- Telephone Kiosk Library

3.11.3 Memorial Hall

Due to its age and build quality the hall is approaching the end of its useful life with increasingly expensive running and maintenance costs. Use however, is high and the hall remains an important asset for Freshford and Limpley Stoke along with Hinton Charterhouse, Westwood and the surrounding area. The Trustees of Freshford Village Memorial Hall have set up a Development Sub-committee who have invited selected architectural and design practices to submit an expression of interest for producing outline proposals for a rebuilt or refurbished Hall (Summer / Autumn 2012).

The parish vision for the future of the hall is to modernise, enhance and extend the Village Memorial Hall facility to provide, with the Galleries Shop, a welcoming and attractive multipurpose focus for local community activity, complementing its rural setting.

Fig 2 Asset Map of Freshford

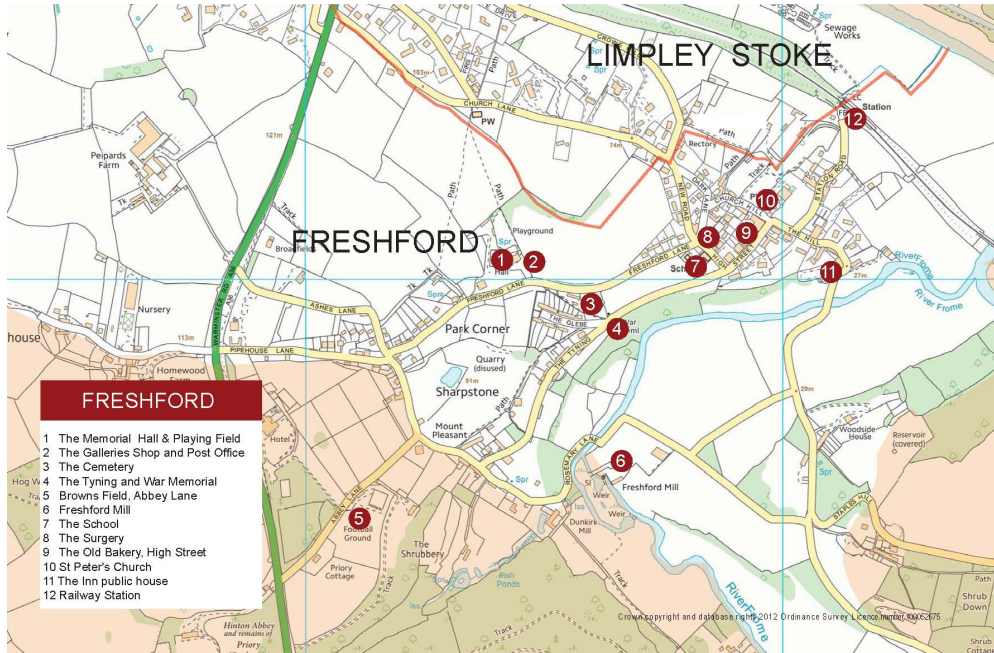
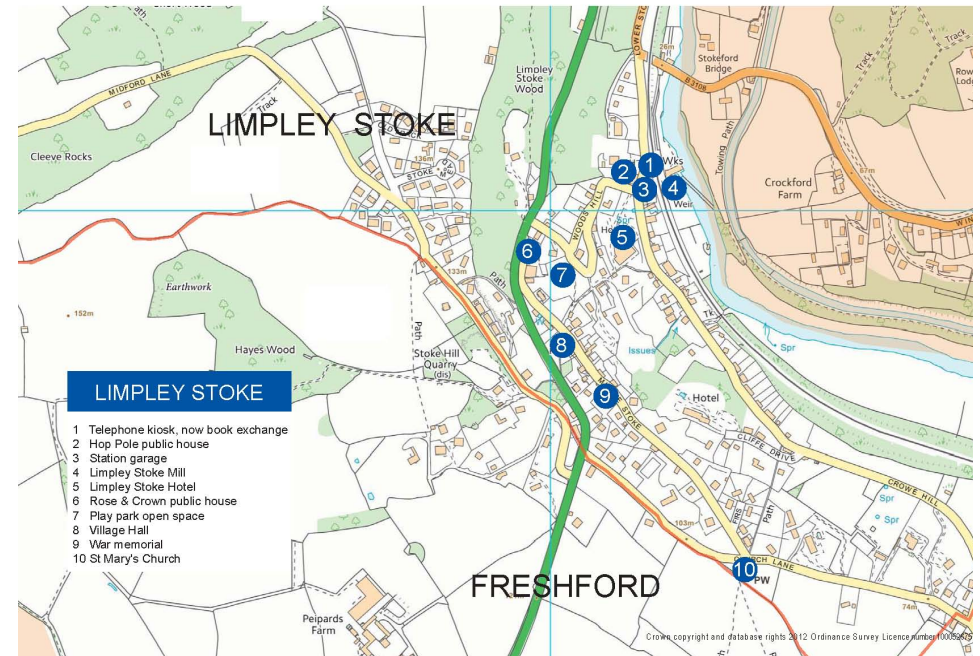


Fig 3 Asset Map of Limpley Stoke



4.0 Key Environmental and Sustainability Issues (task A3)

4.1.1 Within the parishes, certain sustainability issues are more significant than others, e.g. high house prices could be a particular socio-economic constraint. These issues will need to be highlighted as areas of concern within the sustainability appraisal. Issues are identified through:

- the review of relevant regional and local plans and programmes.
- identification of baseline characteristics.
- local knowledge.

4.1.2 Strengths Weaknesses Opportunities and Threats

The table below gives a SWOT overview of the plan area. It has been informed by baseline information collected in chapter three and neighbourhood plan workshops and consultation.

Table 1: SWOT Analysis

<p>Strengths</p> <p>Primary school / Low crime / Landscape setting – good condition & high quality / Built environment – high quality / Heritage assets / Natural assets / Designated land (AONB / SSSI / SAC) / Access to railway / National Cycle Route / Thriving community shop / Link community run transport / Extensive footpath network / Community Spirit</p>	<p>Weaknesses</p> <p>Road safety / Lack of affordable housing / A36 – barrier / parking problems / Inadequate pavements / poor GP facilities / Poor Broadband connectivity</p>
<p>Opportunities</p> <p>Redevelopment of Memorial hall / improved GP facilities / Provision of facilities for young people / provision of village green amenity and recreation facilities / Renewable energy and waste management initiatives / Safe integration of people and vehicles – shared space / Safe pedestrian crossing of the A36 trunk road which physically divides both parishes / Renewable energy generation (hydro) / creation of allotments / encourage business growth / More sustainable Tourism potential for local economy / undeveloped sites (Freshford Mill)</p>	<p>Threats</p> <p>Loss or damage to biodiversity / loss of rural character / adverse impact on AONB setting / erosion of heritage assets / Significant upgrading or rerouting of A36 / More traffic / heavy lorries / More road signs, yellow lines and marking / over development of the village / Loss or lack of small (1-2 bed) affordable housing</p>

4.2 Key Issues

- 4.2.1 There are a number of sustainability issues and challenges facing the parishes. While the plan area offers a high quality environment for those who live, work and visit the area, the Neighbourhood Plan will need to manage and seek to resolve a series of issues over its lifetime to achieve sensitive development that meets environmental, social and economic needs of the parishes.
- 4.2.2 The absence of a Neighbourhood Plan (and as a consequence a lack of vision and strategy for land use in the parishes), will result in fewer opportunities to address the issues and challenges facing the parishes in a coordinated way.

Table 2

Sustainability Issue / Problem	Basis for identification of the issue and possible effects <i>without</i> a Neighbourhood Plan
Maintenance and enhancement of the high quality natural environment and biodiversity of the parishes	<ul style="list-style-type: none"> • Area BAP • SNA • Cotswold Area Management Plan • Community Consultation <p>A key positive feature of the area is the rich biodiversity and the natural environment. It is important to protect and, where possible, enhance existing habitats. Local level understanding, management and conservation will contribute to this aim.</p> <p><i>Without a neighbourhood level plan, adequate local level understanding and action may not be enabled to help to ensure protection and enhancement.</i></p>
The sensitive AONB landscape setting and greenbelt designation	<ul style="list-style-type: none"> • Local LCAs • Cotswold Area Management Plan • Community Consultation <p>The exceptional quality of the landscape in the plan area contributes to local distinctiveness and is of one of national importance with the AONB designation. It is also noted as an important area of tranquility to many in its immediate locality and beyond. Conservation is a priority. The greenbelt designation covering the plan area also places significant constraints on new development.</p> <p><i>Without a neighbourhood plan local level understanding, detail and delivery of strategic may not be achieved.</i></p>

<p>Maintenance of local built settlement character and heritage assets</p>	<ul style="list-style-type: none"> • Local Authorities Development Plan Policies • English Heritage • Conservation Area Character Appraisal • Cotswold Area Management Plan • Community Consultation <p>Part of the built settlement within the plan area is a designated conservation area and all are within the AONB and acknowledged to be high quality and locally distinct. There is also a high number of heritage assets – many of them listed also highlight the sensitive character</p> <p><i>District and national level designations and assessments provide a sound level of protection that could be further enhanced through Neighbourhood Plan policies. As indicated by the Cotswold Management Board and the local authorities, local level plans are important ways to realise and reinforce strategic objective bringing added value.</i></p>
<p>Flood risk from the River Avon</p>	<ul style="list-style-type: none"> • Environment Agency • Strategic Flood Risk Assessment <p>Some areas adjacent to the River Avon are designated as flood risk zones – functional floodplain – by the Environment Agency and through the Flood Risk Assessments commissioned by the local authorities.</p> <p><i>Possible effects without a neighbourhood plan – N/A</i></p>
<p>Local level impacts of climate change e.g. rising energy prices</p>	<ul style="list-style-type: none"> • Development Plan Policies • B&NES Sustainable Construction and Retrofitting SPD • Wiltshire Renewable Energy Action Plan • Cotswold AONB Management Plan • Community Consultation <p>Local community concerns about climate change together with national and local policy objectives, provide an opportunity through sensitive local approaches to landuse and buildings (new and existing).</p> <p><i>Without a Neighbourhood Plan led approach, a coordinated and sensitive shaping of non strategic sustainable development opportunities and retrofitting projects would be difficult to achieve. A coordinated community approach may also be able to harness funding opportunities.</i></p>
<p>Traffic volume and speed</p>	<ul style="list-style-type: none"> • Joint Local Transport Plan • Getting About Report Freshford Parish Council • Parish Plans • Community Consultation <p>Key issues identified in relation to traffic speed and volume include pedestrian safety, severance of communities and quality of the public realm for the residents of parish. There is also increased awareness of the need to and importance of redressing the hierarchy in the public realm.</p> <p><i>Without a Neighbourhood Plan a coordinated and effective approach to addressing issues may not be achieved along with evidenced need to access local transport funding.</i></p>

<p>Maximising sustainable movement and travel patterns</p>	<ul style="list-style-type: none"> • Joint Local Transport Plans • Getting About Report Freshford Parish Council • Parish Plans • Community Consultation <p>Although sustainable travel for rural communities it often difficult, in the plan area the existing infrastructure offers opportunity and good links to nearby towns and cities. Protecting and improving services together with minimising the need to travel for services and facilities and aiming to ensure they are 'walkable' will be key to this issue. <i>Without a Neighbourhood Plan a locally responsive approach to maximising sustainable travel patterns may not be achieved.</i></p>
<p>Access to community facilities and services</p>	<ul style="list-style-type: none"> • Sustainable Community Strategies • Parish Plans • Community Consultation <p>The need for adequate community facilities and accommodation of them is acknowledged as key for community cohesion and wellbeing. Accommodation for community services such as the memorial hall and the post office is highlighted as inadequate, and there is also indication from the Parish Plans the existing services are underused. <i>Without a Neighbourhood Plan there may be fewer opportunities to address the issues and challenges associated with accessing facilities and services in a coordinated way.</i></p>
<p>Lack of affordable housing for residents of the parishes</p>	<ul style="list-style-type: none"> • Housing Needs Studies • Cotswold Area Management Plan • Community Consultation <p>Housing Needs Studies have identified the need for affordable housing of various types in the parishes to meet the needs of a range of people. Cost of existing housing stock in the area is high in relation to gross income. Reuse / redevelopment of existing vacant buildings in the plan area will contribute to addressing this issue. <i>Without a Neighbourhood Plan, the delivery of affordable housing is an ongoing issues and one that may not happen without policies to identify suitable land and possibly also buildings to deliver the identified need.</i></p>
<p>A lack of infrastructure and support for local businesses</p>	<ul style="list-style-type: none"> • Cotswold Area Management Plan • Parish Plans • Community Consultation <p>Community consultation and workshops identified an increasing number of people working from home in the area, and a desire to encourage and support local business networks. The tourist economy of the wider AONB area is perhaps not harnessed to its potential. <i>Without a Neighbourhood Plan the needs and aspirations of local entrepreneurs and small businesses may not be met in a coordinated way and local economic opportunities not harnessed.</i></p>

5.0 Sustainability framework

5.1.1 The list of sustainability issues and baseline environmental information set out in this report, along with the framework from the Core Strategies from the two local authorities, together with other plans, has been used to formulate the sustainability objectives which form the basis of the Sustainability Framework. The DRAFT Framework for Freshford and Limpley Stoke Neighbourhood Plan is set out below. Objectives are listed on the left and in a right hand column will be expanded on to further explain how the objective may be applied to the Neighbourhood Plan .

OBJECTIVES	X	XX	0	✓	✓ ✓	SUPPORTING EVIDENCE
Objective 1: NATURAL ENVIRONMENT <i>To protect and enhance our natural, built and historic environment within the Green Belt, Cotswolds Area of Outstanding Natural Beauty and Local Conservation Areas. At the same time we want to live in a vibrant community which provides for, and supports, people of all ages.</i>						
1.1 Protect existing areas of ecological importance within the plan area by incorporating them appropriately?					✓✓	Development framework established. Development to be limited to existing settlement areas. Sites of importance identified and safeguarded. (see Map Of Habitats and Landscape))Local Green spaces identified. See NP policies 1, 4 and 11
1.2 Take into account potential impacts of new development on areas of ecological importance both within and outside the NP area, particularly the Bath and Bradford on Avon bats SAC?					✓✓	As above See HRA Report Bat house already built at Freshford Mill site as a condition of planning permission. See also NP Policy 5 re: street lighting control in order to minimise light pollution.
1.3 Maintain and enhance existing area and condition of priority habitats?					✓✓	Yes. No net loss of hedgerows and woodland. (See Para 5 et seq of NP) Environmental Group formed with ongoing projects. Links with CAONB Management Plan and with emerging Core

						Strategies of lead Councils (B&NES and Wiltshire.)
1.4 Encourage good biodiversity practice and understanding – gardens / farming / maintenance?					✓✓	Ongoing work of Environment Group. See also NP Para 5 for projects and policies that address this.
1.5 Include guidance on how development is expected to take account of biodiversity objectives and targets?			✓			Village Design Statement incorporated into NP. (See Para 3.1) Woodlands protected.(NP Policy 4) Local Green Spaces incorporated.(NP Policy 6)
1.6 Promote energy efficiency in new development with clear requirements and targets?			✓			No clear requirements or targets other than is contained with Village Design Statement (see above)
1.7 Promote energy efficiency in existing buildings in the parishes?			✓			No
1.8 Identify and promote sensitive and appropriate opportunities for greater energy generation from renewable resources in the area?				✓		No. But hydro scheme now installed at Farthingham Weir and at Iford. Ongoing investigation of hydro scheme at Limpley Stoke weir.
1.9 Encourage sustainable construction and retro-fitting?				✓		Village Design Statement (as above) and B&NES Council Guidance on Sustainability and Retro Fitting
1.10 Minimise the impacts of flooding by locating development away from the flood plain?					✓✓	Any development is outside the flood plain save that the brown field site of Freshford Mill lies in part within the flood plain zone – planning permission has already been granted for 21 units of housing.
OBJECTIVE 2: PLANNING & DEVELOPMENT: <i>To drive and support sustainable development which delivers affordable homes, businesses and infrastructure, helping our community to flourish as it meets present and future demands.</i>						

2.1 Enhance key areas that contribute to local distinctiveness				✓✓	Development Framework established. Village 'envelopes' introduced to strengthen sustainability of all settlement areas within the NP area. Local Green Spaces as per Para 77 NPPF. Added layers of protection for the Green Belt. Village hub promoted (NP Policy 10)
2.2 Seek to minimise the visual impact of new developments on the landscape				✓✓	Development within existing settlement areas. And see 2.1 above.NP Policies 1,3, 6 10 and 12
2.3 Preserve and enhance the Freshford and Sharpstone Conservation Area			✓		Limited development in accordance with NP policies 1 and 3. The Tying is afforded added protection as Local Green Space.
2.4 Include guidance on locally distinctive design				✓✓	Village Design Statement
2.5 Encourage the use wherever possible of locally-sourced materials will help maintain and enhance local character and distinctiveness?				✓✓	Village Design statement
2.6 Ensure that all new homes are built to high standards of design and sustainable construction standards				✓✓	Village Design Statement
2.7 Support new housing that meets defined needs and respects the character of existing settlements and meets Design Guidelines				✓✓	Yes
2.8 Identify land to meet established needs?			✓		Identifies brown field sites and settlement areas (envelopes) to meet housing needs but not specific land sites within the village envelopes.
2.9 Encourage a range of housing types to the meet the needs of different households?			✓		See NP Policies 1-3. Housing Needs Surveys
OBJECTIVE 3: WALKING CYCLING & SAFER ROADS: <i>To create a safe environment for pedestrian movements, cyclists, accessible public transport and traffic on roads</i>					
3.1 Allocate adequate parking spaces in locations where they are most needed?			✓		Main emphasis remains to encourage alternative means of travel to private car ownership.
3.2 Address specific areas of concern, e.g. the road outside the school?				✓✓	Yes. Work due to commence on High Street Junction.

						See NP Projects/Policy 7 and Shared Space Report (Hamilton Baillie) and Getting About in Freshford Report (Freshford PC) in Appendices 'x'. Proposal that parking for school bus be provided off road adjacent to the school.
3.3 Re-balance the safety and needs of pedestrians and motorists in favour of the former?					✓✓	Yes Painted pavements. Gateways. Concept of Shared Space pursued.20mph zone to be introduced across both villages.
3.4 Address the division of communities by the A36?				✓		Highways Agency advises that any proposals will have to be seen in the context of the primary purpose of the Strategic Road Network and the Agency's policies standards and processes. Proposals for speed reduction on the A36, safe crossing points, no overtaking signs to be pursued through the Valley Parishes Alliance/ Highways Agency forum.
3.5 Encourage walking access to local services and between parish settlements?					✓✓	Yes as above. Improved footpaths and new footpaths to community hub.(and see Diagram E in the NP) See also Safe Travel to School Plan.(Appendices 'X')
3.6 Support existing transport networks and initiatives?					✓✓	Yes. See also Heart of Wessex Community Rail Partnership Annual Report 2012 (Appendix X of NP)
OBJECTIVE 4: FACILITIES & SERVICES: To improve health, social and cultural well being for all and ensuring facilities and services are in place to meet local needs						

4.1 Support ways to deliver improved accommodation for community facilities and local services				✓✓	Register of Assets compiled. Registration of Assets of Community Value Additional land identified adjacent to existing Memorial Hall Freshford for play area. Feasibility Study underway in respect of redevelopment of the Hall
4.2 Support and strengthen the local employment base by improving the infrastructure and promoting business support measures.				✓	Upgrade sought of Broadband provision. Local websites – Freshford and Limpley Stoke PC's provide links to tourist accommodation etc. Support for home working and development adaptation needs of small businesses run from home. (NP Policy 12). Sustaining the School, the Pre School and Shop help strengthen the local economy and provide local opportunities for employment. Excellent rail links allow local business people to commute – Bath, Bristol and London. Galleries Shop and Café has improved facilities as a business hub – IT connectivity
4.3 Support and improve access to recreational and leisure facilities.				✓✓	Gateways/painted pavements will allow safer access to facilities such as Browns Field/ play areas and the Tynning. Purchase of Tynning – increased access to village green. Additional play area contemplated adjacent to community hub
4.4 Support the redevelopment of the Memorial Hall, Freshford and the facilities that it will offer to the wider community				✓✓	Yes. Support for development of the community hub and additional facilities – Doctor's Surgery. See NP Policy 10.