

CD/PMP/MM3/1

Bath & North East  
Somerset Council

Bath and North East Somerset  
Draft Placemaking Plan

**Non-Technical Summary**  
of the Sustainability Appraisal Report  
on the Main Modifications to  
the Submitted Placemaking Plan

Date  
January 2017



## Explanation

The Draft Placemaking Plan was submitted to the Secretary of State to be examined by an independent Planning Inspector in April 2016. The Examination hearings took place in September/October 2016. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation on the Main Modifications.

The Inspector is inviting comments on the Main Modifications to the Submitted Placemaking Plan. Main Modifications are those which the Inspector considers are necessary to make the plan sound/and or legally compliant. The Main Modifications are proposed without prejudice to the Inspector's final conclusions on the Placemaking Plan which will be informed by all representations submitted in response to this consultation.

This Sustainability Appraisals (SA) Non-Technical Summary accompanies the Main Modifications to the submitted Placemaking Plan. All Main Modifications are screened for further appraisal. The screening process has identified changes which are considered to make a difference to the SA of the Placemaking Plan (i.e. that the previous assessment of the submitted Placemaking Plan requires amendments) and are therefore considered to be significant.

Annex J shows the screening of the Main Modifications to the submitted Placemaking Plan. Where significant changes have been identified, Annex D (Placemaking Plan Policies) and G (Core Strategy Policies) of the Placemaking Plan SA report have been updated.

This report is published for consultation alongside the Main Modifications to the submitted Placemaking Plan. Representations can only be made on the appraisals of the Main Modifications at this stage. This is not an opportunity to make comments on any other part of the SA report. In order to show the results of the Main Modifications appraisals clearly, new text is shown underlined and deleted text is shown with strike through to the previously published SA Report that accompanied the submitted Placemaking Plan.

Amended text of the draft SA report subject to consultation are:

Non- Technical Summary

Draft SA report

Annex D Draft Placemaking Plan Policy Appraisal Matrices

Annex E Cumulative Impact of Placemaking Plan Policies and Amended Core Strategy

Annex G Core Strategy Amendments Appraisal Matrices

Annex H Potential Cumulative Effects with Other Plans

Annex J Screening of Main Modifications

Other annexes can be accessed from

*Annex A Review of relevant plans, programmes and strategies*

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_a.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_a.pdf)

*Annex B Baseline data*

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_b.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_b.pdf)

*Annex C Placemaking Plan alternative options appraisal matrices*

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_c.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_c.pdf)

*Annex F Core Strategy amendments screening*

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_f.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_f.pdf)

*Annex I Contextual indicators monitoring programme*

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_i.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_i.pdf)

## **1. Introduction**

1.1 This in the Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) Report for the Bath & North East Somerset (B&NES) Main Modifications to the submitted Placemaking Plan.

1.2 The SA Report outlines the significant effects in relation to environmental, social and economic factors of the appraisal of options throughout the development of the Placemaking Plan and includes the findings of the SA of the draft Placemaking Plan for Bath & North East Somerset. It outlines the reasons for selecting the alternatives dealt with and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the Main Modifications to the submitted Placemaking Plan.

1.3 Through undertaking SA, the impacts of a plan on the environment and on social and economic issues can be understood. The SA is undertaken as an integral part of the plan making process, helping to inform and guide decisions on options and preferences.

1.4 The purpose of this NTS is to summarise the content and main findings of the SA report in a clear and concise way to help decision-makers understand what the potential environmental, social and economic effects of the Changes to the Submitted Placemaking Plan are likely to be.

1.5 The draft SA Report is being published for consultation alongside the Bath & North East Somerset Main Modifications to the submitted Placemaking Plan. The consultation period runs from 5<sup>th</sup> January to 14<sup>th</sup> February 2016.

1.6 Please send your comments on this report by the 14<sup>th</sup> February 2016 to:

[placemaking\\_plan@bathnes.gov.uk](mailto:placemaking_plan@bathnes.gov.uk)

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## **2. B&NES Development Plan – Planning Framework**

2.1 The Placemaking Plan complements the Council’s Core Strategy (July 2014). The Placemaking Plan will be a development plan document which will allocate a range of sites for development for a range of uses; facilitate the delivery of key sites with planning requirements; set out development management policies which will be used to determine planning applications; and to safeguard and enhance the quality and diversity of places in Bath and North East Somerset (‘B&NES’). It is focussed on creating the conditions for better places, and on providing greater clarity to enable the right developments to be delivered.

- 2.2 A full SA has been carried out on the B&NES Placemaking Plan. A Sustainability Appraisal (SA) to develop the Placemaking Plan was undertaken to inform all stages of the plan preparation together with an Appropriate Assessment (AA). The SA was carried out in line with the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment Directive) and the UK Environmental Assessment of Plans and Programmes Regulations (2004). The final report can be accessed from [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy).
- 2.4 ~~Placemaking Plan Options document was published for consultation along with the interim SA report in November 2014. The next stages of the production of the Placemaking Plan are set out in the Council's approved Local Development Scheme. In summary these are;~~  
~~Spring 2016 ———— Submission~~  
~~Summer 2016 ———— Examination Hearings~~  
~~Winter 2016 ———— Adoption of Placemaking Plan.~~

### 3. The Sustainability Appraisal Process

- 3.1 Table 1 below presents a summary of the stages of the Sustainability Appraisal alongside the stages in plan development.

Table 1 The Sustainability Appraisal Process	
Plan Development Stage	Sustainability Appraisal Stage
Prior to drafting plan	Scoping: Setting the context for the appraisal, collecting baseline information about the area, reviewing relevant policies, plans and programmes, identifying sustainability issues/problems.
	Developing a set of social, economic and environmental objectives for the appraisal (Sustainability Appraisal framework).
Developing options	Testing the effect of the options using the appraisal framework.
Developing a set of policies	Testing the effect of the policies using the appraisal framework.

### 4. The plan's relationship with other plans and programmes

- 4.1 One of the main purposes of reviewing other policies, plans and programmes is to ensure that the most up to date targets and objectives within other relevant documents are included in the SA of the Placemaking Plan. This ensures that the plan is delivering the targets or as a minimum, is not working against them. Annex A presents the review of the relevant policies.  
[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_a.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_a.pdf)

## 5. The Sustainability Baseline and Existing Sustainability Issues

- 5.1 Key baseline data has been updated and presented in Annex B and Table 7 of the main. In addition, trend information reported in the Scoping Report has been used to identify the “future baseline”, the potential evolution of the baseline in the absence of the plan.  
[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_b.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_b.pdf)

## 6. The SA Framework

- 6.1 From all of the information collected in the review of the relevant plans, policies and programmes and the review of baseline data, an “SA Framework”, or set of sustainability objectives, was developed, against which the various components of the Core Strategy have been appraised to date. The SA Framework is presented in Table 4. The SA Framework has been agreed with the statutory consultees through consultation on the scope of the SA. The Scoping Report can be found here:  
[www.bathnes.gov.uk/placemakingplan](http://www.bathnes.gov.uk/placemakingplan).

<b>Table 2: Placemaking Plan Revised SA Framework</b>
Objective 1: Improve the health and well-being of all communities
Objective 2: Meet identified needs for sufficient, high quality and affordable housing
Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime
Objective 4: Build a strong, competitive economy and enable local businesses to prosper
Objective 5: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking
Objective 6: Protect and enhance local distinctiveness
Objective 7: Protect and enhance the district’s historic, environmental and cultural assets
Objective 8: Encourage and protect habitats and biodiversity and geodiversity (taking account of climate change)
Objective 9: Reduce land, water, air, light, noise pollution
Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)
Objective 11 Increase resilience to climate change
Objective 12: Encourage careful and efficient use of natural resources including energy and encourage sustainable construction

<b>Table 2: Placemaking Plan Revised SA Framework</b>
Objective 13: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

## **7. Reasons for Choosing Options and Alternatives and Results of the Appraisals of Options**

7.1 Section 6 of the SA Report provides an overview of the social, environmental and economic factors that have been considered in choosing the draft Placemaking Plan. The factors are as follows:

- Complying with national planning policy context;
- Complying with the Core Strategy;
- Area covered and time-frame;
- Levels of growth predicted;
- Distribution of development / spatial strategy; and
- Environmental constraints.

7.2 **The Placemaking Plan Options Paper (Nov 2014)** was appraised by the Policy authors and internal cross services SA group. Comments and recommendations were fed back to Policy leads as the paper was developed. SA matrices for these options were published for consultation alongside the Placemaking Plan Options document.

### **SA report for Options Document**

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/14-12-18\\_pmp\\_options\\_sa\\_report\\_final.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/14-12-18_pmp_options_sa_report_final.pdf)

7.3 **Options Appraisal November/December 2015:** Following the consultation on the SA of the Placemaking Plan Options document (Nov 2014 – Feb 2015), all options were reviewed taking into account matters such as representations received through the consultation, conformity with the Core Strategy framework, engagement with key stakeholders, changes in national guidance, up-to-date evidence, land availability and viability.

7.4 The revised options and key points are summarised in Table 9 in the main SA report. Full appraisals are presented in Annex C.

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft\\_pmp\\_sa\\_annex\\_c.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/draft_pmp_sa_annex_c.pdf)

## **8. Results of the Appraisal of the draft Placemaking Plan**

8.1 The appraisals of the Options document (Nov 2014) and Options appraisals (Dec 2015 Annex C) have informed the formulation of the draft

Placemaking Plan. The appraisals of the draft Plan were carried out in a number of steps.

- 1) Individual policy appraisals are summarised in Table 10 and presented in Annex D.
- 2) Core Strategy amendments screening is presented in Annex F and appraisals are presented in Annex G
- 3) Potential cumulative effects of the Placemaking Plan as a whole including the amendments made to the Core Strategy are presented in Annex E.

~~Table 10 in the main SA report presents the key points and significant effects of the draft policies of the Pre-submission Draft Placemaking Plan.~~

- 8.2 Following the Examination hearings in September and October 2016, changes (Main Modifications) were proposed to the submitted Placemaking Plan. The screening process (Annex J) has identified changes which are considered to make a difference to the Sustainability Appraisal (SA) of the Placemaking Plan (i.e. that the previous assessment of the Submitted Core Strategy requires amendment) and are therefore considered to be significant.
- 8.3 Where significant changes have been identified, Annexes D (Placemaking Plan Policies) and G (Core Strategy Policies) of the Placemaking Plan SA report have been updated to amend the previous policy assessment matrix. The summary of findings of the appraisal (Table 10 in the main SA report) incorporates the key points and significant effects of the Main Modifications to the submitted Placemaking Plan.

### **Core Strategy amendments**

- 8.3 The Placemaking Plan complements and seeks to deliver the strategic framework set out in the Adopted Core Strategy. The Core Strategy forms Part 1 of the B&NES Local Plan and the draft Placemaking Plan is Part 2. For the purposes of clarity and convenience for plan users the Plans (Part 1 and 2) have been combined. In some instances the Placemaking Plan policy or text will supersede that set out in the Core Strategy. Therefore a screening exercise was undertaken (Annex F and Annex J) and further appraisals were undertaken where the screening identified potential impact on the sustainability issues, which is presented in Annex G. The key points are summarised in Table 11

### **Potential cumulative effects**

- 8.4 The SEA Regulations require an assessment of cumulative effects. The potential cumulative effects of the Placemaking Plan policies and the amended Core Strategy policies have been identified as part of the appraisal and presented in Annex E.

- 8.5 In summary, within the context of the Core Strategy framework, the Placemaking Plan site allocations direct new development to more sustainable locations with employment opportunities, access to key services and facilities, and accessible by public transport, cycling and walking.
- 8.6 The site allocations also facilitate meeting the housing needs of the district for both market and affordable housing and creating employment opportunities in key urban areas. Therefore there are major positive effects on meeting social and economic led objectives. The site allocations respond to the environmental opportunities and constraints and set out site specific Development and Design Principles which help protect and enhance historic and cultural environment and ecological assets. Detailed Development Management Policies also provide further guidance to achieve sustainable development.
- 8.7 Some negative and uncertainty effects have been identified on Objective 2 (Meet identified needs for sufficient, high quality and affordable housing) and objective 4 (Build a strong, competitive economy and enable local businesses to prosper) for Bath. The draft Plan enables the development of a significant quantum of office floorspace to plan for the growth in the knowledge intensive and creative employment sectors. It allows for a contraction in industrial floorspace, yet recognises the importance of maintaining a mixed economy within the city and retains industrial land in the Newbridge Riverside area. As acknowledged in the draft Plan there is not enough land in the city to meet all of the objectively assessed needs as identified by the key evidence.
- 8.8 The Council has therefore had to prioritise land uses to meet its housing numbers and office floorspace in full, but leaving a shortfall in meeting the retail capacity currently identified, and student accommodation or Higher Educational establishment teaching space in the Central Area or River Corridor. (see detailed assessments in Annex D and Annex G.)
- 8.9 Therefore the progress of development in the Enterprise Area will be monitored and reviewed as part of the Plan review process. The number of C3 dwellings converted to C4 Houses in Multiple Occupation (exempt from Council tax) will also be monitored and compensatory provision will be made if the achievement of 7,000 net additional dwellings for the city is at risk.

## **9. Monitoring**

- 9.1 The requirements of the SEA Regulations focus on monitoring the effects of the plan. This equates to both the plan's significant effects and also unforeseen effects. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to the implementation of the Placemaking Plan when they occur. Due to this difficulty we have suggested a number of more general monitoring

indicators which are linked to the SA Objectives (contextual indicators, see Annex I).

## **10. Next Steps**

- 10.1 If any significant issues arise through consultation leading to amendments to the Placemaking Plan document, then further consultation would be required. If the changes made to the Placemaking Plan are significant, they would also need to be subject to SA.
- 10.2 A Sustainability Appraisal (SA) Adoption Statement will need to be published in accordance with the SEA Regulations (Statutory Instrument 2004 No. 1633 on The Environmental Assessment of Plans and Programmes). These regulations state that as soon as reasonably practicable after the adoption of the plan a statement should be produced and published setting out how environmental considerations and opinions expressed through consultation have been taken into account in the planning process.
- 10.3 For further information on the timetable with regard to the next steps in the production of the Core Strategy please contact the Planning Policy team on 01225 477548.