

Bath and North East Somerset Adopted Placemaking Plan

Non-Technical Summary of the Sustainability Appraisal Report on the adopted Placemaking Plan

Date
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1. Introduction

- 1.1 This is the Non-Technical Summary of the Sustainability Appraisal (SA) Report for the Bath and North East Somerset (B&NES) Placemaking Plan Development Plan Document.
- 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 Placemaking Plan. 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 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 was undertaken as an integral part of the plan making process, helping to inform and guide decisions on options and preferences.

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 allocates 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/placemakingplan.

3. The Sustainability Appraisal Process

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

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. **SA Report Annex A** presents the review of the relevant policies.

5. The Sustainability Baseline and Existing Sustainability Issues

- 5.1 Key baseline data has been updated and presented in **SA Report Annex B** and **Table 7 of the main report**. 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.

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 Placemaking Plan have been appraised. The SA Framework is presented in Table 2. 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.

Table 2: Placemaking Plan Revised SA Framework
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

Table 2: Placemaking Plan Revised SA Framework
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
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

- 7.3 Draft Placemaking Plan (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 SA Report 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

8. Results of the Appraisal of the Placemaking Plan

- 8.1 The appraisals of the Placemaking Plan Options document (Nov 2014) and the Draft Placemaking Plan (Dec 2015 Annex C) have informed the formulation of the adopted Placemaking Plan. The appraisals of the Plan were carried out in a number of steps. Individual policy appraisals are summarised in Table 10 of the SA Report and presented in Annex D.

Core Strategy amendments

- 8.3 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 of the SA main report.
- 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.

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 Placemaking 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 Placemaking 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 a number of more general monitoring indicators have been suggested which are linked to the SA Objectives (contextual indicators, see Annex I) as set out in the Proposed Monitoring Programme below.

Proposed Monitoring Programme – Significant Effects Indicators				
Potential issue	Proposed indicators	Published targets	Source of data	Frequency of reporting
Delivery of housing	Progress against Local Plan Housing Delivery Target	The Local Plan housing requirement for the period up to 2026 is 13,000	B&NES	Annual
Delivery of affordable housing	Progress against Local Plan Housing Delivery Target	Core Strategy affordable housing %	B&NES	Annual
Potential negative effects of the housing allocation sites with regards to heritage and culture, pollution and local distinctiveness	Potential effects (as appropriate – see Table 6.1 in the SA Report and Annex D) in relation to: <ul style="list-style-type: none"> • SA Objective 12 Protect and enhance local distinctiveness; • SA Objective 13 Protect and enhance the district’s historic, environmental and cultural assets; and • SA Objective 15 Reduce land, water, air, light, noise pollution. 	See the Placemaking Principles within the site allocation policies.	Environmental Statements (ES) submitted with planning applications on these sites. Planning obligations including any management plans deemed necessary.	Reported in the ES and any management plan reporting required through planning obligations.
Air quality	Annual Mean concentrations of all regulated air pollutants (i.e. benzene, 1,3 butadiene, carbon monoxide, lead, nitrogen dioxide, particles (pm10), sulphur dioxide)	Member States are required to reduce exposure to PM2.5 in urban areas by an average of 20% by 2020 based on 2010 levels. It obliges them to bring exposure levels below 20 micrograms/m ³ by 2015 in these areas.	B&NES	Bi-annual