

CD10/A1/1

**Bath & North East
Somerset Council**

Bath and North East Somerset Core Strategy

Addendum to the Sustainability Appraisal Report on the Proposed Changes to the Submitted Core Strategy (published in March 2013)

November 2013

Explanation

There have been various changes to the submitted Core Strategy at different stages to address soundness issues raised by the Inspector. In making changes or proposing amendments, all reasonable options have been assessed throughout using the SA framework. The SA reports set out how the SA influenced the production of the Core Strategy. Whilst efforts have been made to make the report itself as accessible as possible, the SA process is inevitably a complex one due to the number of assessments and range of options assessed, including outcomes presented in the Annexes.

The report is prepared using a consistent approach, and is presented in full for transparency. In utilising the SA process as an integral part of plan making to assess the options and inform the strategy in an iterative way, its apparent complexity and length is unfortunately unavoidable.

The table below sets out the key stages and relevant SA reports/Annexes. All documents are available from the Core Strategy Examination Core Document from;

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/core_documents_list.pdf

Core Document number is shown as CDXX/X. Some Annexes present the assessment of previous stages.

Core Strategy	Accompanying SA reports	Consultation	Notes
Publication Draft Core Strategy CD5/5	The SA report (Nov 2010) CD4/A10	16th Dec 2010 to 3rd Feb 2011	
The Draft Core Strategy submitted (3rd May 2011) CD5/7	The SA report (April 2011) CD4/A13	Some changes to the Publication Draft Core Strategy were made responding to the consultation comments.	The Draft Core Strategy submitted (3rd May 2011) CD5/7
Changes proposed to the submitted Core Strategy (CD5/27) The examination was temporarily suspended	The SA report (September 2011) CD4/A17 Updated again following review of the Bath Compensatory	19th Sep – 21st Oct 2011	A Housing Contingency Assessment was undertaken. The Council decided not to identify additional housing contingency. Annex K presents the findings of the
Inspector's preliminary comments and questions in ID/1 and ID/4.	Storage (flood risk mitigation measures) CD4/A20 and 21	Contingency Assessment for the benefit of completeness and robustness.	Inspector's preliminary comments and questions in ID/1 and ID/4.
January to March 2012: Examination hearings June 2012: Examination suspended to enable the Council to undertake further work to address the Inspector's preliminary conclusions.			
March 2013: Changes to the Core Strategy agreed by the Council and published for consultation	SA Report (this report) including a number of annexes (see above)	26th March – 8th May 2013	Changes include the inclusion of urban extension locations to respond to up-to-date housing requirements.
November 2013 Amendments to the Proposed Changes to the Core Strategy published for consultation	SA Report (This report, Annex N and Annex O)	11th November – 20th December 2013	Changes include the allocation of urban extension sites to respond to the Inspector.

1. Introduction

- 1.1. This is an addendum report to the SA Report to the Proposed Changes to the Submitted Core Strategy which were published in March 2013. The March Changes indicated the broad locations for urban extensions leaving the Placemaking Plan to define the most suitable sites for development. However the Inspector (ID40) has raised his concerns regarding clarity and the deliverability of housing development sites within the 5 year period. Responding to the Inspector's concern, the Council has identified and is proposing to allocate specific sites within the broad areas indicated previously.
- 1.2. This report is focused on the amendments to the Proposed Changes to the Submitted Core Strategy, therefore the only relevant section of the SA report and annexes are provided for consultation.
 - **SA report (This report)**
 - **Policy Appraisal Matrices (Annex N)**
 - **Site Appraisal Matrices (Annex O)**
- 1.3. The consultation runs from 11th November to 20th December 2013.
- 1.4. This report forms part of Core Strategy Sustainability Appraisal documents. The final version of the SA report and all annexes (A – O) will be comprehensively updated prior to the adoption. Collectively, these SA documents have been prepared in accordance with government guidance on SA, and fulfill the requirements of the Planning and compulsory Purchase Act 2004 and the European Strategic Environmental Assessment Directive (2001/42/EC).

2. Habitats Regulations Assessment

- 2.1. The Core Strategy has been subject to a parallel Habitats Regulations Assessment (HRA). HRA of plans is a requirement of the Conservation of Habitats and Species Regulations 2010 and relates to the protection of European designated nature conservation sites. The assessment focused upon two specific housing allocations and associated green belt amendments at Odd Down and Weston in relation to the European site: Bath & Bradford on Avon Bats (SAC) (CD10/A2)
- 2.2. The assessment has concluded that the approach to site allocations and the use of site development requirements and concept diagrams provide a robust approach to the protection and enhancement of SAC bat foraging conditions at Weston and Odd Down.

3. Screening of Proposed amendments to Submitted Core Strategy

- 3.1. The screening of the Amendments to Proposed Changes to the draft Core Strategy was undertaken. The screening process has identified amendments which are considered to make a difference to the Sustainability Appraisal of the Core Strategy and are therefore considered to be significant.

Amendments need to be appraised are;

Policy DW1 District Spatial Strategy
Policy B3A(Land adjoining Odd Down)
Policy B3B(Land adjoining Weston),
Policy K3A(Land adjoining East Keynsham),
Policy K3B (Safeguarded Land),
Policy K4(Land adjoining South West Keynsham) and
Policy RA5 (Land at Whitchurch)

Other changes;

- 3.2 They are considered as minor textural changes for clarification which have no effect on the previous SA findings or text explaining the process followed or background information which have no bearing on the SA findings.

4. Appraisals for the Amendments to the Proposed Changes to the draft Core Strategy (Full appraisals is presented in Annex N)

- 4.1. Policy DW1 allocates strategic sites for development removing these areas from the Green Belt rather than identifying the broad locations for development and awaiting the site selection process to take place through the subsequent Placemaking Plan. To support site allocations, Policies B3A (Land adjoining Odd Down), B3B (Land adjoining Weston), K3A (Land adjoining East Keynsham), K3B (Safeguarded Land), K4 (Land adjoining South West Keynsham) and RA5 (Land at Whitchurch) set out detailed Placemaking Principles giving clear direction for the Masterplan process and the determination of planning applications.
- 4.2. Overall sustainability remains generally as set out in previous appraisals, however allocating sites at this stage will bring the sustainability effects forward therefore affecting the short term results with key differences as follows;
- There are major positive effects on meeting identified needs for housing including affordable housing in the short term as well as the medium and long term compared with the broad location approach. It ensures continued delivery of housing.
 - Safeguarded land for future development would have major positive effects on meeting social and economic objectives in that it gives a degree of certainty about continuity of housing provision.
 - The certainty provided by allocating the sites facilitates delivery and the continued supply of housing also positively contributes to achieving a strong, competitive economy.
 - Placemaking Principles for allocated sites set out the infrastructure requirements which contribute to meeting the SA objectives to improve accessibility to community facilities and services including health facilities and to support integration with existing communities. Identifying these principles

provide clarity about need for facilities which contributes to clarity about provision of infrastructure

- The Site Appraisals (Annex O) have helped to identify more specifically the areas with good potential to link to existing communities to promote vibrant and cohesive communities. They also helped to avoid the areas without physical links or good potential to be linked by public transport or areas with disproportionately high infrastructure costs.
- Development Principles for all 5 sites now require provision of 20% renewable energy on site informed by the Regen SW Renewable Energy Study. Policy B3B Odd Down, B3C Weston and RA5 Whitchurch require new development to meet Code for Sustainable Homes (CSH) Level 5. This leads to a major positive effect on the SA objective to encourage sustainable construction and renewable energy.
- There are negative effects on protecting and enhancing local distinctiveness, the district's historic assets, landscape and ecology in relation to new development at greenfield sites. However, detailed studies including the Addendum to Landscape & Visual Impact Assessment and Preliminary Ecological Surveys and Assessment have set out the impact and effects of new development and potential for mitigations helping to gain further understanding of the areas and informing the site selection process. The Site Appraisals (Annex O) have helped to avoid the areas which have higher negative effects on environmental objectives. They also help to ensure appropriate mitigation where necessary.

Potential cumulative effects

- 4.3 The SEA Regulations require an assessment of cumulative effects. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
- 4.4 The potential cumulative effects for the different policies within the plan and with other Plans and Strategies were presented in the main SA report (March 2013) (CD9/A1).
- 4.5 No cumulative effects arising from the allocation of strategic sites within the district are identified at this stage. However, the potential cumulative effects of the development sites need to be considered through the Development Management Process.

Residual Effects

- 4.6 The mitigation measures and recommendations put forward by the SA assessors, particularly in the Site Appraisals (Annex O) have been responded to by policy authors and, where relevant, the assessment matrices within Annex N have been amended to reflect the residual effects.

Site Appraisals (Annex O)

- 4.7 The broad locations for urban extensions were identified in the Proposed Changes to the submitted Core Strategy in March 2013 (CD9/PC6). The SA informing these changes are presented in the SA report (Section 6) (CD9/A1/2) and Annex L (CD9/A1/5).
- 4.8 In order to identify the most suitable sites within the broad locations previously identified, further site assessments were undertaken to the areas offer reasonable prospects of accommodating required uses and capacities using the same SA framework and outcomes are presented in Annex O.
- 4.9 Some peripheral areas within the broad locations were not tested since they are not considered as reasonable alternatives for a variety of reasons such as its remote location and detrimental impacts on Landscape.
- 4.10 Site assessments have informed the site selection process and formulations of Policies B3A (Odd Down), B3B (Weston), K3A (East Keynsham)/K3B (Safeguarded Land), K4(South West Keynsham) and RA5(Whitchurch). The Council's response (BANES51) to the Inspector's Notes (ID40) sets out the alternative options considered but not carried forward taking into account the SA along with evidence such as the Green Belt Review Stage 2 report.

5. Monitoring

- 5.1. The SEA Regulations require the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate remedial action where necessary. Please see section 7 of the main SA report (March 2013).

6. Next Steps

- 6.1. 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.
- 6.2. The SEA Regulations set out the particulars that should be covered by the statement as follows:
- How environmental (sustainability) considerations have been integrated into the Core Strategy DPD;
 - How the Environmental (SA) Report has been taken into account;
 - How opinions expressed in response to consultation have been taken into account;
 - The reasons for choosing the Core Strategy DPD as adopted, in the light of the other reasonable alternatives dealt with; and

- The measures that are to be taken to monitor the significant environmental (sustainability) effects of the implementation of the Core Strategy DPD.

6.3 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.