



**Placemaking Plan Development Plan Document
Sustainability Appraisal Scoping Report (October 2013)**

Schedule of Consultation Responses

Introduction

Under section 19(5) of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004, the Council is required to undertake a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) as part of the preparation of its Development Plan Documents (DPDs). Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) is a process of appraising the social, environmental and economic effects of plans strategies and policies from the outset of plan preparation.

This scoping report sets out the SA framework which will be used to test the plan and will help to identify the most sustainable options available. The Scoping Report represents the first stage of the SA process and has been prepared for consultation on the scope and level of detail that should be included in the Sustainability Appraisal of the Bath & North East Somerset Placemaking Plan DPD.

The Core Strategy provides a policy framework for the Placemaking Plan DPD so the decision has been made to base this SA process on the SA process used for the Core Strategy. The scoping report for the Placemaking Plan DPD is much more concise and focused due to the information already available as part of the Core Strategy SA process which does not need to be repeated. Updates of the policy reviews, the baseline data and the SA framework have been undertaken to ensure they are up to date and relevant to the Placemaking Plan DPD.

In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 the SA Scoping Report for the Placemaking Plan was published for a five week period of consultation with English Heritage, Natural England and the Environment Agency between 5th September and 10th October 2013. Other relevant Statutory Consultees were informed of the consultation. The report was also made available on the Council website for information and comment from other stakeholders.

The table below sets out the comments received in full, together with the Council's response and the changes proposed. Where there is a change, new text is shown as underlined and deleted text is shown as struck through.

RESPONDENT	COMMENT	COUNCIL RESPONSE	CHANGE
Bristol City Council	<p>Thank you for consulting Bristol City Council on the Scoping report of the Bath & North East Somerset Placemaking Plan.</p> <p>At this stage the council has no comments to make on the Sustainability Appraisal. However, we look forward to receiving the next stage of the Placemaking Plan and Sustainability Appraisal,</p>	Comments noted.	No change required.

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	for consideration and consultation.		
English Heritage	<p>I consider this report prepared by ENVIRON would benefit from a careful review and revision mindful of recent updated advice 'SEA/SA and the Historic Environment' (English Heritage, July 2013).</p> <p>www.helm.org.uk/guidance-library/strategic-environment-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf</p> <p>I have a number of observations to illustrate my concern.</p> <p>The report, especially at section 3.4, needs to reflect more accurately the broad role of the historic environment in the delivery of sustainable development as set out in the NPPF, and the language it uses.</p> <ul style="list-style-type: none"> - Alternative text in the grey box at 3.4.1 might read for example: The identification of appropriate development sites, and the inclusion of development management policy to ensure a conservation of the significance of the historic environment (including designated and non-designated heritage assets), and; to provide opportunities to enhance heritage assets at risk. - Table 3.4 fails to pick out the key policy messages from international and national historic environment policy documents. 	<p>The text in each of the grey boxes under each section is formatted in the same way under two headings and needs to remain that way for consistency's sake. Nevertheless the suggested text is useful and could be included in para 3.4.1.</p> <p>These documents will be reviewed and the key policy messages extracted.</p>	<p>Amend para 3.4.1 of the Scoping Report to read: 'It is important to consider the influence that the Placemaking Plan DPD can have on the issues, <u>specifically through the identification of appropriate development sites, and the inclusion of development management policies to ensure conservation of the significance of the historic environment (including designated and non-designated heritage assets), and provide opportunities to enhance heritage assets at risk.</u> The Placemaking Plan DPD can influence heritage, archaeology and landscape in the following way:'</p> <p>Add to and mend Table 3.4 Key International Policy as follows: European Landscape Convention United Nation</p>

RESPONDENT	COMMENT	COUNCIL RESPONSE	CHANGE
	<ul style="list-style-type: none"> <li data-bbox="421 309 987 373">– I understood the Bath WHS Setting SPD was adopted this year? <li data-bbox="421 475 987 539">– Why have you selected certain conservation area appraisals? <li data-bbox="421 1008 987 1072">– You refer to the old WHS management plan, long since reviewed and updated. 	<p data-bbox="1016 309 1384 453">The adoption date for the Bath WHS Setting SPD should be amended to August 2013 and its title to refer to 'setting'.</p> <p data-bbox="1016 475 1384 986">The list should be amended to include those Conservation Area Appraisals referred to in Annex A: Policy Plan and Programme Review: Chew Magna, Midsomer Norton and Welton and Paulton. Pensford, Radstock, Wellow and Woollard, South Stoke, Combe Hay and Hinton Blewett Conservation Area Appraisals should also be included in Table 3.4 and Annex 1A for completeness.</p> <p data-bbox="1016 1008 1384 1110">Agree that the latest WHS Management Plan published in 2010 should be referenced.</p>	<p data-bbox="1411 252 1473 284">2006</p> <p data-bbox="1411 300 2056 549">The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. <u>This will be achieved through the Implementation Framework, and guided by two broad outcomes</u></p> <ul style="list-style-type: none"> <li data-bbox="1411 564 2011 670">– <u>promoting a landscape perspective to influence spatial planning, landuse and resource management nationally, regionally and locally.</u> <li data-bbox="1411 686 2011 826">– <u>creating an inclusive, people centred approach raising awareness with the public and fostering community engagement as well as working with professionals, specialist bodies and politicians</u> <p data-bbox="1411 842 2024 874">European Spatial Development Perspective 1999</p> <p data-bbox="1411 884 1989 954"><u>Key concepts underpinning the European Spatial Development Perspective 1999 include:</u></p> <ul style="list-style-type: none"> <li data-bbox="1411 970 2002 1110">– <u>an integrated approach - recognising that environment, economic development of development activity or transport all affect one another other;</u> <li data-bbox="1411 1126 1720 1158">– <u>spatial development -</u> <li data-bbox="1411 1174 2033 1238">– <u>strategic aspects - interlinked actions to achieve balanced and sustainable territorial development</u> <p data-bbox="1411 1254 2056 1394"><u>Spatial policy guidelines include the wise management of the natural and cultural heritage, which will help conserve regional identities and cultural diversity in the face of globalisation.</u></p> <p data-bbox="1411 1410 1935 1442">UNESCO World Heritage Convention 1972</p>

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			<p>The UK ratified the UNESCO World Heritage Convention in 1984 and the Department for Culture, Media and Sport is responsible for ensuring compliance. English Heritage has the lead advisory role on the cultural heritage aspects.</p> <p><u>UNESCO World Heritage Convention 1972 states that all parties to the Convention agree to not only identify, protect, conserve, and present World Heritage properties, but also to protect its national heritage. They are encouraged to integrate the protection of the cultural and natural heritage into regional planning programmes, set up staff and services at their sites, undertake scientific and technical conservation research and adopt measures which give this heritage a function in the day-to-day life of the community.</u></p> <p>Convention on the Protection of Archaeological Heritage (Revised)(Valetta Convention 2000)</p> <p>The Convention on the Protection of Archaeological Heritage contains provisions for the identification and protection of archaeological heritage, its integrated conservation, the control of excavations, the use of metal detectors and the prevention of illicit circulation of archaeological objects. <u>Its objectives include the integration of the conservation and archaeological investigation of archaeological heritage in urban and regional planning policies;</u> and the dissemination of information.</p> <p>Add to and amend Table 3.4 Key Local Policy as follows: 'Key Local Policy</p>

RESPONDENT	COMMENT	COUNCIL RESPONSE	CHANGE
	<ul style="list-style-type: none"> <li data-bbox="421 1034 981 1139">– 3.4.4 There are far more significant issues facing the historic environment in the District than suggested in the report. <li data-bbox="421 1321 981 1426">– The report fails to appreciate the significant contribution the historic environment makes to the local and sub-regional economy. 	<p data-bbox="1016 1034 1375 1219">Para 3.4.4 is intended as a summary of the key issues for the historic environment. However the second bullet point could be strengthened.</p> <p data-bbox="1016 1321 1308 1426">Noted. The text in the ‘Economic Development’ section will be amended</p>	<p data-bbox="1411 252 2060 325">B&NES - City of Bath World Heritage Site Management Plan (2003-2009) (2010-2016)</p> <p data-bbox="1411 335 1944 367"><u>Radstock Conservation Area Appraisal (1999)</u></p> <p data-bbox="1411 376 1989 408"><u>Chew Magna Conservation Area Appraisal (2003)</u></p> <p data-bbox="1411 418 2042 491"><u>Paulton Conservation Area Appraisal (2003)</u><u>Midsomer Norton and Welton Conservation Area</u></p> <p data-bbox="1411 501 1603 533"><u>Appraisal (2004)</u></p> <p data-bbox="1411 542 1917 574"><u>Wellow Conservation Area Appraisal (2007)</u></p> <p data-bbox="1411 584 1939 616"><u>Pensford Conservation Area Appraisal (2008)</u></p> <p data-bbox="1411 625 1939 657"><u>Woollard Conservation Area Appraisal (2008)</u></p> <p data-bbox="1411 667 1980 699"><u>South Stoke Conservation Area Appraisal (2014)</u></p> <p data-bbox="1411 708 1980 740"><u>Combe Hay Conservation Area Appraisal (2014)</u></p> <p data-bbox="1411 750 2007 782"><u>Hinton Blewett Conservation Area Appraisal (2014)</u></p> <p data-bbox="1411 791 2056 865"><u>City of Bath World Heritage Site Setting SPD May 2012 August 2013.</u></p> <p data-bbox="1411 874 2056 1011">Bath <u>Bridling Building</u> Heights Strategy 2010’ and add new documents to Annex 1A for completeness (see Appendix 1 to this schedule)</p> <p data-bbox="1411 1021 2060 1299">Amend the second bullet point of para 3.4.4 to read: ‘The District has an exceptional cultural heritage. There are many areas in the District which are valued for their landscape and heritage value. There are threats to the character of the District <u>from the cumulative impact of increasing traffic and significant development proposals.</u>’</p> <p data-bbox="1411 1308 1989 1398">Amend Table 3.5 to adds the following document: Key National / Regional Policy</p> <ul style="list-style-type: none"> <li data-bbox="1411 1407 2051 1439">– <u>The Historic Environment: a prospective for growth</u>

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	<p>Please refer to The Historic Environment: a prospective for growth in the south west (The SW Heritage Forum, August 2013) www.english-heritage.org.uk/publications/the-historic-environment-a-prospectus-for-growth-in-the-south-west/sw-hef-historic-environment-prospectus-for-growth.pdf</p> <p>– Section 3.9. The Placemaking Plan will be expected to contribute towards an improvement in the condition of the historic environment including streets, places and spaces. Mindful of the sensitivities of the District's historic environment the report should acknowledge the following key publications</p> <ul style="list-style-type: none"> • Bath Public Realm and Movement 	<p>accordingly.</p> <p>Agree that these key publications should be included in Table 3.9 and Annex 1A for completeness.</p>	<p><u>in the south west (The SW Heritage Forum, August 2013)</u></p> <p>Amend the 'Details of relevance ...' to read: <u>The historic environment makes a significant contribution to the local and sub-regional prosperity and economic well-being. Its positive contribution to urban and rural regeneration can be recognised and promoted through, for example:</u></p> <ul style="list-style-type: none"> – <u>investing in authenticity, choice and quality</u> – <u>unlocking development potential in existing historic visitor attractions</u> – <u>developing new markets, products and experiences in heritage tourism</u> – <u>developing digital technologies for heritage tourism businesses and attractions</u> – <u>regenerating commercially viable 'at risk' heritage</u> – <u>investing in historic places</u> – <u>supporting retail in historic centres</u> – <u>capitalising on the affinity between historic buildings and key growth sectors</u> <p>Amend Table 3.9 to add the following documents: Key National / Regional Policy <ul style="list-style-type: none"> – <u>Manual for Streets I and II (DoT, 2010)</u> – <u>Streets for All (English Heritage, 2004)</u> Key Local Policy <ul style="list-style-type: none"> – <u>Bath Public Realm and Movement Strategy (BANES, 2010)</u> and add new documents to Annex 1A for completeness</p>

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	<p>Strategy (BANES, 2010)</p> <ul style="list-style-type: none"> • Manual for Streets I and II (DoT, 2010), and • Streets for All (English Heritage, 2004) <p>A credible SA for the Placemaking Plan will rely on the accuracy and robustness of the appraisal process undertaken by ENVIRON. I sincerely hope my brief comments will help inform a review to enhance the scoping reports authority and the subsequent appraisal. I remain confident that with the assistance provided by the aforementioned guidance for the preparation of an SEA/SA for the HE the changes required to ensure a robust appraisal is within reach.</p>	<p>Comments noted.</p>	<p>(see Appendix 1 to this schedule)</p>
<p>Network Rail</p>	<p>The Sustainability Appraisal Scoping Report and associated Placemaking Plan DPD may result in development which impacts upon the railway infrastructure whether by allocating the land for residential or business use. Therefore we would request that the following be taken into account in the preparation of this and relevant future documents to highlight the areas of impact upon the operational railway and to ensure that developers mitigate any issues arising from such schemes.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling</p>	<p>Comments noted. Requiring developer contributions is outside the remit of the Scoping Report as this relates to the consideration of the sustainability effects of specific development proposals. However, this matter in relation to new or improved infrastructure and/or railway station facilities can be considered as part of developing an appropriate policy framework for considering development proposals through the preparation of the Placemaking</p>	<p>No change required.</p>

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	<p>systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.</p> <p><u>Developer Contributions</u></p> <p>New development will create a significant change in the usage of a part of the transport network and thus generate requirement for new or improved infrastructure and/or railway station facilities.</p> <p>The Sustainability Appraisal Scoping Report should require appropriate development policies which set a strategic context requiring developer contributions / CIL contributions towards rail infrastructure.</p> <p>Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.</p> <p><u>Level Crossings</u></p> <p>Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service</p>	<p>Plan, as will other policy suggestions in respect of level crossings.</p>	

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	<p>provision.</p> <p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.</p> <p>In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:</p> <ul style="list-style-type: none"> • The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010. • Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing 		

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	<p>should be supported by a full Transport Assessment assessing such impact: and</p> <ul style="list-style-type: none"> The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. <p>We trust these comments will be considered in your preparation of the forthcoming Sustainability Appraisal Scoping Report and subsequent Placemaking Plan DPD.</p>		
Natural England	<p>Sustainability Appraisal Scoping Report</p> <p><i>“The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process”</i> The Plan Making Manual.</p> <p>We have considered the Sustainability Appraisal Scoping Report and are generally satisfied that it meets the requirements for EU Strategic Environmental Assessment Directive and adequately covers the interests of the natural environment. The baseline information and key issues that have been identified in the document (s) appear reasonably robust and comprehensive for this stage of the assessment process, as does the Policy Plan and Programmed review.</p>	Comments noted.	No change required.

Annex A

Review of Relevant Plans, Programmes and Strategies: Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA
Cultural Heritage, Archaeology and Landscape
Local
<p><u>Pensford Conservation Area Appraisal (2008)</u></p> <p><u>The special architectural and historic interest of Pensford was recognised by its designation as a Conservation Area in 1988. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.</u></p>
<p><u>Radstock Conservation Area Appraisal (1999)</u></p> <p><u>The special architectural and historic interest of Wellow was recognised by its designation as a Conservation Area in 1999. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.</u></p>
<p><u>Wellow Conservation Area Appraisal (2007)</u></p> <p><u>The special architectural and historic interest of Wellow was recognised by its designation as a Conservation Area in 1983. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.</u></p>
<p><u>Woollard Conservation Area Appraisal (2008)</u></p> <p><u>The special architectural and historic interest of Woollard was recognised by its designation as a Conservation Area in 1990. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.</u></p>
<p><u>South Stoke Conservation Area Appraisal (2014)</u></p> <p><u>The special architectural and historic interest of Woollard was recognised by its designation as a Conservation Area in 1982.</u></p> <p><u>The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.</u></p>
<p><u>Combe Hay Conservation Area Appraisal</u></p>

Review of Relevant Plans, Programmes and Strategies:**Aim of Document including key Objectives, Targets and Indicators relevant to plan and SA**

The special architectural and historic interest of Woollard was recognised by its designation as a Conservation Area in 1981. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.

Hinton Blewett Conservation Area Appraisal

The special architectural and historic interest of Woollard was recognised by its designation as a Conservation Area in 1993. The Council has a duty to preserve and enhance the character and appearance of Conservation Areas in exercising its planning powers, and to periodically reappraise the boundaries. This appraisal will be a material consideration in the determination of planning applications. Identifies elements which contribute toward the character of the area and those that detract from it. This provides a base upon which to develop proposals for preservation and enhancement.

Transport**National****Manual for Streets I and II (DoT, 2010)**

Manual for Streets is expected to be used predominantly for the design, construction, adoption and maintenance of new residential streets, but it is also applicable to existing residential streets subject to re-design. Or new streets, it advocates a return to more traditional patterns which are easier to assimilate into existing built-up areas and which have been proven to stand the test of time in many ways. The Manual aims to assist in the creation of streets that: help to build and strengthen the communities they serve; meet the needs of all users, by embodying the principles of inclusive design; form part of a well-connected network; are attractive and have their own distinctive identity; are cost-effective to construct and maintain; and are safe.

Streets for All (English Heritage, 2004)

Sets out principles of good practice for street management – such as reducing clutter, co-ordinating design and reinforcing local character whilst maintaining safety for all. The guide is intended as a reference manual of good practice for all concerned in the long chain of decision making, including councillors, highway engineers, landscape and urban designers, town planning and conservation staff, amenity societies, contractors and utility companies. It sets out a comprehensive list of general principles for Ground Surfaces, Street Furniture, Traffic Management and Environmental Improvements respectively.

Local**Bath Public Realm and Movement Strategy (BANES, 2010)**

Recommends a radical and inspirational plan for the transformation of Bath's urban environment. The strategy puts forward a series of measures to address traffic movement within and around the centre of the city in order to establish a network of new and reclaimed public spaces, successful streets and an enhanced River Corridor. It recommends a programme of improvements to simplify, refashion and manage the public realm, including the removal of street clutter and the introduction of a new bespoke range of street furniture and pedestrian wayfinding products to enhance, reveal and communicate the distinctiveness and diversity of Bath. The proposals within this document take full account of, and seek to deliver a range of public realm objectives within the City of Bath World Heritage Site Management Plan, particularly the sections on Physical Access, Interpretation and Visitor Management.