

Sustainability Appraisal (SA) for the Bath and North East Somerset Local Plan

SA Report Non-Technical Summary (NTS) to accompany Regulation 18 consultation

Bath and North East Somerset Council

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Quality information

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1. Introduction

Introduction to SA

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Bath and North East Somerset Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement and is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

The Regulation 18 Local Plan is an Options Document exploring a range of site and policy options for the emerging Local Plan. The SA is a stand alone document exploring alternatives to meet regulatory requirements, and to inform the next stage of plan-making.

Structure of the SA Report/ this NTS

In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially “identifies, describes and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”. The report must then be considered, alongside consultation responses, when finalising the plan.

More specifically, the SA Report should answer the following three questions:

1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e., in relation to the Draft Plan.
3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan.

The SA Report is structured in parts that each seek to address these three questions. This is a Non-Technical Summary (NTS) of the SA Report, and it is similarly structured with chapters dedicated to each question.

The SA Report and NTS accompanies the Bath and North East Somerset Local Plan for Regulation 18 consultation.

What is the Local Plan seeking to achieve?

The Council has identified spatial priorities for the Local Plan which shape and articulate what it is that the Local Plan will achieve. These priorities are informed by the key issues and challenges identified within the Plan and link with the Council's Corporate Strategy. The spatial priorities are:

“Our Local Plan will plan for development in response to local needs to create attractive, healthy, and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- *Maximise the delivery of housing that is affordable.*
- *Create a fairer, more prosperous, and sustainable economy.*
- *In doing so, our plans for development must:*
- *Enable B&NES to become zero carbon by 2030 and mitigating/ adapting to climate change.*
- *Protect and enhance nature through facilitating nature recovery.*
- *Improve health and well-being outcomes for all, including through planning healthier places and providing for cultural enrichment.*
- *Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities.*
- *Respect, conserve, and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath.*
- *Align the timely provision of transport, health, social, cultural, and green infrastructure with development.”*

What is the scope of the SA?

The scope of the SA was established in 2023 and has been continuously updated since (including in **Appendix B** of the SA Report). The scope is summarised by a series of 14 SA objectives that form the structure for the assessment.

The SA Report (**Chapter 3**) includes the SA framework which provides assessment criteria to assist the assessment. The series of SA objectives are:

SA-1: Improve the health and well-being of all communities and create healthy places

SA-2: Meet identified needs for sufficient, high-quality housing including affordable housing

SA-3: Promote stronger, more vibrant and cohesive communities and reduce anti-social behaviour, crime, and the fear of crime

SA-4: Create inclusive environments which foster good relations between people and support high-quality living environments with good access to housing and services.

SA-5: Build a strong, competitive economy and enable local businesses to prosper

SA-6: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure

SA-7: Protect and enhance local environmental distinctiveness and the character and appearance of landscapes

SA-8: To conserve and enhance the historic environment, heritage/ cultural assets and their settings

SA-9: Conserve and enhance the condition and extent of Biodiversity in the district

SA-10: Reduce land, water, air, light, and noise pollution

SA-11: Reduce vulnerability to, and manage flood risk (taking account of climate change)

SA-12: Reduce negative contributions to climate change, increase resilience and promote adaptation to climate change

SA-13: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction

SA-14: Promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)

2. Plan-making/ SA up to this point

Introduction

In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council will consider the appraisal findings when developing the Local Plan. Part 1 of the SA Report is given over to:

1. Presenting the reasons for selecting the alternatives dealt with at this stage.
2. Presenting a summary of the appraisal of the alternatives, and
3. explains the Council's approach moving forward.

This part of the report presents information regarding the consideration of reasonable alternatives, with alternatives explored in relation to both the spatial strategy and policy framework. This information is important given regulatory requirements.¹

Alternatives have been developed to address the regulatory requirements, but it is recognised that the Local Plan Options Document is at an early stage of development (considering options) and the Local Plan options will be refined (and alternatives updated) in later plan and SA stages.

Establishing reasonable alternatives

The SA Report (Chapter 5) explores in detail the evidence around the housing growth needs in the district and potential locations to accommodate these needs.

Using the standard method for calculating housing need and the latest affordability data, the current indicative housing need for the district equates to **725 dwellings per annum**, or a total of **14,500 homes** over the plan period 2022 – 2042.

The SA explores housing growth potential across the district, and tests the site options emerging at this stage. All suitable, available, and achievable HELAA sites have been subject to a high-level 'quantitative' GIS analysis. The method for this assessment and the assessment outcomes are presented in **Appendix C** of the main SA Report. This work has also produced individual proforma outputs for each site assessed, which are provided in a separate technical annex to this report and linked via **Appendix C**.

SA of key settlements

There are key settlements across the district that provide a reasonable level of services and facilities and are considered relatively well connected by sustainable transport modes.

The key settlements are therefore explored through the SA for their strategic growth potential (i.e., potential for larger scale contributions to housing supply). This is with the intention of informing ongoing work to reach district-wide alternatives.

¹ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

There is an assumption that small and medium sites emerging within the settlement boundary or utilising brownfield land, would be prioritised as part of any future growth strategy dependent upon the outcomes and recommendations of the HELAA (given these are deemed appropriately connected and accessible areas).

Furthermore, sites that have known insurmountable issues are discounted as reasonable alternatives and these are identified within the settlement narratives, within **Chapter 5** of the SA Report, as appropriate.

The following figures (**NTS.1 – NTS.8**) set out the options identified for each of the district's key settlements. Summary SA findings can be found in **Chapter 6** of the main SA Report, with detailed assessments provided in **Appendix D**.

Figure NTS.1 Bath City and Environs strategic growth options for SA

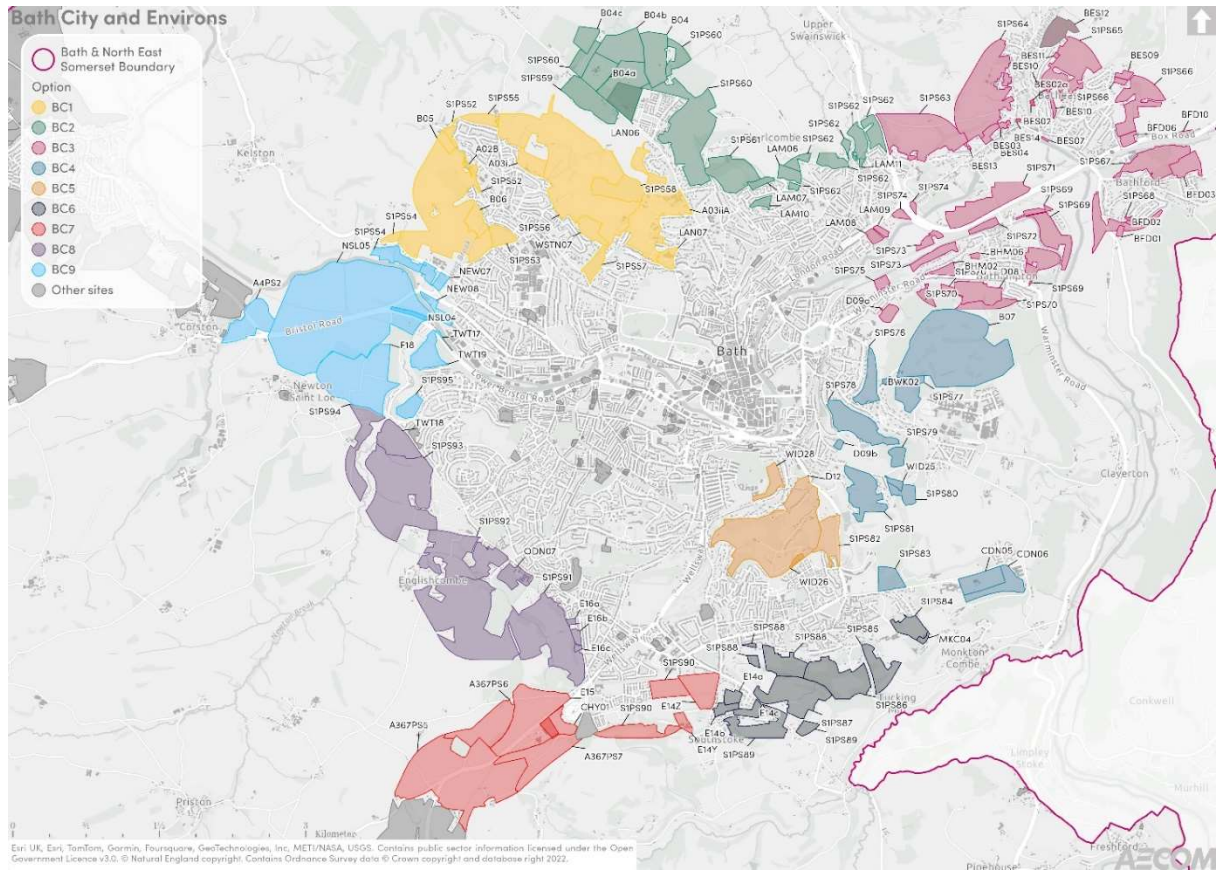


Figure NTS.2 Keynsham strategic growth options for SA

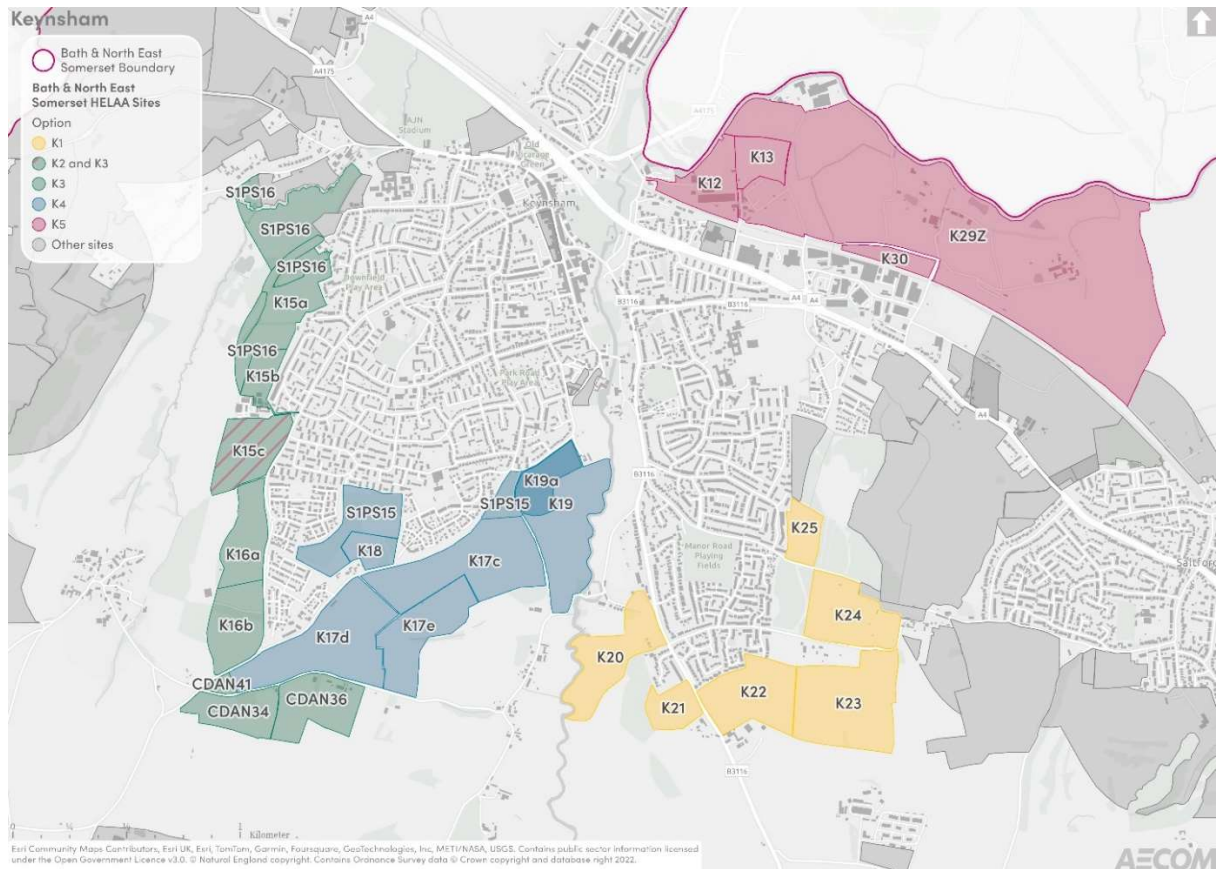


Figure NTS.3 Salford strategic growth options for SA



Figure NTS.4 Whitchurch strategic growth options for SA

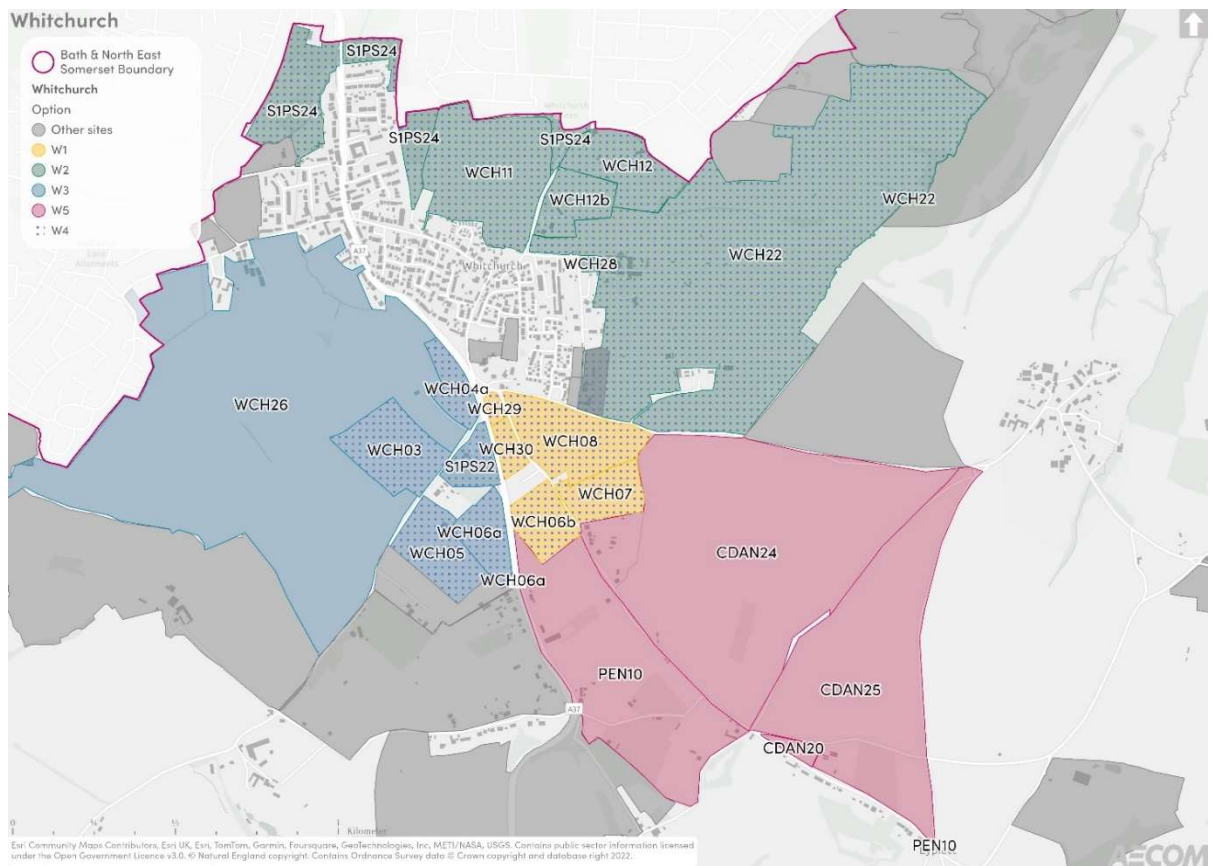


Figure NTS.5 Hicks Gate & Brislington strategic growth options for SA

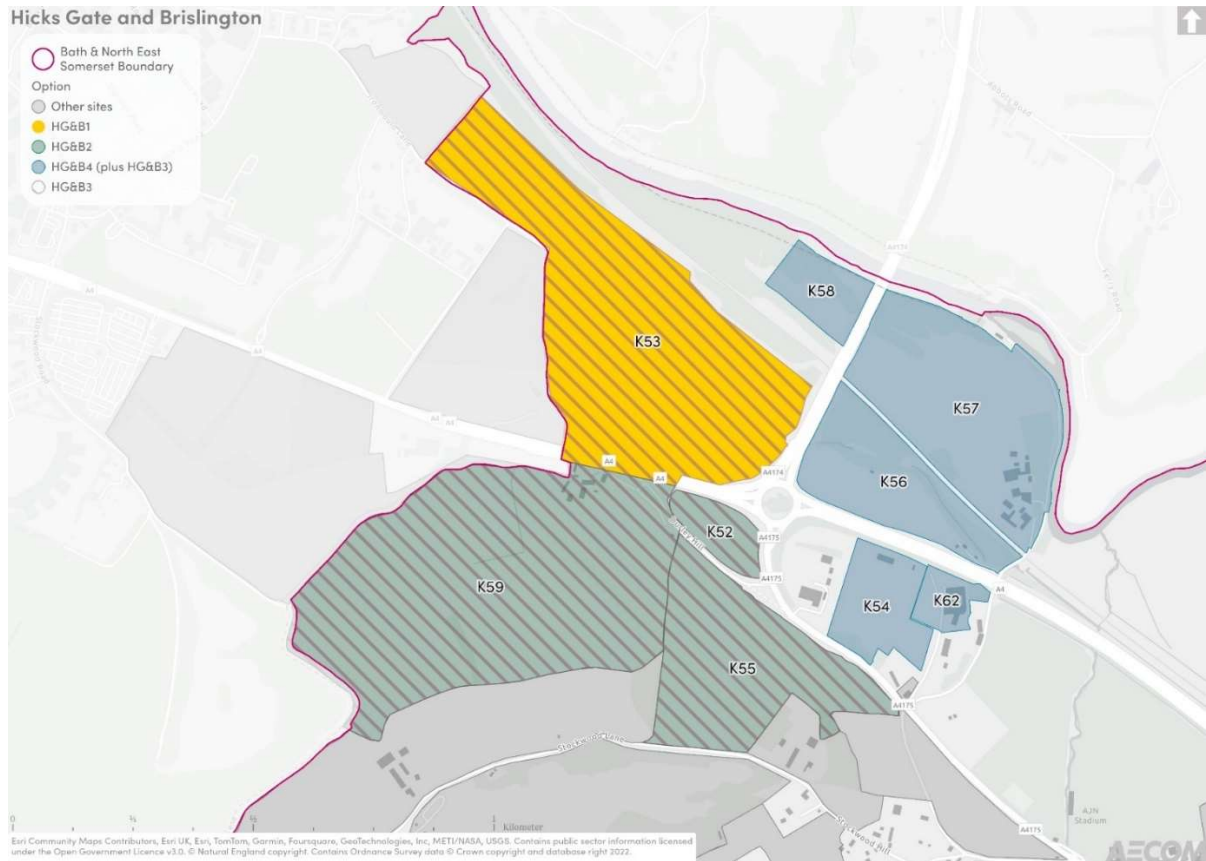


Figure NTS.6 Midsomer Norton & Radstock strategic growth options for SA

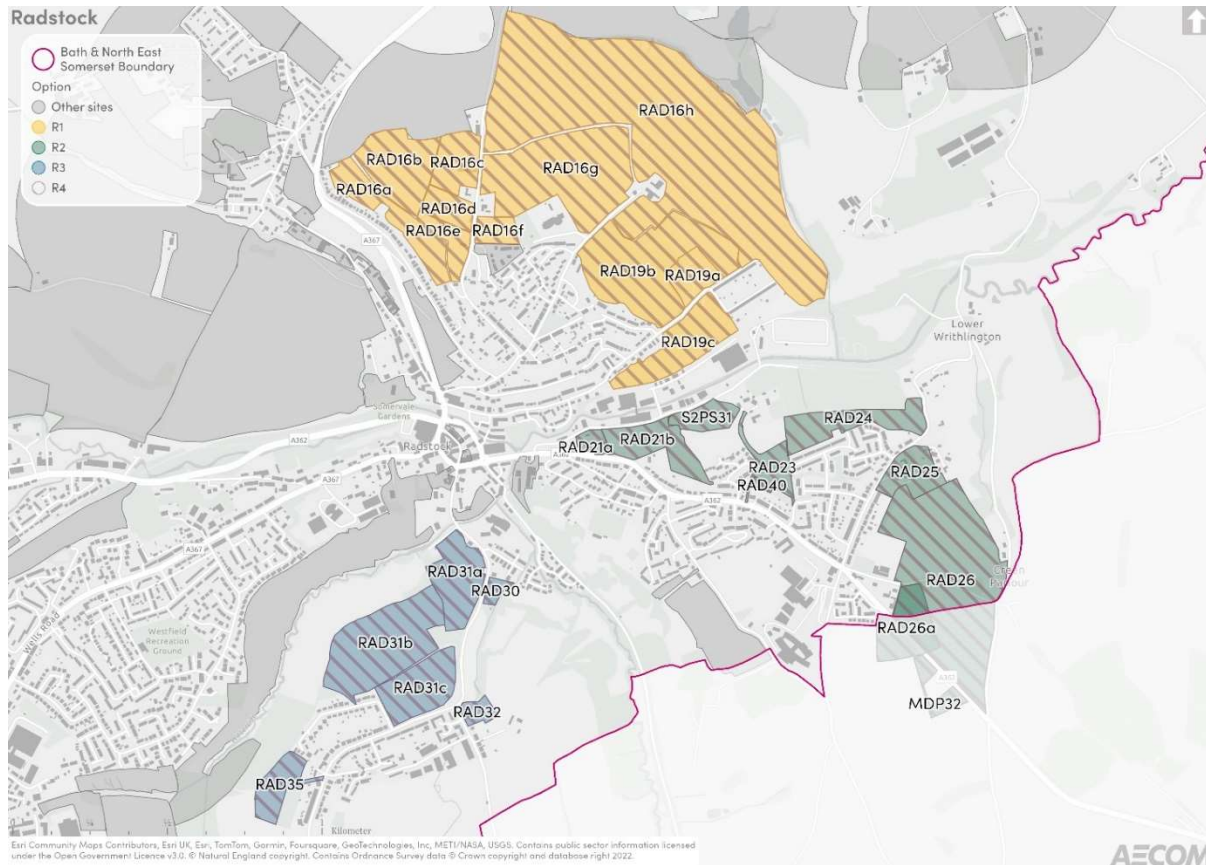


Figure NTS.7 Peasedown St John strategic growth options for SA

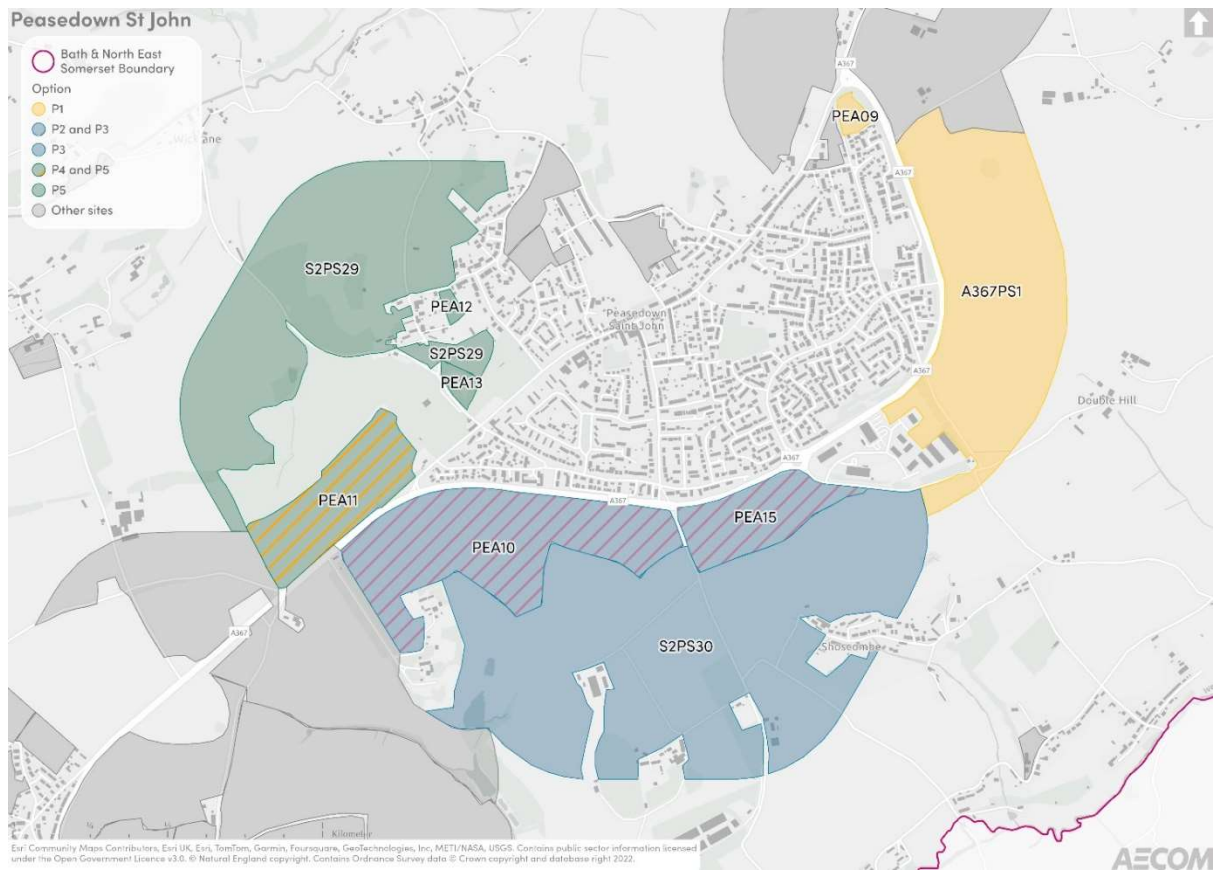
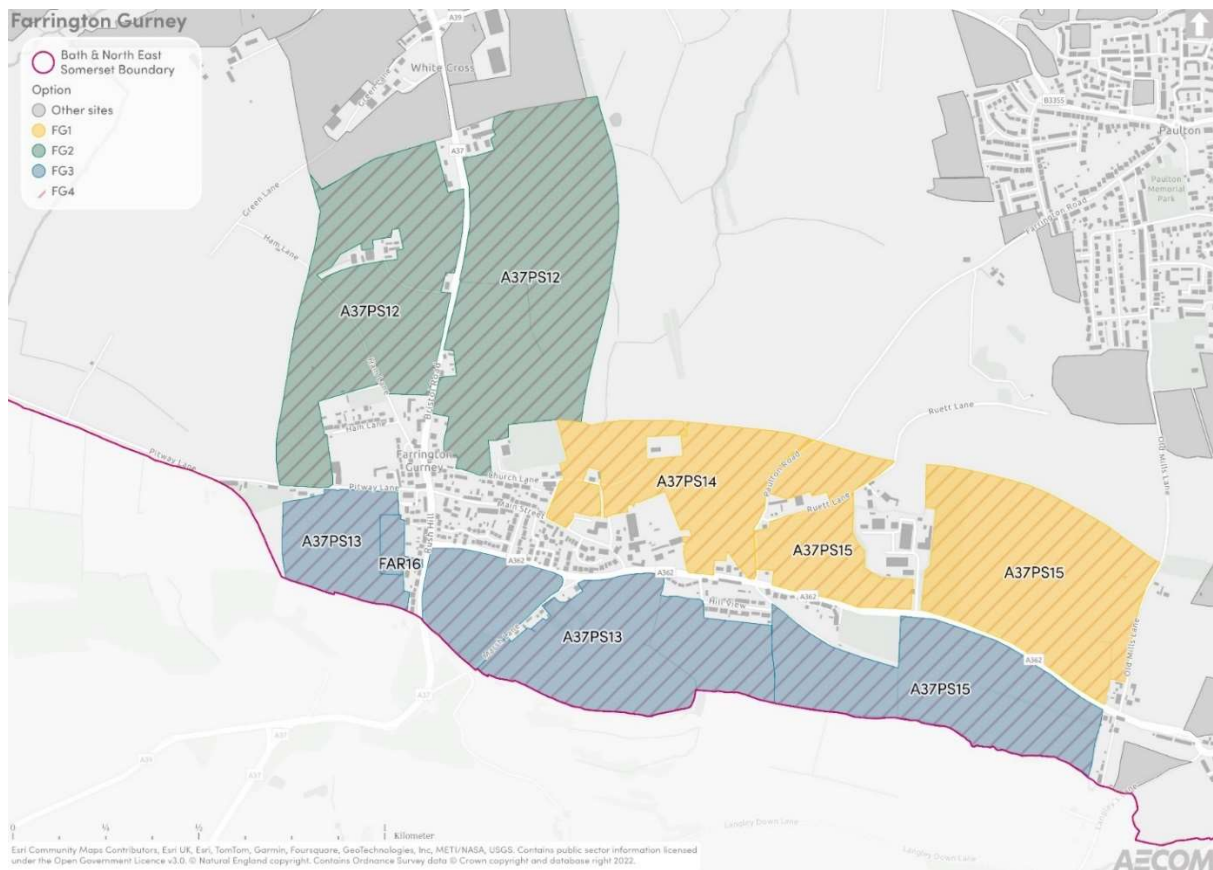


Figure NTS.8 Farrington Gurney strategic growth options for SA



Other policy considerations explored

Whilst a framework of development management policies is being developed, in the context of discussions around future growth, there are a few policy areas that stand out for their potential to affect the overall growth strategy. These policy areas warrant further attention as part of options assessment.

The key policy focus areas have been developed in collaboration with the Council and cover:

- Purpose Built Student Accommodation (PBSA);
- Renewable energy development; and
- Biodiversity net gain.

Further discussion of policy focus areas can be found in **Chapter 5** of the SA Report, with detailed assessment of options provided in **Appendix E**.

What district wide reasonable alternatives can be identified at this stage?

SA of the above key settlement and policy options, all of which have a bearing on strategic growth potential, has enabled the development of the following four district-wide spatial alternatives.

Option 1: This higher growth option is focused on significant Green Belt release across the district, maximising strategic opportunities in key sustainable settlements Keynsham, Saltford, and Whitchurch.

Option 2: This option is focused on NPPF Standard Method for calculating housing need, with a higher reliance on Green Belt release in key sustainable settlements Keynsham, Saltford, and Whitchurch.

Option 3: This option is focused on NPPF Standard Method for calculating housing need, with a lower reliance on Green Belt release. Capacity therefore reduces in key sustainable settlements Keynsham, Saltford, and Whitchurch, and increases in the Somer Valley and rural areas.

Option 4: This lower growth option excludes Green Belt release and therefore does not meet the NPPF Standard Method total need. Capacity at Whitchurch and Hicks Gate is 0 under this option, while capacity at Keynsham and Salford would be limited.

These district wide options are further detailed in the SA Report, and subsequently presented in Table 5.12.

Table 5.12 of the SA Report draws together the housing supply situation (commitments, windfall estimates, and known small and medium sites), providing options for additional growth at the key settlements and rural areas. At key settlements, the strategic opportunities considered reasonable by the Council are identified.

District-wide options have been developed and tested for the purpose of SA. These options are separate to the options in the Local Plan Options Document and remain very high-level options to inform continued plan development. No preferred approach is identified at this stage.

Appraising reasonable alternatives

Table NTS.2 overleaf explains the summary appraisal findings for the established district-wide growth options. To summarise the options are as follows:

Option 1 – Higher growth (significant Green Belt release)

Option 2 – Standard Method growth needs (high reliance on Green Belt release)

Option 3 – Standard Method growth needs (lower reliance on Green Belt release)

Option 4 – Lower growth (excluding Green Belt release)

The detailed narrative explaining these findings is presented in **Chapter 6** of the SA Report.

Methodology

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability objectives and topics identified through scoping (see **Table 3.1** of the SA Report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects of the plan in combination with the effects of other planned or on-going activity that are outside the control of Bath & North East Somerset Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that SA theme compared to an option that is ranked 2. '=' has been used to highlight where options perform equally, and cannot be differentiated between.

Developing the preferred approach

At this stage, the Council are not identifying a preferred approach for the Local Plan and are consulting on a range of spatial and policy options. It is intended that consultation will inform the development of the preferred approach, which will be presented at the next stage of plan-making. Further consultation on the full draft plan and preferred approach will occur at that stage.

At this point in time, the SA has sought to explore a range of spatial options that can inform consultation and stimulate conversation and feedback on the options for future growth in the district. The SA does not identify a preferred approach and has only identified a small range of options that can inform consultation whilst remaining concise and accessible. The development of these options will be informed by feedback through this consultation stage.

3. SA findings at this stage

Introduction

Part 2 of the SA Report presents an appraisal of the Local Plan Options Document, as currently published under Regulation 18 of the Planning Regulations.

Methodology

The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3.1** of the SA Report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Options Document in more general terms.

Within the appraisal narrative below specific policies are referred to only as necessary and relevant to each SA theme (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

Summary appraisal findings

Table NTS.2 overleaf presents summary conclusions reached for each of the SA themes.

The detailed narrative explaining these findings is presented in **Chapter 9** of the SA Report.

Table NTS.2 Summary SA of the Local Plan Options Document

SA theme	Summary of conclusions and recommendations
Health and wellbeing	The Options Document recognises the role of planning in delivering healthy places that support improved health outcomes, with health embedded as a key consideration, including as part of the vision and objectives of the plan. Dedicated policy provisions and stipulations for future growth will embed key health considerations and design principles (including public health and amenity) and equitable access to nature and green space (including delivering new green spaces as necessary to support future growth), that will deliver against the vision for healthy places. Significant positive effects are concluded overall.
Housing	The housing strategy and policy framework seeks to meet the varying housing needs of residents across the district, including specialist groups ranging from older people to the Gypsy & Traveller community. In this context it is recognised that there is a limited and premium land supply with competing housing needs, which includes PBSA needs with Bath - housing the two universities in the district. The Strategy also provides an opportunity to potentially contribute homes to the wider Housing Market Area. Significant positive effects are therefore concluded overall.
Communities	The Options Document highlights how the core Local Plan values and priorities relate directly to creating and maintaining sustainable, vibrant, and healthy communities. Sustainable communities would be supported by good access to public transport, community services and facilities (including schools), and local green and open spaces. As such, the overall effects for communities are considered likely to be significant positive effects . However, it is recognised that accommodating a spatial growth strategy will have implications for different settlements across the district and will need to be carefully managed to avoid impacts arising in relation to settlement identities.
Economy	The emerging Economic Strategy shows that within the district there is a highly skilled workforce and unemployment levels are low, however limited affordable housing for residents and workers is known to have a direct impact on the economy. The Local Plan will seek to address these issues through the identification of land for further economic development. The options document highlights the role of the city of Bath as a main economic centre for the district, the economic growth of the Bath to Bristol corridor, and proposed investment in the Somer Valley Enterprise Zone, and wider sustainable transport network. Considering these points, and others made in Chapter 9 of the SA Report, significant positive effects are considered likely overall.

SA theme	Summary of conclusions and recommendations
Transportation	<p>Transport and congestion is a key issue for the whole district, as discussed in Chapter 9 of the SA Report, and is therefore naturally a focus of the options document. Future development within the district will be required to follow the sustainable transport hierarchy, utilising the spatial strategy, and following a site selection process to locate people close to the services and facilities that they need, e.g. employment, education, retail, leisure, public transport. The Options Document highlights spatial issues and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. The Options Document performs well in this respect, identifying potential sites for substantial growth in Keynsham, Saltford, Hicks Gate and Whitchurch, which outside of Bath are considered to be the most sustainable locations from a transport perspective. The Document is underpinned by key evidence and it is considered that as the plan evolves, further transport evidence will likely come forward and inform the next stage of plan making and SA. Therefore, uncertainty is noted at this stage.</p>
Landscape	<p>The nature of likely effects on landscape as a result of the Options Document are mixed. This reflects the sensitivity of the landscape within and surrounding the district's settlements, and that notably any growth to constrained settlements could adversely impact upon intrinsic qualities and setting of NLs, as well as the OUV of the WHS, and the purposes of the Green Belt. However the development management policy framework seeks to ensure the landscape is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of the landscape and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development.</p> <p>More broadly, options in respect of town/ village centres and renewable energy development could have implications for the landscape, which will need detailed consideration moving forward.</p>
Historic environment	<p>The nature of likely effects on the historic environment as a result of the Options Document are mixed. This reflects the sensitivity of the historic environment throughout the district, recognising that any impact on the OUV of the Bath City WHS or its setting could in turn impact upon its UNESCO listing. Outside of Bath and its environs, many of the district's settlements have rich heritage resources and therefore growth has the potential to lead to adverse effects. However, the development management policy framework seeks to ensure the historic environment is managed in the most efficient and effective way, ensuring the proper assessment, and understanding of the significance of a heritage asset and the contribution of its setting in the development process. It is considered that further consideration will be given to site options/ allocations at the next stage of plan making, for example in relation to detailed masterplanning and layout of development.</p>

SA theme	Summary of conclusions and recommendations
	<p>More broadly, options in respect of town/ village centres and renewable energy development could have implications for the historic environment, which will need detailed consideration moving forward.</p>
Biodiversity	<p>The findings of the HRA scoping exercise (2024) recommends updates to the wording of site and policy allocations to avoid significant adverse effects on European designated sites. However, the HRA scoping also concludes potential cumulative impacts to the Bradford on Avon Bat SAC, and to the Chew Valley Lake SPA, cannot be ruled out and consultation with Natural England is recommended. While the spatial strategy hasn't been fully determined yet, and will inevitably influence the potential for significant effects, taking a precautionary approach, minor negative effects are concluded at this stage.</p> <p>It is however recognised that more broadly, the Options Document performs well through placing emphasis on connecting places through the LNRS, planning for BNG, urban greening, and capitalising upon natural capital and ecosystem services. Therefore, options discussed above could lead to minor positive effects on biodiversity if opportunities were maximised and recommendations set out through the HRA scoping are adopted; in consultation with Natural England. It is likely this will be explored through the next stage of plan-making and evidence gathering.</p>
Natural resources	<p>The options presented in the Options Document have the potential to lead to significant negative effects in relation to natural resources. Whilst impacts on air quality, water resources and quality, and minerals and waste will likely be mitigated through the policy framework, the plan will inevitably lead to the extensive loss of greenfield / BMV land. Nevertheless, it is recognised that where brownfield sites are available, particularly in Bath and Keynsham, these are being considered for development through regeneration schemes. It is also noted that in the Somer Valley and rural areas, brownfield land is sparse and therefore to meet the identified local housing need, development of greenfield / BMV land is largely unavoidable.</p>
Climate change	<p>The Options Document seeks to highlight the main contributors to climate change (e.g. transport, energy and the built environment) and presents reasonable options for addressing and mitigating adverse effects where possible whilst meeting ambitious growth targets. From a adaptation perspective, it is recognised that a number of sites are constrained by flood risk, however, the Options Document recognises that there are significant opportunities for nature recovery, and highlights that ensuring that flood risk is properly considered is an important factor influencing the location of development and resilience to climate change. Sites and policies presented through the Options Document</p>

SA theme	Summary of conclusions and recommendations
	are underpinned by key evidence and it is considered that as the plan evolves, further evidence will likely come forward and inform the next stage of plan making and SA. Therefore, uncertainty is noted at this stage.
Waste	It is recognised that a wider policy framework influences how waste will be managed in the context of future growth. With regards to the growth strategy (both housing and employment allocation site options), it is considered that all options can promote waste management in accordance with the waste hierarchy, and all options would provide access to recycling facilities locally. Given these points and considering the wider policy framework influencing this SA objective, broadly neutral effects are considered most likely.

4. Next steps

Introduction

Part 3 of the SA Report summarises the next steps for plan-making and the SA.

Next steps

This Interim SA Report & NTS will accompany the Local Plan 2022-2042 Options Document for public consultation (Regulation 18). Any comments received will be reviewed and then considered as part of the iterative plan-making and SA process.

The representations received, as well as ongoing engagement and further evidence base work, including further SA work, will be used to help shape the Draft Local Plan before further consultation (at the Regulation 19 stage). An SA Report & NTS will accompany the draft Local Plan for consultation at the Regulation 19 stage.

