



**Bath Western Riverside - Sustainability
Appraisal, Draft Sustainability Report -
June 2006**

Bath and North East Somerset Council

QM

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1 Background

1.1 PURPOSE OF THE SUSTAINABILITY APPRAISAL (SA) AND THE SA REPORT

1.1.1 Bath and North East Somerset Council appointed WSP Environmental Ltd to undertake an SA of the emerging Supplementary Planning Document (SPD) for Bath Western Riverside (BWR). This report presents the draft results of the SA.

1.1.2 The purpose of the SA is to help ensure that the SPD is sound and that it contributes to a range of sustainable development objectives.

1.1.3 This section of the draft SA Report:

- Defines sustainable development and Sustainability Appraisal;
- Outlines the content of the SPD;
- Discusses compliance with the SEA Directive, and
- Outlines the structure of the rest of this report.

1.2 WHAT IS SUSTAINABLE DEVELOPMENT?

1.2.1 The most widely used and recognised definition of Sustainable Development is that taken from the report 'Our Common Vision' produced by the World Commission On Environment and Development in 1987 (Brundtland Report):

"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs"

1.2.2 The government outlined the United Kingdoms approach to sustainable development in the 'UK Government Sustainable Development Strategy (March 2005). Within this document the government identifies five guiding principles with which the United Kingdoms sustainable development strategy would be developed:

Living within Environmental Limits

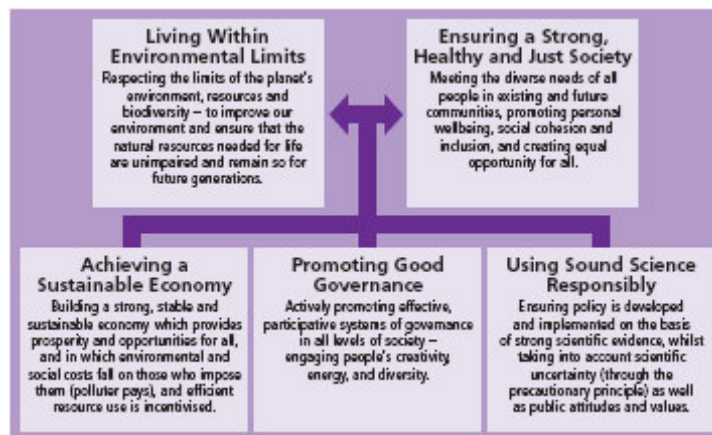
Ensuring a Strong Healthy and Just Society

Achieving a Sustainable Economy

Promoting Good Governance

Using Sound Science Responsibly

1.2.3 The guiding principles are further explained in the diagram below which is taken from the government's strategy.



1.2.4 The Government has also produced a definition of sustainable communities. Sustainable communities are:

“Places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.”

1.3 WHAT IS SUSTAINABILITY APPRAISAL?

1.3.1 Sustainability Appraisal has been defined as:

“a systematic and iterative process undertaken during the preparation of a plan, which identifies and reports on the extent to which implementation of the plan would achieve environmental, social and economic objectives by which sustainable development can be defined, in order that the performance of the plan can be improved”¹.

1.3.2 Under the new planning system² SA is mandatory for Local Development Documents, including SPDs. The SA also needs to comply with the requirements of European Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the environment’ (the SEA Directive). Throughout the remainder of this report where reference is made to Sustainability Appraisal, SA or the SA Report, it denotes Sustainability Appraisal under the Act incorporating the requirements of the SEA Directive. Section 1.3 below demonstrates how this SA Report complies with the SEA Directive and associated regulations.

1.4 THE PLAN OBJECTIVES AND OUTLINE OF CONTENTS

1.4.1 The western riverside area of Bath is an exciting development opportunity which is of regional significance. At 35ha the site is comparable in size with Bath City Centre. The principle role of the SPD is to provide a Spatial Masterplan to guide the redevelopment and regeneration of BWR. More detailed Masterplans will be required as more specific development proposals are prepared.

1.4.2 The vision for Bath Western Riverside redevelopment is:

“To create a vital and viable place which reconnects the urban fabric of Bath in a seamless way to offer a high quality mixed use environment that functions as a working and living quarter of the City, and reinforces its World Heritage status”.

1.4.3 The SPD brings forward the key principles that are set out in the Adopted Supplementary Planning Guidance for BWR and Policy GDS1:B1 of the Bath & North East Somerset Local Plan and applies them spatially to the site following detailed environmental investigation and a masterplanning process that has involved developers and stakeholders. Finally, the SPD sets out an Implementation Framework for development, in terms of phasing, requirements for applications, developer contributions, and design codes.

1.4.4 Section 1 of the SPD provides an overview of development requirements, including a discussion of the principal of achieving ‘embedded sustainability’ and a set of energy targets. Section 2 of the SPD presents a set of organisational principles and Section 3 sets out an implementation Plan. The SPD also includes a set of design codes.

¹ Good Practice Guidance on Sustainability Appraisal of Regional Planning Guidance, DETR, 2000

² Section 39(2) of the Planning Compulsory Purchase Act, 2004 (the Act).



1.5 COMPLIANCE WITH THE SEA DIRECTIVE AND REGULATIONS

1.5.1 The flow chart in Figure 1 below sets out the SA process and how this SA Report and the process to date has complied with the SEA Directive and associated regulations.

1.6 STRUCTURE OF THIS REPORT

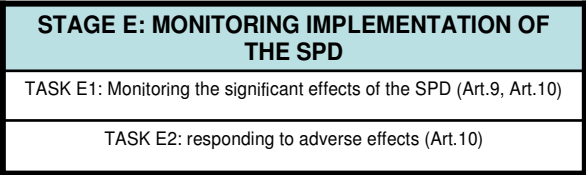
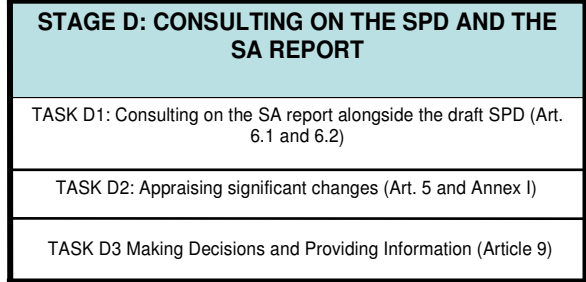
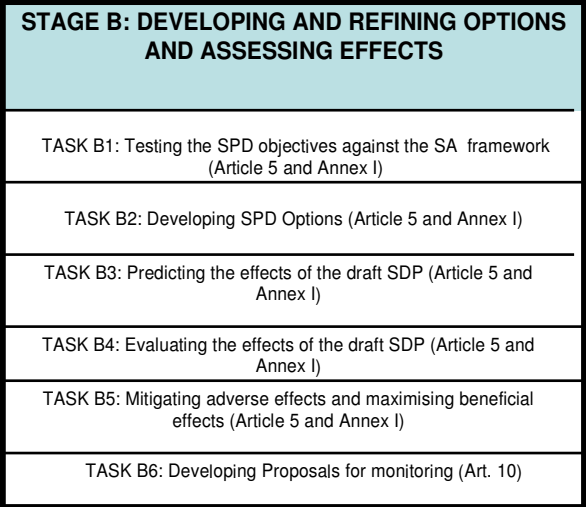
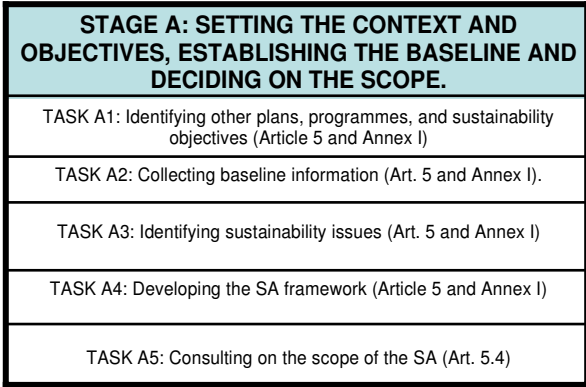
1.6.1 The remainder of this report is structured as follows:

Section 2 describes the appraisal methodology and the process to date;

Section 3 sets out the key results from the work undertaken at the Scoping stage and introduces the objectives that have been used to appraise the SPD. Appendix A demonstrates how the objectives align with the issues identified in the SEA Directive. Appendix B summarises responses received at the scoping stage. Appendix C summarises links to other plans and programmes and Baseline information is presented in Appendix D;

Section 4 sets out the key results of the appraisal and is supported by a detailed set of matrices at Appendix E and F;

Section 5 sets out links to other tiers of plans and programmes and proposals for monitoring.





2 Appraisal Methodology

2.1 INTRODUCTION

2.1.1 The methodology adopted is consistent with guidance set out in '*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister, November 2005*'. This section summarises the approach and also considers consultation and any difficulties encountered during the appraisal.

2.1.2 The SA process is summarised in Figure 1 above and each task is briefly described below. Tasks A1 to A5 were undertaken prior to production of this report. A Scoping Report was published in May 2005. The key issues arising from this work are summarised in Section 3 of this report and Appendix C and D.

2.2 SA STAGE A: SETTING THE CONTEXT AND OBJECTIVES, ESTABLISHING THE BASELINE AND DECIDING ON THE SCOPE

2.2.1 The tasks associated with this stage are summarised below.

TASK A1: IDENTIFYING OTHER RELEVANT PLANS, POLICIES AND PROGRAMMES AND SUSTAINABILITY OBJECTIVES

2.2.2 The purpose of this task is to help take account of relationships between the SPD and other relevant plans policies and programmes and sustainability objectives, including environmental protection objectives established at international, European Community or national levels. The task aims to identify potential synergies and address any inconsistencies and constraints.

TASK A2: COLLECTING BASELINE INFORMATION

2.2.3 Baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems. The current and likely future state of the environment needs to be considered, including consideration of how the environment will evolve if the plan that is being appraised is not implemented.

TASK A3: IDENTIFYING SUSTAINABILITY ISSUES AND PROBLEMS

2.2.4 The identification of sustainability issues (including environmental problems as required by the SEA Directive) is an opportunity to define key issues for the SPD and to inform the selection of SA objectives that will be used to appraise the SPD. This task was undertaken as part of the preparation of the Scoping Report.

TASK A4: SUSTAINABILITY APPRAISAL FRAMEWORK

2.2.5 The SA Framework sets out the objectives that will be used to appraise the SPD they are independent of the SPD objectives but may overlap them. The objectives were included in the Scoping Report and consulted on (see below). The objectives are set out in Appendix A.

TASK A5: CONSULTING ON THE SCOPE OF THE SA

2.2.6 To meet the requirements of the SEA Directive the Countryside Agency, English Heritage, English Nature and the Environment Agency were consulted on the scope of the SA. A Scoping Report was produced in May 2005 and a list of consultees is provided at Section 2.7 of this report.



2.3 SA STAGE B: DEVELOPING AND REFINING OPTIONS AND ASSESSING EFFECTS

2.3.1 The tasks associated with this stage are summarised below.

TASK B1: TESTING THE SPD OBJECTIVES AGAINST THE SA FRAMEWORK

2.3.2 The SPD objectives should be in accordance with sustainability principles. The objectives are tested for consistency with the SA objectives and consistency with each other. The results of this exercise are reported in Section 4.

TASK B2: DEVELOPING SPD OPTIONS

2.3.3 In line with the ODPM guidance the extant policies were also appraised. The extant policy is made up of the Adopted Supplementary Planning Guidance for BWR and Policy GDS1:B1 of the Bath & North East Somerset Local Plan. Appraising the extant policy is encouraged to help provide a basis for identifying the baseline situation.

2.3.4 For the purposes of complying with the SEA Directive the option of not preparing the SPD is briefly considered, in such a scenario the site would still be covered by the existing policies discussed above. The analysis of the 'do-nothing' option therefore considers the benefits that the SPD provides over and above those that would be anticipated in the absence of the SPD.

TASK B3: PREDICTING THE EFFECTS OF THE DRAFT SPD

2.3.5 The purpose of this task is to predict the social, environmental and economic effects of the draft SPD. Task B3 was undertaken in conjunction with Tasks B4 and B5 below. The sections within the SPD were appraised individually. Alternative approaches were to appraise the SPD as a whole or to appraise individual policy statements. The former was not considered appropriate because of the size of the document and the latter was not considered appropriate because of the way the document was structured. Appraising sections seemed to strike the right balance between achieving a robust appraisal whilst not getting lost in detail. Individual matrices were prepared for each section of the draft SPD, and the extant policy and these are provided in Appendix E and F.


2.3.6 A slightly different approach was taken to evaluating the Urban Design Codes. Given the nature of the codes the appraisal team considered it more appropriate to review the codes and to identify any potential gaps. Discussions were also held with CABE on the potential use of Design Codes for achieving embedded sustainability. One alternative would have been to prepare a matrix for each code, which we did not feel would add value to the process because of the number of matrices this would generate. In a lot of instances no relationship would have been identified between a code and objectives because the codes are very specific in nature. Another alternative would have been to do one matrix for all the codes, which we felt would be too simplistic.

TASK B4: EVALUATING THE EFFECTS OF THE DRAFT SPD

2.3.7 The appraisal matrix adopts a simple approach. A judgement is made as to whether or not there is a potential link between the section of the SPD being appraised and an SA objective. If there is a link a judgement is made as to whether or not the section of the SPD would move towards or away from the objective and if this would be minor or major in significance.

2.3.8 To comply with the SEA Directive the SA also needs to consider:

- Probability

- 
-
- Duration
 - Frequency
 - Reversibility
 - Magnitude and spatial extent
 - Cumulative and synergistic effects

2.3.9 A commentary is provided on each of these in Section 4.

TASK B5: CONSIDERING WAYS OF MITIGATING ADVERSE EFFECTS AND MAXIMISING BENEFICIAL EFFECTS

2.3.10 Throughout the SA process, opportunities to mitigate any potential adverse effects and maximise beneficial effects were identified. In identifying such opportunities regard was had to the scope of the section of the SPD that was being appraised and the matters it deals with.

TASK B6: PROPOSING MEASURES TO MONITOR THE SIGNIFICANT EFFECTS OF IMPLEMENTING THE SPD

2.3.11 Monitoring allows the actual significant effects of implementing the SPD to be tested against those predicted in the SA. There is also a requirement for the Local Planning Authority to prepare an Annual Monitoring Report for the Local Development Documents and it makes sense for the indicators used as part of that process to allow for monitoring associated with the SA.

2.4 SA STAGE C: PREPARING THE SA REPORT

2.4.1 The SA report on the draft SPD is a key output of the appraisal process and is undertaken as Task C1. This report has been prepared in accordance with the guidance provided by ODPM.

2.5 SA STAGE D: CONSULTING ON THE DRAFT SPD AND SA REPORT

2.5.1 The tasks associated with this stage are summarised below.

TASK D1: PUBLIC PARTICIPATION ON THE DRAFT SPD AND SA REPORT

2.5.2 This report has been made available to members of the public and a range of stakeholders in accordance with relevant guidance. Any responses should focus on the effects of the SPD and not the policies that the SPD is helping to implement.

TASK D2: APPRAISING SIGNIFICANT CHANGES

2.5.3 SA is an iterative process. An appraisal of any significant changes that are made after the consultation stage will be undertaken.

TASK D3: MAKING DECISIONS AND PROVIDING INFORMATION

2.5.4 Following adoption of the SPD, a consultation statement will be prepared and this will include information on how the SPD was influenced by the SA process. Any changes to the proposed monitoring regime will also be put forward in the statement.

2.6 SA STAGE E: MONITORING SIGNIFICANT EFFECTS OF IMPLEMENTING THE SPD

2.6.1 The effects of implementing the SPD need to be monitored. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable

appropriate remedial action to be undertaken, although such action is not specifically obligated by the Directive. Section 5 of this report considers proposals for monitoring.

2.7 CONSULTATION

The scoping report was submitted to the following consultees and stakeholders and this draft report is also being circulated to them:

Statutory Consultation Body

English Nature

The Heritage Buildings and Monuments Commission for England
(English Heritage)

Environment Agency

Countryside Agency

Stakeholder

Bath and North Somerset Council

British Waterways

Local Community Partnership Research Officer-Police
Representative

Local Primary Healthcare Trust

Chamber of Commerce

Highways Agency

Joint Strategic Planning and Transportation Unit

2.7.1 A summary of their responses is contained within Appendix B. In addition to the formal consultation on the Scoping Report a workshop was held to develop the SA framework. A number of the consultees did not respond in writing to the Scoping Report as their comments were documented during the sustainability workshop.

2.7.2 The attendees at the workshop were as follows:

Number	Name	Title	Organisation
1	Will Doughty	Principal Consultant	WSP Env
2	Colin Morrison	Senior Consultant	WSp Env
3	Ric Eales	Principal Consultant	CEP
4	Andrew Sharland	Landscape Architect	B&NES Council
5	Alison Slade	Ecologist	B&NES Council
6	Jane Wildblood	Sustainability manager	B&NES Council
7	Mel Clinton	Local partnerships manager	B&NES Council
8	Kerry Greig	Corporate Projects Officer	B&NES Council
9	John Howe	Planner	JSPTU
10	Gary Ward	Housing Development Officer	B&NES Council
11	Simon Harwood	Env Protection Manager	B&NES Council

12	Rob Saunders	ALO/CPO Bath police	Bath Police
13	Jon Poole	Community Safety Research Officer	Bath Safety and Drugs Partnership
14	Colin Blundel	Planner, South West	British Waterways
15	Nigel Hutchings	CEO	Bath Chamber, Business West
16	Peter Brook	Network Manager	B&NES Council
17	Abigail Harrap	World Heritage Officer	B&NES Council
18	Vaughn Thompson	Planning	B&NES Council
19	Alastair Crowdy	Senior Partner	CWHB


2.8 SUSTAINABILITY APPRAISAL AS AN ITERATIVE PROCESS

2.8.1 This report sets out the results of the second iteration of the SA. The first iteration involved an initial and unpublished working draft of the SPD. The SA was undertaken in December 2005 and a set of recommendations provided to the policy authors.

2.9 DIFFICULTIES ENCOUNTERED

2.9.1 The main difficulty the team encountered appraising the SPD stemmed from the nature of the document. It is a bridging document between the general policies in the Local Plan and more detailed masterplanning work that will be required to translate the SPD into more specific proposals. It is focussed on urban design, which is understandable given the sensitivities of the site, but also touches on land uses and sustainable development issues, e.g. waste and renewable energy. It was therefore difficult to make a judgement as to whether or not the SPD should cover specific topics or if these fell outside of its remit. An example relates to the provision of community facilities and how prescriptive the SPD should be on what should be provided.

2.9.2 It was also difficult to identify the appropriate section of the SPD in which to raise specific issues, for example issues relating to sustainable design and construction, these are touched on in a number of the sections of the initial draft that we appraised, including the Urban Design Codes. The danger is that issues are touched on in the SPD but not carried through to firm policies.



3 Sustainability Objectives, Baseline and Context

3.1 INTRODUCTION

3.1.1 This section discusses the results of earlier stages of the SA process. Links to other policies, plans and programmes are discussed with an analysis identified in Appendix C. The baseline and associated issues are then discussed, with an analysis in Appendix D. Although this work is substantially based on the work undertaken at the time the Scoping Report was prepared, the opportunity has been taken to update it, where necessary. The SA Framework is then discussed and Appendix A demonstrates how this covers the factors identified in the SEA Directive.

3.2 LINKS TO OTHER POLICIES, PLANS AND PROGRAMMES AND SUSTAINABILITY OBJECTIVES AND HOW THESE HAVE BEEN TAKEN INTO ACCOUNT

3.2.1 A number of documents have been reviewed to inform this work. The Detailed reviews were presented as part of the Scoping Report and the key findings are set out in Appendix C. The table has also been updated to reflect recent publications. This information was used to inform the appraisal.

3.3 THE EXISTING AND PREDICTED BASELINE AND KEY ISSUES

3.3.1 The baseline and key issues are presented in Appendix D. This is based on what was produced at the Scoping Stage but again the opportunity has been taken to update the information. This information was used to inform the appraisal.

3.4 THE SA FRAMEWORK

3.4.1 Appendix A sets out the appraisal objectives and also demonstrates that they cover the issues identified in Annex 1(f) of the SEA Directive

HOW WERE THE SA OBJECTIVES DEVELOPED?

3.4.2 Objectives and criteria are used within the SA to describe, analyse and compare environmental effects. The Strategic Sustainability Assessment of the South West Regional Spatial Strategy was used as the main starting point for a set of draft SA objectives for the BWR SPD. A gap analysis of these objectives was then undertaken with the following documents to identify objective gaps:

- South West Regional Sustainable Development Strategy
- Bath and North East Somerset Local Plan Sustainability Appraisal
- Community Strategy
- Other documents reviewed

3.4.3 Information from the baseline data review and from the policy review was also used to modify the framework. Guidance on the framework was also sought from 'A Draft Practical Guide to the Strategic Environmental Assessment Directive (ODPM, July 2004) and Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks Consultation Paper' (ODPM, September 2004).

3.4.4 These objectives were then grouped according to their social, economic and environmental context. These objectives were then placed into the scoping report in order to obtain opinions.



3.4.5 During the sustainability workshop the proposed objectives were discussed with the delegates to determine their suitability from a local perspective. There was a consensus amongst the delegates that if possible a degree of continuity should be achieved between the existing RSS, forthcoming LDF and the SPD. Baaed on this request it was suggested that this could be achieved by basing the proposed SPD objectives around the existing RSS objectives. These objectives consisted of six high level objectives, each one divided into a number of sub-objectives. These objectives were then reviewed to provide a more local context where possible using baseline information and local knowledge of the delegates.

3.4.6 The SEA Directive requires consideration of material assets but does not define what these are. The SEA Directive also requires consideration of effects on population but provides no guidance on the scope of this topic. Appendix A sets out the SA framework and the SEA topics that we consider to be covered by each objective; this includes material assets and population.



4 Appraisal Results

4.1 INTRODUCTION

4.1.1 This section sets out the results of the appraisal for each section within the SPD. The extant policy has also been appraised and this is discussed first with the matrices presented in Appendix E. A matrix has been prepared for each key section of the SPD, see Appendix F. Consideration is also given to the issue of options, as required in the relevant guidance and legislation.

4.2 EXISTING POLICY

4.2.1 The Adopted Supplementary Planning Guidance for BWR and Policy GDS1 of the Bath & North East Somerset Local Plan have been appraised.

4.2.2 Policy GDS.1 requires a mixed-use scheme but the only uses specified are residential, B1 and small scale shops and offices. The need for sustainable design and construction is only partially acknowledged. The policy and the other policies that are referred to provide some environmental safeguards but could go further, e.g. there is a need to take account of nature conservation interests, rather than an explicit need to enhance such interests.

4.2.3 The adopted SPG differs from the SPD in terms of its style and content. In effect the SPG is a stepping stone to the masterplan. The SPG sets out a range of considerations that the masterplan and associated development proposals would need to take account of. By identifying issues like flood risk, ecology etc. it scores well against the relevant SA objectives. It also discusses sustainable design and construction, although this is done briefly and there are no specific targets or measures suggested.

4.3 THE SPD - CONSIDERATION OF OPTIONS


4.3.1 The SPD does not put forward options for development of the site. That would be contrary to its purpose, which is to provide the framework against which proposals can come forward.

4.3.2 For the purposes of considering options as part of the SA process we have given consideration to the option of not preparing the SPD, i.e. the 'do-nothing option'. We feel that preparing the SPD provides the following advantages:

- The SPD provides a comprehensive framework which will ensure that the whole of the site is developed in a co-ordinated manner, with each development contributing to the greater scheme;
- The provision of detailed design guidance should help ensure that the site respects the World Heritage Site status of the area;
- The Implementation Plan provides developers with greater certainty than they would otherwise have in relation to developer contributions, it provides the basis for pooling contributions and will therefore provide an important vehicle for ensuring that a sustainable community is delivered.

4.4 THE SPD - GENERAL COMMENTS

4.4.1 In appraising the earlier version of the SPD one of the comments made was that it was difficult to differentiate between background text, explanatory text and requirements/policies. We recommended that a clear distinction be made between these to aid the reader and to help ensure that the objectives of the SPD are met. We



think that the published draft version of the SPD is an improvement in this respect but it could still be improved further and a recommendation is made below.

4.5 SPD PART 1: STRATEGIC FRAMEWORK

4.5.1 Consideration of the vision and key principles against the appraisal objectives has identified a number of potential gaps and uncertainties and these are shown on the appropriate matrix.

4.5.2 We welcome the aspiration for BWR to be a “*beacon of sustainable development and living through the concept of embedded sustainability*”. The draft SPD sets out commitments relating to energy and also sets out a requirement for development to achieve EcoHomes or BREEAM Excellent rating. Both should make a significant contribution to achieving sustainable development.

4.5.3 The targets relating to embedded sustainability could be summarised in one place to assist the reader. They could also be referred to in the Design Codes as a reminder for readers.

4.5.4 The targets could also be extended to include targets relating to reducing water consumption, the recycling of water and recycling of waste.

4.5.5 The principles could also be extended to provide a more rounded discussion of sustainability e.g. by acknowledging the need for:

- Sustainable design and construction (this is broader than energy, waste and CO2 emissions – the factors discussed in Section 1.5 of the SPD and covers issues like, water consumption, flexible building design and Green Travel Plans);
- The need to secure provision for long term management;
- Opportunities to enhance biodiversity;
- Ensuring the provision of facilities on or near the site (health facilities, community facilities, play facilities and open space)
- Social inclusion (affordable housing/targeting local people for jobs and the role of education and training);

4.5.6 There may be scope for district heating but the SPD does not carry this forward as a policy requirement or identify it as something to explore.


4.5.7 The SPD could reference the need for the use of Construction and Environmental Management Plans, incorporating waste minimisation and management programmes.

4.5.8 The commitment to providing health and education facilities as part of a community hub is welcomed.

4.6 SPD PART 2: SPATIAL MASTERPLAN

4.6.1 The vision statement is very urban design focussed. If that is the intention perhaps it should be reworded to make that clear. If the statement is intended to have a broader role it could embrace other aspects of sustainable development, such as the use of sustainable design and construction techniques, a commitment to enhancing biodiversity, whilst off-setting any negative environmental effects.

4.6.2 The over-arching design principles have a section on sustainability. This seems to send out mixed messages with the reference to the need to balance consideration of sustainability and the need to respect local context – could this be used by anyone seeking to avoid meeting relevant targets, e.g. in relation to renewable energy? The section headed sustainability could be amended to read “this is at the heart of the BWR concept and must be demonstrably be embodied in



all design proposals in accordance with the provisions set out in Section 1.5 Embedded Sustainability.”

4.6.3 The key organising principles make a contribution to the achievement of objectives relating to the built environment, e.g. objectives relating to townscape. They make less of a contribution towards other objectives but this is in part due to the scope of the key organising principles. We suggest that the principles are extended to include the opportunity for providing an ecological corridor along the river (which is identified elsewhere in the SPD) and also the need to consider micro-climate and opportunities for passive solar gain and the use of renewable energy.

4.6.4 The section on public realm should cover issues in relation to the provision of open space, with 3000 dwellings to be provided on site the open space requirements will be significant. We recognise that some provision may need to be made off-site. The Implementation Plan and accompanying appendix do give detailed consideration to open space requirements but do not provide an indication of the overall amount of open space that will need to be accommodated.

4.6.5 There is no reference to the promotion of cycling routes in the River Corridor section as well as the use of water taxis (if feasible). The issue of water safety is also not mentioned. It will also be important to ensure that a functional ecological corridor is provided along the entirety of the river bank. The design principles in Section 2.6 would be an appropriate point to mention this as a requirement. Section 2.9 of the Design Codes does make reference to this principle.

4.6.6 The section on Character Areas is about the mix of uses across the site and identifies four broad zones. We would therefore recommend amending the title of the section to make its contents clearer at the outset. Section 2.7.7 refers to the western neighbourhood as an exemplar of sustainable urban living. We wonder if this is the right section to make this statement. In any event the section does not discuss what this means.

4.6.7 The landscape strategy could reference the need to use species that reflect local character but also consider the long term implications of climate change and the impact this might have on the choice of species. There is no mention to the use of flora to reduce surface water run-off and therefore reduce flooding risk. The Landscape Strategy could also set out how applicants should demonstrate regard to landscape issues in applications and supporting information.


4.6.8 We suggest changing the title of the section on stakeholders to ‘Building Communities’ the section seeks to identify key principles relating to community facilities and how BWR will relate to the wider area but at the moment it is not clearly expressed. This section presents an opportunity to set out a list of community facilities that will need to be provided on site. The section could highlight the need to ‘pepper-pot’ affordable housing throughout residential elements.

4.7 DESIGN CODES

4.7.1 As noted in the section of this report on methodology, the appraisal team did not feel it appropriate or useful to appraise the design codes against the objectives. The codes are, because of their nature, focussed on a narrow range of issues.

4.7.2 The codes begin with a set of design principles relating to:

- Façade design;
- Roof design;
- Corners;

- 
-
- Refuse storage;
 - Car parking;
 - Soft landscape;
 - River Corridor;
 - Street Furniture and;
 - Traffic calming.

4.7.3 The general principles would seem an appropriate part of the design codes to provide a section on embedded sustainability with a cross reference to the requirements and targets set out in Section 1.5 of the SPD, e.g. the need for buildings to achieve BREEAM or EcoHomes excellent. The general principles could also highlight the need for all buildings to be flexible and adaptable. The Design Codes could also include an allowance for the provision of 'Life-Time Homes' and 'Live-Work Units'

4.7.4 The Design Codes perform well against relevant SA objectives, e.g:

- 2.4 'Promote safer, stronger and more vibrant communities;
- 4.4 'Make public transport, cycling and walking easier and more attractive;
- 5.3 'Protect and enhance landscape and townscape;'
- 5.5 'Maintain and enhance cultural and historical assets; and
- 5.8 'Promote the efficient use of land...'

4.7.5 The way in which the Design Codes are presented is significantly different to the earlier draft that was appraised and the revision should make the Codes much easier to use.

4.8 SPD PART 3: IMPLEMENTATION PLAN

4.8.1 The Implementation Plan and accompanying appendix provide a clear and comprehensive list of requirements that developers will need to consider. It is not the role of the SA to comment on the level of contributions sought but the topics covered provide a comprehensive list of factors that will need to be considered.

4.8.2 The Implementation Plan also sets out the requirements for supporting information. It is suggested that Construction and Environmental Management Plans are added to the list of requirements. These should help ensure the use of sustainable construction and also reduce potential for impacts during construction.

4.8.3 The Implementation Plan could also explore opportunities for local involvement in future arrangements for management of the area.

4.9 SPD – NATURE OF EFFECTS

4.9.1 The majority of the effects identified are potentially permanent and would materialise once development took place. The benefits associated with training during construction would be temporary (albeit that the site is anticipated to take 15 years to fully develop). The impacts are mainly local in nature and restricted to the BWR site and its immediate environment, although benefits associated with transport will benefit the wider area served by the RTS. Given the World Heritage Site status, any benefits associated with the quality of the built environment are potentially of international significance.



4.10 SPD - CUMULATIVE AND SYNERGISTIC EFFECTS

4.10.1 Cumulative effects might arise, for instance, where several sections of the SPD might have a combined effect.

4.10.2 Synergistic effects interact to produce a total effect greater than the sum of the individual effects.

4.10.3 Table 4.1 below summarises the results of the SA. This provides the basis for identifying cumulative effects. Various aspects of the SPD are judged to promote:

- healthy lifestyles;
- stronger, safer and more vibrant communities;
- participation in arts and culture;
- the city economy;
- reducing the need to travel by car and making public transport more attractive;
- protecting townscape and landscape; and
- promoting the efficient use of land.

4.10.4 The BWR could have a very significant synergistic effect if, as anticipated, it provides the impetus for implementation of the Bath Vision.

4.11 KEY CONCLUSIONS AND RECOMMENDATIONS

4.11.1 Overall it is considered that the draft SPD will make a significant contribution to sustainable development.

4.11.2 Although some areas of uncertainty have been identified, no instances where the SPD is anticipated to have a negative effect have been identified.

4.11.3 The SA has identified a number of opportunities for enhancing the SPD. The key suggestions are:

- Adding a summary of the targets for embedded sustainability and broadening the targets to include targets relating to reducing water consumption, the recycling of water and recycling of waste;
- Adding such requirements and the need for buildings to be EcoHomes or BREEAM Excellent to the general section of the Design Codes;
- Amending the principles to provide a more rounded discussion of sustainability (see 4.4.5. of this report)
- Adding a reference to District Heating as a concept to be explored;
- Review the discussion sustainability and local context in the over-arching design principles (see 4.6.2 above);
- The key organising principles could be extended to include the opportunity for providing an ecological corridor along the river (which is identified elsewhere in the SPD) and also the need to consider micro-climate and opportunities for passive solar gain and the use of renewable energy;
- The section on public realm could give an indication of the total amount of open space that will need to be accommodated on site;
- The section on the River Corridor could discuss issues in relation to water safety, provision of a functional ecological corridor and promotion of cycling along the corridor;



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- The landscape strategy could reference the need to use species that reflect local character but also consider the long term implications of climate change and the impact this might have on the choice of species;
 - We suggest changing the title of the section on stakeholders to 'Building Communities' to better reflect the subject matter it covers;
 - The general principles in the Design Codes would seem an appropriate part of the Codes to provide a section on embedded sustainability with a cross reference to the requirements and targets set out in Section 1.5 of the SPD, e.g. the need for buildings to achieve BREEAM or EcoHomes excellent. The general principles could also highlight the need for all buildings to be flexible and adaptable;
 - The Design Codes could include an allowance for the provision of 'Life-Time Homes' and 'Live – Work Units';
 - Construction and Environmental Management Plans could be added to the list of requirements in the Implementation Plan; and
 - The Implementation Plan could also explore opportunities for local involvement in future arrangements for management of the area.

Table 4.1 Summary of Results for the SA of the SPD

Sustainability Appraisal Objectives	Chapters Reviewed																
	1.1 Vision and Key Principles	1.5 Developments Requirements	2.2 Vision Statement	2.3 Overarching Design Principles	2.4 Spatial Masterplan- Key Organising Principles. Public Realm	2.5 Public Realm	2.6 River Corridor	2.7 Character Areas	2.8 Block Structure	2.9 Scale Height and Massing and 2.10 Townscape	2.11 Movement of Access	2.12 Zonal Masterplan	2.13 Landscape Strategy	2.14 Stakeholders	2.15 Heritage Enhancement	3 Implementation plan	
1: Improve health																	
1.1 Improve health	+/-	+	+/-	+/-	+/-	+	+/-	+	0	0	+/-	+/-	0	+/-	+/-	++	
1.2 Reduce health inequalities	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	0	+/-	+/-	0	+/-	+/-	+	
1.3 Promote healthy lifestyles, especially routine daily exercise	+/-	+	+	+	+	+	+	+	0	0	+	+/-	+	+/-	+	++	
2: Support communities that meet people's needs																	
2.1 Help make suitable housing available and affordable for everyone	+/-		+/-	+/-	+/-	0	0	+	0	+	0	+	0	+/-	+/-	+	
2.2 Give existing and new residents access to learning, training, skills and knowledge	+/-	+/-	+/-	+/-	+/-	0	+	+/-	0	0	+/-	+/-	0	+/-	+/-	++	
2.3 Reduce crime and fear of crime and promote health and safety	+	+/-	+/-	+/-	+/-	+	+	+/-	+	0	+	+/-	+/-	+	+/-	++	
2.4 Promote safer, stronger and more vibrant communities	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
2.5 Increase access to and participation in arts and cultural activities	+/-	+	+/-	+/-	+	+	+	+	0	+/-	+	+	0	+/-	+/-	+	
3: Develop the economy in ways that meet people's needs																	
3.1 Give everyone in the local area access to satisfying work opportunities, paid or unpaid	+	+	+	+/-	+	0	0	+	0	0	+/-	+	0	+/-	+/-	0	
3.2 Help everyone afford a comfortable standard of living	+/-	++	+/-	+/-	+/-	0	0	0	0	0	+/-	+	0	+/-	+/-	0	
3.3 Reduce poverty and income inequality	+	+	+/-	+/-	+/-	0	0	+/-	0	0	+/-	+/-	0	+/-	+/-	+	
3.4 Support the development of the local, city and regional economy, meeting local need locally where appropriate	++	++	+	+/-	+/-	+	+	+	0	0	+/-	+	0	+	+/-	++	
3.5 Increase the circulation of wealth within the local area	++	+	+	+/-	+	+	+	+/-	0	0	+/-	+	0	+/-	+/-	++	
3.6 Harness the economic potential of the coast in a sustainable way	+	+/-	+/-	+/-	+/-	+	+	0	0	0	+/-	+	+/-	0	+/-	0	
3.7 Reduce the vulnerability of the economy to climate change and harness opportunities arising	+	+/-	+/-	+/-	+/-	0	+/-	0	0	0	+/-	+/-	0	0	+/-	0	
4: Provide access to meet people's needs with least damage to communities and the environment																	
4.1 Reduce the need/desire to travel by car	++	+	++	+	++	+	+	+	+/-	+/-	++	+	0	+/-	+/-	+	
4.2 Reduce the need/desire to travel by air	+	0	+	0	+/-	0	0	0	0	0	+/-	0	0	+/-	+/-	0	
4.3 Help everyone access basic local services easily, safely and affordably	++	+	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	0	+	+/-	+	



Sustainability Appraisal Objectives	Chapters Reviewed															
	1.1 Vision and Key Principles	1.5 Developments Requirements	2.2 Vision Statement	2.3 Overarching Design Principles	2.4 Spatial Masterplan- Key Organising Principles. Public Realm	2.5 Public Realm	2.6 River Corridor	2.7 Character Areas	2.8 Block Structure	2.9 Scale Height and Massing and 2.10 Townscape	2.11 Movement of Access	2.12 Zonal Masterplan	2.13 Landscape Strategy	2.14 Stakeholders	2.15 Heritage Enhancement	3 Implementation plan
4.4 Make public transport, cycling and walking easier and more attractive	++	+	++	++	++	+	+	+	+/-	+/-	++	+	+	+	+/-	+
4.5 Encourage a switch from transporting freight and passengers by road to rail or the river	+	+	+/-	+/-	+/-	+	+/-	0	0	0	+/-	+	+/-	+/-	+/-	0
5: Maintain and improve environmental quality and assets																
5.1 Protect and enhance habitats and species (taking account of climate change)	+	+/-	+/-	+/-	+/-	+	+	0	0	0	+/-	+/-	+	+/-	+/-	+
5.2 Promote the long-term management and maintenance of the environment	0	+/-	+/-	+/-	+/-	+/-	+/-	0	+	0	+/-	0	+	+/-	+	+
5.3 Protect and enhance landscape and townscape	+	+	+	++	++	+	+	+	++	++	+	+	+	+/-	++	+
5.4 Value and protect diversity and local distinctiveness including supporting the rural economy	+	0	+	++	++	+	+	+	++	+	+	+	+	+/-	++	+
5.5 Maintain and enhance cultural and historical assets	+	+	+	++	+	+	+	+	++	+	+	+	+/-	+/-	++	+
5.6 Reduce vulnerability to flooding and potential consequences of climate change	+/-	+	+/-	+/-	+/-	+/-	+	0	0	0	+/-	+/-	+/-	+/-	+/-	+
5.7 Promote waste management in accordance with the waste hierarchy	++	++	+/-	+/-	+/-	+/-	+/-	0	0	0	+/-	+/-	+/-	+/-	+/-	+
5.8 Promote the efficient use of land, including re-use of brownfield land and appropriate remediation of contaminated land	+	+	++	+/-	+/-	+	+	+	+/-	+	+/-	++	+/-	+/-	+/-	++
6: Minimise consumption of natural resources																
6.1 Maximise the use of renewable energy and reduce non-renewable energy consumption thus reducing greenhouse gas emission	+/-	++	+/-	+/-	+/-	+/-	+/-	0	0	0	+/-	0	0	+/-	0	+
6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)	+/-	+	+/-	+/-	+/-	+/-	+/-	0	0	0	+/-	0	+/-	+/-	0	0
6.3 Minimise consumption and extraction of minerals and maximise recycling and use of materials obtained from sustainable and local sources	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	0	0	+/-	0	+/-	+/-	+	+
6.4 Encourage the adoption of sustainable design and construction practices	+/-	+	+/-	+/-	+/-	+/-	+/-	0	0	0	+/-	0	+/-	+	+/-	+
6.5 Minimise land, water, air, light, noise pollution and statutory nuisance	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	0	0	+/-	0	+/-	+/-	0	0

Key
Major Positive= Dark Green ++ Minor Positive = Light Green + Uncertain= Blue +/- Minor Negative= Orange - Major Negative = Red -
Unknown= ? No Relationship= White 0

5 Implementation

5.1 INTRODUCTION

5.1.1 This section considers the implications for other plans and programmes and also considers the need for monitoring to satisfy the requirements of the SEA Directive.

5.2 LINKS TO OTHER PLANS AND PROGRAMMES

5.2.1 The SPD is a bridging document between policy in the Local Plan and more detailed Masterplans for zones within the site. Table 5.1 below sets out the technical work that will be required as specific proposals progress. It also identifies other technical work that could be undertaken. Both provide an opportunity to ensure that sustainable development considerations are integrated into the development process.

Table 5.1: Links to other Plans and Programmes (an incomplete and preliminary list)

Topic	Plan or Programme	Status	Reference/ Resource
Environmental Effects	Environmental Impact Assessment	Likely to be mandatory given the location of the site	
Contaminated land	CLR 7-10 Contaminated Land Exposure Assessment (CLEA), (DEFRA and EA, 2002)	Mandatory	www.defra.gov.uk/
Transport	Transport Assessment	Mandatory	
	Travel Plan	Voluntary	'A travel plan resource pack for employers'. The Carbon Trust (2000)
Flood Risk	Flood Risk Assessment according to Appendix 7, PPG25	Mandatory	www.environment-agency.gov.uk
	Drainage Strategy (adopting SUDS principles)	Mandatory	
Infrastructure	Fifth edition Sewers for Adoption (2002)	Mandatory	http://www.wrcplc.co.uk/sfa/
	Part H of the Building Regulations	Mandatory	
	Roads – in process		
Energy	Part L2 of the Building Regulations	Mandatory	
	Energy Efficiency Best Practice Programme	Voluntary	The Carbon Trust, www.thecarbontrust.co.uk



Topic	Plan or Programme	Status	Reference/ Resource
	Integrating renewable energy into new development, toolkit for planners, developers and consultants (London Renewable, Sep 04)	Voluntary	http://www.london.gov.uk/mayor/environment/energy/docs/renewables_toolkit.pdf
	Carbon Neutral Co.	Voluntary	www.carbonneutral.com
Waste	Waste Management Licence	Mandatory if deposit, keep, treat or dispose of controlled waste	
	Duty of Care for Waste (2003)	Mandatory	
	Hazardous Waste Registration (if produced) with the Environment Agency	Mandatory if produced	
	Waste minimisation, an environmental good practice guide for industry (EA, 1997)	Voluntary	
	Waste Audit	Voluntary	
	National Industrial Symbiosis Programme	Voluntary	www.nisp.org.uk
	Waste and Resources Action Plan	Voluntary	www.wrap.org.uk
Ecology/ Biodiversity	Code of practice for the management, destruction and disposal of Japanese Knotweed (EA, 2001)	Mandatory	Environment Agency
	Duty of Care for Waste	Mandatory	
Lighting	Guidance Notes for the Reduction of Obtrusive Light (Institution of Lighting Engineers, 2005)	Voluntary	www.ile.org.uk
Health	Health Impact Assessment	Voluntary, could be incorporated in EIAs but important that the site as a whole is considered	
Water	Pollution Prevention Guidelines (EA)	Voluntary	www.environment-agency.gov.uk
Materials	ENVEST II or The Green Guide to Specification (2002)	Voluntary	www.bre.co.uk/envest
	Control of Asbestos at Work	Voluntary	www.hse.gov.uk

Topic	Plan or Programme	Status	Reference/ Resource
	Regulation 1998, HSE Approved Code of Asbestos (1993)		
	Procurement Plan	Voluntary	
Urban Design	Urban Design Statement (incorporating Secured by Design)	Mandatory	
Sustainable Design	BREEAM/ Ecohomes	Mandatory – specified in the SPD	www.breeam.org
Construction	Building Regulations Part L2 (2002)	Mandatory	
	Building Users Guide	Voluntary	www.cibse.org
	Considerate Construction Scheme	Voluntary	http://www.considerateconstructorsscheme.org.uk/home.htm
	Pollution Prevention Guidelines (EA)	Voluntary	www.environment-agency.gov.uk
	CIBSE Commissioning Codes	Voluntary	www.cibse.org
	British Standard BS5837 (1991)	Voluntary	
	Construction and Environmental Management Plan	Voluntary	
Planning Application	Planning Conditions S.106 Agreement	Mandatory	
Monitoring	Annual Monitoring Statement for LDF	Mandatory	

5.3 MONITORING

5.3.1 The SEA Directive requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken (Article 10.1 refers).

5.3.2 Guidance on monitoring from ODPM states³:

“Local planning authorities should adopt an integrated approach to monitoring local development frameworks that takes full account of the monitoring needs of sustainability appraisal and the SEA Directive.”

5.3.3 Local Planning Authorities are required to prepare an Annual Monitoring Report. The Council is in the process of devising a set of indicators and it is recommended that the indicators are capable of monitoring implementation of this SPD.

5.3.4 The indicators will need to include consideration of the following topics in order to meet the requirements of the SEA Directive:

³ Local Development Framework Monitoring: A Good Practice Guide, ODPM, March 2005



-
- Biodiversity;
 - Population;
 - Human health;
 - Fauna;
 - Flora;
 - Soil;
 - Water;
 - Climatic factors;
 - Material assets;
 - Cultural heritage;
 - Landscape.



6 Next Steps

6.1.1 The consultation period for the draft SPD and SA Report runs from Monday 19th June 2006 to Friday 28th July 2006. Please send comments to:

Planning Policy Team,
Bath and North East Somerset Council,
Trimbridge House,
Trim Street,
Bath BA1 2DP.
[E-mail planning_policy@bathnes.gov.uk]

6.1.2 Representations should be made on a representation form and should specify the document and paragraphs to which they relate and the grounds on which they are made.

6.1.3 On adoption of the SDP a final Sustainability Appraisal Statement (SA Statement) will be prepared which will set out:

- Any changes to or deletions from the SPD in response to the information in the SA Report;
- Ways in which responses to consultation on the SA have been taken into account;
- Reasons for choosing the SPD as adopted, and why other reasonable alternatives were rejected; and
- Confirmation of monitoring measures, which could have been modified in light of consultation responses.

6.1.4 The final SA Statement will be made available to the consultation bodies and the public. The public and other consultees will be informed and given access to the Core Strategy once it has been adopted.