



Bath Western Riverside Sustainability
Appraisal - Non Technical Summary
Bath and North East Somerset Council

November 2007

QM

Issue/revision	Issue 1	Revision 1	Revision 2	Revision 3
Remarks				
Date	June 2006	November 2007		
Prepared by	Sean Nicholson	Sean Nicholson Russell Buckley		
Signature				
Checked by	Vicky Piggot	Pat Searle		
Signature				
Authorised by	Sean Nicholson	Sean Nicholson		
Signature				
Project number	12260056	12260056		
File reference	001	001		

WSP Environmental Ltd
Buchanan House
24-30 Holborn
London
EC1N 2HS

Tel: +44 (0)20 7314 5000
Fax: +44 (0)20 7314 5111
<http://www.wspgroup.com>



Contents

1	Background	3
2	Results of the SA	7
3	Sustainability Statement	8
	Appendix A Example of a Matrix	9



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 followed by the issues identified in the Sustainability Statement.

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?

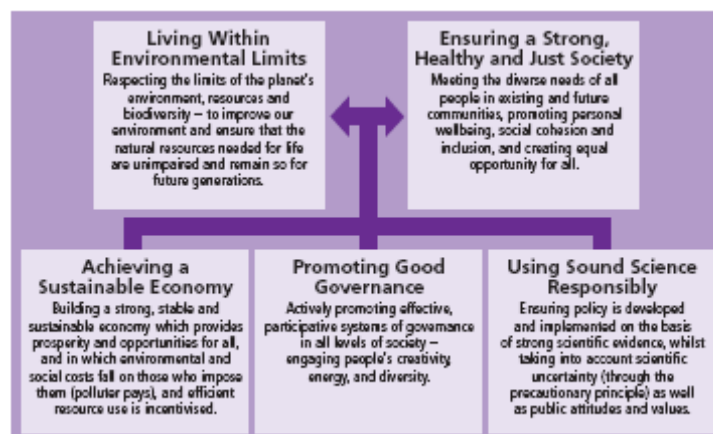
1.2.1 The most widely used and recognised definition of Sustainable Development is that taken from the report 'Our Common Vision' produced by the World Commission On Environment and Development in 1987 (Brundtland Report):

“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

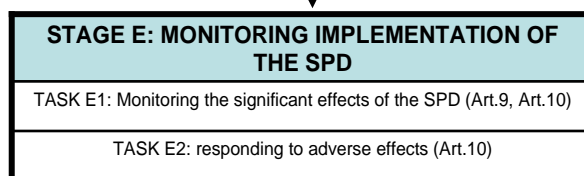
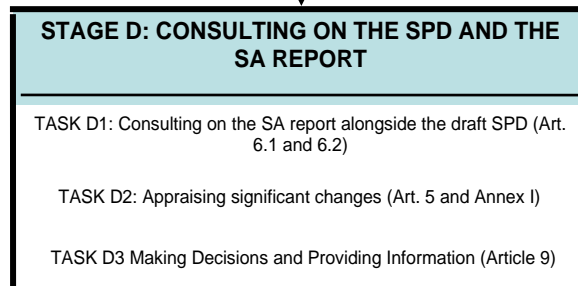
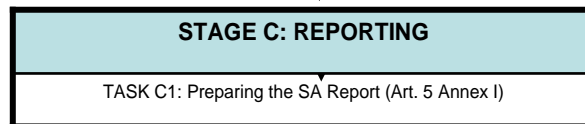
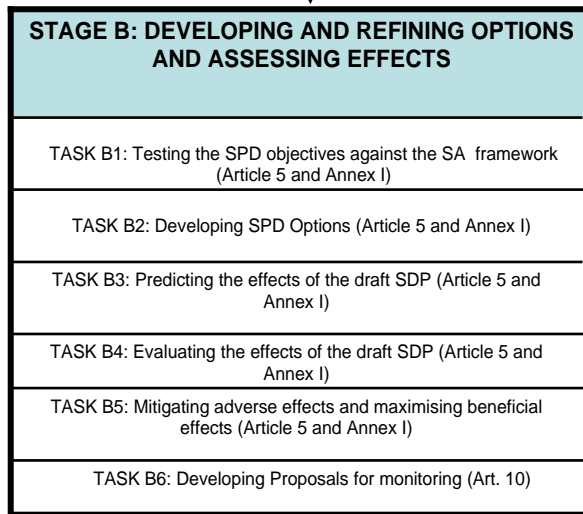
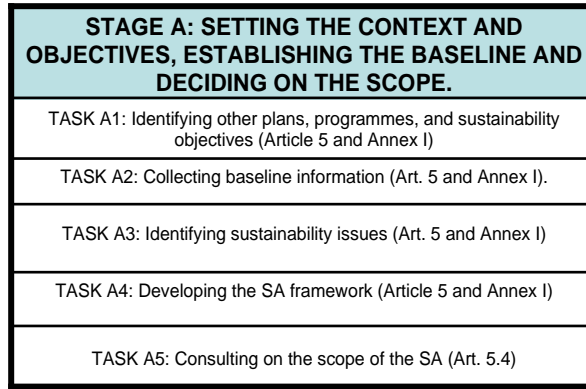
² Section 39(2) of the Planning Compulsory Purchase Act, 2004 (the Act).



1.5 COMPLIANCE WITH THE SEA DIRECTIVE AND REGULATIONS

1.5.1 The SA process consists of the following stages:

- Stage A – identifying other relevant plans and programmes and sustainability objectives, establishing the sustainability baseline, identifying sustainability problems and opportunities and establishing SA objectives;
- Stage B – deciding on the scope of the SA and consulting with environmental bodies and other sustainability consultees;
- Stage C – assessing the effects of the plan, identifying measures to reduce or mitigate negative effects or identify opportunities for improving sustainability, devise monitoring programme and prepare Sustainability Appraisal Report (this report);
- Stage D – consultation on the Draft SPD and Sustainability Appraisal Report;
- Stage E – monitoring the significant sustainability effects of implementing the SPD.





2 Results of the SA

2.1.1 The main SA Report sets out the full results of the appraisal. The results are summarised below: An example of the matrix used, showing the SA objectives is attached as Appendix A.

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

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

2.1.4 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 the main SA 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 of the main SA report);
- 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;
- 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.



3 Sustainability Statement

3.1.1 A Sustainability Statement has been prepared that documents how the changes made to the SPD as a result of the SA Report and the consultation process have effected the sustainability performance of the SPD. It gives information on:

- How sustainability has been integrated into the SPD;
- The outcomes of the consultation process;
- The reasons for choosing the preferred option; and
- Monitoring requirements.

3.1.2 The Bath Western Riverside SPD was a largely sustainable approach to development when in draft form. Because of this the SA report identified areas of further improvement, rather than addressing issues where the SPD was expected to have a negative impact. There are several examples of how sustainability has been integrated into the SPD rather than added onto it and these are given in the Sustainability Statement.

3.1.3 The SA Report was consulted on alongside the SPD. An Appendix to the Sustainability Statement contains the relevant responses. Issues addressed include giving greater regard to the significance of the World Heritage Site status and giving more detail on certain environmental issues such as drainage and flooding.

3.1.4 As explained in the SA report, the SPD was assessed against the 'do nothing' option as is appropriate for an SPD of this kind. Therefore the Sustainability Statement reiterated the benefits of the SPD over the do nothing option.

3.1.5 Monitoring of the SA will be carried out through the Annual Monitoring Report. This was not complete in time for inclusion in the Sustainability Statement but will need to include coverage of the 11 topic areas identified in the SEA Directive and provide sufficient information to assess the effects of the SPD. The information collected can then be used to assess whether the SPD contributing towards the achievement of the SA objectives any whether any adverse effects have been identified and how these may be addressed if necessary.

Appendix A Example of a Matrix

[Click here and type Appendix text.]

1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
1: Improve health		
1.1 Improve health	`+/-	No explicit reference to health in the vision or key principles. Some of the key principles would have an indirect benefit on health, e.g. employment generation and opportunities for cycling.
1.2 Reduce health inequalities	`+/-	No explicit reference to health in the vision or key principles.
1.3 Promote healthy lifestyles, especially routine daily exercise	`+/-	No explicit reference to health in the vision or key principles. Some of the key principles would have an indirect benefit on health, e.g. opportunities for cycling and walking.
2: Support communities that meet people's needs		
2.1 Help make suitable housing available and affordable for everyone	`+/-	No explicit reference to the provision of suitable and affordable housing in the vision or key principles.
2.2 Give existing and new residents access to learning, training, skills and knowledge	`+/-	No explicit reference to these considerations in the vision or key principles.
2.3 Reduce crime and fear of crime and promote health and safety	+	Appraised on the basis that a high quality mixed environment would incorporate crime reduction measures.



1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
2.4 Promote safer, stronger and more vibrant communities	+	Appraised on the basis that a high quality mixed environment would help achieve this objective. Other key principles will also contribute to the achievement of this objective.
2.5 Increase access to and participation in arts and cultural activities	+/-	No explicit reference to these considerations in the vision or key principles.
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	+	There is a commitment to ensuring that the local community benefits from investment in the area.
3.2 Help everyone afford a comfortable standard of living	+/-	Not explicitly covered but it is implied that standards of living could be improved through economic investment.
3.3 Reduce poverty and income inequality	+	One of the key principles is to ensure that the local community benefits from investment in the area.
3.4 Support the development of the local, city and regional economy, meeting local need locally where appropriate	++	The first part of the objective is strongly supported by two of the key principles. The second part of the objective, relating to meeting local needs locally, is not explicitly supported.
3.5 Increase the circulation of wealth within the local area	++	Three of the key principles support this objective, i.e. those relating to 2, 5 and 7.
3.6 Harness the economic potential of the river in a sustainable way	+	The key principles recognise the role of the river.



1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
3.7 Reduce the vulnerability of the economy to climate change and harness opportunities arising	+	The key principles recognise the need for achieving 'embedded sustainability.'
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	++	Supported by key principles 3 and 4.
4.2 Reduce the need/desire to travel by air	+	The vision contributes to this objective by seeking to enhance Bath as a World Heritage Site and as such a destination for tourism.
4.3 Help everyone access basic local services easily, safely and affordably	++	The vision seeks to deliver a high quality mixed use development, which we assume would contain basic local services.
4.4 Make public transport, cycling and walking easier and more attractive	++	Supported by key principles 3 and 4.
4.5 Encourage a switch from transporting freight and passengers by road to rail or the river	+	Public transport is promoted, although no role identified for the river.
5: Maintain and improve environmental quality and assets		
5.1 Protect and enhance habitats and species (taking account of climate change)	+	Key principle 5 seeks to maximise environmental works and we have assumed that the enhancement of habitats would be covered by this and that such works would have regard to existing wildlife. No reference to



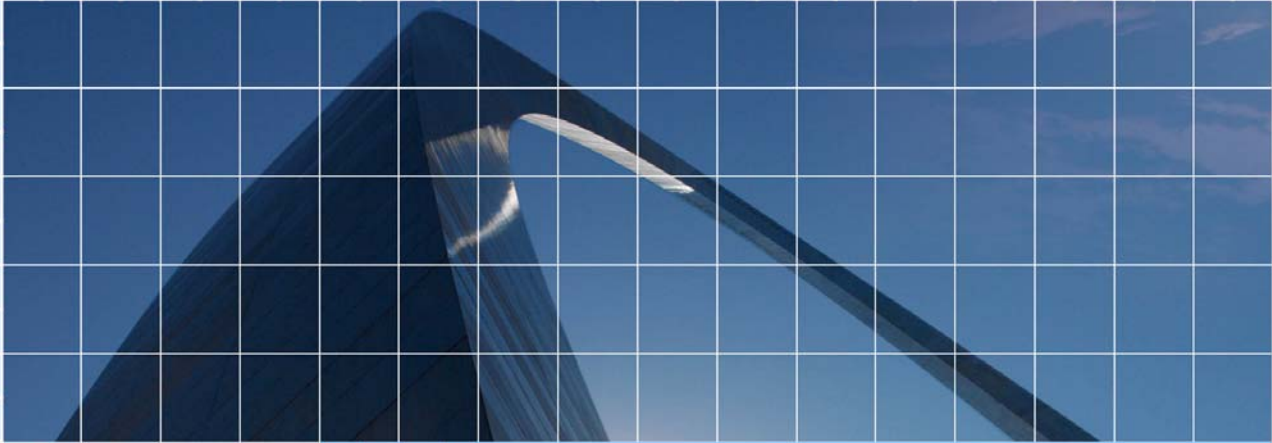
1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
		climate change in the vision.
5.2 Promote the long-term management and maintenance of the environment	0	No reference to management/maintenance of the environment.
5.3 Protect and enhance landscape and townscape	+	Key principles 1 and 5 work towards this. The vision seeks to reinforce the World Heritage status of the City.
5.4 Value and protect diversity and local distinctiveness including supporting the rural economy	+	Principles 1 and 5 support this objective. The vision also seeks to reconnect the urban fabric of Bath and it is assumed that this would be done in ways that value local distinctiveness (in terms of the built environment). No connection to the rural economy in the vision or key principles.
5.5 Maintain and enhance cultural and historical assets	+	No link to cultural assets made but historical assets are acknowledged.
5.6 Reduce vulnerability to flooding and potential consequences of climate change	+/-	No explicit reference to flood risk or climate change.
5.7 Promote waste management in accordance with the waste hierarchy	++	The concept of embedded sustainability is referred to in the key principles and this is explored in Section 1.5. The concept is taken to include sustainable waste management practices.
5.8 Promote the efficient use of land, including re-use of brownfield land and appropriate remediation of contaminated land	+	Key principle 8 accords with this objective.



1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
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	++	Key principles refer to embedded sustainability and this is taken to include renewable energy.
6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)	+/-	No explicit reference to water consumption in the vision and key principles.
6.3 Minimise consumption and extraction of minerals and maximise recycling and use of materials obtained from sustainable and local sources	+/-	No explicit reference to minerals in the vision and key principles.
6.4 Encourage the adoption of sustainable design and construction practices	+/-	No explicit reference to sustainable design and construction.
6.5 Minimise land, water, air, light, noise pollution and statutory nuisance	+/-	No explicit reference to these factors.
Overall Commentary/key recommendations: Consideration of the vision and key principles against the appraisal objectives has identified a number of potential gaps and uncertainties. The reference to embedded sustainability is welcomed; this is discussed further in Section 1.5 of the SPD. In addition the		



1.1 VISION AND KEY PRINCIPLES FOR BWR		
Does the policy / proposal . . .	Minor/Major positive effect (++/+) Minor/Major negative (--/-) Uncertain (+/-) No relationship (0) Unknown (?)	Appraisal Comments
<p>key principles should be extended to cover the following:</p> <ul style="list-style-type: none"> • 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); 		



Bath Western Riverside
Sustainability Statement
November 2007

Bath and North East Somerset Council



QM

Issue/revision	Issue 1	Revision 1	Revision 2	Revision 3
Remarks				
Date	November 2007			
Prepared by	Russell Buckley Sean Nicolson			
Signature				
Checked by	Pat Searle			
Signature				
Authorised by	Sean Nicholson			
Signature				
Project number	12260056-001			
File reference	Statement			

WSP Environmental Ltd
Buchanan House
24-30 Holborn
London
EC1N 2HS

Tel: +44 (0)20 7314 5000
Fax: +44 (0)20 7314 5111
<http://www.wspgroup.com>

Reg. No: 2454665



Contents

1	Introduction	4
2	Sustainability in the SPD	6
3	Consultation	14
4	Options	16
5	Monitoring requirements	17





1 Introduction

1.1 BACKGROUND

1.1.1 A Sustainability Appraisal has been undertaken of the Bath Western Riverside Supplementary Planning Document (SPD).

1.1.2 Sustainability Appraisal considers the potential impacts of a plan on the environment, the economy and society. It does this by assessing the extent to which the plan will help achieve a set of objectives that cover a range of issues, including air quality, landscape, water, health and the population. The Sustainability Appraisal also has to satisfy the requirements of the EC Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (known as the Strategic Environmental Assessment Directive).

1.1.3 The SEA Directive was transposed into UK legislation in July 2004 through the Environmental Assessment of Plans and Programmes Regulations and came into force on the 20 July 2004. To comply with the UK Regulations and the Planning and Compulsory Purchase Act 2004 it was essential that a Sustainability Appraisal of the SPD was undertaken. This needed to be completed in parallel to the development of the SPD so that it could influence the evolution of the plan and potentially introduce measures that are beneficial to the environment and mitigate any negative effects of the plan or programme on the environment.

1.1.4 The principle role of the SPD is to provide a Spatial Masterplan to guide the development of the Bath Western Riverside area, bringing forward the key principles from the adopted Supplementary Planning Guidance for the Bath Western Riverside area. The SPD also sets out an Implementation Framework for development, in terms of phasing, requirements for applications, developer contributions, and also a set of three dimensional site specific design rules for development in the form of Design Codes.

1.2 DOCUMENTS PRODUCED

A range of documents have been produced during the development of the SPD and Sustainability Appraisal and these are detailed in Table 1.

Table 1: Documents produced as a part of the SPD and sustainability appraisal process

Document	Purpose	How to access the documents
The SA Scoping Report	The Scoping Report set out the background information collated in stage A of the SA process (see flow chart below), which has subsequently been used in the later stages of the assessment. The Scoping Report was consulted on in 2005.	The documents can be accessed at the following web address: http://www.bathnes.gov.uk/BathNES/environmentandplanning/majordevelopments/Bath+Western+Riverside+Project.htm
The draft Supplementary Planning	The Sustainability Report documents the	The documents can be accessed at the following web address:

<p>Document and Sustainability Report</p>	<p>findings of Stages A, B and C of the SA process demonstrating how the detailed sustainability considerations are informing the plan making process. It accompanied the draft SPD dated XX and was consulted on over the period 19 June 2006 to 28 July 2006.</p>	<p>http://www.bathnes.gov.uk/BathNES/environmentandplanning/default.htm</p>
<p>The SPD approved for development control purposes (the SPD will become adopted when the Local Plan is adopted) and Sustainability Statement</p>	<p>The SPD approved for development control is the final version of the Plan which has been amended in light of consultation on the draft plan.</p> <p>This Sustainability Statement describes how the Sustainability Report and consultation have been taken into account in the development of the SPD. It describes why this version of the plan has been chosen and also sets out proposals for monitoring the effects of the plan.</p>	<p>When published, the SPD will be available on the Councils website:</p> <p>www.bathnes.gov.uk</p> <p>The SPD and its associated documents are also available for inspection at the following locations:</p> <p>Council offices at Trimbridge House, Trim Street, Bath; Guildhall, High Street, Bath; Riverside, Temple Street, Keynsham; Keynsham Town Hall; and The Hollies, High Street, Midsomer Norton between the hours of 8.30 am to 5.00pm Mondays- Thursdays and 8.30 am to 4.30 pm on Fridays.</p> <p>All public libraries in Bath including the mobile library.</p>



2 How sustainability has been integrated into the SPD

2.1 THE ASSESSMENT

2.1.1 The Sustainability Report documented the analysis of both the existing Local Plan & SPG and the SPD. The assessment of the Local Plan and SPG was in effect an analysis of the sustainability effects of not implementing the SPD. This provided a comparator to analyse the benefits and disadvantages of the SPD. The assessment of the SPD included an assessment of the “vision and key principles” against the SA objectives, plus an assessment of the potential environmental effects of the policies and proposals contained in the SPD, including an assessment of the cumulative and synergistic effects.

2.1.2 The assessments considered that the SPD as a whole would make a significant contribution to sustainable development. Whilst some areas of uncertainty were identified, there were no instances where the SPD was expected to have a negative impact.

2.2 SUSTAINABILITY IN THE SUPPLEMENTARY PLANNING DOCUMENT

2.2.1 Sustainability has been integrated into the SPD in line with Planning Policy Statement 1 and DCLG guidance. The Key Principles identified for the BWR development demonstrate that sustainability is a core aspect the proposed development, in particular the two key principles of:

- Maximising opportunities for economic, environmental and social regeneration; and
- Creating a beacon of sustainable development and living through the concept of ‘embedded sustainability’.

2.2.2 The concept of ‘embedded sustainability’ is making sustainable living and working an inherent part of everyday life rather than an add-on to it. The main aims of embedded sustainability are ‘zero waste’ and ‘zero carbon’. To achieve these aims the SPD highlights that the layout, design and construction of new development needs to be sustainable and modes of transport other than the car must be encouraged.

2.2.3 The Key Principles and the concept of embedded sustainability are integrated throughout the SPD. The Spatial Masterplan aims to provide significant open space for the public (such as on the south bank of the River Avon) and a network of smaller social areas. The Masterplan aims to reduce the dominance of the car by assisting in the development of the bus based Rapid Transit system. The strategic framework contains a comprehensive approach to reducing energy consumption through energy efficient homes and additionally reducing carbon emissions through the use of on site renewable energy technology.

2.2.4 The design codes build on the sustainability principles set out in the strategic framework by, for example, prohibiting large areas of surface car parking. Specific attention is given to maintaining ecological integrity along the main river corridor.

2.3 HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

2.3.1 The Sustainability Report gave a list of recommendations for enhancement of the SPD. How the recommendations have been integrated into the SPD is listed below. Due to the largely sustainable nature of the SPD, few changes were required:





Key conclusions and recommendations in the SA	Council Response
<p>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</p>	<p>No summary of targets added as consider this would duplicate.</p> <p>Paragraph 1.5.47 expanded to refer to efficient water consumption</p> <p>Recycling of waste already in SPD paragraph 1.5.46</p>
<p>Adding such requirements and the need for buildings to be EcoHomes or BREEAM</p> <p>Excellent to the general section of the Design Codes</p>	<p>No changes made to the Design Codes</p> <p>These requirements covered in the SPD – the Design Codes are an Appendix to this.</p>
<p>Amending the principles to provide a more rounded discussion of sustainability (see 4.4.5. of this report) e.g. by acknowledging the need for:</p> <ul style="list-style-type: none"> ■ Sustainable design and construction; ■ The need to secure provision for long term management; ■ Opportunities to enhance biodiversity; 	<p>Rounded approach to sustainability is already taken by the SPD:</p> <p>Sustainable design/construction covered in some depth in the SPD</p> <p>Long term management already referred to in the context of affordable housing provision (e.g. 1.5.21) and street furniture (e.g. 2.11.4).</p>



Key conclusions and recommendations in the SA	Council Response
<ul style="list-style-type: none">■ 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);	<p>Already reference to enhancing biodiversity of natural edge (e.g. paragraph 2.6.12)</p> <p><u>Providing facilities:</u></p> <p>SPD outlines that detail of open space and how this links to the site will be explored through Context Plans. Standards for open space also set out in the Green Space Strategy (paragraph 1.5.49). Vision statement includes open space along the length of the River Avon. Also covered as Design Principle 7 (section 2.3). Many instances where open space considered in some detail throughout the SPD.</p> <p>Access to health facilities included with principles of sustainable development (paragraph 1.1.6). Already a section in the SPD on Healthcare Facilities (paragraph 1.5.52).</p> <p>Play facilities mentioned as part of Western Neighbourhood (paragraph 2.7.20). Also covered in Local Plan which this supplements.</p>



Key conclusions and recommendations in the SA	Council Response
	<p><u>Social Inclusion:</u></p> <p>Affordable Housing covered in some depth in the SPD (e.g. 1.5.16)</p> <p>No mention of providing jobs for local people in the SPD.</p> <p><u>Amendments reflecting a more rounded discussion of sustainability:</u></p> <p>Paragraph 1.5.51 amended to make reference to sustainable communities, patterns of sustainable living, community interaction & social cohesion.</p> <p>New para added after 1.5.48 to state that BWR will have a role in education and training about sustainable technology through the provision of an education and training centre.</p>
Adding a reference to District Heating as a concept to be explored	No reference added SPD mentions Biomass heat sources including CHP in para 1.5.43:
Review the discussion sustainability and local context in the over-arching	No change has been made.



Key conclusions and recommendations in the SA	Council Response
<p>design principles. The section headed sustainability could be amended to read</p> <p>“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</p> <p>Embedded Sustainability.”</p>	
<p>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</p>	<p>Ecological corridor mentioned elsewhere (e.g. paragraph 2.6.12).</p> <p>Paragraph 1.5.43 amended to include reference to photovoltaics and solar hot water generation. Renewable technologies listed in this paragraph.</p> <p>No mention of microclimate added.</p>
<p>The section on public realm could give an indication of the total amount of open space that will need to be accommodated on site</p>	<p>No amendment made.</p> <p>Paragraph 1.5.49 includes reference to the Green Space Strategy which has been prepared this will determine the total amount of public open space</p>
<p>The section on the River Corridor could discuss issues in relation to water safety,</p>	<p>No mention of water safety added.</p>



Key conclusions and recommendations in the SA	Council Response
<p>provision of a functional ecological corridor and promotion of cycling along the corridor</p>	<p>Ecological corridor mentioned elsewhere (e.g. paragraph 2.6.12).</p> <p>No mention added of cycling along the corridor. However, cycling mentioned as a key principle for BWR (1.1.5) and as a key part of transport infrastructure (1.5.25) and as a priority (1.5.44). Cycle network also mentioned in overall design principles.</p>
<p>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</p>	<p>No reference added.</p> <p>Para 2.13.2 of the SPD states that details of tree species in Design Codes. Three main categories of tree species outlined (not specific species but types of species).</p>
<p>We suggest changing the title of the section on stakeholders to 'Building Communities' to better reflect the subject matter it covers</p>	<p>Amended as a non-material change</p>
<p>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,</p>	<p>No changes made to the Design Codes</p> <p>These requirements covered in the SPD – the Design Codes are an</p>



Key conclusions and recommendations in the SA	Council Response
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	Appendix to this.
The Design Codes could include an allowance for the provision of 'Life-Time Homes' and 'Live – Work Units'	No changes made to the design codes Design Codes are an Appendix to the SPD not appropriate to add this level of detail. .
Construction and Environmental Management Plans could be added to the list of requirements in the Implementation Plan	Implementation Plan does not include this, considered too detailed.
The Implementation Plan could also explore opportunities for local involvement in future arrangements for management of the area	Implementation Plan does not include this, considered too detailed.



3 How the consultation responses have been taken into account

3.1 SCOPING REPORT

3.1.1 The SEA Directive requires that the designated environmental authorities should “be consulted when deciding on the scope and level of detail of information which must be included in the environmental report” (Article 5[4]). The designated environmental authorities were:

- English Nature*;
- The Environment Agency;
- The Countryside Agency*;
- English Heritage.

(*English Nature and The Countryside Agency have since merged to become Natural England)

3.1.2 The B&NES Council published the Scoping Report for consultation in May 2005. The consultation period on this document was five weeks, from the date that the environmental authorities received the scoping report.

3.1.3 Of the statutory consultees, comments were only received from the Environment Agency. As the response did not require the B&NES Council to change the scope or approach, no changes were made to the scope of the SA or the approach that B&NES Council was proposing. Summaries of the comments received on the Scoping Report and can be found appended to the Sustainability Report

3.2 SUSTAINABILITY REPORT

3.2.1 Regulation 13(1) requires that the Sustainability Report is consulted upon at the same time as the draft SPD. It also states that the Sustainability Report should be made available to the statutory environmental consultees and the public. The consultation period for the draft SPD and Sustainability Report ran from Monday 19 June 2006 to Friday 28 July 2006.

3.2.2 Appendix A Table 2 shows the consultation responses that have been received on the Sustainability Report and B&NES Council’s response to them. In certain cases no change has been made to the SPD as there is disagreement over the issue being commented on.

3.2.3 There were very few consultation responses that addressed the SA Report directly. However there were additional consultation responses that addressed sustainability more generally in the SPD and these are shown in Appendix A Table 3.

3.2.4 The ways in which consultation responses in both Tables 2 and 3 have been taken into account are as follows:



-
- Comments were received regarding the World Heritage Site status. Concern was raised that the SPD should be more strongly influenced by, and make greater reference to, the Bath WHS Management Plan and the stated Bath WHS Outstanding Universal Values. The relevance of the World Heritage Site has been made more explicit throughout the SPD.
 - Comment was received requesting that greater reference could be made within the SPD itself to certain environmental issues although the comment did not list all of the issues, those that were made explicit will be addressed through a new SPD section on drainage and flooding.
 - Comment was received requesting that, in line with national and local policies there should be a commitment to a comprehensive Travel Plan for the site. A new paragraph has been added committing to a Travel Plan.
 - Comment was received requesting that the SPD sets out how the recommendations from the Sustainability Report have been considered and integrated where appropriate. It is the role of this Sustainability Statement to establish how the Sustainability Report has influenced the SPD and it is addressed in Section 2.



4 Options

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

For the purposes of considering options as part of the SA process consideration was given to the option of not preparing the SPD, i.e. the 'do-nothing option'. The following advantages of preparing the SPD were identified:

- 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.



5 Monitoring requirements

5.1 MONITORING

5.1.1 The SEA directive requires monitoring of the significant environmental effects of the implementation of the plan, citing the potential use of existing monitoring arrangements where appropriate to avoid duplication (Article 10.1 and 10.2 refer).

5.1.2 The ODPM guidance on SEA explains that any proposals for monitoring considered earlier in the SA process need to be viewed in light of consultation responses.

5.1.3 It is proposed that the Annual Monitoring Report (AMR) will provide sufficient data for the monitoring component of the SA. Where necessary, these can be supplemented by additional SA indicators. The AMR is still under development; however it will need to cover the following topic areas to meet the requirements of the SEA Directive:

- Biodiversity;
- Population
- Human Health
- Flora;
- Fauna;
- Soil;
- Water;
- Climatic Factors;
- Material assets;
- Cultural heritage;
- Landscape;

5.1.4 Two comments were raised regarding the monitoring arrangements. The first was a response by the Highways Agency to Section 1.5.44 of the SPD requesting that a Travel Plan for the site be drawn up with an accompanying long term monitoring program (Appendix A Table 3). When it is complete, the monitoring program for the Travel Plan can feed into the SA monitoring process, particularly on issues such as human health as a consequence changes in air quality resulting from variations in the volume of traffic. Climatic factors may also be affected by variations in the volume of traffic effecting the amount of CO₂ entering the atmosphere.



5.1.5 The second was a comment by the International Council on Monuments & Sites UK looking for an indication as to how the SPDs impact on the World Heritage Site (WHS) can be monitored (Appendix A Table 4). In line with the response given by B&NES Council in the Consultation Report (November 2007) the impact on the WHS would be very difficult to measure in its own right, however the SPD policies promote the WHS, as such the degree of compliance with the SPD with indicate the degree of compliance with this particular objective.



Appendices, Figures & Tables



Appendix A Consultation Responses

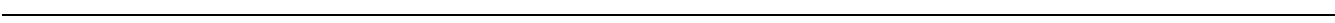




Table 2 - Consultation responses on the Sustainability Appraisal Report

Paragraph/Plan No/Proposal	Support/Object	Company	Comments	Council Comments
General Objection (Sustainability Appraisal)	object	GOSW	The Sustainability Appraisal has made a number of recommendations and the SPD will need to demonstrate how these have been considered and incorporated where appropriate.	Disagree. The Final SA Report will set out how the SPD has changed to respond to the SA.
General Objection	object	GOSW	SPD could be developed further to ensure that it is spatial rather than primarily land use. For example consideration should be given to how the community, social and economic aspects of the scheme can be expressed in the Masterplan. In my opinion the document would benefit from considerable editing to provide a more succinct text which focuses upon the key principles. Better use could also be made of the diagrams to inform the reader and illustrate key points.	<p>It is the role of the Sustainability Appraisal Report to assess to what extent the SPD meets community, social and economic objectives.</p> <p>It is considered that the SPD strikes a good balance between text and illustrative material. The document needs to be robust enough to be appropriate over time, and to withstand detailed scrutiny and interpretation.</p>



Table 3 - Consultation responses on broader sustainability issues

Paragraph/Plan No/Proposal	Support/Object	Company	Comments	Council Comments
General Objection (WHS Management Plan) Point 6 page 18	object	International Council on Monuments & Sites UK	There is little mention of the Bath WHS Management Plan, which UNESCO World Heritage Centre has accepted as the over-arching document to guide the management of change within the WHS Reference to enhancement of the WHS has no suggestion of what this might mean. Greater clarity is needed.	Include reference to WHS management plan at 2.15. Rephrase item 6 in paragraph 2.4 to exclude “not only in physical terms but also in the management of the existing asset”
General Objection (Environmental Issues)	object	The Environment Agency	It is felt that greater reference could be made within the SPD itself to certain environmental issues. These include elements of flood defence and groundwater protection/contaminated land, and also the need to adopt stringent pollution prevention measures. However, it is acknowledged that these issues are detailed in associated documentation and are currently the subject of discussions between the Agency and the applicant's agent.	Include this requirement in a new section 2.14 Drainage and Flooding.
1.5.44 Embedded Sustainability (transport)	object	Highways Agency	This section should include reference to the concept of developing a travel plan as the site is brought forward. In accordance with national and local policies we would anticipate a commitment to a comprehensive Travel Plan, encompassing all activities on the site. We would also expect the Travel Plan to be supported by a long term monitoring programme together with legally and financially binding commitments to introducing remedial measures if found necessary.	Agreed. New para. after 1.5.45 setting out requirements for Travel Plans.



Table 4 - Consultation response on monitoring

Paragraph/Plan No/Proposal	Support/Object	Company	Comments	Council Comments
Part 3 Monitoring impact	object	International Council on Monuments & Sites UK	Some indication should be given as to how development in the WHS will be measured for its impact on the 'outstanding universal value' of the WHS.	It would be extremely difficult to measure how this was being achieved. The SPD takes into account and promotes the outstanding universal value of the WHS, therefore, the degree of compliance with the SPD will indicate the degree of compliance with this particular objective.



Bath Western Riverside
Sustainability Appraisal Addendum
November 2007

Bath and North East Somerset Council



QM

Issue/revision	Issue 1	Revision 1	Revision 2	Revision 3
Remarks				
Date	November 2007			
Prepared by	Russell Buckley Sean Nicholson			
Signature				
Checked by	Pat Searle			
Signature				
Authorised by	Sean Nicholson			
Signature				
Project number	12260056-001			
File reference	Final SA			

WSP Environmental
Buchanan House
24-30 Holborn
London
EC1N 2HS

Tel: +44 (0)20 7314 5000
Fax: +44 (0)20 7314 5111
<http://www.wspgroup.com>

Reg. No: 2454665



Contents

1	Introduction	4
2	Review of proposed changes	5





1 Introduction

1.1.1 This is an addendum to the Sustainability Appraisal Report for Bath Western Riverside dated June 2006 and should be read in conjunction with it.

1.1.2 This addendum undertakes Task D2 of the OPDM's *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005)*. Task D2 states that:

“If significant changes to the draft SPD are raised during consultation that have not already been subject to SA, it will be necessary for the LPA to ensure that the significant social, environmental and economic effects of these changes are appraised.”

1.1.3 The Sustainability Appraisal of the Bath Western Riverside draft Supplementary Planning Document (SPD) carried out an assessment of the performance of the various chapters of the SPD against the Sustainability Appraisal objectives. The SPD has since been reviewed in light of consultation responses and the Sustainability Appraisal Report. The full list of proposed changes resulting from the review has been published in Annex 2 of the SPD *Schedule of Proposed Changes to the Bath Western Riverside SPD* (October 2006). It is the performance of the proposed changes that is assessed in this addendum.

1.1.4 The results are presented in the next section.



2 Review of proposed changes

2.1 INTRODUCTION

2.1.1 All of the proposed changes were assessed to see whether they would affect the original score given in the Sustainability Appraisal Report for each chapter of the SPD.

2.1.2 Table 1 contains the proposed change, the Sustainability Appraisal objectives affected by the change, the changed score for the objective and why the score was changed. These scores have been extracted from a much broader assessment detailed in the Sustainability Appraisal Report, a summary of which is given in Table 4.1 of that report. It has not been possible to show the effects of all of the amendments in Table 1 as the amendments include introducing new chapters that were not originally assessed. This is addressed in Section 2.3 below.

2.2 OBJECTIVES AFFECTED

2.2.1 Table 1 shows where the scores given in the SA Report (June 2006) have been amended as a result of the proposed changes to the draft SPD.



Table 1 – Revised Assessment resulting from the proposed changes to the SPD

Proposed change to SPD	SA objective affected	Previous Assessment	Revised Assessment	Reason for revised assessment
<p>Paragraph 1.5.14 revised to say “up to 450”.</p> <p>Original Para. 1.5.14:</p> <p><i>In its entirety, depending on the development option pursued on the eastern sector, BWR is expected to provide in the region of 3,000 dwellings over the total redevelopment period. The Bath & North East Somerset Local Plan expects 800 of these to be provided by 2011.</i></p>	<p>2.1 - Help make suitable housing available and affordable for everyone</p>	<p>++</p>	<p>+</p>	<p>Although the BWR will still make a contribution towards this objective, the anticipated reduction in the amount of housing to be provided up to 2011 will reduce the significance of the effect (relative to the earlier draft of the SPD).</p>



<p>New Section 1.4 and 2.2 – World Heritage Site Management Plan:</p> <p><i>The WHS Management Plan aims to provide a framework to conserve the cultural and heritage assets of the World Heritage Site of Bath. This remit includes protection and enhancement of the architectural, archaeological, landscape and natural assets and their urban and landscape settings, improving the understanding of the Site, its interpretation and use as an educational resource, and supporting the local community in its cultural, social and economic viability.</i></p> <p><i>The redevelopment of BWR must respect the outstanding universal values of the World Heritage Site and in so doing must continue the strong tradition of development that respects its context and creates visual harmony.</i></p> <p><i>A summary of the outstanding universal values of the WHS is included in Section 2.2.”</i></p>	<p>5.5 - Maintain and enhance cultural assets.</p>	<p>+</p>	<p>++</p>	<p>The previous version of the SPD acknowledged the WHO and incorporated it in the Vision for Bath Western Riverside.</p> <p>The new section 1.4 and 2.2 give greater emphasis to the World Heritage Site and the need for new development to respect it.</p>
---	--	----------	-----------	---



<p>New paragraph after 1.5.45 setting out requirements for Travel Plans:</p> <p><i>A Travel Plan and a Travel Plan Co-ordinator will be required to promote walking, cycling and public transport to achieve transport modal share targets</i></p>	1.3 Promote healthy lifestyles, especially routine daily exercise	+	++	<p>A Travel Plan for the Bath Western Riverside area will promote modes of transport other than the car, reducing the need to travel by car. In combination with the other development requirements walking and cycling will become a more attractive option which will in turn increase the level of routine daily exercise.</p>
	4.1 Reduce the need / desire to travel by car	+	++	
	4.4 Make public transport, cycling and walking easier and more attractive	+	++	



2.3 ADDITIONAL BENEFIT

2.3.1 The new Section 2.14 promotes sustainable urban drainage systems (SUDS) and improved water management through grey water recycling and run off attenuation for landscape irrigation. This will have a positive effect on objective 5.6, which is to reduce the risk to flooding. It does not have a significant effect on any other objective. As this is a new section it does not fit into Table 1.

2.4 CONCLUSION

2.4.1 Table 1 makes a change to 5 of the 538 scores in the Sustainability Appraisal report; almost all of the original scores have not been affected. Overall, 5 minor positive changes and one minor negative change have been made to the Sustainability Appraisal objective scores as a result of the proposed changes to the SPD. This is largely a result of the inherently sustainable nature of the SPD in draft form so no major revisions in terms of sustainability were necessary. As such it is not necessary to carry out further Sustainability Appraisal work at this time.



Appendices, Figures & Tables

