

Annex 2

Revised Sustainability Appraisal

of the Wiltshire and Swindon

Waste Local Plan 2011 –

Executive Summary

Wiltshire and Swindon

Waste Local Plan 2011
Revised Deposit Draft

Sustainability Appraisal

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Executive Summary

1. INTRODUCTION

- 1.1 The first Deposit Draft of the Wiltshire and Swindon Waste Local Plan was placed on deposit in November 2001. A number of representations were received and the WPA has produced a number of proposed changes to the Plan in light of those representations and to update the Plan. These changes are incorporated in the Wiltshire and Swindon Revised Deposit Draft of the Waste Local Plan (RDWLP).
- 1.2 The first Deposit Plan was subjected to a sustainability appraisal (SA). This document is intended to update this earlier appraisal, taking account of the proposed changes to the plan set out in the Revised Deposit, new guidance affecting local plans and developments in best practice in Sustainability Appraisal that have occurred since the earlier appraisal.
- 1.3 Sustainability Appraisal is a process that anticipates and evaluates the environmental, social and economic consequences of a development plan, and strives to recommend ways of achieving a sustainable balance between these consequences.
- 1.4 The appraisal process included a review of Sustainability Appraisal best practice, which in this case included assessment of the methodology used for the SA of the First deposit Draft, a scoping exercise focusing on documents published since the previous appraisal, commentary on the appraisal of policies against sustainability criteria and on the in-house appraisal of potential preferred areas and those recommended for inclusion in the Plan.
- 1.5 Relatively few significant changes were proposed in the RDWLP. A number of policies had been amended to reflect altered Government planning policy guidance or waste management targets, and in response to recommendations made after the policy appraisal sessions or to meet valid objections to the first deposit version. In places the Waste Planning Authority sought to strengthen and/or clarify the degree of protection afforded to interests of acknowledged importance and a number of additional site allocations have been made.

2. NATIONAL BEST PRACTICE

- 2.1 A review of relevant literature was undertaken to ensure that the SA represented current best practice. The best practice review assessed government guidance and various methodologies and approaches used by others to undertake Sustainability Appraisals nationally.
- 2.2 The review of government best practice showed that sustainability appraisals should include an assessment of issues relating to social progress as well as environmental and economic factors. It was felt that the SA of the First Deposit Draft was weak in this particular aspect. The review of best practice

methodologies in previous sustainability appraisals carried out by Babbie led to some amendments to the sustainability criteria/objectives.

3. SCOPING

- 3.1 A scoping study was carried out to ensure that the local plan reflects, develops and refines relevant EU, national, regional, strategic and local legislation, policies and guidance. The key value of the scoping exercise was to ensure that the plan adequately reflects Government and other relevant advice in terms of the scope and the detailed provisions and content of plans.
- 3.2 It was established that the RDWLP took on board many of the recommendations of relevant government guidance. Nevertheless, some remaining issues were identified and recommendations made as to how the Plan's position might be clarified and enhanced.
- 3.3 The responses received from the Waste Planning Authority incorporated and justified most of the recommendations made by Babbie. It was considered that the changes made in accordance with the recommendations could significantly strengthen the Plan. Recommendations and actions are summarised below.

KEY ISSUE 1 QUALITY OF LIFE

Recommendation: Policy 1, criteria f, could be amended to promote quality of life now and for future generations to come.

- 3.4 The Waste Planning Authority propose two additions to the supporting text for policy 1. This will include a reference to RPG10 and a reference to "the impact of development upon quality of life for this and future generations, through its effect on environmental, economic, social and community assets". These changes will help to ensure that the development plan reflects and helps to implement these broad sustainable development principles. However, in finalising its policies, the Waste Planning Authority must be satisfied that the WLP and its relationship with the Structure Plan seek to give appropriate weight to quality of life issues, in accordance with national and regional policy.

KEY ISSUE 2 – CULTURAL ENVIRONMENT

Recommendation: Use the term 'cultural environment' instead of cultural heritage in policy 6 criteria h.

- 3.5 In response to this comment the Waste Planning Authority have since added new clauses to policy 6 referring to "protection of other important archaeological remains, parks and gardens of historic interest and the Roundway Down Battlefield" and "protection of other recreational, cultural and tourism assets". A reference to the broader 'cultural environment' is proposed to the relevant supporting text. These proposed changes will help to broaden the protection offered in Policy 6 to wider cultural environment interests.

KEY ISSUE 3 – FLOOD RISK AND SUSTAINABLE DRAINAGE METHODS

Recommendation: To avoid additional flood risk the risk-based sequential test for development should be applied.

- 3.6 In response to this comment the Waste Planning Authority propose to add to the supporting text to Policy 6 by referring to use of the sequential approach by the WPAs and promoting sustainable drainage systems (Policy 6 refers to the need to safeguard against flood risk). These proposed changes should help to protect areas at risk from flooding.

KEY ISSUE 4 – LOCATING SUITABLE SITES IN SWINDON

Recommendation: Policies 3 and 4 should ensure priority is given to the provision of waste management facilities that will recover value from waste at or near the PUAs. The sites identified should reflect regional targets and the assessment of need of the sub-region.

- 3.7 In response to this comment, the Waste Planning Authority note that the role of Swindon in the Plan and has been reinforced by the increased number of Preferred areas from 4 to 7 in the Revised Deposit Draft. This provision reflects the assessment of need for facilities carried out in Chapter 3 of the Plan. This has been revised to include more on the Plan area's likely role in dealing with waste imports. It also reflects a new assessment of links with surrounding areas in Chapter 2. This response demonstrates that the need to manage waste close to its source has been comprehensively addressed in the formulation of the Plan's strategy and policies.

KEY ISSUE 5 – NON-RENEWABLE RESOURCES

Recommendation: Avoid/prevent the sterilisation of non-renewable resources including minerals.

- 3.8 In response to this comment the Waste Planning Authority propose to ensure the 37 sites that have come through the site appraisal are checked in relation to this issue. Consideration of this matter during the site selection exercise should ensure the appropriate protection of non-renewables.

KEY ISSUE 6 – BIODIVERSITY GAIN IN NEW DEVELOPMENTS

Recommendation: An overall biodiversity gain should be met on 50% of new developments, where possible.

- 3.9 In response to this comment the Waste Planning Authority propose to take account of targets in the Action Plan. This action should aid the implementation of the Action Plan.

KEY ISSUE 7 – LAND LIABLE TO SUBSIDENCE

Recommendation: To ensure land liable to subsidence has been considered when identifying preferred areas for policies 3 and 4.

- 3.10 In response to this comment the Waste Planning Authority propose to ensure the 37 sites that have come through the site appraisal are checked in relation to this issue. Consideration of this matter during the site selection exercise should help to ensure that allocated sites have ground conditions appropriate for a given development.

KEY ISSUE 8 – REPROCESSING WASTE

Recommendation: Consider including policy or supporting text to support reprocessing development.

- 3.11 In response to this comment the Waste Planning Authority propose that Policy 9 deals with this issue as far as possible in a WLP. It is expected that development proposals by industry using waste as a feedstock would be determined by the District and Borough Councils as LPAs, using their policies in the District/Borough Local Plans. However, if consulted, the WPAs could use policy 9 to support this principle. However, the Waste Planning Authority propose that it would be useful to clarify this point in the supporting text to policy 9. Additional explanation of the issues around reprocessing and closing the 'recycling loop' should help to provide direction to Local Planning Authorities that determine applications for reprocessing development.

4. COMMENTARY ON IN-HOUSE APPRAISAL AND SELECTION OF PREFERRED AREAS FOR WASTE DEVELOPMENT

- 4.1 A review of the methodology used to appraise sites was carried out, incorporating a commentary on the site appraisal tables produced by the Waste Planning Authority.
- 4.2 The site appraisal process was largely an extension of the site appraisal process carried out for the First Deposit Plan. The methodology review found the in-house methodology used for the appraisal and selection of preferred areas to be generally in accordance with best practice.
- 4.3 An analysis of the site appraisal tables identified any discrepancies between the matrix tables and the summary sheets. This process was intended to ensure consistency in the application of appraisal methodology and a consequential identification of preferred areas that accord with sustainable development principles. No significant discrepancies were found and the WPAs responded to the analysis by indicating that they will take the points identified on board in the final version of the Site Appraisal.

5. APPRAISAL OF POLICIES AGAINST SUSTAINABILITY CRITERIA

5.1 Each draft policy was assessed against 33 separate sustainable development objectives, to determine what impact each policy might have on each objective. Impacts were scored either very positive, positive, neutral, negative or very negative. Two additional scores, 'depends on implementation' and 'don't know', were used when potential policy impacts could be dependent upon the interpretation of a policy in a given situation, or where impacts were not clear or certain.

5.2 The performance of each policy against sustainable development objectives is summarised in the comparative policy appraisal matrix (see table attached). The key findings of the policy appraisal process and recommended actions are summarised below.

OBJECTIVE 5 - TO AVOID SIGNIFICANT IMPACTS ON ROUTES AND AREAS THAT ARE POPULAR WITH TOURISTS

Recommendation: Consider revising Policy 6, criteria k), to include wider recreational/tourist interests.

5.3 In response to this comment the Waste Planning Authority has since added new clauses to policy 6 referring to "protection of other important archaeological remains, parks and gardens of historic interest and the Roundway Down Battlefield" and "protection of other recreational, cultural and tourism assets". A reference to the broader cultural environment is proposed to the relevant supporting text. These changes accord with the recommendations for Policy 6.

OBJECTIVE 11 - TO DIRECT BAD NEIGHBOUR DEVELOPMENT AWAY FROM AREAS THAT ALREADY SUFFER DEGRADATION

Recommendation: Ensure that other development plan policies recognise the importance of protection of amenity impacts and avoidance of cumulative impact.

5.4 In response to this comment the Waste Planning Authority proposes to amend Policy 6 criterion (a) to include the safeguarding of '...degraded areas'. This will also include additions to the supporting text. This change will help to address concerns about cumulative impact.

OBJECTIVE 15 - TO SECURE GOOD DESIGN WITHIN THE BUILT ENVIRONMENT

Recommendation: Investigate the possibility of expanding Policy 6, or adding to the supporting text, to clarify what is required from 'good design'.

5.5 In response to this comment the Waste Planning Authority proposes to amend criterion (b) to 'appropriate design' with additions to the text, which refers to materials, scale, form, and siting of plant and lighting. It is considered that this proposed change will go some way towards meeting the terms of the

recommendation. However, the term 'appropriate design' may still be open to too wide an interpretation, to the detriment of the control of development, although it is recognised that the absence of specific design guidance in Policy 6 must be balanced against the need for clear and succinct policies.

OBJECTIVE 16 - TO PROTECT AND ENHANCE GREEN SPACES WITHIN URBAN AREAS

Recommendation: Include the protection and enhancement of urban green spaces as a criteria in Policy 6. Re-word Policy 24 to account for this factor.

- 5.6 In response to this comment the Waste Planning Authority propose to amend Policy 6, criterion (a) to include the safeguarding of 'urban green spaces' and also include additions to the supporting text. The Waste Planning Authority has also clarified policy 24 by referring to 'new greenfield development' as the last option in the sequence. These changes will improve the protection afforded urban green space and accord with the recommendations.

OBJECTIVE 20 - TO MAINTAIN AND ENHANCE THE HISTORIC ENVIRONMENT AND ASSETS

Recommendation: Consider removing criteria j, Policy 6 into supporting text.

- 5.7 In response to this recommendation the Waste Planning Authority has proposed to clarify the policy. The policy now includes a number of clauses that reflect the categories of protection set out in PPG15 including:

- designated sites/areas
- settings of designated sites/areas
- other important archaeological and historic remains
- other recreational, cultural and tourism assets.

These proposed changes meet the concerns regarding protection of the historic environment.

OBJECTIVE 21 - TO MAXIMISE OPPORTUNITIES FOR MOVEMENT OF WASTE BY RAIL OR WATER

Recommendation: Documentation of the site selection process should justify the inclusion of strategic sites that do not have the potential for rail or water transportation links.

- 5.8 In response to this comment the Waste Planning Authority will add the necessary justification to the site appraisal report. This action should be satisfactory. The site selection process took account of the importance of sustainable transport and is likely to be able to justify the allocations made.

OBJECTIVE 32 - TO USE WATER EFFICIENTLY

Recommendation: Consider incorporating a criteria to encourage the efficient use of water within Policy 6 or cover in supporting text.

- 5.9 In response to this comment the Waste Planning Authority has now included a specific reference to 'efficient use of water' in Policy 6, with changes to the supporting text. These changes should contribute towards meeting the terms of Objective 32.

6. CONCLUSIONS

Best Practice Review

- 6.1 The review of best practice led to some amendments to the sustainability criteria/objectives that are used to appraise the plan. The SA methodology review focussed on improving the 'user-friendliness of the appraisal mechanism to encourage a more focussed approach to the appraisal of potential policy impacts on sustainable development objectives.

Scoping

- 6.2 A number of key issues were identified for possible action to improve the Plan's compliance with sustainable development indicators. Many of these issues related to the scope of Policy 6 and the question of the appropriate degree of protection given to the extensive range of interests covered by that policy. In each case, the Waste Planning Authority's response to recommended changes results in an improved appreciation of the particular sustainable development issues within the Plan, thus contributing to a move towards the delivery of more sustainable development.

Sustainability appraisal of draft policies

- 6.3 The appraisal of Waste Local Plan policies against sustainable development objectives revealed that a number of objectives could be compromised to a degree by the potential impact of certain policies. On the whole, areas where Plan policies were shown to be potentially deficient in meeting sustainable development objectives could be dealt with through appropriate amendments to policies or supporting text of the Plan. The Waste Planning Authority responded positively to recommended changes.

- 6.4 A large proportion of recommended changes related to Policy 6. This highlighted the potentially conflicting aims of ensuring that development plans take account of and help to achieve sustainable development objectives, set out in government and other policy and guidance, and the need to produce clear and concise development plans that are effective in delivering development control, again in accordance with government policy. On balance it was felt that the Waste Planning Authority's approach to Policy 6, to other Plan policies and a willingness to make appropriate changes to policies to accord with sustainable development objectives, struck the right balance between these aims.