

Daventry Design Codes SPD

Sustainability Appraisal

December 2005

**Prepared by Halcrow Group Limited
For Daventry District Council**

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1 Context and Purpose of the Sustainability Appraisal

1.1 Introduction

Halcrow group was appointed by Daventry District Council to undertake a Sustainability Appraisal (SA) of the emerging Daventry Design Codes SPD. The SA forms an integral part of the SPD.

The SA provides an independent assessment of the effects the SPD will have on a range of sustainability objectives. The Design Codes SPD and accompanying SA represents a critical opportunity to drive forward the sustainability agenda and to present a high-level vision for sustainable development in Daventry. The SA ensures that the SPD is grounded on sustainable foundations. It is envisaged that the Design Codes SPD can help provide the basis for ensuring that sustainability goals are met and that future development will impact positively on sustainability targets.

1.2 Consultation

The following were consulted on the Scoping Report of the SA. These were the 4 statutory bodies, plus 2 local organisations:

- Environment Agency
- Countryside Agency
- English Nature
- English Heritage
- Daventry Town Council
- Daventry and District Civic Society

The Scoping Report was followed by the preparation of a draft SA, which was presented to Planning Committee on 6th July 2005 and Strategy Group on 21st July 2005. Consultation took place on this for a period of 6 weeks until Friday 23rd September 2005. The consultation was in accordance with the submission version of the Statement of Community Involvement. Consultation responses and proposed changes returned to Planning Committee on 16 November 2005 and Strategy Group on 24 November 2005, with the SA being approved by Full Council on 8 December 2005.

1.3 Structure of the SA

This SA sets out the context of SA, the appraisal framework used (Appendix 1) and then the actual appraisal (Appendix 2). Appendix 3 and 4 provide the feedback comments from the Scoping and Consultation Draft stages respectively. Where applicable, these have been incorporated into the appraisal (Appendix 2).

2. Status of SA in the UK

2.1 Under the requirements of the Planning and Compensation Act 2004, SA is mandatory for Regional Spatial Strategies and Local Development Frameworks. The requirement for SA is supported by the 'Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance' (DETR, 2000). In order to ensure that SA meets the requirements of SEA Directive, the Office of the Deputy Prime Minister (ODPM) has prepared bridging guidance¹. The principle guidance document relating to SEAs/SA is contained in *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Draft, September 2004*, once finalised this will replace the guidance produced by DETR in 2000.

2.2 Jaquelin Fisher Associates Ltd has been appointed by Daventry District Council, Northampton Borough Council and South Northamptonshire Council to undertake the preliminary stages of an SEA for their emerging Local Development Frameworks. This work will be used to inform the assessment of future documents produced within each authority on a consistent basis. This methodology report draws on the work available to date, i.e. a set of objectives and a system for recording effects.

2.3 Purpose of the SA

In March 2005, the Prime Minister launched the Government's new strategy for sustainable development: *Securing the Future*². The new adopted vision for sustainable development is defined as:

The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.

For the UK Government and the Devolved Administrations, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible.

Government must promote a clear understanding of, and commitment to, sustainable development so that all people can contribute to the overall goal through their individual decisions.

Similar objectives will inform all our international endeavours, with the UK actively promoting multilateral and sustainable solutions to today's most pressing environmental, economic and social problems. There is a clear obligation on more prosperous nations both to put their own house in order, and to support other countries in the transition towards a more equitable and sustainable world.

¹ *Sustainability Appraisal of Regional Spatial Strategy and Local Development Frameworks*. Draft for Consultation. Office of the Deputy Prime Minister, September 2004.

² The UK Government Sustainable Development Strategy, March 2005

To achieve this new strategy, five key principles have been proposed,

- Living Within Environmental Limits
- Ensuring a Strong Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibility

SA is a systematic appraisal process aimed to appraise the social, environmental and economic effects of planning strategies and policies to ensure that decisions are made in accordance with the latest Government strategy on sustainable development.

The requirements of the SEA Directive and of emerging Government Guidance are such that SA is to be an integral part of the plan development process, providing a clear record of decisions taken at various stages, the reasons for these decisions, and impacts of these decisions on the environment.

The key benefits of undertaking an SA of the Design Codes SPD are as follows:

- It provides an opportunity to develop clear sustainability objectives and criteria for what the Design Code is to achieve;
- It ensures that the views of key stakeholders have been taken on board;
- It ensures that environmental, social and economic issues are fully integrated into the SPD;
- It provides an opportunity to evaluate the sustainability consequences of decisions relating to the Design Code;
- It provides an explicit statement of the environmental, social and economic consequences of the Design Code within an appraisal matrix, with commentary, acknowledging any mitigation required to address potentially adverse effects; and
- It will provide recommendations to assist in the SPD development, so as to reduce any potential negative impacts.

We believe it is best practice to undertake a SA of the SPD to ensure that it is comprehensive and robust enough to support the DPD during public examination, and that the full range of sustainability issues are considered.

This approach is endorsed by ODPM guidance³ which states:

“The different forms of SPD that may be prepared will necessitate a relatively flexible approach to SA to ensure that it is appropriate and relevant.”

Paragraph 2.3.5

³ Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Paper- ODPM, September 2004

In accordance with the requirements of the Directive and in keeping with emerging Government Guidance, the key stages in this SA are broadly as follows:

- Setting the context and purpose of the SA;
- Devising SA objectives and criteria;
- Developing an appraisal framework to appraise the SPD against the sustainability criteria; and
- Preparing a Methodology Report and undertaking consultation;
- Preparation of a final Report setting out the results of the appraisal and how it has influenced the final form of the document.

3. Developing the SA Objectives and Appraisal Framework

3.1 Introduction

Current guidance on SEA of land use and spatial plans and the consultation paper on SA of RSSs and LDFs advocates the use of objectives in the appraisal process. The identification of objectives forms the basis for the appraisal. It provides the starting point for ensuring that both the SA and sustainability issues are at the heart of and are fully integrated into the SPD preparation. In order to facilitate legibility and ease of understanding and use, the sustainability objectives and criteria have been set out in the form of a matrix (Appendix 1). An explanation of the methodology for formulating the Appraisal Framework is presented below.

3.2 SEA Topics

The SEA topics, as identified in the SEA Directive, form the organisational logic of the matrix. These topics include: Biodiversity, Water & Soil, Population & Human Health, Air, Climatic Factors, Material Assets, Social Inclusiveness and Economic Development.

3.3 Objectives

The next step was to identify and develop the sustainability objectives that will underpin the SPD. The objectives form the basis for the appraisal. The objectives were developed by Jaquelin Fisher Associates Ltd on behalf of Daventry District Council, Northampton Borough Council and South Northamptonshire Council.

3.4 Criteria

Following on from the identification of objectives, a range of associated criteria have been identified to provide further clarity in respect of future development directions as well as to assist in the appraisal process. The criteria provide a more specific elaboration of the individual objectives. They focus specifically on the items, which are of direct relevance to the SPD preparation. The SA identifies and highlights potential conflicts and provides recommendations and mitigation measures, which would improve the sustainability performance of the Daventry Design Codes document. The appraisal has been undertaken and presented in a matrix format to ensure clarity and transparency. The results of the appraisal were recorded using the following seven point scale matrix, which has been developed by Jaquelin Fisher Associates Ltd:

Notation	Meaning
✓	Positive impact
✓?	Possible positive impact, depending on assumptions
0	Neutral impact
-	No relationship
X	Negative impact
X?	Possible negative impact, depending on assumptions
?	Uncertain impact

SA Framework for Daventry Design Codes SPD

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
Biodiversity, fauna and flora	SA1	To not damage key and designated wildlife sites and protected species	Is there potential for negative impacts on designated sites/protected species? If so can these be mitigated?		
	SA2	To value, protect and maintain biodiversity	Will the initiative avoid adverse impacts on biodiversity?		
	SA3	To restore the full range of characteristic habitats (floodplains, woodlands etc) & manage the ecological processes on which they depend.	Does the initiative include measures for the creation of new habitats?		
			Have any ecological features like woodland/ new green spaces been designed to enhance wildlife and ecological interest?		
Population and human health	SA4	To protect and enhance human health & amenity through safe, crime-free, clean, pleasant environments.	Will the initiative reduce the proportion of journeys made by the private car, and promote safe walking and cycling as an alternative?		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
			<p>Does the initiative include design measures, which will minimise crime and fear of crime and enhance safety and security?</p> <p>Does the lay out and form of the new buildings create well designed streets and places that are well connected and over looked?</p> <p>Does the initiative have regard to guidance and standards for well designed streets and public spaces?</p>		
	SA5	To decrease noise & vibration.	Will the initiative include specific design and amenity measures to minimise noise pollution and vibration , particularly in residential areas?		
	SA6	To plan & promote preventative health care practice.	Does the initiative increase opportunities for cycling, walking and include measures to reduce transport contribution to the degradation of air quality?		
Water and Soil	SA7	To limit water pollution to levels that do not damage natural systems.	Will the initiative impact on groundwater quality? If so, is there evidence of measures to maintain and improve groundwater quality?		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
			Will the initiative impact on water quality in rivers? If so, is there evidence of measures to maintain and improve water quality?		
			Will the initiative incorporate measures to ensure that water is used more sustainably, e.g. grey water recycling/rainwater collection?		
	SA8	To reduce, reuse, recover & recycle waste through composting, energy recovery and bioremediation ⁴ .	Does the initiative promote design and layout which facilitates and promotes reduction, re-use, recovery and recycling of waste?		
			Does the initiative include specific measures to reduce the amount of construction waste produced?		
	SA9	To maintain water abstraction, run-off and recharge within carrying capacity	Reduce run off levels and rates from development		
			Avoid previously undeveloped land in the floodplain and ensure that new development is not at risk from flooding.		

⁴ Bioremediation is the term used to describe the use of biological systems such as micro-organisms and plants to decontaminate polluted land, water or air.

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
	SA10	To reduce contamination & safeguard soil quality and quantity.	Does the initiative include measures to limit the loss of soils to development? Will contaminated sites be dealt with sustainably, including the treatment/removal of contaminated material?		
Air	SA11	To limit air pollution to levels that do not damage natural systems.	Will the initiative pro-actively address transport issues, ensuring modal switch, which will result in reduced emissions on the road network?		
	SA12	To reduce the need to travel by encouraging necessary access to facilities, services, goods and other people in ways that make less use of the car and minimise environmental impact.	Will the initiative reduce the need for travel by promoting mixed use development?		
			Does the initiative promote the creation of a network of safe pedestrian and cycle routes to local facilities?		
			Does the initiative include specific measures to utilise locally sourced materials and low environmental impact materials in buildings and infrastructure, thereby decreasing the amount of road traffic?		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
	SA13	To develop transport infrastructures that are forward-thinking enough to embrace new alternative forms of transport that improve the current levels of transport efficiency.	Does the initiative include traffic management measures to reduce traffic flows?		
			Is the parking provision appropriate for the location and desired modal split?		
Climatic Factors	SA14	To reduce greenhouse gas emissions by planning for energy efficiency.	Does the initiative include measures aimed at promoting reduced energy demand and enhanced energy efficiency in the layout and design of buildings?		
	SA15	To reduce vulnerability to the effects of climate change e.g. flooding, disruption to travel by extreme weather etc.	Does the initiative promote design for more extreme climatic events, incorporating robust and weather resistant built forms?		
	SA16	To encourage the use of renewable technology in the planning and design of new development.	Does the initiative include measures aimed at promoting reduced energy demand and enhanced energy efficiency in the lay out and design of buildings?		
			Does the initiative include measures to optimise passive solar design, such as solar hot water heating and allow retrofitting?		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
Material assets	SA17	To ensure access to housing, wholesome food, water, amenity and fuel at reasonable cost.	Does the initiative include measures which will improve everyone's access to high quality health, housing, education, recreation and community facilities?		
			Does the initiative provide a range of housing types and tenures?		
			Does the initiative prioritise the development of brownfield land and the re-use of redundant buildings?		
			Does the initiative optimise the density of development?		
	SA18	To meet local needs locally wherever possible.	Does the initiative include measures to promote the provision of local amenities?		
Cultural heritage & landscape	SA19	To preserve and enhance historic buildings and archaeological sites and to conserve other culturally important features/areas and their settings.	<p>Does the initiative enhance and respect the character and setting of Daventry's historic and cultural assets? Including:</p> <ul style="list-style-type: none"> • Protection of features of cultural, visual and historical importance • Enhancement of the local architectural heritage 		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
	SA20	To create quality, diverse, durable places, spaces and buildings that are human in scale and form.	Does the initiative include measures to maintain and enhance the quality of Daventry's landscape and built character?		
	SA21	To enhance the quality of landscapes, the countryside, townscape character and local distinctiveness.	Does the initiative help reinforce the distinctive quality/local context and character of the existing landscape/townscape?		
	SA22	To improve the quantity and quality of publicly accessible open space.	Does the initiative promote public access to high quality green/open space for all sectors of society?		
Social Inclusiveness	SA23	To improve access to skills & knowledge needed to play a full part in society.	Does the initiative promote public access to community and amenity facilities for all sectors of society?		
	SA24	To make local facilities and opportunities for culture, leisure & recreation readily accessible for everyone including those most in need	Does the initiative include measures which will improve everyone's access to local facilities, high quality cultural and recreational facilities?		
	SA25	To enable all sections of the community to participate in decision-making & social enterprise so to help encourage a sense of community identity	The local community will have the opportunity to be involved in the preparation of the guidance		

Topic	Objective Number	Objective	Criteria	Appraisal Score	Appraisal Comments
Economic Growth	SA26	To give access to satisfying and rewarding work and to reduce unemployment	Does the initiative provide measures which will help improve Daventry's economic performance and contribution to regional competitiveness		
	SA27	To increase investment in people, equipment, infrastructure and other assets to enhance the business image of the area	Does the initiative include measures to stimulate local economic growth?		
	SA28	To increase the efficiency of transport and economic activities without comprising the social and environmental performance of the economy	Does the initiative incorporate measures which will help ensure sustainable locations for employment development?		

SA for Daventry Design Codes SPD

Notation	Meaning
✓	Positive impact
✓?	Possible positive impact, depending on assumptions
0	Neutral impact
-	No relationship
X	Negative impact
X?	Possible negative impact, depending on assumptions
?	Uncertain impact

DC = Design Codes document

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
Biodiversity, fauna and flora	SA1	To not damage key and designated wildlife sites and protected species	✓	The DC recognises that the protection of sites of nature conservation importance should be a key objective of sustainable extensions, in line with policies GN2 and EN23 of the Local Plan. This principle covers the town centre and potential urban extensions.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
	SA2	To value, protect, maintain and enhance biodiversity	✓?	The DC highlights the need to provide a habitat for wildlife and encourage biodiversity, in the context of the Town Centre. In the context of urban extensions the emphasis of the open space and landscape strategy should be to deliver a series of linked open spaces to encourage biodiversity and nature conservation interest through the design of a range of semi-natural greenspaces. The SPD performs well against the objective and also refers to the County Biodiversity Action Plan.
	SA3	To restore the full range of characteristic habitats (floodplains, woodlands etc) & manage the ecological processes on which they depend.	✓?	The DC seeks to incorporate wildlife corridors within the urban extensions. It states that these wildlife corridors should be designed to reflect the naturalistic character of these areas and are to consist substantially of semi-natural habitat. Balancing areas are to be designed primarily to encourage biodiversity and nature conservation interest as well as creating an attractive environment. This aspect of the SPD performs well against the objective.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
Population and human health	SA4	To protect and enhance human health & amenity through safe, crime-free, clean, pleasant environments.	✓	<p>This SPD can contribute to the protection and enhancement of human health by promoting walking and cycling. The DC promotes cycling in the context of urban extensions and in relation to local centres. Less emphasis appears to be placed on encouraging cycling within the town centre, including the provision of parking for cycles.</p> <p>The provision of relatively tranquil open spaces within the town centre and urban extensions will also contribute to a feeling of well-being.</p> <p>The SPD seeks to avoid elements of the environment within the town centre that may enable crime to happen or give rise to a fear of crime, e.g. subways and poorly lit alleys. The SPD gives consideration to safety and security within the context of urban extensions and this is common to both the town centres and urban extensions.</p> <p>So far as the provision of a clean and pleasant environment is concerned the section on the Town Centre identifies the importance of a clearly defined public realm, positioning of loading bays and bin storage areas off main streets etc.</p>
	SA5	To decrease noise & vibration.	✓	<p>Vibration is not relevant here. Noise can impact on the quality of people's lives. So far as the town centre is concerned the use of rubberised paving tiles outside public houses is also advisable in terms of protecting paving and reducing noise. The SPD encourages a mix of uses within the Town Centre, including residential. It could highlight the need for careful siting of any residential development and the use of noise insulation techniques and screening to mitigate potential disturbance from noise. Noise from traffic could be reduced through the use of noise reducing surfaces on roads combined with appropriate screening – this is also relevant in the context of urban extensions.</p>

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
	SA6	To plan & promote preventative health care practice.	✓?	The DC highlights the need for such facilities. The SPD already highlights promotion of the dual use of facilities (eg schools/sports). It may be that there is a need for higher order facilities which are best located within the town centre or improved access to existing facilities in the town centre, the SPD could comment on this.
Water and Soil	SA7	To limit water pollution to levels which do not damage natural systems.	✓?	Sustainable Drainage (SuDs) techniques are referred to in the section relating to urban extensions. The use of such techniques will help reduce water pollution associated with surface water run-off. There is equally scope for SuDs to be incorporated in the Town Centre and the SPD now contains a section on SuDs that is common to both situations. Reference is made to the need for restrictions on development based on the sensitivity of the area to groundwater pollution.
	SA8	To reduce, reuse, recover & recycle waste through composting, energy recovery and bioremediation.	✓?	This should form part of the essential infrastructure for urban extensions, development in the Town Centre and individual buildings. A waste section is now contained within the document. This comment applies to both construction waste and waste that arises once development is operational (20% of total waste nationally is produced by the construction industry ⁵).
	SA9	To maintain water abstraction, run-off and recharge within carrying capacity (including future carrying capacity).	✓?	The SPD contains a section on SuDs.
	SA10	To reduce contamination & safeguard soil quality and quantity.	✓?	The SPD now provides a section on soil.

⁵ WWF 'One Planet Living in the Thames Gateway', WWF UK, One Million Sustainable Homes Campaign Report, June 2003.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
Air	SA11	To limit air pollution to levels that do not damage natural systems.	✓	Transport is a key source of pollutants to air. The SPD seeks to promote alternatives to the car. It also promotes mixed use and higher density development that will widen people's choice as to whether or not to travel by car.
	SA12	To reduce the need to travel by encouraging necessary access to facilities, services, goods and other people in ways that make less use of the car and minimise environmental impact.	✓	The SPD seeks to promote alternatives to the car. It also promotes mixed use and higher density development that will widen people's choice as to whether or not to travel by car. It also promotes local centres within urban extensions (but see comments on this under SA6).
	SA13	To develop transport infrastructures that are forward-thinking enough to embrace new alternative forms of transport that improve the current levels of transport efficiency.	-	The appraisal team are unsure as to how the SPD could contribute towards this objective and on balance we do not feel there is a relationship.
Climatic Factors	SA14	To reduce greenhouse gas emissions by planning for energy efficiency.	✓?	The SPD gives some consideration to energy.
	SA15	To reduce vulnerability to the effects of climate change e.g. flooding, disruption to travel by extreme weather etc.	✓?	The SPD now includes more on flood prevention.
	SA16	To encourage the use of renewable technology in the planning and design of new development.	✓?	The SPD gives some consideration to energy.
Material assets	SA17	To ensure access to housing, wholesome food, water, amenity and fuel at reasonable cost.	✓?	Although the DC refers to the need to provide a mix of housing types and tenures this is the only reference in the document. So far as access to food is concerned the SPD relating to urban extensions promotes the provision of local centres which could potentially include food shops. So far as access to amenity is concerned the SPD encourages provision of open space.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
	SA18	To meet local needs locally wherever possible.	✓?	The SPD relating to urban extensions promotes the provision of local centres The SPD now also promotes the recycling of materials produced locally, e.g. soils.
Cultural heritage & landscape	SA19	To preserve and enhance historic buildings and archaeological sites and to conserve other culturally important features/areas and their settings.	✓?	The SPD is strong on the need to respect, preserve and enhance the built environment and now includes reference to archaeology, which could be relevant in the context of development in the Town Centre and on urban extensions.
	SA20	To create quality, diverse, durable places, spaces and buildings that are human in scale and form.	✓	The SPD performs well against this objective.
	SA21	To enhance the quality of landscapes, the countryside, townscape character and local distinctiveness, in keeping with local landscape character, as described in the Northamptonshire Landscape Character Assessment.	✓	The SPD performs well against this objective.
	SA22	To improve the quantity and quality of publicly accessible open space.	✓?	The SPD performs well against this objective so far as urban extensions are concerned. Section 4 relates to the quality of open spaces in the Town Centre and includes reference to the adequacy of provision of open space. The SPD also encourages the inter-connection of green spaces.
Social Inclusiveness	SA23	To improve access to skills & knowledge needed to play a full part in society.	✓?	The DC identifies the need for schools and community centres to be planned for within urban extensions.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
	SA24	To make local facilities and opportunities for culture, leisure & recreation readily accessible for everyone including those most in need.	✓?	<p>The DC identifies the potential for the market place to be used for cultural events.</p> <p>The SPD covers the provision of open space which will be an important recreational resource. The SPD could signpost other guidance relating to recreational facilities, e.g. Sport England's tool-kit.</p> <p>The DC identifies the importance of developments being readily permeable with connected layouts, which in turn ensures good access for the mobility impaired.</p>
	SA25	To enable all sections of the community to participate in decision-making & social enterprise so to help encourage a sense of community identity	✓	<p>A stakeholder workshop has ensured that the views of a wide cross-section of Daventry's community, including developers, civic groups, local businesses, and interest groups have been taken into account in the development of the design code.</p> <p>The DC covers management and maintenance. It identifies the opportunity for people to get involved in management and the need for proposals to include arrangements for this.</p>
Economic Growth	SA26	To give access to satisfying and rewarding work and to reduce unemployment	✓?	The DC identifies the potential for providing employment land within urban extensions – there is a need for subsequent plans for individual extensions to be more prescriptive. The SPD promotes mixed-use development that will include employment opportunities.
	SA27	To increase investment in people, equipment, infrastructure and other assets to enhance the business image of the area	✓?	The provision of attractive gateways into the Town and enhancements to the Town Centre will contribute to this objective.

Aspect of the SPD Appraised:				
Topic	Objective Number	Objective	Appraisal Score	Appraisal Comments
	SA28	To increase the efficiency of transport and economic activities without comprising the social and environmental performance of the economy	✓	The SPD seeks to promote alternatives to the car. It also promotes mixed use and higher density development that will widen people's choice as to whether or not to travel by car. It also promotes local centres within urban extensions (but see comments on this under SA6).
<p>Overall Commentary:</p> <p>At the moment it is unclear as to whether or not the concept of sustainable design and construction applies to the town centre, rather than just urban extensions. There seems scope for a set of overarching principles that apply to both contexts. This could be achieved by restructuring the document to have a section at the start that is common to both situations.</p> <p>Where policies are quoted reference should be made to the relevant Appendix, which we understand will contain the text of relevant policies.</p> <p>Although the SPD highlights the opportunity for green links, particularly in the context of urban extensions it could be more ambitious by aiming to create a green grid or interlinked network that extends into the town centre.</p> <p>At the moment the SPD performs poorly against Objective SA8 relating to the provision of waste management facilities and we see this as a missed opportunity. The SPD provides detailed guidance on the attributes of urban extensions.</p> <p>The section on SPD for urban extensions gives some consideration to energy efficiency but we feel it could be much stronger on this, e.g. in relation to passive solar gain, small scale renewable energy projects etc. The section relating to the Town Centre does not consider this issue, e.g. in relation to renewable energy, solar gain and energy efficient air conditioning</p> <p>There is a need to be clear about the status of different parts of the text in the SPD, e.g. which parts are explanatory text and which parts are policy.</p>				

Sustainability Appraisal Scoping Report Comments

For Daventry Design Codes (Consultation Draft)

Daventry District Council June 2005



1.1 A Scoping Report of the Sustainability Appraisal was prepared in April 2004. This highlighted a suggested sustainability framework and objectives, which would then be used as a basis for more detailed investigation, in order to prepare the Sustainability Appraisal (Consultation Draft) and the Daventry Design Codes (Consultation Draft). The Scoping Report was circulated for comment to the Strategic Environmental Assessment Bodies (Countryside Agency, English Heritage, English Nature and Environment Agency), as per current legislative guidance. It should be noted that it is not a requirement to consult anyone else, apart from these Statutory Consultees, at the scoping stage. However, in order to provide an opportunity at the earliest stage for a local input to the preparation of this document, a copy was also sent to Daventry Town Council and Daventry Civic Society, should they wish to comment. A copy of the Scoping Report is available to view at Daventry Library or at Planning Reception, Daventry District Council during normal opening hours. The responses to the Scoping Report were as follows:

Organisation	Comment Received	Response to Comment
Statutory Consultees		
Countryside Agency	Two first steps appear to be missing – identifying and reviewing other plans and programmes and their sustainability objectives to establish how the plan is affected by outside factors and how	This SA work has been developed from the SEA/SA work being prepared for the Core Strategy by Jaquelin Fisher Associates Ltd (JFA). The JFA work provides the SEA/SA context for this work and it is

	<p>constraints can be addressed.</p> <p>Secondly, collecting baseline information, trends and indicators to help identify key issues and assist in developing SA/SEA objectives.</p> <p>Monitoring the implementation of the plan is not mentioned – developing aims and methods of monitoring in order to determine effects/inform future revisions.</p> <p>SA2 strengthen to say “enhance” biodiversity.</p> <p>SA3 strengthen to include reference to critical ecological and wildlife corridors.</p> <p>Support and welcome SA20, 21 and 22</p> <p>A variety of sources of data information are highlighted.</p>	<p>not felt appropriate to purely repeat that work within this SA i.e in terms of setting the broad SEA/SA context.</p> <p>Again, the same applies with this comment – work has been undertaken by JFA on this already. It is not felt appropriate to reiterate their work here.</p> <p>The Consultants are advised to consider this point and action accordingly.</p> <p>The Consultants are advised to amend this.</p> <p>The Consultants are advised to amend this.</p> <p>Point welcomed.</p> <p>Information supplied welcomed.</p>
English Heritage	Satisfied that the Objectives and Criteria SA19 - SA22 provide an appropriate framework for the SA and adequately cover the relevant issues for the historic environment and landscape and townscape character.	No changes required.
English Nature	None Made	No changes required.
Environment Agency	None Made	

Local Non-Statutory Consultees		
Daventry Town Council	<p>Well-structured framework identifies a wide range of sustainability topics.</p> <p>Key sustainability objectives/intentions appear to be covered.</p> <p>Daventry Town Council propose to use this and the Design Codes document as a basis to produce a Daventry Town Design Statement.</p> <p>It is anticipated that Daventry Town Council will comment on future planning applications using the detailed contents of these key documents.</p>	Points noted. No changes required.
Daventry Civic Society	None Made	No changes required.

Daventry Design Codes

Responses To Sustainability Appraisal Consultation Draft

The table below sets out a summary of responses received. It should be noted that the four Statutory Consultees are also consulted at the Scoping Stage i.e which takes place prior to the publication of the Sustainability Appraisal (Consultation Draft) (SA-CD) and that any comments at that stage were fed into the preparation of the SA-CD. It should be noted that no comments were received to the Consultation Draft from English Nature or English Heritage (who are the other two Statutory Consultees), however comments were received from English Heritage during the Scoping Stage. At the end, a section has been included which sets out additional key changes proposed by the Senior Planning Officer, Daventry District Council.

Respondees List

1. Turley Associates for Danetree Village Consortium
2. The Environment Agency
3. The Countryside Agency

Abbreviations

- DC = Design Codes
DDC = Daventry District Council
SA = Sustainability Appraisal

Respondee	Summary of Comment	Response	Changes to SA and/ or DC
STATUTORY CONSULTEES			
The Environment Agency	Echo objectives 8, 9, 10. Strong guidance on waste reduction, re-use and recycling important and should be included in SPD.	Points welcomed. DC to be amended re- waste.	Amend DC
The Countryside Agency (Landscape, Access and Recreation Division)	<p>LAR has the following comments on this document:</p> <ul style="list-style-type: none"> • In general LAR supports the sustainability appraisal and considers that it has been carried out using a logical methodology and covering a comprehensive range of issues. • In particular we support objectives SA20, SA21 and SA22. <p>In the Sustainability Appraisal Scoping Report Comments we are pleased to note that most of the Countryside Agency's comments have either been taken on board or been given adequate explanation.</p>	Comments welcomed.	None

English Heritage	No Comments	None	None
English Nature	No Comments	None	None
Turley Associates for Danetree Village Consortium	<p>The SA is of considerable use i.e believe DC could be more detailed, more meaningful references to Daventry and greater cross-referential guidance. Endorse SAs view that:</p> <p>Draft SPD is formally unclear as to whether sections relate to the town or urban extensions or both. Structure could be made clearer and more consistent.</p> <p>The draft SPD sees Daventry and urban extensions exclusively, rather than strategically as a whole, with policy discrepancies between the two. This exists in sections relating to wildlife protection; designing out crime; noise; water. SA suggests sections common to both situations, which we echo.</p> <p>Draft SPD could be more prescriptive in giving thresholds for community facilities, presumably echoing emerging infrastructure guidance – useful to see details confirmed/cross-referenced here. Draft SPD does not contain any reference to measures to reduce, reuse, recover or recycle waste or other materials. No mention of archaeology or ICT (Information and Communication Technology). Could signpost other documents, initiatives and useful</p>	DC to be amended to incorporate these points.	Amend DC

	<p>contacts e.g Biodiversity Action Plan, infrastructure requirements, policy documents relating to sustainable design.</p> <p>Unclear how issues raised in workshop fed into document. Important to demonstrate validity of exercise and document.</p> <p>However, disagree with SA relating to dual use of facilities (school/sports/community) and inadequacy of greenspaces in existing town centre as SPD is explicit in promoting the former and in addressing the later.</p> <p>In terms of energy efficiency, use of renewable technology and promotion of advanced transit system, it is suggested that the document be more realistic in taking into account viability, in particular where costs impacts upon viability, as indicated in government guidance.</p>	<p>SA to be amended to highlight this.</p> <p>DC to be amended to refer to viability.</p>	<p>Amend SA</p> <p>Amend DC</p>
<p>Senior Planning Officer, Daventry District Council</p>	<p>Within the topic of biodiversity, include objective to restore and enhance BAP species/habitats.</p> <p>SA2 and SA3 should read neutral or possible positive impact, as assessment is not supported by quality of existing resource or enhancement proposals.</p> <p>SA7 and SA8 should better reflect need for further consideration of policies and guidance on objectives for water resources. SA7 might be better assessed as neutral or possible positive.</p> <p>SA21 welcomed – use Landscape Character Assessment as a baseline and modify objective to</p>	<p>SA to be amended to highlight this.</p> <p>SA to be amended.</p> <p>SA to be amended to highlight this.</p> <p>SA to be amended to highlight this.</p>	<p>Amend SA</p> <p>Amend SA</p> <p>Amend SA</p> <p>Amend SA</p>

	read "to enhance the quality of landscapes, the countryside, townscape character and local distinctiveness, in keeping with local landscape character, as described in the Northamptonshire Environmental Character Assessment".		
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