

Sustainability Appraisal Scoping Report Responses Analysis

Environment

24 May 2016

Local Plan

Sustainability Appraisal Scoping Report Responses Analysis

Analysis of consultation responses received during consultation on the Scoping Report from 4 January to 8 February 2016, including how the comments and issues raised by the respondents have been taken into account in the Revised SA Scoping Report (May 2016).

May 2016

Ref. no.	Name / Organisation	Full Response	Response Summary	Changes made to the Revised SA Scoping Report
1.	Natural England (Thames Valley Team)	<p>Sustainability Appraisal Scoping Report</p> <p>Our comments below relate to the individual sections of the scoping report. Our advice covers our strategic environmental interests including, but not limited to, statutory designated sites, landscapes and protected species, geology and soils.</p> <p>Section 2 – Context Review</p> <p>The list of relevant legislation, plans or policies should also include:</p> <ol style="list-style-type: none"> 1. the Natural Environment and Rural Communities Act 2006. The Act sets out the duties of the Local Planning Authority with regard to biodiversity and lists national Priority Habitats and Priority Species which are the subject of specific policies within the NPPF. 2. the All London Green Grid (as set out in the London Plan All London Green Grid SPG and associated Area Frameworks) which provides the strategic framework for the delivery of green infrastructure in London: https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid <p>The section on Pg17 covering biodiversity and nature conservation should be updated to correctly detail the responsibilities of the LPA as a Competent Authority under the EU Habitats and Wild Birds Directives. In advance of undertaking an Appropriate Assessment a Competent Authority should first undertake an assessment of Likely Significant Effect of the plan. This should consider the likely impacts of the plan on European Protected Sites within and outside of the Borough and determine if an Appropriate Assessment is required.</p> <p>The section on Pg17 covering climate change should also reflect the role of green infrastructure in climate change adaptation as per NPPF policy 99 which states that <i>“.... When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure”</i>.</p> <p>Section 3:</p> <p>The open space assessment and data does not include consideration of access to nature and natural greenspace. In London the Mayor maps Areas of Deficiency in Access to Nature. This is distinct in London Plan policy from access to open space standards and therefore should also be considered. Natural England have also published Accessible Natural Greenspace Standards to support decision makers in planning for the provision of natural greenspace: http://webarchive.nationalarchives.gov.uk/20140605090108/http://publications.natural</p>	<p>Suggested adding some more relevant legislation to list of plans, policies and programmes</p> <p>Update the responsibilities of the LPA as a Competent Authority</p> <p>Several responsibilities are set out in the Directives as Detailed in Appendix 1. Add in requested wording</p> <p>Consider assessing access to nature and natural greenspace. Should :</p> <ol style="list-style-type: none"> 1) include the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife 	<p>Added to section of national policies in the List of Plans Considered: Table 3 in the SA Scoping Report.</p> <p>P.18 Section on biodiversity and nature conservation has been updated to detail the responsibilities of the LPA as a Competent Authority under the EU Habitats and Wild Birds Directives.” In advance of undertaking an Appropriate Assessment a Competent Authority should first undertake an assessment of Likely Significant Effect of the plan. This should consider the likely</p>

		<p>england.org.uk/publication/40004?category=47004</p> <p>Table 35 – conservation and enhancement of biodiversity - should also reflect the mitigation hierarchy and role of plan making in enhancing ecological networks as set out in the NPPF policies 117 and 118.</p> <p>Table 35 – conservation and enhancement of biodiversity – should include European Site Conservation Objectives as an evidence source in addition to SSSI conservation objectives. Natural England publish this information here: http://publications.naturalengland.org.uk/category/6528471664689152</p>	<p>corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;</p> <p>2) promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;</p> <p>3) aim to prevent harm to geological conservation interests; and</p> <p>4) where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.</p>	<p>impacts of the plan on European Protected Sites within and outside of the Borough and determine if an Appropriate Assessment is required. “</p> <p>On Pg17, climate change, added wording as suggested by EA. in order to reflect the role of green infrastructure in climate change adaptation as per NPPF policy 99. “.... <i>When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure’.</i></p>
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2.	Natural England (Dorset Hampshire Isle of Wight)	<p>Sustainability Appraisal (SA) Scoping Report</p> <p>Natural England has reviewed the Sustainability Appraisal Scoping report and considers that you have broadly covered the main environmental issues to be assessed.</p> <p>To strengthen the Sustainability Appraisal further Natural England would advise including more information on the following: Landscape and Fragmentation of habitats and species.</p> <p>For landscape, it is noted that you acknowledge that there is potential for the character of the landscape and townscape to be harmfully affected by change, however in your objectives and decision making criteria landscape is not mentioned. We believe it should be.</p> <p>For fragmentation of habitats and species, we do not see this mentioned within your objectives and decision making criteria. Over time isolated and fragmented habitats and species can result in the loss of important habitats and species. As such we advise ensuring that important habitats and species are not fragmented should form an essential part of the decision process for protecting the natural environment.</p>	<p>.</p> <p>Include more information on the Landscape and Fragmentation of habitats and species</p>	<p>Noted</p> <p>Landscape and townscape character of areas is considered under the Boroughwide Village Planning process.</p> <p>Fragmentation of habitats and species is discussed under green infrastructure.in SA Report</p>						
3	Environment Agency	<p>Section 3 –Sustainability Appraisal Scoping report feedback</p> <p>We welcome the detailed environmental and flood risk evidence included within the scoping report which will help to inform robust local plan policies and the site allocation process. The evidence base should be regularly reviewed and updated using the latest environmental evidence and flood risk and climate change. Environmental data is available from datashare in the link below.</p> <p>We feel the key evidence base are included. We recommend reference to the following strategies and guidance within Appendix 1 of the scoping report.</p> <table border="1" data-bbox="465 1321 1469 1386"> <thead> <tr> <th data-bbox="465 1321 685 1386">Strategies /</th> <th data-bbox="685 1321 1189 1386">Information</th> <th data-bbox="1189 1321 1469 1386">Link to website</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Strategies /	Information	Link to website				<p>Welcomed robust environmental and flood risk evidence.</p> <p>Recommended reference to several strategies and guidance within Appendix 1 of the scoping report</p>	<p>Reference to the recommended strategies and guidance are now set out within Appendix 1 of the scoping report.</p>
Strategies /	Information	Link to website								

		<p>guidance</p>				
		<p>Thames River Basin Management Plan (RBMPs) October 2015</p>	<p>The RBMPs are the over-arching source of information on the water environment and the actions we and others are undertaking. This document sets out the:</p> <ul style="list-style-type: none"> <input type="checkbox"/> current state of the water environment <input type="checkbox"/> pressures affecting the water environment <input type="checkbox"/> environmental objectives for protecting and improving the waters <input type="checkbox"/> programme of measures, actions needed to achieve the objectives <input type="checkbox"/> progress since the 2009 plan <p>All public bodies, including local authorities are required to “have regard to the River Basin Management Plan and any supplementary plans in exercising their functions”</p>	<p>https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan</p>		
		<p>River Thames Alliance (RTA) Waterways Plan</p>	<p>The RTA is a collective membership of Council and Government bodies designed to improve, protect and promote the River Thames. Consultation and development is underway for the new Thames Waterway Plan 2015/2021</p>	<p>http://www.thames-alliance.co.uk/waterwaysplan.html</p>		

			<p>http://www.thames-alliance.co.uk/waterwaysplan.html</p> <p>Aspects of the new Thames Waterway Plan should be considered when drafting a local plan that could have the potential to influence the way in which people use the river</p>				
		Port of London Authority Plan (PLA)	<p>This is an ongoing consultation on a shared Thames Vision for the Tidal Thames. Including goals and priority actions. This also includes an opportunity map which includes the River Thames in Richmond upon Thames to Teddington Lock.</p>	<p>https://www.pla.co.uk/About-Us/The-Thames-Vision/Thames-Vision-Consultation-on-emerging-Goals-and-</p>			
		Priority-Actions					
		River Crane Catchment summary for Water Framework Directive (WFD)	<p>This summaries the current state of the water environment across the Crane Catchment and suggestions on improving the water environment. We are producing similar catchment summaries for the Thames and Beverley Catchments.</p>	<p>Attached to the EA response</p>			
		Thames Estuary 2100 (TE2100) briefing for London Borough of Richmond	<p>This key the actions required across the London Borough of Richmond upon Thames to ensure the borough is resilient to the changing climate and sea level rise as part of the TE2100 plan.</p> <p>We recommend including this as an appendix to your updated Strategic</p>	<p>Attached to the EA response</p>		<p>[Appended River Crane Catchment</p>	

		upon Thames	Flood Risk Assessment (SFRA).			summary and TE2100 briefing to the updated SFRA]
4	Historic England	<p>Sustainability Appraisal Scoping Report</p> <p>Historic England is pleased to see that earlier suggestions are largely incorporated within the SA scoping report, and that new publications, such as the Historic Environment Good Practice Advice notes are included. Consequently, our comments are few, and these are set out below.</p> <p>Plans and Programmes</p> <ul style="list-style-type: none"> - Regional context – the Mayor’s World Heritage Sites SPG could be included here - Local context – Conservation Area Appraisals could be included here - Key findings – in para 2.3.4, sustainable development, we recommend that the text in line 12 reads ‘... protecting and enhancing the <i>natural, built and historic</i> environment, ensuring social ..’ thereby identifying the historic environment in terms that align with the NPPF phrasing. (paras 61 & 157) - Key findings – in para 2.3.4, Historic environment, amend the second sentence to ‘The conservation of these <i>heritage assets and their settings</i> should be a key priority of the plan and policies should be in place to <i>protect them from harm and to take opportunities to enhance their significance...</i>’ <p>Baseline information</p> <p>Historic Environment, 3.24 – The baseline information in this section is helpful, and we are pleased to see the additions arising from Historic England’s previous comments. It would be suitable to include reference to the information in the emerging Village Plan character areas. Indicators for the Historic Environment are a matter which could be given more thought, to encompass both condition (eg. the number of heritage assets at risk) and the factors that the plan can readily influence (eg. the number of permissions where enhancement or harm to heritage assets has occurred).</p> <p>Sustainability Issues</p> <p>The historic environment sustainability issue in table on p88 requires amendment to include ‘and their settings’ as has been incorporated within the table on p89.</p> <p>SA Framework</p> <p>For sustainability objective 7, the first decision-making criterion should be amended to: ‘Will it affect the significance of heritage assets through direct impacts or impacts</p>			<p>Suggested additions and rewording of text.</p> <p>Key Findings text changes to align with NPPF.</p> <p>Suggested indicators.</p>	<p>Added, included, and wording inserted.</p> <p>reads ‘... protecting and enhancing the <i>natural, built and historic</i> environment, ensuring social ..’</p> <p>Amended to ...‘The conservation of these <i>heritage assets and their settings</i> should be a key priority of the plan and policies should be in place to <i>protect them from harm and to take opportunities to enhance their significance...</i>’</p> <p>Will consider indicators as suggested</p> <p>Amended to include ‘and their settings’</p> <p>Amended to include</p>

		on their setting?'		revised criteria
5	Alice Jean Cousens	<p>Comment for Draft Sustainability Appraisal Scoping Report:</p> <p>In relation to the Environment section:</p> <ul style="list-style-type: none"> • The <u>summary</u> does not include reference to biodiversity - only to 'Protection and enhancement of the natural environment and green infrastructure including green and open spaces'. I would like the word 'biodiversity' added after the words 'natural environment' • In the detailed item no 1 'Conservation and enhancement of biodiversity'. the Description only refers to 'designated areas' such as of national, regional or local significance. This may appear to limit the protection of biodiversity to only that which is located in areas which have been designated. I would wish the value of the biodiversity currently using or present on any site to be considered whether or not that site had been designated as of significance (e.g. for example if a local person commenting on the application provided evidence of a significant species on that site. • I would like the reference to 'fragmentation of the green spaces' to be strengthened to be more active such as to 'maintain and protect existing green corridors and routes for wildlife movement' (or similar wording). [I am not sure how LBRuT defines green corridors but I would wish to include even narrow wildlife routes e.g. hedgerows. All such green routes will be important to prevent creatures such as hedgehogs losing safe routes for foraging and to prevent pools of creatures being isolated - this will be even more important with climate change.] 	<p>Wording to add "biodiversity".</p> <p>Biodiversity to be considered on all sites regardless of designation.</p> <p>Strengthen the green corridors and green routes</p>	<p>See section 3.16 of the Scoping Report.</p> <p>[See existing Local Plan policy DM OS 5, Biodiversity and new development.] Note The presence of BAP species will be a material consideration in planning decisions]. See above : Natural England; Reference made to fragmentation of habitats and species in Green Infrastructure policies and SA Scoping Report.</p>
6	Jane Harrison	<p>You have successfully managed to make your report as incomprehensible as possible. The only thing I can partially understand is that the Lower Mortlake Road has the worst air quality of all the tested areas in the borough. Might I suggest that no more schools, hospitals, old folks homes etc be built along this filthy corridor?</p>		<p>Noted. Not for the SA Scoping Report.</p>