

Representations from consultation on Sustainability Appraisal Scoping Report								Subject = questions on Consultation Response Form
respondent no.	response no.	title	first name	surname	organisation	subject	Summary of representation	officer comment & proposed revisions
001	001.001	Ms	Sue	Rippon	Chief Executive's Department	Q1	Include South London Economic Development Implementation Plan when published.	Noted. Will include when published.
	001.002					Q2	Baseline data are appropriate	Noted
	001.003					Q3	No further data need be added to the list	Noted
	001.004					Q4	No mistakes in data made	Noted
	001.005					Q6	London bombings may have resulted in some people switching transport mode away from public transport to cars for personal safety. Could this be monitored in the SA?	This may not be possible in between Censuses.
	001.006					Q7	Being comprehensive is not always best - could identify key priorities. It is not always easy to persuade small businesses to be more sustainable.	Noted.
	001.007					Q8	Objectives are suitable	Noted
	001.008					Q9	No further objectives needed	Noted
	001.009					Q11	Methodology meets requirements	Noted
	001.010					Q12	No comments on consultation	Noted
	001.011					Q13	Most relevant data have already been incorporated.	Noted
002	002.001	Mr	Simon	Richards	The Royal Parks	Q1	Include Richmond Park Management Plan 2000-2010 & Bushy Park Management Plan 2004.	Noted. Will include in Environment Report
	002.002					Qs 2/3	Para 3.2.23 - Richmond Park is now a Special Conservation Area. Para 3.2.54 - Richmond & Bushy Parks are both Grade 1 landscapes on the English Heritage Register	Will revise content before publication of Environment Report.
	002.003					Q4	Information on Beverley Brook needs updating	Will check data on Environment Agency website and revise for inclusion in Environment Report.
	002.004					Q5	Key issues are appropriate	Noted.
	002.005					Q6	No other relevant issues	Noted.
	002.006					Q7	No issues should be removed	Noted.
	002.007					Q8	Objectives are suitable.	Noted.
	002.008					Q9	No further objectives needed	Noted.
	002.009					Q10	No objectives should be removed.	Noted.
	002.010					Q11	No comments on methodology	Noted.
	002.011					Q12	No comments on consultation	Noted.
	002.012					Q13	No other data collected.	Noted.
003	003.001	Mr	Christoph	Kratz	The Countryside Agency	Q8	SA should assess the impact of the LDF on landscape character - & Council has taken this on board & approach is therefore endorsed.	Noted.

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						Q2/3	Baseline information makes no reference to landscape character nor to open spaces, although Appendix 2 refers to indicators on the subject. Should be referred to therefore in Chapter 3.	Add cross-reference in Chapter 3 to Appendix. - and more emphasis on former. The Council will consider the issue of character areas and landscape character assessments.
004	004.001	Ms	Jill	Sanders		general	LDF should stop the ripping out of hedgerows & removal of trees in Conservation Areas, parks & water side. SA should monitor the demolition of older buildings & clearance of gardens. The importance of gardens is underestimated. The LDF's approach to open spaces should be clarified. Planners need to insist on buildings being designed and built sustainably & not built on floodplain. LDF should place more emphasis on the re-use of buildings. Replacements have no garden space & have shorter life spans. We must do better with waste management. Emphasis on reduction in car use needed - education of residents. Insufficient affordable housing is being built & should not be sold on. Overall balance of development & environment needs to be addressed. Need for green toilets for public. Allotments are a priority.	Consultation will begin in October/November on the policy development of the Local Development Framework. Many of the points raised on e.g. biodiversity will be subject to policies in the LDF. The SA & Annual Monitoring Report will monitor the LDF's impact on the environment. The SA Framework has been amended to reflect the importance of connecting and other sites, rather than key wildlife sites only.
	004.002					Q3	SA should include figures on development in the floodplain. No data on HAPS or BAPs. Community facilities should be more clearly defined - not just expensive private facilities.	Data are to be included on developments in the floodplain if available in Annual Monitoring Report & Environment Report. Data are included on developments in Green Belt, OOLTI & POS. More data on biodiversity to be included if possible.
	004.003					Q4	Data need to be updated on road traffic accidents. Data needed on the contribution of trees to air quality, light pollution, data on emerging habitats, data on Mogden sewage works.	Will consult with colleagues and update if necessary/available via Annual Monitoring Report & Environment Report.
	004.004					Q12	Council should provide feedback.	Responses to UDP consultations have been reported to Committee & available on-line for several years. This Schedule provides a summary of the SA Scoping Report consultation.

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	004.005					Q8	Obj 2 - "to make the most efficient use of land" is vague & meaningless. Obj 7- responsible management of all sites not just key sites. Obj 9 - "best use of previously developed land" - also meaningless, Obj 14 - economic growth is the greatest threat to the natural environment.	Terminology is accepted in government guidance. Obj 7 altered to conserve biodiversity throughout the borough. Point noted. However, the Government expects LPAs to take an integrated approach to achieving social , environmental and economic objectives in their spatial development plans, seeking to optimise benefits across each objective.
005	005.001	Mr	Colin	Coomber	LBRuT - Energy Efficiency Co-ordinator	Q2	Emphasis should be placed on energy efficiency objectives in documentation and the effects of sea level rise which will impact on this borough. Planning permission for renewable energy should not be refused on aesthetic grounds. More emphasis on sustainable/ ecological construction methods (recognised that this will come later in the LDF process.)	These issues have been addressed in the Sustainability Appraisal framework. Detailed policy matters will be addressed during development of Local Development Framework policies.
006	006.001	Ms	J	Gregory		Q12	Would have benefited from a summary. Easier to read a hard copy.	Hard copy offered to respondent. Executive Summary to be included in subsequent documents.
	006.002					Q2	Further emphasis needed on affordable housing provision & its location - social housing should avoid areas where there are social problems. Adequate facilities should be provided.	Affordable housing is usually provided on-site, and thus location is difficult to control. To be addressed during development of Local Development Framework policies.
007	007.001	Mr	Rob	Gray	(Chair of Richmond LA 21 - all views are his own))	general	Sustainability has been too narrowly defined - with too much reference to national policies.	The Sustainability Appraisal Framework must cover all elements of Sustainable Development.

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	007.002					Q5	Not enough emphasis on natural and built environment. Levels of income mean that there is no great need to improve economic productivity. Key sustainability concerns are the transport system, community involvement and the physical and emotional wellbeing of the population. Key issues are: providing a balance between green space & the built environment, improving the quality of life of the population, improve sense of community & social cohesion, reducing reliance on private motorised vehicles & encouraging walking & transport, encouraging the use of local supplies, skills & resources. Issue 2 - most efficient use of land - not sure what this means & not a sustainability objective. Issue 4 - could go further to encourage alternatives to car. Issue 5 - should be aiming to improve rather than maintain water quality. Issue 7 - biodiversity goes beyond protection of most important sites. Issue 14- economic growth should not be in a sustainability document better to promote local suppliers & markets. Issue 15 - does not promote sustainability.	See response to 004.005 . The Sustainability Appraisal Framework has been revised in the light of comments with regard to objectives 5 & 7. "Most efficient use of land" is accepted government terminology.
	007.003					Q1	Add report by E O&S Committee on Climate Change	Noted - to be included in Environment Report.
	007.004					Q2	Add data on link between transport & quality of life & data on mode. More data needed on waste. No data on pollution incidents in Thames. No information on community involvement.	Noted - data will be provided if possible. Data on mode of travel to work is in Appendix 2. The Draft SCI sets out details of consultation arrangements for the LDF.
	007.005					Q3	More emphasis on value of resources & social issues rather than economic development.	See response to 004.005 .
	007.006					Q4	Housing objective is problematic as to fulfil demand will have consequences for the environment. Health is also about preventative measures - link to appreciation of environment. A safe place to live is also linked to community and environmental appreciation. Economic growth should not be promoted - what is evidence for lack of diversity in economy. No mention of promoting walking, cycling & reducing dependency on the car. The framework should ensure there are no adverse effects on the environment. Biodiversity goes further than just protected areas such as SSSIs.	Noted. See Response to 004.005

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008	008.001	Ms	Victoria	Phillips	Richmond and Twickenham Friends of the Earth	Q1	Include the Mayor's Waste Strategy	Noted. To be included in Environment Report.
	008.002					Q2	Baseline data is very variable. Appears to be very thorough in relation to some areas eg employment and ethnicity of residents, but very sparse in relation to others e.g. air pollution, greenhouse gas emissions, need for employment land.	Information has been sought from various organisations. Relevant data is to be included as and when it becomes available, through Annual Monitoring Report and Environment Report.
	008.003					Q3	Suggests further data is needed. Suggests 1) Commercial waste arisings and recycling and disposal routes, 2) nos of children and adults registered with GP as suffering from asthma & other respiratory diseases, 3) detailed air quality monitoring data, 4) current emissions of CO2 & other greenhouse gases across the boro., 5) housing waiting list and transfer request data (Housing Dept), and 6) numbers of primary age children within walking distance of their school.	Noted. Availability of data requested will be examined and relevant data will be included in the Environmental Report if available. More research on housing need will be undertaken in 2006 as part of the LDF process.
	008.004					Q4	Does not know of any mistakes in data made	Noted.
	008.005					Q5	Believes key issues are too broadly stated and need to be more closely focused on local situation.	Noted. See response to 007.001
	008.006					Q6	Reworded responses (See Q5 & Q7)	(See Q5 & Q7)
	008.007					Q7	Replace "Housing for all" with "affordable housing" Remove "small employment base within the borough", "provide for local opportunities and "provide for sustainable tourism".	Government guidance requires local authorities to provide for a range of housing needs as well as affordable housing. More research will be available shortly and will be fed into the process. Government guidance sets out the numbers of new housing units to be provided.
	008.008					Q8&Q9	The objectives are mostly suitable. The separation of some objectives is suggested.	Noted. Issues broadly addressed by the Framework. No. of objectives needs to be manageable. Revisions made to energy objective (Obj. 6) as sought.
	008.009					Q10	Seeks the removal of economic objectives 14 & 15.	See response to 004.005

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	008.010					Q11	Unclear whether there will be a revised set of sustainability objectives published and made public prior to consultation on issues & options (and environmental report) stage of LDF this autumn.	A sustainability appraisal will accompany consultation draft issues and options. Any changes to the SA framework will be incorporated by then. The Environmental Report will be prepared at the Preferred Options stage, in accordance with ODPM guidance. Changes to the Framework are outlined in this document.
	008.011					Q12	Did not receive email invitation to respond despite registering as consultation contact	Will update contacts list
	008.012					Q13	has no data/information to supply to the Council	Noted
	008.013					Q14	no other comments on draft SA Scoping Report	Noted
009	009.001	Mr	Chris	Bedford	GOL	general	May be benefits in setting out "sub-objectives" as suggested in annex 5 of draft guidance	Noted
	009.002					Q2	indicator on P86 perhaps should read "number of potentially contaminated land sites remediated or found not to be contaminated"	Noted. Indicator will be revised
	009.003					Q3	London Noise Map may provide useful data <a href="http://www.defra.gov.uk/environment/noise/mapping/index.htm">http://www.defra.gov.uk/environment/noise/mapping/index.htm</a>	Further information will be added to Environmental Report if applicable
	009.004					Q8	1) Does the notion of "decent homes" apply in the borough? (obj 9). 2) PPG25 indicates a need to reduce risk of and damage that flooding causes. Repword Obj 5 to read "reduce risk of and from flooding". 3) Add water conservation to the objectives	Obj 5 reworded as sought. Issue of standards to apply to housing will be covered in Local Development Framework consultation.
010	010.001	Mr	Simon	Tompsett		Q8	Obj 7 doesn't go far enough and should seek to preserve and develop wildlife corridors. Economic growth contradicts sustainability and all references to it should be removed from the LDF.	Obj 7 altered to conserve biodiversity throughout the borough. The point made is recognised. However, the SA process requires LPAs to take an integrated approach to achieving social, environmental and economic objectives in their plans, seeking to optimise benefits across each objective.
011	011.001	Mr	James	Deasley	LA21 Building Responsibly Group	general	Useful information. An executive summary would be helpful. Scope proposed is too wide. More concise definition of sustainability would be helpful. Must protect against threat of climate change	Noted summary to be provided in subsequent documents. Agree climate change is a serious threat.

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	011.002					Q5	Social and economic "objectives" (issues in Table A3.1)) do not rank alongside those designed to combat climate change.	The point is recognised. However, the Government expects LPAs to take an integrated approach to achieving social , environmental and economic objectives in their plans, seeking to optimise benefits across each objective.
	011.003					Q8	Noise pollution is not as important as CO2 pollution. Agree obj 4 but more emphasis could be placed on walking and cycling and a stronger note that congestion should not be countered by means such as road building. Obj 7 drop "key" sites as wildlife throughout the borough merits conservation. Obj 8) "townscape" and "high quality" buildings are not sustainability issues. Objs 10-15 are not sustainability issues. In particular stimulating commercial growth would encourage over-development.	Noise pollution affects quality of life. It also can be indicative of other polluting activities such as motorised traffic and aircraft travel. See response to 004.005 & 007.002
Response from Consultation Body received after the deadline of 15th August 2005								
	012.001	Mr	Paul	Losse	English Nature	Q1	Plans & programmes have been correctly identified in relation to biodiversity.	Noted.
	012.002					Q2	OSNI is a term not in common usage and should be amended to SINC	OSNI is terminology used in the adopted UDP and is therefore relevant. However, terminology will be reviewed as part of the LDF process.
						Q3	Refer to Barn Elms Reservoir SSSI. List all nature conservation sites & areas. Include data from GLA Greater London Habitat Survey	Noted & agree to amend.
						Q3	Indicators could include extent of SINC's & bird populations Indicator confusing.	Will include data in SINC's in Environment Report. Will include bird population data if available. Indicator on sites of nature conservation importance will be amended to relate to UDP policies ENV 18 & 19.
						Q5	Existing environmental problems which are relevant to the plan or programme have not been identified. The possible policy options need to be developed.	Issues regarding biodiversity to be developed further in consultation with colleagues. Policy to be further developed through the LDF process.