

Ref no	Individual or Organisation	Issue	Section	Response	Comment	Action
-	<b>Tom Jones, Independent Consultant</b>	Presentation and general overview	Introduction	Requirement that scope in terms of which LDDs and timescale for life of Scoping Report is clear.	Paragraph 1.7 – Core Strategy, Redhill AAP, Horley Infrastructure SPD and Horley Design Guide. A clearer reference re: life could be helpful.	Clarify paragraph 1.7 so it is clear that these are only the first LDDs.
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability Appraisals	Focus on significant effects and reasonable alternatives, bearing in mind the scope of other plans and appropriate level of appraisal.	The SA should focus increasingly on key significant impacts and identify reasonable alternatives and how they have been considered. The SA will need to clarify reasons for omissions and how conflicts to be resolved through precedence, policy development and legal requirements. Later appraisal work will also address synergies and conflicts more definitively.	Add text to reflect clarification to section 5.
-	Tom Jones, Independent Consultant	SA /SEA Guidance	Next Steps for Sustainability Appraisals		Many aspirations are identified in the baseline, providing strong guidance. As specific LDD objectives are developed, targets will need to be set for more indicators.	Noted.
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability		The process of collecting and continually improving the baseline is clear. The	Noted. Add to section 5 text to clarify that "Focus for significant

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			Appraisals		baseline will be revisited for each LDD and updated if necessary. SA will focus increasingly on significant issues.	effects will emerge".
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability Appraisals		Further SA work will develop the consideration of tensions and inconsistencies. Consultation responses aid the focus.	Noted. Add to section 5 text to clarify.
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability Appraisals		Consultation responses should provide a basis for focusing on significant effects. Additional targets will need to emerge.	Noted. Consulted statutory consultees and internal Officers but received few suggestions for targets. East Surrey local authorities will continue joint working to identify significant effects/targets.
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability Appraisals		Clear opportunities will need to be afforded consultees to influence and comment upon issues and options.	Noted.
-	<b>Tom Jones, Independent Consultant</b>	SA /SEA Guidance	Next Steps for Sustainability Appraisals		It has not been possible to include 'issues and options' for any particular LDD in the Scoping Report since they are currently being	Noted.

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					devised and will be influenced by responses to the Scoping Report consultation. Further SA work must involve stakeholders early in the process and any reports demonstrate how their concerns and opinions have been considered.	
1.1	<b>Peter Russell, Drainage Engineer, RBBC Streetcare Services</b>	Water Quality and flooding	Objective No.5	There are two main issues – building in the floodplain and attenuation. They are separate issues but Objective No.5 seems to jump between them and loses the thread. The first issue is that there should be no development in the floodplain. The second is attenuation – every developer should take on board i.e. consider how it will operate/can contribute. For example, on all major planning applications (10 units plus) within the River Mole Catchment area (i.e. Central and South teams) attenuation is being asked for. This can and should be done on major applications, although it is not practical to do on single houses. As a general rule this is being asked for, whether developers are contributing is another matter as it is costly!	The Table of Objectives (pages 9 to 13) shows Objective 5 with an indicator for risk from flooding and an indicator for sustainable drainage. This would seem to cover both aspects which are referred to. Seek clarification from respondent.	Amend text to clarify.
1.2	<b>Peter</b>	Water	Objective	The small isolated EA maps look like	Ensure accurate maps	Key is from EA – quote

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	<b>Russell, Drainage Engineer, RBBC Streetcare Services</b>	Quality and flooding	No.5	they are Zones 2&3 which are not what is described in the key. Zone 2 is equivalent to a 1 in 1000 year storm and Zone 3 is equivalent to 1 in 100 year storm. Also, the area of Horley and Gatwick are duplicated in the smaller EA maps and the Borough Council larger map.	used during appraisal of policies and, more importantly, individual sites. Ensure maps are clear in updated version of SR.	source and clarify.  Delete maps 6 & 7 as using Horley Flood Study for local plan purposes.
1.3	<b>Peter Russell, Drainage Engineer, RBBC Streetcare Services</b>	Water Quality and flooding	Objective No.5	The first sentence under Sustainability problems... needs to be written in plain English.	Plain English should be used whenever possible, particularly in a summary document.	Amend first sentence.
1.4	<b>Peter Russell, Drainage Engineer, RBBC Streetcare Services</b>	Water Quality and flooding	Objective No.5	The reference to promoting the use of SUDs to reduce pressure and specifically in Redhill was questioned. Sewer upgrades can do the opposite since it pushes the water downstream. Sewer upgrades are wanted for foul water, but you just want sustainable development for surface water.	These points noted for appraisal and subsequently in designing the detailed wording of policy.	Amend to clarify and remove reference to Redhill.
2.1	David Paine, Senior Planning Officer, GOSE	Plans and Programmes influencing the LDF	Annex 1	Demonstrate that plans of neighbouring Authorities (not necessarily Surrey) have been considered. The Mayor of London's Spatial Development Strategy and West Sussex Structure Plan for example.	Consider which plans and programmes for neighbouring London and West Sussex Boroughs may be appropriate. Also see comments by West Sussex.	Include in PPPs analysis West Sussex Structure Plan (RD) and London's Spatial Development Strategy.
2.2	David Paine,	Housing	Objective 1	Pleased Objective 1 addresses	Include housing trajectory	Include.

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	Senior Planning Officer, GOSE			housing needs in principle. Could the housing trajectory be used as an indicator?	information in the 'trends' entry, Indicator 1a	
2.3	David Paine, Senior Planning Officer, GOSE	Testing objectives	General	How will the LDD objectives be established with stakeholders, noting the need to address reasonable alternatives to meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004?	During Regulation 25 consultation, specifically request stakeholders to comment on whether the options appraised are appropriate and whether any others should be appraised. Appraise any new options consequently arising prior to Regulation 26 starting. Pursue informal (telephone) as well as formal means to ensure key stakeholders have had opportunity to comment.	Noted.
3.1	Leon Hibbs, RBBC	Air Quality	Objective 8	NO <sub>2</sub> should read NO <sub>2</sub> in fourth paragraph in overview, page 60; in the first entry in the data table, page 62; and in the first and third sentences on page 64. PM <sub>10</sub> should read PM <sub>10</sub> in the table, page 62.  Title needs to be added to map, top right on page 63	Amend if revised baseline issued.	Amend.
3.2	Leon Hibbs, RBBC			Rising global ozone concentration over the coming year will not help	Note comments for appraisal and in revised	Amend.

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				efforts to reduce NO <sub>2</sub> concentrations and it is also a problem in its own right	SR.	
4.1	Ray Bowers, Head of Spatial Planning, SEERA			The Assembly is unable to comment at this stage, but wishes to be kept informed of progress on the LDF.	Noted	Noted.
5.1	Sue Janota, District Liaison Officer, Surrey County Council	Plans and programmes:  International	Table pages 5-7, Annex 1	<p>Valetta Convention (the European Convention on the protection of the Archaeological heritage) which came into force in 2001:</p> <ul style="list-style-type: none"> <li>• To provide for the maintenance of an inventory of the country's archaeological heritage (article 2i);</li> <li>• To provide for archaeological participation in planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest (article 5ia);</li> <li>• To ensure that in development schemes affecting archaeological sites, sufficient time and resources are allocated for an appropriate scientific study to be made of the site and for its findings to be published (article 5iib);</li> <li>• To make provision for conservation in situ when feasible (article 5iv)</li> </ul>	All these requirements are considered in the SR. Add references to PPP summary.	Include in PPPs analysis Valetta Convention.
5.2	Sue Janota, District	National	Table pages 5-7, Annex 1	This could be extended to include Circular 5/05 (Planning Obligations)	Requirements of the adopted PPS3 to be	Draft PPSs have not been included in PPPs

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	Liaison Officer, Surrey County Council			and Draft PPS3 (Planning for Mixed Communities)	considered in future appraisal	analysis until they are adopted. Include in PPPs analysis Circular 5/05.
5.3	Sue Janota, District Liaison Officer, Surrey County Council	National	Table pages 5-7, Annex 1	The reference to UK Strategy for Sustainable Development needs to be updated as the 2005 version now exists, 'Securing the Future' March 2005	Requirements of the updated UK Strategy for Sustainable Development to be considered in future appraisal	Include in PPPs analysis.
5.4	Sue Janota, District Liaison Officer, Surrey County Council	National	Table pages 5-7, Annex 1	PPS10, Planning and Sustainable Waste Management has now been published	Requirements of PPS10 to be considered in future appraisal	Include in PPPs analysis.
5.5	Sue Janota, District Liaison Officer, Surrey County Council	National	Table pages 5-7, Annex 1	In the comment about PPG15 in Annex 1, should the first word be 'reconcile' rather than recognise?	Amend as suggested	Amend.
5.6	Sue Janota, District Liaison Officer, Surrey	Regional	Table pages 5-7, Annex 1	Reference to the Regional Housing Strategy should be to the RHS for 2006-2009 which was published on 30 <sup>th</sup> June 2005	Requirements of updated RHS to be considered in future appraisal	Include in PPPs analysis.

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	County Council					
5.7	Sue Janota, District Liaison Officer, Surrey County Council	Regional	Table pages 5-7, Annex 1	The South East Plan reference should be updated to July 2005	Amend as suggested	Include in PPPs analysis.
5.8	Sue Janota, District Liaison Officer, Surrey County Council	Surrey	Table pages 5-7, Annex 1	Reference to 'Surrey Design' and 'Future of Surrey's Landscape and Woodlands' should be added	Add reference and summarise key issues	Include in PPPs analysis Surrey Design and Future of Surrey's Landscape and Woodlands.
5.9	Sue Janota, District Liaison Officer, Surrey County Council	Surrey	Table pages 5-7, Annex 1	The provisional Surrey Local Transport Plan 2006/07-10/11 is due to be published at the end of July 2005 with final LTP2 in March 2006. The LTP Annual Progress Report is also due out at the end of July	Add reference and summarise key issues where appropriate for a draft Plan	Include in PPPs analysis.
5.10	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 1	Fourth indicator – rather than average house price and average earnings, a better indicator of affordability would come from using the lower quartile house prices and lower quartile earnings	This focuses monitoring on the specific problem of affordability. RBBC to consider substituting for 1d or adding	Add as an additional indicator under Objective 1.
5.11	Sue Janota,	Objectives	SA Objective	An indicator dealing with the provision	In the absence of data for	Additional indicators

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	District Liaison Officer, Surrey County Council	and Indicators	2	of new and loss of existing health care facilities should be considered. An indicator on the completion of Extra Care Housing might be considered.	Indicator 2e and 2f, and if data is available, RBBC should set two indicators as suggested, particularly as this is a key issue for sustainability	relating to performance of Acute NHS Trust and completion of Extra Care Housing incorporated.
5.12	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 3	The last indicator could be broadened to provision of key services in accessible locations such as town, district and local centres.	The suggested amendment would ensure the key areas of Preston and Merstham are monitored	% of rural households deleted, as insignificant in Reigate & Banstead.
5.13	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 3	There could also be reference to access for those with disabilities	For 1j seek data which breaks down for those with disabilities	Agree that inclusion of indicator for disabled access desirable. Appropriate indicator and data will be sought for future revision.
5.14	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 5	Second indicator – need to clarify what is meant by the phrase 'properties built with sustainable drainage installed'. Suggested wording: 'number of new properties linked to sustainable drainage systems'	Use suggested wording.	Incorporate new wording.
5.15	Sue Janota, District	Objectives and		A new indicator on area of land identified for flood storage purposes	Discuss second point with Thames Water as it may	It is unclear at this stage whether flood

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	Liaison Officer, Surrey County Council	Indicators		as part of catchment flood management plan could be included	be beyond the scope of the LDD.	storage proposals will affect the Borough. Consider for future revision as and when more information is known.
5.16	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 7	Second indicator – this refers to the area of Grade 1, 2 and 3 land. This could be 3a rather than 3 to reflect national guidance and the local situation in which Surrey has a low percentage of Grade 1 and 2 land.	Amend as suggested	Indicator altered to recognise local situation. Source of data to be identified for use in future revision.
5.17	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 8	Third indicator – need to clarify what is meant by the term ‘poor air quality’.	3 <sup>rd</sup> – The background information provides detail of what poor air quality would be. The target in the table also refers to UK Air Quality objectives. No amendment considered necessary, although it will be important to be clear about the definition in summary documents.	Amend to clarify.
5.18	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 8	Fifth indicator – it could be argued that this is 100% so why needed? If it only relates to motorway and primary roads, this should be mentioned	5 <sup>th</sup> – RBBC to clarify meaning and target through discussion with SCC LTP Team	Clarify indicator.

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5.19	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 10	Fifth indicator - A revised wording might be 'proportion of potential archaeological sites (i.e. Areas of High Archaeological Potential and development sites over 0.4ha) where acceptable archaeological assessment took place. Proportion of these where archaeological recording took place to a satisfactory standard having been required. Proportion should be 100% in each case.' This allows for the standard system: all sites as defined should have proper assessment, but some assessments will show that there is no need for further work. When a need for further work is identified this should be required and then take place.	Amend as suggested	Incorporate amended wording.
5.20	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators		Eleventh indicator – the proposed use of the Accessible Greenspace Standards as an indicator is welcomed, but it is worth noting that applying the standard to the Borough as a whole may mask local areas of deficiency and it may also be worth considering applying the standards at a ward or parish level.	Consider revising at a later date once the effectiveness of the current indicator and availability of information has been tested.	If the Accessible Natural Greenspace standard is incorporated in future policy, the detail of its implementation will be considered at that time, along with standards and targets.
5.21	Sue Janota, District Liaison Officer, Surrey	Objectives and Indicators		There is no mention of landscape conservation and enhancement or management of the urban fringe within the indicators. The AONB and Green Arc could be referred to within	It is difficult to identify an indicator for landscape conservation due to the nature of its value. Whilst a more meaningful	Landscape conservation is undertaken by a variety of groups throughout the Borough: north,

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	County Council			indicators.	indicator is sought, a reference should be added as suggested.	central and south. Indicators derived from the Downlands Project and Gatwick Greenspace Partnership have been incorporated as a proxy.
5.22	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 11	Second indicator – should the measure not be traffic levels so that one can judge whether or not reduction has occurred? Also, given that growth in car traffic is likely to be inevitable, an indicator dealing with the reduction in growth of car traffic should be considered.	No change, the indicator is a percentage of a base level set in 1998.	Taken from LTP, therefore no change.
5.23	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 16	An indicator on mixed use developments should be considered	No change, the indicators are considered to provide a measure for the consequences of mixed use development, such as reduced need to travel and better supply/demand balance	No change.
5.24	Sue Janota, District Liaison Officer, Surrey County Council	Objectives and Indicators	SA Objective 20/21	There should also be indicators such as number of homes taking up energy saving grants and number of development schemes incorporating renewable energy generation of part of its energy demand. In particular, Objective 20: Third Indicator – other alternatives such as solar panels. PV should be mentioned if CHP is to be	Point on Objective 20 accepted, but cross-reference to 21a is possible. No change	Improvement in dwelling SAP is optimum measure for energy efficiency. CHP is indicator for energy efficiency only as it is highly likely to be gas-fired. Full range of RE technologies are

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				specified.		included as indicators to Objective 21.
5.25	Sue Janota, District Liaison Officer, Surrey County Council	Baseline	SA Objective 1b	Under targets, recent advice to SEERA on policies for the London Fringe proposes 40% affordable housing and not 50%	Amend as suggested	Amend.
5.26	Sue Janota, District Liaison Officer, Surrey County Council	Baseline	SA Objective 10e	This needs to link to development and take account of the possibility of there being no finds to record	Noted and see 5.19	Make change in line with comment 5.19.
5.27	Sue Janota, District Liaison Officer, Surrey County Council	Baseline	SA Objective 11	The commentary will need to be updated to reflect the Provisional LTP and 2005 Annual Progress Report. Also the RTS recognises the regional hub as Reigate/Redhill not just Redhill.	Noted, see 5.9	Update commentary. Accept other changes.
5.28	Sue Janota, District Liaison Officer, Surrey County Council	Baseline	SA Objective 11j	There is no Structure Plan target 12	Amend the source of 11j to refer to Policy DN3 of the Structure Plan 2004	Amend.
5.29	Sue Janota,	Baseline		The County Council is developing a	Noted	Noted.

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	District Liaison Officer, Surrey County Council			data repository 'Surrey Data Online'		
5.30	Sue Janota, District Liaison Officer, Surrey County Council	General		Please see the evaluation framework for SEA/SA produced by Jessica Salder (on the S-Net)	Noted	Noted.
6.1	Judy Sauter, Planning Officer, Surrey Wildlife Trust	Plans and programmes	Annex 1	SWT consider all relevant plans, programmes and strategies have been included	Noted	Noted.
6.2	Judy Sauter, Planning Officer, Surrey Wildlife Trust	Objectives		SWT supports the sustainability objectives	Noted	Noted.
6.3	Judy Sauter, Planning Officer, Surrey Wildlife Trust	Indicators	SA Objective 9	Indicators: 'to conserve and enhance biodiversity within the plan area'. SWT considers the general indicator of 'population of wild birds' will not be able to be monitored as birds are highly mobile and as far as SWT can ascertain there are no organisations that monitor on a borough/district	Delete indicator and discuss potential to monitor specific species with English Nature.	Delete indicator. Specific species will be included as directed by English Nature.

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				level. SWT has been in discussion with English Nature and the County Ecologist regarding this and believes English Nature is looking at specific bird species that live in a fairly restricted habitat type that could possibly be monitored.		
6.4	Judy Sauter, Planning Officer, Surrey Wildlife Trust			'Extent and condition of key habitats for which Biodiversity Action Plans have been written' – at this moment this information is not available due to a lack of resources, in particular for the Surrey Biological Records Centre. This data will be available in the future but depends on the availability of future funding for the BRC.	Noted	Noted.
6.5	Judy Sauter, Planning Officer, Surrey Wildlife Trust			'to address the causes of climate change through reducing emissions etc.' – SWT supports the indicator requiring the monitoring of a number of sites of ecological interest where flora or fauna were damaged by extreme or persistent weather events, but query how it could be achieved.	Noted	Further information will be sought as to how this indicator could be adequately monitored in future revisions.
6.6	Judy Sauter, Planning Officer, Surrey Wildlife Trust		SA Objective 7	'maintain and improve the water quality of the region's rivers and groundwater etc' – although not within the Trusts remit SWT questions whether the number of call outs by water authorities could be an indicator of the boroughs plans and policies as it appears to be outside the control of	Accepted that the LDF would not directly be able to control leakage, but planning policy can ensure adequate and suitable infrastructure. No action.	No action required.

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				the LPA and unrelated to its duties.		
6.7	Judy Sauter, Planning Officer, Surrey Wildlife Trust			SWT questions the availability of baseline indicators for all the above	Noted	Noted. The Borough Council is happy to take further advice regarding the appropriate choice of indicators as and when these are clarified.
6.8	Judy Sauter, Planning Officer, Surrey Wildlife Trust		SA Objective 5	SWT fully supports the opportunities for Objective 5 and in particular the contribution of SUDS, not only to flood defence but also in providing benefits for biodiversity. Likewise the promotion of rainwater harvesting reduces the dependence on water resources and Green Roofs provide benefits for biodiversity as well as insulation and aesthetic advantages.	Noted	Noted.
6.9	Judy Sauter, Planning Officer, Surrey Wildlife Trust		SA Objective 6	SWT welcomes the recognition that brownfield sites may support biodiversity. Each site should be judged on its merits rather than a blanket policy to use brownfield sites before greenfield.	Noted	Noted.
6.10	Judy Sauter, Planning Officer, Surrey Wildlife Trust	Indicators	SA Objective 9	The text states that Local Nature Reserves enjoy statutory protection, the only protection afforded to LNRs is Local Plan or LDF policies	Ensure reference is correct in updated versions of the Scoping Report and future SA work	Reference corrected. Also reference to Mole Gap to Reigate Escarpment updated to its new SAC designation.
6.11	Judy Sauter,		SA Objective	Please see comments above relating	Noted	Noted (See comment

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	Planning Officer, Surrey Wildlife Trust		9	to the availability of quantified data and source (6.7). SWT supports the summary for this objective which shows Reigate and Banstead's commitment to protect and enhance the Borough's biodiversity		against 6.7).
6.12	Judy Sauter, Planning Officer, Surrey Wildlife Trust		Annex1	With regard to the key targets and indicators relevant to the LDF and SA Annex 1 SWT recommends the following amendment: 'There will be no direct loss or damage through inappropriate management of Council owned sites or from development, to sites of international, national or county wildlife importance, including priority habitats identified in the Surrey Biodiversity Action Plan and priority species identified in the UK Biodiversity Action Plan.	Whilst emerging policy in the Core Strategy DPD will seek to protect these areas, the management of Council land would be more directly relevant to other RBBC Plans and Programmes.	Noted. No action required.
6.13	Judy Sauter, Planning Officer, Surrey Wildlife Trust			SWT looks forward to the drawing up of a Core Strategy and Development Plan Documents with robust policies that support sustainable development and protect and enhance the boroughs biodiversity.	Noted	Noted.
7.1	Georgie Cook, Planning Administrator, Thames Water	Indicators	SA Objective 19	A key sustainability objective for the preparation of the new LDF should be for new development to be co-ordinated with the infrastructure it demands and to take account of the capacity of existing infrastructure.	Indicators in Objective 19 cover this issue, although not specifically as 'Infrastructure'.  Policies requiring adequate	Noted.

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	Properties			Paragraph 4.9 of PPS12 2004 states: 'LPAs should ensure that delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision'	and sustainable provision of infrastructure will need to be developed.	
7.2	Georgie Cook, Planning Administrator, Thames Water Properties		SA Objective 19	<p>Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as water supply and sewerage in preparing LDDs. Paragraph B3 in particular states: 'The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of <u>all</u> LDDs. Infrastructure here includes water supply and sewers, waste facilities ...'</p> <p>TW Properties therefore considers that it is essential that the list of main objectives and indicators to be covered is amended to make reference to the provision of adequate utilities infrastructure to service development to avoid unacceptable</p>	<p>As above.</p> <p>Also discuss which indicators would be appropriate for waste water.</p>	Strengthen text relating to sewage and waste water to address concerns. Request for additional indicators from Thames Water not presently met.

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				impacts on the environment such as sewage, flooding of residential and commercial property, pollution of land and watercourses plus water shortages associated with low pressure and water supply problems. Objective 19 relates to water supply and water efficiency but does not cover sewerage and waste water treatment which is considered to be a major flaw.		
7.3	Georgie Cook, Planning Administrator, Thames Water Properties	Indicators	SA Objective 19	Section D5 of the Draft South East Plan, January 2005, relates to 'Sustainable Natural Resource Management'. Paragraph 1.10 states: 'the quality of rivers is affected by discharge of waste water effluent from housing, business and industry and diffuse urban and agricultural pollution. A growing population will place extra demands on the sewage treatment infrastructure and water receiving effluent. Water quality standards are also getting tighter, in part to meet requirements of the European Habitats Directive and Water Framework Directive. Ensuring that water quality is maintained and improved, while accommodating new housing and economic development, is also a key challenge for the region.'	Noted	Noted.
7.4	Georgie		SA Objective	In March 2005 The Planning	It will need to be	DPDs will be subject to

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	Cook, Planning Administrator, Thames Water Properties		19	Inspectorate published 'A Framework for Assessing Soundness and Focusing Representation on DPDs and SCIs'. Paragraph 3.4.2 includes a key question stating: 'Has adequate account been taken of the relationship between the proposals in the Plan and other requirements, notably those of utility companies and agencies providing services in the area which have a requirement for land and premises?' It is considered at present that the Scoping Report does not answer this key question and would, therefore, fail the 'soundness' test. The Scoping Report should be amended as detailed above.	demonstrated that the SA process as a whole has taken such considerations into account. The revised Scoping Report can also address this matter.	the test of soundness that the plan and its policies have been subjected to sustainability appraisal. The Scoping Report itself should not be subject to a test of soundness. The Scoping Report does address expectations about the future availability of infrastructure and therefore the appraisal of each DPD will need to take this into account. No further action required.
8.1	Steve Brown Planning Services West Sussex County Council		General	Thank you for your letter of the 23rd June 2005 inviting comments on the above document. Firstly, may I congratulate you on producing such a comprehensive document, it's very impressive. Well done!	Noted	Noted.
8.2	Steve Brown Planning Services West Sussex County		Annex 1	Should there be references to adjoining planning authorities plans? I'm thinking particularly of our adopted West Sussex Structure Plan 2001 - 2016, and our adjoining District	Request PPP summary information from West Sussex and include any appropriate issues from WS Structure Plan. See	Include in PPPs analysis West Sussex Structure Plan (see also comment 2.1).

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	Council			Councils local plans and emerging LDFs? Reason: Cross border planning policies, allocations, etc.	also 2.1 above	
9.1	Steve Williams, English Heritage	General		Overall, I believe the draft provides much of what will be required to assess the LDF and the sections relating to the historic environment are well developed	Noted	Noted.
9.2	Steve Williams, English Heritage	General		The historic environment is more than a cultural or environmental asset; it is an important driver for economic regeneration, helps build social cohesion and provide a better quality of life for all.	Noted. The nature of the SA Framework and SA methodology allow for cumulative benefits to be recognised and positive synergies developed	Noted.
9.3	Steve Williams, English Heritage	Baseline	SA Objective 10	In terms of baseline data, it is important that the historic environment is broadly defined; all designated historic assets and their settings should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. PPS12, paras 4.8/4.9 makes it clear that policies prepared by the local planning authority should be founded on a thorough understanding of the needs of their area and the opportunities and constraints which operate within that	Noted. As above.	Noted.

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				area. The evidence base is critical to the preparation of local development documents.		
9.4	Steve Williams, English Heritage	Baseline		<p>There are some problems in representing the historic environment spatially in an appropriate way. Point data provided by individual designations makes a useful but partial contribution. Historic landscape characterisation and urban characterisation broadens the understanding of place describing the evolution of the present day landscape / townscape.</p> <p>Information sources include: the historic environment record (HER/SMR); historic landscape characterisation (HLC); Extensive Urban Studies (EUS); Urban archaeological databases (UAD); Buildings at Risk register (BAR) and the annual state of the historic environment report 'Heritage Counts' (see <a href="http://www.heritagecounts.org.uk">www.heritagecounts.org.uk</a>).</p>	Noted (see 9.5).	Noted.
9.5	Steve Williams, English Heritage	Indicators	SA Objective 10	<p>The heritage sector is working on a number of possible indicators that may be drawn from the following:</p> <p>Number of Listed Buildings under each grade                      Number and % LBs at risk</p>	RBBC to consider using indicators from this list which are not already included in the SA Framework (highlighted yellow).	Will assess availability of data to support the usability of these indicators for use in future revisions.

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				Number of SAMs Number and % archaeological sites at risk Number of registered historic parks and gardens Number and % at risk Number of conservation areas Number and % Conservation Areas with appraisals Number of conservation statements submitted in connection with an application for listed building consent Impact of change on the character or appearance of conservation areas % or areas of historic buildings, sites and areas, including locally listed assets, affected, whether in an adverse or beneficial way Street / public realm audits, improvements works, de-cluttering works % residents content with character and appearance of local area The rate of loss of historic landscape features Erosion of quality character and distinctiveness		
9.6	Steve Williams, English Heritage			When making a judgement on significant effects on the historic environment, including within this architectural and historic landscape quality, the following should be considered:	Noted for Appraisal sessions.	Noted.

Ref no	Individual or Organisation	Issue	Section	Response	Comment	Action
				<ul style="list-style-type: none"> <li>• Rarity and trends</li> <li>• The historic environment is irreplaceable</li> <li>• Thorough understanding of the historic environment can inform new development and avoid or reduce significant impacts</li> <li>• The inextricable link between the historic and natural environment and landscape</li> </ul> <p>When considering impacts upon the historic environment, you are advised to consider the effect of cumulative impacts before concluding that impacts on individual heritage sites are not strategically significant. This is because individual sites can have regional or national significance, perhaps through scarcity or individual associations, or because the cumulative minor impacts on a range of individual sites becomes significant.</p>		
9.7	Steve Williams, English Heritage	Terminology and methodology	Introduction	Para. 1.3 of the Preliminary Scoping Report refers to conflict and the issue of 'balance'. Such an approach to accommodating competing needs is less favoured than one which attempts to 'reconcile' economic, social and environmental requirements, since the former invariably implies a straight choice between conflicting demands on land resources. PPG15 (para. 1.2) describes the process as one of	Agreed, although seeking a balance does not necessarily exclude integration and reconciliation. Use this terminology in subsequent SA documents where it provides a clearer explanation of the balance.	Amend Para. 1.3 to take account of need to reconcile aims.

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				'reconciling' development with the need to protect the natural and historic environment, while the recently published PPS1 'Delivering Sustainable Development' (para. 4), describes the process as one of 'integrating' the various competing aims and achieving outcomes 'together' (para. 13(i)). I feel that integration/reconciliation are preferable to 'balance' under the circumstances.		
9.8	Steve Williams, English Heritage	SEA	Introduction	Para. 1.4 refers to the joint consideration of SA/SEA processes. ODPM draft guidance [Sustainability Appraisal of Regional Spatial Strategies & LDFs] requires that the SEA components be clearly signposted (para. 1.2.19).	Noted. The Final SA Report will clearly identify an audit trail for the SA/SEA process and how the SEA Directive has been met.	The Final SA Report will clearly identify an audit trail for the SA/SEA process and how the SEA Directive has been met.
9.9	Steve Williams, English Heritage	Plans and programmes	Annex 1	'Surrey Design: A Strategic Guide for Quality Built Environments' should be considered as an addition to the Plans & Programmes schedule in Section 2.	Identify key appropriate points for SA.	Include in PPPs analysis (see also comment 5.8).
9.10	Steve Williams, English Heritage	Key issues	Plans and Programmes, Section 2	It is disappointing that the summary of issues presented at paragraph 2.3 makes no specific mention of environmental protection, including the need to safeguard character and distinctiveness.	Noted. Environmental protection remains a cornerstone of sustainability. The numerous indicators covering this issue ensure this.	The list is not intended to be exhaustive, but add additional bullet point in Para. 2.3 to include.
9.11	Steve	Community		Para. 2.7 refers to a proposed review	Provide copy of 'Local	Copy forwarded to the

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	Williams, English Heritage	strategy		of the current Community Strategy. English Heritage is concerned to ensure that local strategic partnerships give due consideration to the historic environment when considering their strategies. I attach for your information an electronic-copy of the publication 'Local Strategic Partnerships & the Historic Environment'.	Strategic Partnerships and the Historic Environment' to the Officers producing the Community Strategy.	Community Strategy team.
9.12	Steve Williams, English Heritage	Previously developed land	Section 2	The point at para. 2.10 that the use of previously developed land, particularly at higher densities, can lead to a loss of character is well made. This leads to the need for character appraisals, their regular review and appropriate indicators to monitor change.	Noted. RBBC to consider Character Appraisals in future work programmes.	Noted.
9.13	Steve Williams, English Heritage	Objectives	SA Objective 10	It is recognised that the SA process is iterative and part of that iteration concerns the availability of meaningful data and the development of appropriate targets and indicators. I would like to suggest Sustainability Objective 10 be modified slightly to fit more comfortably with PPG15. 'To protect, and where appropriate enhance and make accessible.....'. I also suggest registered parks and gardens be added to the list of indicators, and subject to availability of data, locally important historic buildings and historic parks and	Make amendments as suggested (see also 9.5)	Amend as suggested.

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				gardens.		
9.14	Steve Williams, English Heritage	Baseline	Section 4	In considering the contribution of previously developed land and buildings, the potential impact upon the historic environment should be added to the considerations in the last paragraph on page 53.	Amend as suggested.	Amend as suggested.
9.15	Steve Williams, English Heritage			I welcome the acknowledgement in the overview section accompanying Objective 10 that the historic environment is about more than the designations, and the importance of character and distinctiveness.	Noted	Noted.
9.16	Steve Williams, English Heritage			You may be aware of the recent joint publication by the statutory environmental bodies 'Environmental Quality in Spatial Planning'. This is available via our respective web sites and hopefully it will provide a useful contribution to the LDF preparation process.	Noted	Noted.
9.17	Steve Williams, English Heritage			The opinions expressed above are based upon the information provided by you enclosed with your letter of 23 June 2005, and for the avoidance of doubt, we may be obliged to provide further advice and potentially object to any specific proposals which may subsequently arise from this consultation or later versions of the plan and which may, despite the SEA,	Noted	Noted.

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				have an adverse effects on the environment.		
10.1	Ben King, Environment Agency	Baseline		We are preparing a set of GIS datasets for your Borough. These will be copied onto a CD-ROM and sent separately.	Add appropriate information to amended SR	Include dataset of Industrial Sites and Pollution in objective 7.
10.2	Ben King, Environment Agency	Baseline		<p>The Environment Agency is preparing River basin Characterisation maps in response to the requirements of the Water Framework Directive (WFD). These maps will show the likelihood of waterbodies achieving WFD objectives as a result of the significant pressures acting on them. These maps are likely to show:</p> <ul style="list-style-type: none"> <li>• <b>Significant point source pressures</b> e.g. effluent from waste water treatment works and industrial discharges;</li> <li>• <b>Significant diffuse source pressures</b> e.g. run-off from farm land and urban areas, acid rain</li> <li>• <b>Significant morphological pressures</b> e.g. land claim for ports or housing, structures for flood defences, river straightening</li> <li>• <b>Significant abstraction and flow regulation pressures</b> e.g. abstractions for manufacturing processes</li> </ul>	When available use in subsequent stages of SA.	Noted.
10.3	Ben King, Environment	Plans and programmes	National	The UK's sustainable Strategy has been updated in March 2005 with	Amend Table page 5 and ensure appropriate	Include in PPPs analysis and will be

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	Agency			'Securing the Future - UK Government sustainable development strategy'	references to 'fifth sustainability objective in SR	taken into account during joint working to amend the future SA framework.
10.4	Ben King, Environment Agency	Plans and programmes	Local	<b>Draft River Mole Strategy</b> – this looks at flood risk and ways to manage that risk for the River Mole Catchment	Amend Table page 6 and consider key points	General thrust from draft Strategy already represented in the baseline for Sustainability Objective 5 and draft Strategy now mentioned. Once Strategy is finalised it can be included as a PPP.
10.5	Ben King, Environment Agency	Plans and programmes	Local	<b>The Mole Catchment Abstraction Management Strategy (CAMS)</b> , which sets out the strategy for water resources management in the catchment. The Mole CAMS is due to be completed in April 2006.	Consider key points when available.	Noted.
10.6	Ben King, Environment Agency	Objectives	SA Objective 5	An additional indicator could be the number of properties or households that have access to the Environment Agency's flood warning service. We can provide numbers of household that are included on the system.	Add indicator	Add indicator. Link to data awaited from EA, will be incorporated into future revision.
10.7		Objectives	SA Objective 9	An additional indicator could be the 'ecological value of river corridors'. This is a good indicator of the impact of development (impact of water quality) on the biodiversity of the river	Consider adding if other indicators are not sufficient	This indicator is already included as an indicator to Objective 19 "Water quality of rivers".

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				corridor. We undertake river corridor surveys on main rivers and will be able to provide data. It would also tie with the objective of the Water Framework Directive to get all water bodies to 'good status'.		
11.1	Gillian Fensome, Countryside Agency	General		No formal representations. Outlined the Countryside Agency's strategic policy involvement and priorities, for information.	Noted	Noted.
-	N/a	Update to PPPs	2 – table of PPPs and Annex 1	N/a	N/a	Include in PPPs analysis PPS 9.
-	N/a	Update to PPPs	2 – table of PPPs and Annex 1	N/a	N/a	Include in PPPs analysis ABI The Vulnerability of UK Property to Windstorm damage.

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