



**LBRuT analysis of all responses received on the consultation of the draft Sustainability Appraisal Scoping Report from 24<sup>th</sup> February to 5<sup>th</sup> April 2020, including how the comments and issues raised by the respondents have been taken into account in the Revised SA Scoping Report (July 2020).**

**Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered nor are they in any order of priority.**

<b>Respondent reference no.</b>	<b>Name / Organisation</b>
3.	Katie Parsons, Historic England
13.	Heather Archer, Highways England
17.	Hannah Bridges, Spelthorne Borough Council
19.	DP9 on behalf of London Square Developments

No.	Name/ Organisation	Response	Officer comments	Changes made to the Revised SA Scoping Report (July 2020)
3.	Katie Parsons, Historic England	<p><b>Representations on behalf of Historic England</b></p> <p>As you will be aware, under the provisions of Article 5(1) of the SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon “cultural heritage including architectural and archaeological heritage”. In terms of the historic environment, whilst we would many aspects of the Appraisal, we have the following comments to make:</p> <p>Plans, Policies and Programmes: There are a number of other relevant plans and programmes that should be included in Section2.2:</p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention</li> <li>• European Landscape Convention</li> <li>• The European Convention on the Protection of Archaeological Heritage</li> <li>• Convention for the Protection of the Architectural heritage of Europe</li> <li>• Ancient Monuments &amp; Archaeological Areas Act 1979</li> <li>• The Royal Botanic Gardens Kew World Heritage Site Management Plan</li> <li>• The local level is also important in setting the appropriate context for the scoping report, which could helpfully draw on Richmond’s existing characterisation studies, local lists, Buildings of Townscape Merit SPD, Conservation Area Appraisals etc. Aspects of the emerging plan have the potential to impact upon the wider historic environment across administrative boundaries. It may be necessary to use local documents from neighbouring boroughs as part of the SA’s baseline evidence where relevant.</li> </ul>	It is considered appropriate to add details in the plans, policies and programmes that set the local context	<p>Added reference to the Kew World Heritage Site in section 2.2, paragraph 3.17.1.</p> <p>Included reference to a number of higher level Heritage documents in PPP section.</p>

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		<p>Section 3.24 - Historic Environment: This section is locally specific, detailed, and comprehensive. We are pleased to see that cross-boundary issues are being taken into consideration.</p> <p>Sustainability issues page 88- we welcome that the conservation of the historic environment is recognised as sustainability issue. Column 3 should be expanded upon to make reference to the Kew World Heritage Site and to the borough's Registered Parks and Gardens. Issues related to traffic congestion, air quality, noise pollution and other problems can affect the historic environment and detract from the setting of heritage assets and so it would be useful if this was identified as an issue.</p> <p>SA Objectives page 101 - this section should make reference to the Kew World Heritage Site and should reference the objectives set out in the WHS Management Plan.</p> <p>Method for Generation of Alternatives – The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires careful judgment based on site visits and the available evidence base.</p> <p>Conclusion We have produced a number of detailed Good Practice Advice and Advice Note documents that we recommend you review as part of your plan preparation process</p>	<p>Support for the Historic environment section.</p> <p>A number of criteria will be used in the selection of alternative proposals. This will take account of the latest evidence available.</p> <p>Noted</p>	<p>Added in reference to Kew World Heritage Site and to the borough's Registered Parks and Gardens and the issues likely to affect them.</p> <p>Included goals and objectives of Kew WHS Management Plan (details in Appendix 2 as a relevant local Policy /plan programme/strategy/ initiative) and added reference into the SA decision-making criteria (Table 33).</p> <p>Alternative proposals will be subject to SA, to help guide decision making.</p>

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13.	Heather Archer, Highways England	Of growing concern to Highways England is air quality and the impact of development traffic contributing to emissions from traffic on the SRN. We shall be paying particular attention to air quality matters and stress the need for appropriate monitoring. It is noted that the document does make reference to the SRN and highlights that there are high levels of traffic in the borough in the morning and evening peaks. However, no reference has been made to how the borough plans to reduce the impact of this (i.e. it should make reference to the car-free or car-lite proposals stated in the Local Plan Direction of Travel Consultation document). We recommend that this document should therefore ensure it identifies ways to reduce peak hour flows on the SRN.	The Council has a role to play in influencing the behaviour of residents in the borough and the Richmond Active Travel Strategy (adopted June 2020) will enable and encourage encouraging 'modal shift' away from the highest emitting forms of transport towards the lower emitting forms of transport where possible. The Direction of Travel already referred to embedding car-free or car-lite lifestyles where opportunities arise, particularly in major development.	Added reference to the Active Travel Strategy at paragraph 3.10.3, and to car free or car-lite development as a possible policy option to address the identified sustainability issue of high car use and congestion on the road network (Table 32). To be considered in the preparation of Local Plan policies. Application of car-free and car-lite proposals will be included as possible mitigation measures in the SA.
17.	Hannah Bridges, Spelthorne Borough Council	The SA should be a key factor in the determination of the strategy pursued through the new Local Plan. This should be an iterative process and should seek to minimise the adverse impacts arising through the Plan.	Agreed, SA is an iterative process to develop viable options and alternatives.	No change proposed.
19.	DP9 on behalf of London Square Developments	<b>Sustainability Appraisal – p. 6</b> The approach to considering environmental, social and economic sustainability in plan-making is supported. Environmental impact arising from pollution is particularly relevant to the subject Site. Its current industrial use has the potential to generate high levels of commercial vehicle traffic and therefore significant air quality impacts to surrounding residential uses. As	Note support for the wider approach. Industrial sites are considered suitable for employment uses such as office, light industry, studio/workshop or similar	The specific site put forward will be considered as part of the Council's response to the call for sites.

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	(regarding the Greggs Bakery site)	part of the approach to promoting environmental sustainability, consideration must be given to protecting established residential communities from poor air quality.	non-polluting uses which can be carried out adjacent to residential property without seriously harming residential amenity.	