



LONDON BOROUGH OF
RICHMOND UPON THAMES

Local Plan

**Site Allocations
Development Plan Document**

**Sustainability Appraisal Scoping Report
Responses analysis**

Analysis of consultation responses received during the consultation on the Scoping Report from 15 March to 19 April 2013, including how the comments and issues raised by the respondents have been taken into account in the Revised SA Scoping Report (July 2013).

July 2013

No	Name / Organisation	Full Response	Response summary	Changes made to the Revised SA Scoping Report
1	Simon Richards, Royal Parks	Bushy Park is more important than the text here would suggest. Both Bushy and Home Parks are being considered for SSSI notification by Natural England and this document should acknowledge that. (Note: Bushy Park is being considered for notification for its invertebrates, veteran trees and acid grassland; it is among the top ten sites in England for decaying wood invertebrates).	Bushy and Home Parks are being considered for SSSI notification by Natural England and this should be acknowledged.	Edited 3.16.4 in line with the consultation response.
2	Simon Richards, Royal Parks	More acknowledgement needed of sites of regional importance (Sites of Metropolitan Importance for Nature Conservation) - as set out in the London Mayor's biodiversity plan.	More acknowledgement needed of sites of regional importance.	Edited 'Conservation and enhancement of biodiversity' in Table 33 in line with the consultation response.
3	Simon Richards, Royal Parks	Focussing only on the condition assessments for the site(s) as a measure is weak as these measures are only (at the moment) one of the site's key features (Acid Grassland) and assessments are carried out infrequently by Natural England.	Condition assessments are insufficient as they are carried out infrequently by Natural England.	There is no other available data source for the Council to include the condition of SSSI other than the Condition Assessment produced by Natural England. No changes have been made.
4	Simon Richards, Royal Parks	The sustainability issues table doesn't include the threat of non-native invasive species. It is important the document also mentions the threat of intensification of development along Park boundaries. The density of development around and in between the Royal Parks increases their isolation resulting in a greater degree of fragmentation of the green spaces.	The sustainability issues table doesn't include the threat of non-native invasive species. Need to mention the threat of intensification of development along Park boundaries.	Edited 'Conservation and enhancement of biodiversity' in Table 33 in line with the consultation response. Also amended Section 5.3 'SA Assessment Framework and Decision Making Criteria' in relation to Objective 6.
5	Simon Richards, Royal Parks	SA objective 2 should include light in the list of significant pollutants. Pollution includes light pollution – this is not picked up in other references to pollution throughout the document. Light pollution is a serious risk to biodiversity. The Royal Parks are intrinsically dark spaces that require protection from artificial	SA objective 2 should include 'light' in the list of significant pollutants.	Edited 'Sustainability Appraisal objective 2' (in Tables 34 and 35 and Appendix 3) in line with

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		lighting impacts.		the consultation response.
6	Simon Richards, Royal Parks	Page 96 (<i>of the original SA Scoping Report</i>) – 6) A lot depends on what is meant by “Analysis” of sites... Unless meaningful metrics are identified and used this could be no use at all. For example: audit to ensure no net loss in extent or degradation of habitats of wildlife importance.	What is meant by “Analysis” of sites; establish meaningful metrics; e.g. audit to ensure no net loss in extent or degradation of habitats of wildlife importance.	Amendments have been made in section 5.3 ‘SA Assessment Framework and Decision Making Criteria’ in relation to Objective 6 in line with the consultation response.
7	Simon Richards, Royal Parks	Page 96 (<i>of the original SA Scoping Report</i>) – 8) should say loss or degradation.	(<i>Original SA Scoping report</i>) page 96, 8) should say loss or degradation.	Amendments have been made in section 5.3 ‘SA Assessment Framework and Decision Making Criteria’ in relation to Objective 8 in line with the consultation response.
8	Charles Muriithi, Environment Agency	<p>Additional evidence includes:</p> <ul style="list-style-type: none"> • Local Flood Risk Management Strategy <p>By 2015, the council is required to develop, maintain, apply and monitor a local flood risk management strategy. The legislation notes that it should be a strategy covering:</p> <ul style="list-style-type: none"> - An assessment of local flood risk - Objectives for managing flood risk and the measures proposed to achieve these objectives - How and when measures will be implemented - The cost of the measures, and how they will be paid for - The Risk Management Authorities and their functions. <ul style="list-style-type: none"> • Preliminary Flood Risk Assessment (PFRA) • Environment Agency’s Thames Catchment Flood Management Plan (CFMP) Richmond is incorporated in the Lower Thames section. • London Borough of Richmond upon Thames Surface Water Management 	<p>The following plans/policies should be added to the SA:</p> <ul style="list-style-type: none"> - Local Flood Risk Management Strategy - Preliminary Flood Risk Assessment (PFRA) 2011 - London Borough of Richmond upon Thames Surface Water Management Plan (SWMP) 2011 	Table 3 has been edited in line with the consultation response. Note, the LFRMS has not been added as this has not yet been produced by/for this Council.

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		Plan (SWMP)		
9	Charles Muriithi, Environment Agency	<p>Evidence in section 3.19 on flooding covers the key evidence base. It may be prudent to mention the Thames Catchment Flood Management Plan and the Lower Thames Flood Risk Management Strategy; which is a long-term plan to manage flood risk in the Lower Thames area. The Environment Agency produced the plan with other public bodies.</p> <p>The strategy aims to reduce the risk of river flooding to 15,000 properties with a one per cent annual (1 in 100 year) chance of flooding, from Datchet to Teddington.</p>	<p>Mention the Thames Catchment Flood Management Plan and the Lower Thames Flood Risk Management Strategy in 3.19. The strategy aims to reduce the risk of river flooding to 15,000 properties with a one per cent annual (1 in 100 year) chance of flooding, from Datchet to Teddington.</p>	<p>The Lower Thames Strategy and Thames CFMP were already included in Table 3 as well as Appendix 1. A reference has been added in 3.19 to the Lower Thames Strategy in line with the consultation response.</p>
10	Charles Muriithi, Environment Agency	<p>Flood risk is incorporated within 'Mitigation and adaptation to climate change, including flood risk'. It could be argued that it would benefit from a separate sustainability issue on its own right.</p>	<p>'Mitigation and adaptation to climate change, including flood risk', flood risk would benefit from a separate sustainability issue.</p>	<p>Noted. No change has been made as the existing SA Objective 5 is deemed appropriate (subject to amendments made regarding taking account flood risk "from all sources".</p>
11	Charles Muriithi, Environment Agency	<p>The objective for flood risk – number 5 - is to ensure resilience to the effects of climate change through effective adaptation, in particular avoiding or reducing flood risk and conserving water.</p> <p>It could be argued that this also has an economic benefit in reducing the amount of new development in flood risk areas – as per page 94 (<i>of the original SA Scoping Report</i>)</p>	<p>The objective for flood risk (5) is to ensure resilience to the effects of climate change through effective adaptation, in particular avoiding or reducing flood risk and conserving water. It could be argued that this also has an economic benefit in reducing the amount of new development in flood risk areas.</p>	<p>Economic benefit has been 'ticked' in the SA Objectives Tables 34 and 39.</p>

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12	Charles Muriithi, Environment Agency	It would be useful to add a paragraph on page 86 (<i>of the original SA Scoping Report</i>) in 'pressure for new development' to include the benefit of directing inappropriate development (more vulnerable classification) away from areas of flood risk using the appropriate sequential and exception tests.	Include the benefit of directing inappropriate development (more vulnerable classification) away from areas of flood risk using the appropriate sequential and exception tests.	Edited Table 33 in line with the consultation response.
13	Charles Muriithi, Environment Agency	Page 96 (<i>of the original SA Scoping Report</i>) should also include reference to the risk of surface water flooding and a link to the Surface Water Management Plan.	Include reference to the risk of surface water flooding and a link to the Surface Water Management Plan.	SA Objective 5 has been amended to include flood risk "from all sources". Objective 5) in section 5.3 'SA Assessment Framework and Decision Making Criteria' has also been amended.
14	Charles Muriithi, Environment Agency	Spatial objectives B and D would both be compatible with a sustainable approach to flood risk management in directing future development away from areas of flood risk.	Site Allocations Plan Objectives B and D would both be compatible with a sustainable approach to flood risk management in directing future development away from areas of flood risk.	Edited Tables 36 and 37 in line with the consultation response.
15	David Wilson, Savills (on behalf of Thames Water)	<p>Sustainability Objective: Water and Sewerage Infrastructure</p> <p>A key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:</p> <p><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></p>	Summary of need for a sustainability objective to include Water and Sewerage Infrastructure	Noted. The Site Allocations Plan will be in conformity with the NPPF and London Plan policies. In addition, Development Management Plan policy DM SD 10 already adequately deals with water and sewerage

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		<p>Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states: “Strategic <i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i> <i>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</i> <i>b) protect and improve water quality having regard to the Thames River Basin Management Plan</i> Planning Decisions <i>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</i> <i>C - Development proposals to upgrade London’s sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</i> LDF preparation <i>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”</i></p> <p>Policy 5.15 of the London Plan relates to water use and supplies and states: “Strategic <i>A The Mayor will work in partnership with appropriate agencies within London and adjoining regional and local planning authorities to protect and conserve water supplies and resources in order to secure London’s needs in</i></p>		infrastructure.

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		<p><i>a sustainable manner by:</i> <i>a minimising use of mains water</i> <i>b reaching cost-effective minimum leakage levels</i> <i>c in conjunction with demand side measures, promoting the provision of additional sustainable water resources in a timely and efficient manner, reducing the water supply deficit and achieving security of supply in London</i> <i>d minimising the amount of energy consumed in water supply</i> <i>e promoting the use of rainwater harvesting and using dual potable and grey water recycling systems, where they are energy and cost-effective</i> <i>f maintaining and upgrading water supply infrastructure</i> <i>g ensuring the water supplied will not give rise to likely significant adverse effects to the environment, particularly designated sites of European importance for nature conservation.</i></p> <p>Planning decisions <i>B Development should minimise the use of mains water by:</i> <i>a incorporating water saving measures and equipment</i> <i>b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.</i> <i>C New development for sustainable water supply infrastructure, which has been selected within water companies' Water Resource Management Plans, will be supported."</i></p>		
16	David Wilson, Savills (on behalf of Thames Water)	<p>The list of sustainability objectives should therefore make reference to the provision of water and sewerage infrastructure to service development. In relation to redevelopment it is essential that capacity exists to serve any net increase in demand as a result of the development. Where new infrastructure is required it is essential that this is in place ahead of development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure forms and integral part of the sustainability appraisal.</p> <p>The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in</p>	It is important that the satisfactory provision of water and sewerage infrastructure forms an integral part of the sustainability appraisal, with the list of sustainability objectives making reference to this.	<p>Edited SA Objective 4 in Tables 34 and 35 and in Appendix 3 in line with the consultation response.</p> <p>Comments in relation to the Asset Management Plan have been noted.</p>

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		<p>the AMP5 period which runs from 1st April 2010 to 31st March 2015 and does not therefore cover the whole LDF period. AMP6 will cover the period from 1st April 2015 to 31st March 2020 and our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013. As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as recognised in PPS12). Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p>		
17	David Wilson, Savills (on behalf of Thames Water)	<p>Indicator: Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure / flooding grounds.</p>	<p>Add additional indicator regarding decisions against sewerage undertaker.</p>	<p>Appendix 3 has been edited in line with the consultation response.</p>
18	David Wilson, Savills (on behalf of Thames Water)	<p>Sustainability Objective: Flood Risk The technical Guidance to the National Planning Policy Framework which retains key elements of PPS25: Development and Flood Risk states that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p>	<p>Include reference to 'sewer flooding' in SA Objective 5.</p>	<p>The Sustainability Issue description in Table 33 and paragraph 3.19.5 has been edited. Also, SA Objective 5 has been amended to include flood risk "from all sources".</p>

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		<p>Flood risk sustainability objectives should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.</p>		
19	Kate Wheeler, Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the detail provided in the report, and we are satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance.</p> <p>The key issues identified in the context of the sustainability appraisal, seem appropriate and include the need to protect and conserve national and international habitats and species and sensitivity.</p> <p>Baseline natural environment indicators appear relevant and we agree with the description of the baseline environment and potential risks. Local plan policies are expected to continue to strengthen their conservation and encourage their enhancement in new development.</p>	<p>SA Scoping Report meets the requirements of the SEA Directive [2001/42/EC] and associated guidance. Key issues identified are appropriate.</p>	<p>Noted. No changes required.</p>
20	Kate Wheeler, Natural England	<p>The SA clearly recognises that the local community has expressed the view that the borough’s natural and built environment should be protected and enhanced.</p> <p>The potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised. The pressures of increased access associated with development should be recognised and mitigation recommendations identified.</p> <p>We very much welcome the key sustainability objectives identified in relation to the natural environment which appear to mirror the baseline environmental review and have been used to set the sustainability objectives. Again we believe these to address all necessary aspects of the natural environment.</p>	<p>The negative impacts of increased access on sensitive habitats should be recognised and mitigation recommendations identified.</p> <p>Key sustainability objectives in relation to natural environmental are sufficient.</p>	<p>The Sustainability Issue description in Table 33 has been edited in line with the consultation response.</p>
21	Kate Wheeler, Natural	<p>Protected species are specifically included in SA 6 and Natural England has produced standing advice that you will find helpful, it is available on our</p>	<p>Note that when planning authorities develop on</p>	<p>A reference has been included in Table 35 (SA</p>

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	England	website Natural England Standing Advice to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England.	protected or BAP species sites, they should consult the Natural England Standing Advice.	Objective 6) in line with the consultation response.
22	Kate Wheeler, Natural England	We welcome recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, (although there is no mention of geodiversity and we suggest you incorporate geodiversity), including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils. The scope of the SA should be relevant to the issues addressed in the local plan which itself should reflect the requirements of the NPPF. The report area should ensure it has sufficient information to fully understand the impact of the potential proposals on any local wildlife sites, and the importance of this in relation to development plan policies.	Include geodiversity into sustainability objectives.	The heading of 3.16 has been amended to include 'geodiversity'. In addition, a new paragraph has been inserted in 3.16 in relation to geodiversity.
23	Kate Wheeler, Natural England	We suggest soils are specifically referred to within the environmental sustainability objectives. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as 'Safeguarding our soils: A strategy for England' (Defra, 2009) can be found on Natural England website. Important soil resources should be protected (e.g. best and most versatile (BMV) agricultural land) and appropriate management and handling of soils during the development process is essential. 'Safeguarding our soils' provides a clear vision in relation to development and soils – we should <i>'prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them.'</i>	Amend SA Objective 2 to include soil quality and quantity.	Edited SA Objective 2 in Tables 34 and 35 and in Appendix 3 in line with the consultation response.
24	Kate Wheeler, Natural England	Monitoring and Indicators Given the abolishment of Local Area Agreements and national indicators, it is vital to look for alternative indicators to monitor the success of the SA objectives. Below are some suggested indicators which may be of use as the	The Council should consider suggested indicators in relation to the following:	The Council has recently reviewed the entire Local Plan and Sustainability Appraisal monitoring

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		<p>SA progresses:</p> <p>Biodiversity/geodiversity/landscape</p> <ul style="list-style-type: none"> • Number of planning applications with conditions to ensure works to manage/enhance the condition of SSSI/SAC/SPA/Ramsar features of interest. • Area of SSSIs in adverse condition as a result of development (available from Natural England website). Information on the condition of designated sites can be obtained at SSSI unit level by selecting condition of SSSI units from County downloadable data. Relevant component SSSI Units for international nature conservation designations can be identified from the nature on the map website. There is Public Service Agreement (PSA) target for 95% of SSSIs to be in favourable or recovering condition. Development should not result in the loss/damage to features of interest, either indirectly or directly. Favourable condition should be maintained where appropriate or measures taken to enhance the units to achieve favourable condition. In relation to the PSA target the conditions are simplified into 2 categories: Favourable ('Favourable' and 'Unfavourable recovering') and 'Adverse' (the remaining unfavourable and destroyed categories). • Protected species – Quantified data might include numbers of applications where protected species are considered, numbers with conditions imposed to ensure working practices and works to protect/enhance protected species, and numbers of planning applications which result in need for protected species licence in order to be carried out . This will indicate that protected species are being given appropriate consideration within the planning system and begin to build up information on their occurrence within the plan area. Updated information following the publication of the Conservation of Habitats and Species Regulations 2010 is available from our website. • BAP habitat - created/ managed as result of granting planning permission (monitored via planning obligations) and which meet Biodiversity Action Plan targets. <p>Green infrastructure/recreation/access</p> <p>Natural England's Accessible Natural Greenspace Standard (ANGSt) provides a set of benchmarks for ensuring access to places near to where</p>	<ul style="list-style-type: none"> - Biodiversity / geodiversity / landscape - Green infrastructure / recreation / access - Landscape Character and Quality. 	<p>framework and it is considered that sufficient indicators are in place to monitor the effectiveness of the adopted policies and the SA objectives.</p>

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		<p>people live. ANGSt can be used as an indicator to monitor the quality of green space and is accessibility. There are also other national standards such as Green Flag for parks and open spaces and the County Park accreditation schemes.</p> <p>ANGSt outlines the following:</p> <ul style="list-style-type: none"> - that no person should live more than 300m from their nearest area of natural greenspace of at least 2ha in size; - provision of at least 1ha of Local Nature Reserve per 1,000 population; - that there should be at least one accessible 20ha site within 2km from home; - that there should be one accessible 100ha site within 5km; - that there should be one accessible 500ha site within 10km. <p>Landscape Character and Quality</p> <p>Indicators/targets could be established from assessing changes in landscape character for National Character Areas (as measured by Countryside Quality Counts data).</p>		
25	Kate Wheeler, Natural England	<p>Natural England welcomes the thorough list of international, national and local review of policies, plans and programmes. It appears to cover all relevant documents. It will be crucial to update this list during the next stage of the SA process to ensure emerging policies, plans and programmes are added to the baseline.</p>	<p>Review of Policies, Plans and Programmes is thorough.</p>	<p>Support noted.</p>
26	Claire Craig, English Heritage	<p>Thank you very much for the opportunity to comment on the Scoping Report for the Sustainability Appraisal (SA) of the proposed Site Allocations Document. As the Government's statutory adviser on the historic environment, and a statutory consultee for the Strategic Environmental Assessment process, English Heritage is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the local planning process.</p> <p>Accordingly, we have reviewed your consultation in light of the <i>National Planning Policy Framework</i> (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>	<p>Provide a map of the boroughs archaeological priority areas.</p>	<p>The archaeological priority areas map was already included; see Figure 24.</p>

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		English Heritage welcomes the inclusion of a wide-range of the borough's heritage assets here, covering all of the major categories of such assets. We would encourage the borough to provide a map of its archaeological priority areas and advise that the Greater London Historic Environment Record could assist with this if necessary.		
27	Claire Craig, English Heritage	Furthermore, we would recommend that the borough take a slightly wider view of its historic environment, both physically and figuratively for the purposes of developing this document. In the first instance, the SA needs to consider trans-boundary issues and consequently an understanding of these in relation to heritage assets and, critically, <u>their settings (currently not mentioned)</u> – is especially important for the London Borough of Richmond-upon-Thames. This is not least due to the fact that the buffer zone for the Royal Botanic Gardens of Kew World Heritage Site falls, in part, within the neighbouring London Borough of Hounslow. The London Borough of Hounslow and the Royal Borough of Kingston-upon-Thames also have highly significant heritage assets that have an important relationship with those in the London Borough of Richmond-upon-Thames and this overlap warrants consideration when developing the SA.	Take a wider view of the boroughs historic environment, both physically and figuratively: consider trans-boundary issues and consequently an understanding of these in relation to heritage assets and, critically, their settings. The fact that boroughs overlap warrants consideration	A new section and paragraph has been included in relation to heritage and trans-boundary issues (paragraph 3.23.9). The Council does however not have historical asset data in GIS compatible format from neighbouring authorities that could be included in our maps. When undertaking the SA for sites particularly near or adjacent to the borough boundary, the impacts on any historic assets, including their settings, will be assessed.
28	Claire Craig, English Heritage	In the second instance, the discussion about heritage assets could usefully broaden to include the borough's exceptional links to artistic, literary and sporting cultural heritage as well. Consideration of the borough's blue plaques (such as that to Virginia Woolf) may be useful for this work but there are other key manifestations such as Pope's burial location, Turner's House and Eel Pie Island.	Broaden the discussion about heritage to include the borough's exceptional links to artistic, literary and sporting cultural heritage as well. Consideration of the borough's blue plaques (such as that to Virginia	Added a paragraph to 3.23 in line with the consultation response.

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			Woolf) and other key manifestations such as Pope's burial location, Turner's House and Eel Pie Island	
29	Claire Craig, English Heritage	<p>Sustainability Issues</p> <p>English Heritage welcomes the identification of the sustainability issue relating to heritage. We recommend that it is reworded as follows to bring it into line with the NPPF:</p> <p><i>Conservation and enhancement of the built environment, heritage assets and their settings, and heritage at risk.</i></p> <p>We support the treatment of the historic environment sustainability issue in the table on page 86 (of the original SA Scoping Report) of the Scoping Report.</p> <p>We consider that careful consideration of how best to adapt heritage assets for improved environmental performance and how this relates to the borough's renewable energy strategy is also something that would benefit from consideration and we note that the tension between these matters is identified in Appendix 2. In respect of Site Allocations the significance of this tension could manifest itself in the selection of sites for renewable energy generation or district heat networks.</p> <p>We refer the borough to our extensive range of guidance on this tension on our website – www.english-heritage.org.uk/saving_energy and to the Retrofitting Soho report which will shortly be available on our Historic Environment: Local Management (HELM) website. It is worth taking this opportunity to indicate to the borough that English Heritage would be happy to work with them in developing their response to this matter should it be considered useful.</p>	Reword the identification of the sustainability issue relating to heritage to: Conservation and enhancement of the built environment, heritage assets and their settings, and heritage at risk.	The Sustainability Issue description in Table 33 has been edited in line with the consultation response.
30	Claire Craig, English Heritage	We consider that careful consideration of how best to adapt heritage assets for improved environmental performance and how this relates to the borough's renewable energy strategy is also something that would benefit from consideration and we note that the tension between these matters is identified in Appendix 2. In respect of Site Allocations the significance of this tension could manifest itself in the selection of sites for renewable energy	Consider how best to adapt heritage assets for improved environmental performance relates to the borough's renewable energy strategy.	The Council does not have a renewable energy strategy or district heating network; it is not anticipated to identify sites in the Site

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		generation or district heat networks.		Allocations Plan for energy generation. It is considered that existing adopted policies, such as DM SD 3 and the policies on Heritage (DM HD1 – DM HD 7), sufficiently address this matter.
31	Claire Craig – English Heritage	<p>Sustainability Objectives</p> <p>English Heritage welcomes the sustainability objective for the historic environment (SA Objective 7) but strongly recommends that this be extended by the addition of the phrase “and their settings” at the end of the objective. The protection of the setting of heritage assets is recognised in the NPPF and we note that the issue is recognised as part of the decision making criteria for the objective. As settings do not appear to have been considered in the baseline information, we consider it beneficial that they are explicitly covered by the objective itself.</p> <p>We further recommend the consideration of our guidance document <i>The Setting of Heritage Assets</i> to assist in establishing how this issue affects the borough and conservation of its heritage assets. In support of these recommendations, the phrase “and their settings” should be added to the end of the list in the Assessing of Proposals Sites in the table on page 86 (<i>of the original SA Scoping Report</i>) for SA Objective 7.</p>	SA 7, strongly recommend that this be extended by the addition of the phrase “and their settings” at the end of the objective. The protection of the setting of heritage assets is recognised in the NPPF and we note that the issue is recognised as part of the decision making criteria for the objective	SA Objective 7 has been amended in Tables 34 and 35 and in Appendix 3 to add the terms as suggested by English Heritage.