

**Appendix 7: Representations received on the Draft Sustainability Appraisal Scoping Report and Council responses.
Consultation period 24th July 2006 - 5th September 2006.**

Name of respondent	Ref. No.	Summary of representation	Council response
Bill Cotton (Swindon Borough Council - Director of Economic Development)	1.1	Review the 'Swindon Economic Development Vision and Framework' in Appendix 1.	This document has been included in the document review.
	1.2	Baseline assessment is of sufficient detail to support the emerging LDF documents.	Noted.
	1.3	Proposed sustainability objectives and decision-aiding questions are appropriate for appraising the effects of a plan.	Noted.
Thames Water Property Services	2.1	A key sustainability objective should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Refer to para 4.9 of <i>PPS12</i> .	It is accepted that this is a key issue for the Borough. One of the decision-aiding questions under sustainability objective 11, 'Provide a high quality built environment' currently relates to transport infrastructure. This has been amended to read 'Ensure new development is co-ordinated with essential infrastructure to support future sustainable growth'.
	2.2	We support, in principal, the section on water resources at paragraphs 3.27-3.31.	Noted.
	2.3	To meet the test of soundness set out in <i>PPS 12</i> , it is essential that the LDF considers water and sewerage infrastructure. Developers must demonstrate that adequate capacity exists both on and off site to serve the development.	It is felt that this is covered adequately through the amendment to the decision-aiding criteria for objective 11. However, a further sentence has been added to para. 3.34 to clarify this point.
	2.4	Thames Water support the use of sustainable drainage systems in appropriate circumstances, however they are not appropriate for use in all areas. A well maintained and managed sustainable drainage system is required to prevent it becoming ineffective.	A further decision-aiding question has been added to objective 4 will the policy 'promote the use of sustainable drainage systems, in appropriate circumstances'.

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Thames Water Property Services	2.5	Policy on flooding should include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain. <i>Draft PPS 25</i> states that a sequential approach should be used by LPAs in areas to be at risk from forms of flooding other than from river and sea.	Points accepted. However, it is felt that the topic of flooding is adequately covered in paras. 3.33-3.37 and through the decision-making criteria for sustainability objective 4, including 'avoid or minimise the risk of flooding to people and property'. It is also covered in Appendix 3 'Key sustainability issues' under 2.3.
	2.6	Existing treatment works may not be able to meet the demands of the Environment Agency and Thames Water may have to invest in technologies that require an increase in energy usage.	Noted.
The Woodland Trust	3.1	Inclusion of the <i>SW Regional Woodland & Forestry Framework (Forestry Commission, 2005)</i> . This is a key regional document driving woodland and forestry strategies in the SW region.	This document has been included in the document review.
	3.2	We are pleased to see in para 3.18 the reference to the Great Western Community Forest and extending woodland cover.	Noted.
	3.3	We would like to see a wider reference to managing existing woodland and forestry, as well as the importance of protecting ancient woodland in the Borough. Ancient woodland is our richest habitat for wildlife and makes up just 0.67% of the land area of Swindon Borough. It is essential this habitat be protected from development.	The importance of protecting ancient woodland is acknowledged. Additional text has been added to the 'Biodiversity, fauna and flora' baseline section to reflect this. Also, an additional decision-aiding question "prevent the loss of ancient woodland" has been added to sustainability objective No.1.
	3.4	We would suggest two more appropriate indicators for sustainable development: 1. No more loss of ancient woodland. 2. Accessible greenspace.	1. Existing ancient woodland indicator added to sustainability objective 1. Relevant decision-aiding criteria and indicators regarding greenspace are attached to sustainability objective 14.
Environment Agency	4.1	We consider the main environmental challenges facing the Borough in the next 15-20 years to be Flood Risk, Water Quality (sewerage infrastructure) and water resources.	Noted.
	4.2	Add <i>Draft PPS25</i> (due to be published October 2006) to review of policies, plans and strategies.	This document will be included in the document review when published (as replacement to PPG25).
	4.3	Add " <i>Water Resources for the Future - a strategy for England & Wales</i> ".	This document has been included in the document review.

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Environment Agency	4.4	Add " <i>Water Resources Annual Review 2005</i> " to review.	It is not considered necessary to include this document in the review as national and regional water resource strategies have been covered.
	4.5	Add " <i>State of the Environment 2005</i> " to review.	This document has been included in the document review.
	4.6	Add " <i>The Climate is Changing - time to get ready</i> " to review.	This document has been included in the document review.
	4.7	Add " <i>Environmental Quality in Spatial Planning</i> " to review.	This document has been included in the document review.
	4.8	Add " <i>The State of Soils in England and Wales</i> " to review.	This document has been included in the document review.
	4.9	Add " <i>Thames Region Water Resources Strategy</i> " to review.	This document has been included in the document review.
	4.10	Add " <i>Water Framework Directive - Thames River Basin District</i> " to review.	This document has been included in the document review.
	4.11	We are currently working on providing you a package of data, to include: GQA Biology and Chemical grades of rivers in the Borough, Groundwater Vulnerability Zones, % of properties at risk of flooding, pollution incidents, source protection zones, waste and landfill sites, groundwater quantity, groundwater quality.	Noted. This will provide valuable data for testing whether the sustainability objectives are being achieved and for updating baseline information.
	4.12	We know that you are aware of the need to undertake a Strategic Flood Risk Assessment for the Borough. We are keen to start discussion on preparation of the Strategic Flood Risk Assessment (SFRA) as soon as possible.	Noted.
	4.13	The SFRA should be completed in time for the production of the Issues and Options paper for the Core Strategy and Site Allocation in February 2007, in order to effectively inform any allocations of land.	Noted.
	4.14	Add sustainability objective "maintain and improve the water quality of the Boroughs rivers"	The decision-making criteria "avoid pollution of all water bodies" under sustainability objective 7 has been amended to read "maintain and improve the quality of all water bodies in the Borough".
	4.15	Add sustainability objective "achieve sustainable water resource management"	It is considered that sustainability objective 4 adequately covers this issue.

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Environment Agency	4.16	Add sustainability objective "reduce the risk of flooding to people and property (new and existing development)"	Decision-aiding criteria for sustainability objective 4 (bullet point No.3) has been amended to read "reduce the risk of flooding to people and property (new and existing development)".
	4.17	Add sustainability objective "maintain and enhance biodiversity and avoid irreversible losses"	Sustainability objective 1 has been amended to "maintain and enhance biodiversity and avoid irreversible losses".
	4.18	Add sustainability objective "improve efficiency of land through re-use of previously developed land and existing buildings"	Sustainability objective 2 has been amended to read "Use land and existing buildings efficiently and prioritise development on previously developed land".
	4.19	Add sustainability objective "conserve soil resources and quality"	Soil quality is covered by decision-aiding criteria under sustainability objective 7. Decision-aiding criteria under sustainability objective 2 has been amended to include soil resources.
	4.20	Add sustainability objective "reduce waste generation and disposal and achieve sustainable resource management of waste"	It is considered that sustainability objective 3 adequately covers this issue.
	4.21	Add sustainability objective "reduce air pollution and greenhouse gas emissions"	It is considered that sustainability objectives 6 and 7 and relating decision-aiding criteria adequately cover this issue.
	4.22	Add sustainability objective "reduce traffic congestion and pollution by improving transportation choices and reducing the need to travel by car"	It is considered that sustainability objective 5, and relating decision-aiding criteria, adequately covers this issue.
	4.23	Add sustainability objective "reduce contributions to climate change through sustainable building practices"	This point has been added as a decision-aiding question to sustainability objective 6.
	4.24	Add indicator "rivers of good/fair chemical quality"	Indicator added to Appendix 4 under sustainability objective 7.
	4.25	Add indicator "rivers of good/fair biological quality"	Indicator added to Appendix 4 under sustainability objective 7.
	4.26	Add indicator "No. of incidents of major significant water pollution occurring in a year in the Borough".	Indicator added to Appendix 4 under sustainability objective 7.
	4.27	Add indicator "Water use (all development) and availability"	This indicator has not been included. Existing indicators regarding water consumption are considered adequate.
	4.28	Add indicator "New developments with water efficiency measures, including use of grey water and rainwater reuse"	Indicator added to Appendix 4 under sustainability objective 4 in place of existing relevant indicator.

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Environment Agency	4.29	Add indicator "groundwater quality/quantity"	Indicator added to Appendix 4 under sustainability objective 7.
	4.30	Add indicator "No. of properties at risk of flooding"	Indicator added to Appendix 4 under sustainability objective 4.
	4.31	Add indicator "new developments in Flood Zone 2 and 3"	Indicator added to Appendix 4 under sustainability objective 4. Existing indicator "% new development situated in EA designated flood plains" removed.
	4.32	Add indicator "No. of new developments with sustainable drainage systems"	This indicator is already included in Appendix 4.
	4.33	The indicators used in Sustainability Appraisal theme 1 (biodiversity) should be used.	Noted.
	4.34	Add indicator "% development completed on previously developed land"	Indicator amended to "% dwellings and/or development completed on previously developed land".
	4.35	Add indicator "areas of contaminated land"	It is considered that this indicator is more useful if it relates to redevelopment of contaminated land. Indicator amended to "Quantity of development on contaminated land after remedial action taken (Ha)"
	4.36	Add indicator "loss of best and most versatile agricultural land to development"	Existing indicator amended to "amount of best and most versatile agricultural land lost to development"
	4.37	Add indicator "% household waste landfilled"	This indicator is included in Appendix 4.
	4.38	Add indicator "% household waste recycled"	This indicator is included in Appendix 4.
4.39	The following recommended indicators are included in the Scoping Report - "% household waste used to recover heat, power and other energy sources", "annual mean value NO ₂ ", "% residents who travel to work by private motor vehicle/public transport", "No. development achieving 'very good' or 'excellent' BREEAM Ecohomes rating", "average annual domestic consumption of gas/electricity".	Noted. These indicators are included in the Scoping Report.	
CPRE North Wiltshire and Swindon Group	5.1	We found this report thorough and wide ranging.	Noted.

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CPRE North Wiltshire and Swindon Group	5.2	In general terms the baseline assessment is of sufficient detail and relevance to support the emerging LDF documents. However, we believe the final document should contain more detail with regard to water resources and the transport assessment which Swindon hopes to carry out later this year and next. Water and transport are two of the key issues with regard to Swindon's future success over the next 10-15 years. The most up-to-date data should be available before the document is produced in a final form.	We acknowledge that these two issues will be very important in Swindon's future development. In light of comments also made by the Environment Agency, a number of additional indicators regarding water resources and flood risk have been added and four additional documents reviewed. The Environment Agency has supplied a package of data that will help monitor relevant indicators. With regard to transport issues, Forward Planning will continue to liaise with the Transport dept.regarding the transport assessment and the baseline section will be updated accordingly.
	5.3	Other information that might be included in the baseline assessment: current figures on the vacant employment space, unemployment figures and the number and type of new businesses starting up in the town. These should be assessed against those businesses which have left over the past 5 years in type and numbers employed.	All of this data is covered by the indicators relating to sustainability objective 15 in Appendix 4.
	5.4	There are no other key sustainability issues affecting the Borough that have not been considered, but water and energy resources should be given greater prominence given the proposed house-building for the sub-regional area.	Water and energy resources have both been considered in Appendix 3 as 'key sustainability issues' for the Borough. Both topics also have specific sustainability objectives (see nos. 4, 5 and 6).
	5.5	The proposed sustainability objectives and decision-aiding questions are appropriate for appraising the social, environmental and economic effects of a plan, but there will be considerable conflict between objective 15 "a vibrant sub-regional economy" and objectives 2,5 and 12.	Noted. Potential conflict between these objectives has also been acknowledged in the compatibility matrix in Appendix 6.
	5.6	We will only comment on Themes 3 and 5 regarding the indicators contained within the sustainability framework. For theme 3, we consider key indicator no.1 the most important, no.6 the second and no.7 the third. For theme 5, key indicator no.8 the most important, no.14 the second, no.5 the third and no.10 the fourth.	Noted.
	Wiltshire Wildlife Trust	6.1	Overall, we would support the approach being taken in this document.

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Wiltshire Wildlife Trust	6.2	Table 4 page 14. Biodiversity, Flora and Fauna. The key objectives should also contain a statement relating to the protection, maintenance and enhancement of protected species and species of conservation concern.	Objective "ensure the protection, maintenance and enhancement of protected species and species of conservation concern" has been added to this table.
	6.3	Section 3.10 Biodiversity, Fauna and Flora. Two comments to make in connection with this: 1. Could all reference to "wildlife" be changed to species?	All references to "wildlife" have been changed to species.
	6.4	The <i>Swindon Biodiversity Action Plan</i> has a generic action and target to conduct a phase one habitat survey of the Borough. This is reiterated in all of the habitat and species action plans, where authors have often stated that more information on the resource is required.	Noted. A sentence to this effect has been added to para. 3.16 and the lack of current information regarding biodiversity in the Borough has been noted as a key sustainability issue in para. 4.2.
	6.5	The <i>Swindon Biodiversity Action Plan</i> has four main aims and not four fundamental objectives.	Paragraph 3.17 has been amended.
	6.6	It should be noted that the list of UK BAP species and habitats is currently under review.	Noted. Paragraph 3.18 has been amended to include this information.
	6.7	Table 6 - it should be noted that the names have become jumbled e.g. Coate Haydon Water	Table amended to read "Coate Water" and "Haydon Meadow".
	6.8	3.20 Land and Water Resources. No mention has been made of the importance of some previously developed sites for biodiversity.	Point accepted. A sentence acknowledging the importance of some of these sites for biodiversity has been included in para. 3.25.
	6.9	3.24 No mention of Green Infrastructure within developments.	The provision of Green Infrastructure will form an integral part of these strategic developments. This point has been included in para. 3.30.
	6.10	4.2 Biodiversity, Fauna and Flora. Insert bullet point reading "there is a lack of information about the species and habitats within Swindon Borough".	This bullet point has been added to para. 4.2.
	6.11	Table 11 objective 1. Both the social and economic boxes should be ticked against this objective following a similar approach in the <i>Draft RSS</i> .	Table 11 has been amended as requested.

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Wiltshire Wildlife Trust	6.12	Table 11. A further objective; to incorporate a network of multifunctional green infrastructure within all new developments to be included.	It is not accepted that a new objective should be added. However, an additional decision-making question has been added to sustainability objective 1 in Appendix 4, "incorporate a network of multifunctional green infrastructure within significant new developments, where appropriate".
	6.13	Appendix 2. No mention is made of County Wildlife Sites. Throughout Wiltshire these non-statutory sites cover approximately 15% of land whereas in Swindon this is significantly less - a situation that may have arisen as no baseline survey has ever been conducted.	An indicator relating to % area of County Wildlife Sites has been added to Appendix 2. Neil Pullen has confirmed that County Wildlife Sites cover 3% of the land area in Swindon Borough.
	6.14	Two documents have recently been produced to review: The Urban Fringe Action Plan and a Green Infrastructure report from the Great Western Community Forest.	1. The Urban Fringe Action Plan will be reviewed in place of the Consultation Draft (2005). 2. Green Infrastructure Planning in the Swindon urban-rural fringe has been added to the document review.
Bishopstone Parish Council	7.1	No other documents need to be considered in this Scoping Report, that the Council can think of.	Noted.
	7.2	The baseline assessment would appear comprehensive.	Noted.
	7.3	The baseline assessment could be made more relevant by ensuring that they are carried out without pre-conceived ideas regarding the necessity of expansion. Question the real need at all stages.	Noted.
	7.4	Other information that might be included in the baseline assessment: light pollution, urban sprawl. Expand the pollution category to tackle wider issues - don't restrict to global warming and cars. Look at sustainable electricity, biomass etc.	The baseline assessment mentions the requirements of Part III Statutory Nuisance (within the Environmental Protection Act 1990) and further detail regarding light pollution is not considered necessary. Decision-aiding criteria for sustainability objective 7 relates to minimising unacceptable levels of light pollution. The issue of urban expansion is adequately covered in paras. 3.24-3.30 and as a key sustainability issue in Appendix 3. The 'Pollution, air and climatic factors' covers a wide-range of issues, including energy efficiency, integrated public transport schemes, local air quality and renewable energy, and is not restricted to global warming and cars.

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Bishopstone Parish Council	7.5	Are there any other key sustainability issues affecting the Borough? The current infrastructure (doctors, hospital, roads etc) cannot support the current population. It is therefore essential that all these are upgraded prior to any new build or that new build is restricted.	Noted. The need for provision of essential infrastructure and services is acknowledged in Appendix 3 (Key sustainability issues), under the themes 'Land and water resources' and 'Healthy and inclusive communities', and is also reflected in a number of sustainability objectives.
	7.6	Are the proposed sustainability objectives and decision-aiding questions appropriate for appraising the social, environmental and economic effects of a plan? Yes.	Noted.
	7.7	The Sustainability Appraisal framework contains a set of possible indicators. Which indicators do you think are most appropriate for monitoring the progress towards each objective? Can you suggest other more appropriate indicators? Provided the measures have sufficient weight to force the prevention of any undesirable activities then yes.	Noted.
Blunsdon St. Andrew Parish Council	8.1	Other relevant documents that should be considered are: any parish plans that have been prepared and any published local council objectives. Other considerations should be observations and guidance on the development of a "principal urban area", and the impact of developing new communities on a big scale (eg water supply and flooding).	The Chiseldon Parish Plan 2004 is the only current Parish Plan in the Borough. This document has been reviewed and any future Parish Plans will also be reviewed. Other relevant documents regarding Swindon's designation as a Principal Urban Area and water resource issues have been reviewed.
	8.2	The size and scope of health provision for the Borough (do we need a new hospital?), and the development of health and leisure activities in line with the growing population (ie the dearth of sports fields/facilities, ageing leisure centres, lack of swimming provision etc), should also be included.	Discussion of the provision of healthcare facilities and cultural/leisure facilities is included in the baseline assessment, and both topics are listed as "key sustainability issues" in Appendix 3.
	8.3	Major developments must have infrastructure in place at the correct stage of the development for social and educational needs of the community.	The baseline assessment adequately covers provision of infrastructure in new developments, including access to community facilities, healthcare and educational facilities, and public transport infrastructure. These issues are also covered in Appendices 3 and 4.

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Blunsdon St. Andrew Parish Council	8.4	Development, training and support for Swindon Borough Council officers and members should be provided to a high standard to ensure personnel can competently manage the growth of the town.	Points noted.
	8.5	The expertise of locally based organisations should be enlisted where appropriate (eg the National Trust in conservation and heritage matters).	Point noted. The views of the National Trust were sought during the initial consultation period for this document, as were many other locally based organisations.
Wroughton Parish Council	9.1	Regarding the detail and relevance of the baseline assessment, Wroughton Parish Council feels this is so all-embracing that it is self defeating. Themes 1, 2 and 3 are seriously threatened by themes 5 and 7 and especially 7. Members felt if priority is not given to 1,2 and 3 then it would not be worth bothering with the rest.	The baseline information provides a basis for predicting and monitoring significant effects of different plans. It can help identify sustainability problems in the Borough and alternative ways of dealing with them. To achieve sustainable development, there will undoubtedly be conflict between social, environmental and economic themes/objectives. The purpose of sustainability appraisal is to try and determine what these conflicts are and how they can be resolved.
	9.2	Members expressed concerns that whilst they consider the baseline topics to be sufficient, they felt the assessment would only be relevant if sufficient time and resources are allocated. They also felt it included everything and therefore would be self negating eg economic growth would force up house prices and make housing unaffordable.	Sustainability Appraisal is mandatory under the new planning system and resources have been allocated by the Council accordingly. Sustainability issues such as the one mentioned will be considered in the Sustainability Appraisal report that will accompany each planning document.
	9.3	Regarding other information that might be included in the baseline assessment: it was felt this requires clear priorities to be made and a decision as to whether economic growth should be the main driver - which it is at the moment.	The Scoping Report considers all relevant sustainability issues - the achievement of economic growth is one of many important considerations for the Borough.
	9.4	Members considered the information sufficient but felt the Borough needed to work with all agencies to ensure all information was to be included.	Noted.

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Wroughton Parish Council	9.5	Regarding the key sustainability issues: Members felt that whilst all the issues had been considered it is again a question of priorities. They felt that despite the housing, schools, employment etc. being excellent it would not be much use if there is pollution, a water shortage and out of control climate change.	Local Development Documents need to reflect sustainability objectives and the Sustainability Appraisal will help demonstrate this. A balance needs to be found between conflicting objectives, and mitigation is one way of achieving this.
	9.6	Members did feel that although all the key issues were present they do contradict each other. The dash for economic growth and consequent development outweighs all other considerations and there are threats to 'inclusive communities', conservation and heritage, water resources, diversity which cannot be properly addressed.	It is acknowledged that there are a number of conflicting issues. Listing these defines the key issues that Local Development Documents need to address. Subsequent Sustainability Appraisal reports will assess whether plans adequately address these issues, and what measures should be put in place to resolve areas of conflict.
	9.7	Regarding the sustainability objectives and decision-aiding criteria: Wroughton Parish Council feel that the objectives of population growth and economic growth make the objectives of affordable housing and elimination of homelessness almost impossible to achieve. Again there need to be stated priorities in these objectives.	Noted. The sustainability objectives have been designed to cover all aspects of sustainable development - social, economic and environmental. The number of objectives had to be kept to a manageable level and they are all considered to have equal priority.
	9.8	Given the house prices in the area, Members felt that very little housing for sale is in any sense 'affordable'. What is never mentioned is that a drive to build social housing would have the effect of reducing house prices and the number of people forced into debt.	Noted. A housing needs survey was undertaken in 2001 which asserted that there is an affordability problem in the Borough for low income households. These issues are dealt with under Policies H9 and H10 of the Adopted Swindon Borough Local Plan 2011.
	9.9	Members felt strongly that social housing has been excluded, with an emphasis on "affordable housing" rather than enough appropriate housing for all social groups.	It is felt that the issue of difficulties accessing local housing has been dealt with adequately in paras. 3.65-3.68 and has been listed as a key sustainability issue in Appendix 3. Decision-aiding criteria for objective 9 also refers to "support the provision of a range of house types and sizes to meet the needs of all sectors of the community".
	9.10	Regarding indicators within the Sustainability Appraisal framework, Members found no reference to indicators.	Indicators can be found in the 4th column of Appendix 4.
South West Regional Assembly	10.1	I would like to refer you to the Regional Spatial Strategy (RSS). The current RSS is RPG10. The draft of the new RSS was submitted to the Secretary of State in April.	Both RPG 10 and the Draft RSS (June 2006) have been reviewed and considered in the publication of the Scoping Report.

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South West Regional Assembly	10.2	In particular you may find it beneficial to refer to the SSA Report for the <i>Draft RSS</i> . In addition, there are three further technical appendices to the SSA Report. You may find Appendix A useful as it contains an analysis of baseline information and a review of relevant plans and programmes at regional level.	Noted.
	10.3	The SSA Report identifies Climate Change as perhaps the biggest challenge facing the South West region. We would anticipate that any local level SSA would also identify this issue, would make recommendations for both reducing CO ₂ emissions (eg through transport, natural resources and sustainable construction policies) and taking adaptive actions in and to vulnerable locations or assets.	The issue of Climate Change has been covered adequately in the baseline assessment, key sustainability issues and in the Sustainability Appraisal Framework.
	10.4	I would also like to draw your attention to the Regional Sustainable Development Framework. However, please note that the RSDF is currently being refreshed in order to bring the sustainability principles more in line with the National Sustainable Development Strategy, "Securing the Future" and the intention is to relaunch the RSDF in the near future.	Noted. This document has been reviewed. The relaunched version will be reviewed when published.
	10.5	In regard to data sources, the RPB produces an Annual Monitoring Report. The South West Observatory can also offer valuable input and opinions on monitoring requirements.	Noted. These data sources will be used during the monitoring phase of the Sustainability Appraisal.
	10.6	As you are probably also aware a new tool is being developed in the region, called 'iGather' which will help planners access a wide range of data which can be used to support sustainability appraisals.	We are aware of this tool and Swindon Borough Council staff have attended training sessions.
English Nature	11.1	English Nature advises that the SA process should ensure that the built and natural environment, community and economy all benefit together from the LDF process.	Noted. This has been incorporated into para. 1.2 of the Scoping Report.

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English Nature	11.2	English Nature considers the review of relevant documents to include a good range of sustainability related publications at national, regional and local levels, with the key documents in relation to nature conservation having been reviewed.	Noted.
	11.3	<p>National <i>PPS 3: Housing</i>. An important aspect of PPS 3 in terms of sustainable development, which should be referred to in the document review, is that PPS 3 specifically excludes the following from previously developed land that should be used to meet the new housing targets: 'land that was previously developed but where remains of any structure or activity have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings), and where there is a clear reason that could outweigh the re-use of the site – such as its contribution to nature conservation.'</p>	The review of <i>Draft PPS 3</i> has been amended accordingly. An explanation of the purpose of the document review can be viewed at paras. 2.1-2.3 of the Scoping Report.
	11.4	<p><i>PPS7 Sustainable Development in Rural Areas.</i> It is felt that under the review of PPS7 further emphasis should be given to the requirements in terms of landscape protection and enhancement, particularly given the presence of an AONB within the administrative boundary of the Swindon Borough. In relation to national landscape designations, refer to paras. 21-23 of PPS7. In relation to landscapes of local importance, refer to paras. 24-25 of PPS7. English Nature considers these requirements to be key objectives for consideration in the LDF in relation to the protection and enhancement of the natural environment, and therefore suggests that they are added to the review of <i>PPS7</i> in the Scoping Report.</p>	The review of <i>PPS 7</i> has been amended accordingly. An explanation of the purpose of the document review can be viewed at paras. 2.1-2.3 of the Scoping Report.

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English Nature	11.5	<p><i>PPS9: Biodiversity and Geological Conservation.</i></p> <p>English Nature supports the review comments given for PPS9, but considers that further points have been omitted that are of particular relevance to the LDF. The following is considered important to note within the review. PPS9 states that:</p> <p>“Development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas.” "Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.”</p>	<p>The review of <i>PPS 9</i> has been amended accordingly. An explanation of the purpose of the document review can be viewed at paras. 2.1-2.3 of the Scoping Report.</p>
	11.6	<p><i>PPG13: Transport</i></p> <p>It is suggested that the need for development to provide opportunities for safe pedestrian travel via walking routes to main services such as schools, and promote walking for journeys of less than 2 km, should be included in the consideration of objectives for the LDF, in accordance with PPG13. English Nature would expect such routes to be provided as part of the green infrastructure of the Borough, ensuring that walking routes include the provision of linear habitat features that improve the enjoyment of the walk and provide suitable habitat for species movement; for feeding, breeding and dispersal, thus bringing people in contact with nature close to their own homes.</p>	<p>The review of <i>PPG 13</i> has been amended accordingly.</p>

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English Nature	11.7	English Nature is pleased to note the inclusion of the 'Working with the Grain of Nature – a Biodiversity Strategy for England' as a national document of relevance for review. The conclusion that plans should build biodiversity considerations into many different policy areas and take account of objectives stated in national and local BAPS is very much welcomed, and provides a positive steer for the integration of biodiversity and the achievement of LBAP into the range of DPDs within the Swindon LDF. English Nature looks forward to seeing this commitment in the various DPDs as they come forward.	Noted.
	11.8	<p><i>South West Biodiversity Action Plan.</i></p> <p>English Nature considers that it is important that the South West Biodiversity Implementation Plan is noted in this review, as this follows on from the regional BAP document. This is a significant document in that it provides a framework for policies, priorities and actions for biodiversity at a regional and local level. Of particular relevance is the 'Nature Map' and the encouragement of local authorities to adopt the methodology and develop similar maps on a more detailed local level. The nature maps indicate areas of biodiversity importance, and areas of biodiversity potential, where restoration of habitat will be a priority. Such maps should be used at a strategic level and inform land use decisions.</p>	The South West BAP has been reviewed and this is considered sufficient. The Wiltshire BAP and Swindon Local BAP are also included in the document review.
	11.9	Policy RE6 in the <i>Draft Regional Spatial Strategy (RSS)</i> . Water resources are a central issue with regards any housing development in the Swindon area. Policy RE6 states that local planning authorities, through their LDD's, must ensure that their rates of planned development do not exceed the capacity of existing water supply and waste water treatment systems and do not proceed ahead of essential planned improvements to these systems.	Water resources have been acknowledged as a key sustainability issue for Swindon within the Scoping Report. However, the review of the Draft RSS cannot cover each individual policy.

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English Nature	11.10	Policy GI1 in the <i>Draft RSS</i> . Green infrastructure (GI) is a key issue in new and existing developments. New developments have the opportunity to incorporate GI into their plans which will comprise multifunctional, accessible, connected assets, planned around existing environmental characteristics.	Point accepted. However, the review of the Draft RSS cannot cover each individual policy.
	11.11	<i>North Wessex Downs AONB Management Plan</i> . English Nature would hope to see the Swindon LDF assisting in the achievement of the specific action plan set out within the AONB management plan for the North Wessex Downs, and achievement of the action plan should be noted in the review, particularly given that local authorities have been allocated a number of actions within the Management Plan.	The review of this document has been amended accordingly.
	11.12	<i>Swindon Local Biodiversity Action Plan and Wiltshire Biodiversity Action Plan</i> . English Nature advises that the LDF considerations should include the requirement for the LDF to contribute to the direct achievement of LBAP targets through the range of DPDs.	The reviews of these documents have been amended accordingly.
	11.13	English Nature supports the review of the ' <i>Seeds of Change-Swindon's LA21 Strategy</i> ' and welcomes the inclusion of the requirement for environmental and ecological issues to be built into the decision making process.	Noted.
	11.14	English Nature also welcomes the inclusion of the 'Your Forest – Now and in the Future' document in the review of local publications, which should ensure that the objectives of the community forest scheme are considered in the LDF.	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.15	English Nature also supports the 'key objectives from document review' set out in Table 4, particularly in relation to the biodiversity SEA topic.	Noted.
	11.16	Under the Cultural Heritage and Landscape SEA topic key objectives, there should be a specific reference to the enhancement of the landscape and its local character as well as its protection.	There are several relevant objectives. The objective "maintain and enhance the diversity and distinctiveness of landscape and townscape character" has been amended to read "...local distinctiveness of...".
	11.17	The introductory text for Chapter 3, Baseline Information, provides a helpful introduction to the area, and promotes its natural environment assets.	Noted.
	11.18	At paragraph 3.12, further explanation of the 'quality of life' benefits gained from a biodiversity rich environment would be useful, to explain to those readers not familiar with the 'quality of life' jargon. Such benefits will include health, education, informal outdoor recreation and enjoyment gained from being close to nature.	An additional sentence has been added to this paragraph to more fully explain the quality of life benefits.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.19	<p>English Nature advises that further clarification will be needed regarding the conclusion that the documents within the Swindon LDF will not require consideration under the Habitats Regulations 1994. Whilst there are no European sites within Swindon's administrative boundary and therefore effects on sites some distance away may be considered unlikely, the Swindon LDF still may have the potential to affect neighbouring European sites in terms of indirect effects such as aquifer depletion and increased recreational pressure from new residential developments, for example. The Habitats Regulations assessment will need to provide information to demonstrate that neighbouring sites will not be affected, rather than just drawing conclusions without setting out the necessary justifications. North Meadow Special Area for Conservation (SAC) is easily accessible by the A419 road from Swindon. It is important that the assessment pays regard to the Habitats Regulations assessment of the Regional Spatial Strategy.</p>	<p>Paras. 3.13-3.15 have been amended in line with the comments received. An additional decision-aiding question regarding Appropriate Assessment has also been added to Objective 1 in Appendix 4.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.20	<p>English Nature is concerned by the statement that the proposed urban extensions may result in the loss of important wildlife sites and agricultural land, at paragraph 3.24. This does not represent sustainable development where economic, social and environmental objectives are achieved together at the same time (as explained in PPS1). It is essential that environmental information is collected as early as possible, to ensure that informed decisions are made on land allocations, and harm to the natural environment is avoided. English Nature would hope to be reassured that the proposed extensions have all given due consideration to the natural environment and that no development is proposed that will result in a net loss for biodiversity, but rather that each provides beneficial gains. English Nature therefore requests further information and clarification.</p>	<p>Paragraph 3.29 has been amended. All allocations identified in any DPD will fully consider the impacts on wildlife sites and agricultural land, as will the Sustainability Appraisal report. Policy DS2 in the Adopted Local Plan 2011 relates to Strategic Locations for Development, and states "...strategic development shall be permitted where proposals protect, enhance and integrate features of natural, historic or environmental importance, including off-site mitigation measures, where appropriate...".</p>
English Nature	11.21	<p>English Nature welcomes the recognition of the need to incorporate sustainable drainage systems into new development, and advises that development is most sustainable in terms of water use when such systems are combined with water reduction and reuse measures. English Nature looks forward to seeing such measures required as a typical feature of new development.</p>	Noted.
	11.22	<p>English Nature also supports the encouragement given for renewable energy schemes, providing that these are located sensitively and do not result in negative impacts for the natural environment. English Nature hopes to see such schemes promoted, particularly for micro-generation for individual developments wherever possible.</p>	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
	11.23	A number of studies have shown that access to natural greenspace, through Green Infrastructure planning, can have significant health benefits. English Nature notes the positive comments made about the outdoor environment and health as part of paragraph 3.59 on the Great Western Community Forest.	Noted.
English Nature	11.24	English Nature would hope to see more emphasis on the benefit of greenspace, and particularly local greenspace, for health throughout the Healthy and Inclusive Communities section of Chapter 3.	The benefits of greenspace for health are acknowledged and an additional sentence has been added to para. 3.81 to stress its importance. It is not considered necessary to emphasise this throughout the Healthy and Inclusive Communities section as this section covers numerous topic areas.
	11.25	The promotion of access to the wider countryside should also be highlighted in paragraph 3.65 regarding recreation.	Agreed. Paragraph amended to read "...and a growing network of recreational routes that promote access to the wider countryside".
	11.26	English Nature welcomes the commitments to protect the environmental quality of the countryside in the discussions on rural settlement within paragraphs 3.69 and 3.70.	Noted.
	11.27	The restoration of degraded green infrastructure and the sensitive maintenance of existing green infrastructure should be included in paragraph 3.76 on open space, and also consideration should be given to the potential mapping of green infrastructure as part of the local nature mapping promoted by the South West Biodiversity Implementation Plan, to contribute to strategic planning for pedestrian access, links from urban to rural areas, habitat networks and biodiversity enhancement.	The benefits of Green Infrastructure have been added to para. 3.104. The potential for mapping green infrastructure has not been discussed in this paragraph, however, the mapping of Green Infrastructure will be incorporated into the Core Strategy DPD.
	11.28	It would be expected that reference would be made to the North Wessex Downs AONB Management Plan within paragraph 3.77.	This Management Plan has been included in the document review and this paragraph states the importance of the North Wessex Downs AONB landscape. It is not considered necessary to make reference to this plan here.
	11.29	English Nature is generally pleased with the baseline indicators proposed.	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.30	<p>Theme 1: Biodiversity, Flora and Fauna.</p> <p>English Nature advises that the first indicator, area designated as SSSI, is not suitable because this area of SSSIs is unlikely to change significantly, if at all, and does not reflect the current state of the natural environment. Instead (or in addition) English Nature suggests that this indicator is replaced with something more meaningful such as:</p> <ul style="list-style-type: none"> • The area of Green Infrastructure with favourable wildlife habitat. • The condition of key habitats (e.g. existing ancient woodland, or existing species rich calcareous grassland) in the Borough. 	<p>Noted. An indicator regarding ancient woodland has been added (see also 3.4). It is accepted that the area of SSSI is unlikely to change significantly and this indicator has been removed as suggested. The indicator suggested for Green Infrastructure is rather vague, particularly regarding the meaning of 'favourable wildlife habitat'. English Nature have agreed to discuss this with the Wiltshire Wildlife Trust and agree on a different indicator for Green Infrastructure. This will be added to Appendix 2 when available.</p>
	11.31	<p>Section 3.17, table 6 should read 'Haydon Meadow' in the third row and 'Coate Water', not Coate Haydon Water in the sixth row.</p>	<p>This table has been amended - see also 6.7.</p>
	11.32	<p>Section 3.18 should read 'The Forest has great potential to 'increase habitat connectivity and enhance biodiversity....'</p>	<p>Para. 3.21 has been amended accordingly.</p>
	11.33	<p>English Nature welcomes the other baseline indicators for this SA theme. We endorse the rest of the indicators.</p>	<p>Noted.</p>
	11.34	<p>Theme 2: Land and Water Resources.</p> <p>Indicators are supported by English Nature, but more specialist advice should be sought from expert bodies such as the Environment Agency on this theme.</p>	<p>Noted.</p>
	11.35	<p>Theme 6: Conservation and Heritage.</p> <p>English Nature advises that, as already noted for SSSIs, the area of AONB is unlikely to change significantly, if at all, and does not reflect the current state of the landscape. It is advised that this indicator should be changed to something more appropriate such as the condition of the various landscape types in the Borough. Advice should be sought from our sister agency, the Landscape Access and Recreation Division (LAR) of the Countryside Agency on this theme.</p>	<p>Noted. Comments have been received from Natural England regarding landscape issues (see 20.1-20.27).</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.36	<p>Other themes</p> <p>English Nature notes that Theme 4: Healthy and Inclusive Communities has twice as many indicators as other themes, which creates an imbalance in the amount of information collected. This then has the ‘knock on’ effect of an imbalance in the indicators used for monitoring, as seen in Appendix 4. A reduction in baseline and monitoring indicators for this theme will readdress this imbalance.</p>	<p>Noted. The sustainability topics covered under 'Healthy and Inclusive Communities' are valid but too numerous to be included under one theme. Consequently, it has been re-organised into two sections - 'Healthy communities' and 'Inclusive Communities'. The Scoping Report has been restructured to reflect this and the number of baseline and monitoring indicators reviewed.</p>
	11.37	<p>Question 4 - Are there any other key sustainability issues affecting the Borough that have not been considered?</p> <p>English Nature generally agrees with the Key Sustainability Issues identified but would like to offer some suggestions to make them more comprehensive.</p>	<p>Noted.</p>
	11.38	<p>It is suggested that the isolation of remaining sites should be added to the comment on the loss of wildlife sites and biodiversity as a result of urban expansion.</p>	<p>Noted. This comment has been added.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.39	<p>Regarding Appendix 3. Biodiversity Fauna and Flora.</p> <p>Issue 1 - English Nature generally supports the main aspects of this issue, but cautions that a) compensatory measures are a last resort option where no alternatives are available and b) conditions are generally not the preferred option for seeking solutions. The LDF must follow the step-wise approach given in PPS9. Avoidance is always the preferred option, and simply going straight for compensatory measures is not acceptable as this does not accord with national guidance on sustainability and the natural environment. In terms of avoiding harm or mitigating harm, PPS9 advises that these measures must be in place prior to granting planning permission, i.e. they should be an integral part of the planning application, not covered by condition. The potential for biodiversity harm may be cause for refusing a particular development in its current form. The text therefore needs amending to reflect the comments made.</p>	<p>Noted. The text has been amended to reflect these comments. It is acknowledged that compensatory measures are a last resort option and the amended text will make this clearer.</p>
	11.40	<p>Issue 2 - The local authority needs to advise on the condition of publicly owned SSSIs in this section even if those privately owned represent the majority, because it is these SSSIs where the local authority can have a direct influence. The council does also need to give further consideration to any initiatives it can take forward that may contribute towards improving the condition of SSSI in private ownership.</p>	<p>Noted. The text has been amended to take account of these comments. The condition of SSSIs within the Borough relates to both public and privately owned SSSIs.</p>
	11.41	<p>Issue 3 - It should be noted that the quantity of water available also affects wetland sites as well as the quality of water. Depleted aquifers can impact on wetland sites, as can any development that redirects surface or ground water away from such sites.</p>	<p>Noted. The text has been amended to reflect these comments.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.42	Issue 4 - As stated for Issue 1, the presumption that harm can be compensated for by condition does not accord with legislation or government guidance. Again any measures to avoid, or if not mitigate for harm should be included in the development proposal. The planning authority will need to have all the necessary survey information and avoidance or mitigation, conservation and enhancement proposals before them before granting determining the planning application. The presence of a protected species is a material consideration and may in some cases prevent the development going ahead in its proposed form. This text therefore requires rewording.	Noted. The text has been amended to reflect these comments.
	11.43	Land and Water Resources. Issue 1 - There should be a note of the preference for restoration of buildings before demolition and rebuild is considered. Also, with regard to the best agricultural land it should be noted that this resource is essentially finite.	Noted. The text has been amended to reflect these comments.
	11.44	Issue 2 - English Nature supports the text associated with this issue, but it is suggested that one way the LDF can address waste during construction is to impose targets for the amount of recycled waste used in any development, which should be higher targets when a building is being demolished on site prior to a new development.	Noted. Targets are not currently imposed on amounts of recycled waste used in developments, but this may be something that the LDF could consider in the future.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.45	<p>Issue 3 - English Nature is concerned by the suggestion that flood protection measures and compensation for floodplain loss should be in place where development is permitted in flood risk areas. This does not accord with the sustainable management of water resources. Development should not be located in the flood plain, rather the floodplain should be being restored wherever possible to benefit landscape character and biodiversity. Hard flood defences should therefore not be necessary and are no longer encouraged. Extra flood plain capacity should be included in new development, to contribute to LBAP targets and return rivers to a more natural landscape.</p>	<p>Noted. The text has been amended to take account of these comments. However, refer to Policy ENV23 (Protection of Floodplains) in the Swindon Borough Local Plan 2011, which states "In areas at potential risk from flooding, as defined by the Environment Agency, development shall only be permitted where appropriate flood protection and full compensation works for losses in floodplain storage and conveyance are determined and provided as part of the development, including sustainable drainage systems".</p>
	11.46	<p>Pollution, air and Climatic Factors.</p> <p>Issue 1 - English Nature hopes that a strong stance will be taken in requiring developers to provide safe pedestrian routes in new development that include wildlife corridors and link residential areas with local services and employment, and with the wider countryside. The creation of new green infrastructure with wildlife habitat will aid species dispersal when climate change renders current wildlife areas unsuitable for certain species.</p>	<p>Noted. Policy T5 of the Swindon Borough Local Plan 2011 states that "Development shall be permitted where there is an existing safe and convenient pedestrian and cycle access or provision is made for such access". Policy ENV20 relates to Strategic Green Corridors and their importance for providing opportunities for non-motorised forms of transport, providing access to the countryside and the protection and enhancement of important linear features such as wildlife corridors. Green Infrastructure is discussed in paras. 3.30 and 3.104 of the Scoping Report.</p>
	11.47	<p>Healthy and Inclusive Communities.</p> <p>Issue 4 - In addition to those points made, the LDF can address this issue by ensuring the provision of multi-functional greenspaces that offer opportunities for informal recreation and enjoyment of natural areas where people can be close to nature.</p>	<p>Noted. The text has been amended to reflect these comments.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.48	<p>Conservation and Heritage.</p> <p>Issue 2 - Adverse effects on landscapes should be avoided. Where this is not possible the effects should be minimised and mitigated for. All development should contribute to the enhancement of the surrounding landscape character. The text for this issue therefore needs amending to reflect this advice.</p>	Noted. The text has been amended to reflect these comments.
	11.49	<p>Question 5 - Are the proposed sustainability objectives and decision-aiding questions appropriate for appraising the social, environmental and economic effects of a plan?</p> <p>English Nature generally supports the questions proposed for the natural environment, but advises that in order to be more meaningful and gain more relevant responses during appraisal of DPDs and SPDs, some of the questions warrant more specific detail or additional questions are needed to provide a stronger sustainability requirement, in order to avoid the situation where the answers to natural environment questions remain vague and dependant upon further detail.</p>	Noted. We will be in further consultation with English Nature to develop decision-aiding criteria further, to make them more meaningful and relevant.
	11.50	<p>For those objectives where English Nature has concerns, suitable amended wording for all the criteria is given. Given the length of criteria for some of the non environmental objectives it is assumed that the addition of new criteria will not be a particular issue for the natural environment objectives.</p>	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.51	<p>1 'Protect and enhance biodiversity' Will the policy...</p> <ul style="list-style-type: none"> • Protect and enhance habitats and species? • Protect and enhance internationally/nationally designated wildlife sites? • Contribute to furthering the conservation and enhancement of nationally designated sites? • Protect and enhance locally designated wildlife sites? • Avoid habitat fragmentation? • Provide green infrastructure to aid species dispersal and reconnect isolated wildlife areas? • Ensure all new developments protect and enhance local biodiversity? • Contribute to the achievement of targets within the LBAP? • Result in a net gain for the natural environment with each new development? 	<p>No change to wording of objective. Bullet points 1 & 2 - no change. Bullet point 3 - existing question considered adequate. Bullet point 4 - question amended. Bullet point 5 - question amended. Bullet point 6 - question regarding Green Infrastructure has been added (see also 6.12). Bullet point 7 - question amended. Bullet point 8 - question added. Bullet point 9 - question added.</p>
	11.52	<p>4 'Use and manage water resources in a sustainable manner' Will the policy....</p> <ul style="list-style-type: none"> • Encourage sustainable management of water resources? • Maximise efficient use of water resources? • Promote the use of sustainable drainage systems? • Avoid or minimise the risk of flooding to people and property? • Protect and enhance the biodiversity value and natural function of floodplains? • Protect aquifers from over abstraction? • Avoid harm to wetland sites in particular the River Kennet SSSI? 	<p>No change to wording of objective. Bullet points 1 - no change. Bullet point 2 - no change. Bullet point 3 - question added. Bullet point 4 - no change. Bullet point 5 - question added 'protect and enhance the natural function of floodplains'. This objective specifically deals with water resources - biodiversity issues are dealt with under Objective 1. Bullet point 6 - this question has not been added. It is felt that bullet point 1 adequately covers this. Bullet point 7 - question added 'minimise the environmental effects of water abstraction, both inside and outside the Borough'.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.53	<p>14 'Conserve and enhance important natural landscapes' Will the policy...</p> <ul style="list-style-type: none"> • Contribute to the conservation and enhancement of the North Wessex Downs AONB? • Protect and enhance the landscape character and scenic quality of the countryside? • Contribute to the restoration of landscape features that have become degraded or lost completely? 	<p>Bullet point 1 - question added. Bullet point 2 - existing question amended. Bullet point 3 - this question may be difficult to measure but will be added if information is available.</p>
	11.54	<p>New Objective: Create opportunities for Green Infrastructure Will the policy</p> <ul style="list-style-type: none"> • Build upon existing expertise and initiatives to identify priorities and partnerships for GI? • Incorporate GI policies setting out broad locations for GI appropriate to the extent and distribution of development proposed, coordinated across administrative boundaries as appropriate?; and • Develop a GI plan with a delivery programme to support GI policies? 	<p>A new sustainability objective relating to Green Infrastructure will not be added, after discussions with English Nature. It was agreed that this topic is too specific, whereas the objectives are purposely broad-ranging. However, decision-aiding criteria regarding Green Infrastructure has been included under objectives 1, 10 & 14.</p>
	11.55	<p>English Nature notes that whilst any potential conflicts between SA objectives have been highlighted, the Scoping Report does not explain how any conflicts may be addressed.</p>	<p>The tensions between sustainability objectives have been highlighted. This helps to focus the later stages of the Sustainability Appraisal. Resolution of these conflicts is addressed in subsequent SA Reports. Clarifying these tensions helps ensure that subsequent decisions are well based, and mitigation or alternatives can be considered.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.56	<p>Question 6 - Sustainability Appraisal Framework indicators: Protect and Enhance Biodiversity - English Nature commends the first six indicators included in Appendix 4 and considers them to be very applicable and appropriate. The last two indicators are however rather negative, and it is advised that more positive indicators such as:</p> <ul style="list-style-type: none"> · Area of habitat created as a benefit of new development (NOT including compensatory or translocated habitat) · Area of degraded habitat restored and sensitively managed as a benefit of new development. The two negative indicators proposed should not result in any data, because such instances should not occur. Habitat fragmentation without mitigation would harm biodiversity and go against the advice given in PPS9, and permissions granted contrary to English Nature advice may be subject to legislative procedures that could result in the permission being reviewed. 	Noted. These two indicators have been added to replace the two existing indicators.
	11.57	<p>Use and Manage Water Resources in a Sustainable Manner The majority of the indicators listed are supported by English Nature.</p>	Noted.
	11.58	The indicator stating the percentage of development situated in the floodplain is a negative indicator for which no data should be collected as development should not be granted in the floodplain.	Noted. An alternative indicator has been added as per comments received from the Environment Agency - see 4.31.
	11.59	Similarly the indicator for the number of applications granted contrary to EA objections is a negative indicator that should not occur.	Noted. This indicator has been removed.

Name of respondent	Ref. No.	Summary of representation	Council response
English Nature	11.60	Further advice should be gained from the Environment Agency on possible indicators, but suitable additional indicators could be: <ul style="list-style-type: none"> · The number of wetland sites enhanced as a result of beneficial gains from development (NOT compensatory measures). · The condition and capacity of aquifers. 	Indicator 1 has been added. Additional indicators have been added as a result of comments from the Environment Agency.
	11.61	Conserve and Enhance Important Natural Landscapes English Nature is very pleased to see the first indicator proposed, which is very positive and meaningful. It is suggested that this could be altered to the percentage of applications, rather than the number, because the aim would be to achieve 100%.	Noted. This indicator has been amended.
	11.62	The second and third indicators are however rather negative in nature. The Landscape Access and Recreation (LAR) division of the Countryside Agency will be able to offer more comment here. However, suggested indicators with a more positive slant could be: <ul style="list-style-type: none"> · Number of applications that make a positive contribution to the achievement of the North Wessex Downs AONB Management Plan. · Number of applications that provide for the restoration of degraded landscape features. 	Comments have now been received from Natural England regarding landscape indicators and the list of indicators reviewed.
	11.63	The indicator for objectives 6 and 11 regarding the percentage of buildings achieving high BREEAM eco-homes standards is welcomed as being very positive. English Nature hopes that this can be effectively implemented through the LDF.	Noted.
Gloucestershire County Council	12.1	Principal Urban Areas are now Strategically Significant Cities and Towns in Draft RSS, and the SA of the LDF may want to recognise this.	Swindon is designated as a Principal Urban Area in the current RPG10. References to PUA have not been amended.

Name of respondent	Ref. No.	Summary of representation	Council response
Gloucestershire County Council	12.2	<p>1. Are there any other relevant documents that have not been reviewed in this Scoping Report, which may influence the preparation of local planning documents? The list of plans and programmes appears to be comprehensive, no obvious omissions.</p>	Noted.
	12.3	<p>2. Can you suggest any other topics that you think we should have included in the baseline assessment? These seem fine.</p>	Noted.
	12.4	<p>3. Are there any other key sustainability issues affecting the Borough that we have not considered? As far as I am aware - nothing to add.</p>	Noted.
	12.5	<p>4. Are the proposed sustainability objectives appropriate for appraising the social, environmental and economic effects of a plan? Objective 1 - I suggest adding 'conserve' after protect Objective 14 - who will decide if a natural landscape is 'important' - I suggest removing this word</p>	No changes have been made to either objective. English Nature is happy with the objectives (see 11.51 & 11.53).
	12.6	<p>Statutory Instrument 2004 No.1633 Schedule 2, 6 lists a number of issues which should be 'covered' by the range of SA Objectives. I note that (c) human health and (i) climatic factors are not explicit in the 17 SA Objectives.</p> <p>Human health SA Objective 9. "Provide a safe and healthy environment in which to live" is clearly related to 'health' but is it specifically about human health? It is noted that health inequalities are raised as a topic but this is perhaps not followed through into the Objectives.</p> <p>Climatic factors In my understanding this relates to tackling Climate change - perhaps either SA Objectives 5 or 6 could be altered to include some mention of tackling climate change.</p>	The SEA Directive states that information to be provided in the Environmental Report includes "the likely significant effects on the environment, including on issues such as....human health.....climatic factors...". It does not state that these issues must be explicit in the wording of the objectives. The Sustainability Objectives cover these topics, as does the baseline assessment and key sustainability issues. The topic of health inequalities has been discussed within the section on health and we do not consider that the wording 'health inequalities' must be included in the Objective. A decision-aiding question 'Encourage healthy lifestyles and reduce health inequalities' is included under Objective 10.

Name of respondent	Ref. No.	Summary of representation	Council response
The Theatres Trust	13.1	<p>Local authorities are required by Government Order to consult the Trust when considering planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old or new, and regardless of whether or not they are still in use as theatres, in other uses, or disused.</p> <p>We are therefore pleased to see specific guidance on protecting and encouraging arts and cultural provision and that Swindon's Wyvern Theatre has been included in item 3.63 as an important existing asset.</p>	Noted.
	13.2	<p>With this in mind, we are surprised that you have not included the Arts Centre and The Mechanics' Institute. As you know, the Arts Centre features all types of music, professional and amateur theatre, films, children's events and one-man shows, and is celebrating its 50th year in its current location. The Mechanics' Institution is a Grade II listed building which should be acknowledged as a cultural asset.</p>	<p>Para. 3.73 is not meant as a definitive list of all the important cultural assets in the Borough. However, the Arts Centre has been included in this paragraph. The Mechanics Institute has been included in the discussion of listed buildings in para. 3.95.</p>
	13.3	<p>We are also pleased to see references to Swindon's Culture and Leisure Strategy 2003-2013 especially in Appendix 3 Key Sustainability Issues where at item 4 it has been noted that culture and leisure facilities have fallen behindand are perceived as poor.</p>	Noted.
	13.4	<p>Theatres are important anchors in the cultural and creative industries, providing jobs, skills, learning and educational opportunities, and providing vital secondary spend to tourism, retail and leisure sectors. A flourishing arts scene gives a sense of local identity and vitality, and entertains and stimulates local residents and businesses. Audiences coming to an event will enliven the surrounding area in the evening and provide regular custom for local bars and restaurants outside normal working and shopping hours.</p>	<p>Noted. Several of these points have been acknowledged in the baseline assessment.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
The Theatres Trust	13.5	We are aware that an Audience Research Study in Swindon's Culture & Leisure Strategy 2003-2013 at 3.5.1 Current Cultural Provision: Gaps and Problems, has identified the need for a better theatre and we therefore look forward to being consulted on any future developments for theatre provision.	Noted.
Hunter Page Planning for David Wilson Homes (SW)	14.1	DWH welcomes the fact that the Council is dealing with SEA and Sustainability Appraisal in a combined and iterative process.	Noted.
	14.2	DWH believes that a comprehensive list of other plans, policies and strategies is set out in Section 2 (Table 3).	Noted.
	14.3	DWH notes the key objectives set out at Table 4 that are derived from the document review.	Noted.
	14.4	DWH is concerned that at Paragraph 3.24 the Eastern Development Area (EDA) is described as being "identified in the Draft RSS as providing the focus for future expansion beyond 2016." This is not the case as draft RSS recognises that in order for Swindon to meet its potential the EDA will be needed from 2006 and sets an annual rate of 600 dwellings over the 20 year RSS period. This needs to be corrected.	This sentence has been amended to read "...this is proposed in the Draft RSS to provide a continuous supply and choice of residential, economic and social opportunities to meet the identified development requirements to 2026".
	14.5	DWH notes at Paragraph 3.28 that the EA's concerns as expressed in RPG10 regarding water supply and waste water capacity are set out. However, what is not set out is RPG policy for the Council, EA and other stakeholders to work together to address the issues raised. DWH is pleased that progress is being made in this direction.	Para. 3.33 highlights the issue of potential water supply problems and waste water capacity. In Appendix 3 'Key sustainability issues', in 2.3, it states that there are "ongoing discussions with the water companies to secure future resources in line with the planned growth".

Name of respondent	Ref. No.	Summary of representation	Council response
Hunter Page Planning for David Wilson Homes (SW)	14.6	<p>DWH is pleased to note that the development of land at EDA will help to meet many of the sustainability issues identified in Section 4 as follows:</p> <ul style="list-style-type: none"> It will provide necessary housing and employment opportunities for Swindon to maintain and enhance its role as an economic powerhouse for the region; It will provide significant areas of community forest; It will provide significant increase in habitat provision; It will provide alternatives to the private car by developing park and ride and bus priority links to the town centre; It will provide opportunities for regeneration along the bus priority route into the town centre; It will protect and interpret important archaeology on site. 	<p>Noted. The contribution that the EDA will make to the sustainability issues identified in Section 4 will be considered in the appropriate DPD and Sustainability Appraisal report.</p>
	14.7	<p>DWH is unclear as to the origin of the wording of objective number 2, in particular the 'prioritisation' of development of previously developed land. It is clear from the preceding content of the Draft Sustainability Appraisal Scoping Report that the levels of development required cannot be realised from previously developed land and that green field development will be required throughout the period to 2026 and probably beyond. Whilst DWH accepts that the regeneration of the town centre in partnership with the New Swindon Company is vital to the success of Swindon as a sub-regional centre, DWH believes that this will only be achieved with increased population able to access the town centre quickly by public transport to support the additional cultural, retail and business sectors in the town centre. DWH fears that 'prioritisation' of development of previously developed land will be interpreted as brownfield first and greenfield second. This would clearly be contrary to the strategic sustainability aims for Swindon.</p>	<p>Comments noted. The Scoping Report has attempted to highlight the main sustainability issues within the Borough, including the conflicts that exist between sustainability objectives. It acknowledges that greenfield releases are a necessary provision to meet housing requirements. However, Local Authorities must have regard to policies contained within PPG3, including to "provide sufficient housing land but give priority to re-using previously-developed land within urban areas.....in preference to the development of greenfield sites". It continues, "Local Authorities should follow a search sequence, starting with the re-use of previously-developed land...then urban extensions" and that "the presumption will be that previously-developed sites should be developed before greenfield sites". Regarding efficient use of land, PPG3 states "Local planning authorities should avoid the inefficient use of land".</p>
	14.8	<p>DWH notes that the status of the Cotswold District Local Plan is out of date as it was adopted in 2006.</p>	<p>Noted. The review of this document has been updated to reflect the adopted status.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
Action for the River Kennet (ARK)	15.1	A major concern of ARK has been the extent of Thames Water's abstraction from the Axford pumping station much of which is transferred to Swindon, and hence does not return to the Kennet catchment area. Water abstracted from the Kennet catchment is particularly attractive to Thames Water because its relative purity means that it is easier and hence cheaper to purify. ARK therefore welcomes Swindon Borough Council's publication of its Draft Sustainability Appraisal Scoping Report.	Noted.
	15.2	The need for co-ordinated regional planning. We draw attention to Draft South West Regional Spatial Strategy and note two main strands related to water resources which are supported by international, national and regional policy documents. 1. Water resources are regarded as essential infrastructure and must be considered in the planning of all future development. Water resources are referred to in the wider sense of environmental protection, rather than just that water is available 2. Planning and development must also take account of local biodiversity and ecosystems, requiring collaboration across local authority boundaries. In particular we refer to Section 7.2.5 of the RSS and Policy RE6 of the RSS.	Noted. The Draft RSS sets the regional context for planning in the South West and will guide the development of the Local Development Documents that form the Local Development Framework (LDF). All of the policies within the Draft RSS, including those relating to water resources, will be considered by the LDF.
	15.3	The effect of Swindon's water demand on the environment. We welcome the references to improved efficiency in the use of water. We note and welcome the several references in the document to the potential effects of water abstraction on the environment (eg in para3.27 et seq). Understandably however these refer only to the environment with the boundary of the Borough Council itself. At present no reference is made to the environmental effects of abstraction outside those boundaries.	Para. 3.19 of the baseline assessment has been amended, and reference has now been made to the environmental effects of abstraction that may occur outside the Borough boundary. See also 11.52 (bullet point 7) of this Appendix.

Name of respondent	Ref. No.	Summary of representation	Council response
Action for the River Kennet (ARK)	15.4	ARK states that the environmental effects of water supply from outside the Borough of Swindon must be taken into account in the Local Development Documents and all planning documents (to which the Sustainability Appraisal and Environmental Impact Assessment applies).	Noted. This point has been added to the decision-aiding criteria of sustainability objective 4. See also response to English Nature at 11.52.
	15.5	Thames Water regards the Axford Groundwater source as an important source of Swindon's water supply. The Environment Agency already regards the River Kennet as "over-abstracted" and the Environment Agency states that "...Thames Water also proposes a new reservoir in Oxfordshire by 2021. Seventeen years is a short time for the development of this reservoir, which is likely to meet serious local opposition. It (TWUL) must also carry out further studies into the impact of climate change on its resources".	Noted. The Upper Thames Reservoir has been referred to in para. 3.37 of the Scoping Report and the possible effects of climate change on water resources is referred to in para. 3.33.
	15.6	A recent report commissioned by Thames Water concluded that abstraction is having an adverse effect on the ecology of the upper Kennet. Groundwater abstraction from the River Kennet SSSI for Swindon's water supply is unsustainable at present levels. Thames Water need urgently to seek alternative sources of water from outside the Kennet catchment to keep Swindon Borough supplied, and the Borough Council should be addressing this with Thames Water. ARK urges the Borough Council to work with the Environment Agency and Thames Water to accelerate the development of alternative sources for Swindon's inevitably rising demand for water.	Noted. See Appendix 3 of the Scoping Report (1.3 & 2.3) and Appendix 4 (objective 4). Reference to the ongoing discussions with water companies is made in Appendix 3 of the Scoping Report, section 2.3.

Name of respondent	Ref. No.	Summary of representation	Council response
English Heritage	16.1	<p>Examples of SEA/SA Objectives that could be included in the Scoping Report.</p> <ul style="list-style-type: none"> · To preserve, protect and enhance sites, features and areas of archaeological, historical and cultural heritage importance. · To protect, enhance and manage the rich diversity of cultural and built environment and archaeological assets. · Preserve, enhance and manage World Heritage Sites, archaeological remains, historic buildings, conservation areas, historic parks and gardens, battlefields and other architectural and historically important features and areas, and their settings. · Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. · Identify, assess and incorporate the physical, social, economic and environmental value of the historic environment in the regeneration of the (authority). · Improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings · Protect, manage and, where necessary, improve local environmental quality 	<p>Noted. Sustainability objective 13 has been amended to read "Conserve and enhance the historic built environment and archaeological assets".</p>
	16.2	<p>We note that your baseline focuses on the World Heritage Site bid, listed buildings and the conservation areas. Whilst we welcome their inclusion it is important that the historic environment is broadly defined; all designated historic assets 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. This covers buildings, historic open spaces and historic features.</p>	<p>The section on the historic environment has been amended to give a broader definition of the historic environment in the Borough.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Heritage	16.3	There are problems in representing the historic environment spatially in an appropriate way. Point data provided by individual designations does not provide a useful overview. Historic landscape characterisation and urban characterisation broadens the understanding of place describing the evolution of the present day landscape / townscape.	Noted.
	16.4	Statutory Designations – Listed Buildings (all grades), Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas - and their settings	Noted.
	16.5	Other important considerations– SMR/HER sites, local list buildings, parks, features, character of wider landscape / townscape, historic landscapes, potential for unrecorded archaeology	Noted.
	16.6	In terms of landscape and townscape urban and historic landscape characterisation describes and develops understanding about what gives the region its distinctive character and sense of place. Data is available from the county HLC projects, EUS and urban characterisation projects. Countryside Quality Counts provides some measures of erosion of historic landscape features.	Noted.
	16.7	English Heritage’s annual series of national and regional reports, Heritage Counts: State of the Historic Environment, includes a suite of indicators for monitoring the extent, size and quality of the assets that comprise the historic environment.	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
English Heritage	16.8	<ul style="list-style-type: none"> • Number of Listed Buildings under each grade • Number and % LBs at risk • Number of conservation statements submitted in connection with an application for listed building consent • Number of SAMs • Number and % archaeological sites at risk • Number of registered historic parks and gardens • Number and % at risk 	<p>Indicator "No. and % SAMs considered at risk" added to replace existing indicator on SAMs. Agreed to add indicator "No. and % archaeological sites considered at risk" as replacement for the two existing indicators on archaeological investigation.</p>
	16.9	<ul style="list-style-type: none"> • BVPI <ul style="list-style-type: none"> o Total number of conservation areas in the local authority area o Percentage of conservation areas in the local authority area with an up-to date character appraisal, "up to date" is defined as within the last 5 years, from the date of the BVPI. o Percentage of conservation areas with published management proposals" 	<p>It is not considered worthwhile monitoring the number of conservation areas as this figure is unlikely to change significantly and does not allow meaningful comparison with other areas. BVPI "% of Conservation Areas with an up-to-date character appraisal" and BVPI "% of Conservation Areas with published management proposals" will be used as replacement for existing indicator re Conservation Areas.</p>
	16.10	<ul style="list-style-type: none"> • 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 • <u>Erosion of quality, character and distinctiveness</u> 	<p>At the present time, there are not the resources available to carry out the necessary assessments to provide information relating to these suggested indicators. The limited nature of information currently held would not provide an accurate picture of the Borough. If the necessary resources become available in the future, the addition of further indicators will be reviewed.</p>
	16.11	<p>When monitoring indicators and assessing the significance of impacts on the historic environment, including within this architectural and historic landscape quality, the following should be considered:</p> <ul style="list-style-type: none"> • Rarity and trends • The historic environment is irreplaceable 	<p>Noted.</p>

Name of respondent	Ref. No.	Summary of representation	Council response
English Heritage	16.12	Cumulative impact, when considering impacts on the historic environment, you are advised to consider very carefully 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 or the effect of small impacts, or loss of features, which are not significant individually.	The need to assess cumulative effects has been noted in the Scoping Report. These comments from English Heritage will be heeded when assessing cumulative impacts on individual historic sites.
	16.13	In a wider context, urban characterisation and historic landscape characterisation (HLC) studies should be used to help assess the potential impacts of major schemes, and the cumulative effects of smaller scale projects, on the character of the local townscape and landscape.	Noted.
	16.14	Information sources.	We acknowledge the wide range of information sources provided by English Heritage and will consult these sources during the ongoing Sustainability Appraisal process.
Swindon Coalition of Disabled People	17.1	P.30 of the Scoping Report - 'Health inequalities'. Make reference within this section to the barriers that disabled people face and refer to Social Model of Disability for further information. Separate the 'Healthy and Inclusive Communities' chapter into 'Health' and 'Inclusive Communities'. More emphasis on disabled access and equality. Expand paragraph 3.40 in Scoping Report and refer to Jane Leaman (PCT) report on Equalities and Health.	The 'Healthy and inclusive communities' section has been seperated into two sections - 'Healthy communities' and 'Inclusive communities' (see also 17.3). Reference has been made to equality and access issues for disabled people within the Inclusive communities section.
	17.2	The document 'Guidance Notes for Council Members, Managers and Staff' should be reviewed in Chapter 2 of the Scoping Report. This document contains important policies and requirements that the LDF needs to address.	Accepted. This document has been reviewed.

Name of respondent	Ref. No.	Summary of representation	Council response
Swindon Coalition of Disabled People	17.3	Use of the word accessibility – we need to be careful how we use this word in the Sustainability Appraisal. SCODP see it in terms of physical barriers, but it can also be used in terms of accessibility to services. Need to make it clearer in the text what we are referring to.	The term 'accessibility' has been further clarified within the text where this was required.
	17.4	The Sustainability Appraisal needs to be a flexible process. Issues are constantly evolving, not static.	Noted.
	17.5	Review the indicators and decision-aiding criteria in the Sustainability Framework (Appendix 4 Scoping Report). Possibly add relevant indicators and questions re disabled access.	Indicator " BVPI 156 % of local authority buildings suitable for and accessible by disabled people" added to sustainability objective 8.
Alan Wylde (Swindon Borough Council - Housing Enabling Manager)	18.1	In Section 2 does the Swindon Local Plan 2011 include the Supplementary Planning Guidance for Affordable Housing? If not, it needs to be listed separately.	We have not included Supplementary Planning documents in the document review. SPDs and SPGs provide policy guidance that amplifies policies and proposals already contained in the Local Plan.
	18.2	We are also in the process of completing the Swindon sub-regional Housing Market Assessment which will need to be listed (expected completion in September).	Noted. This document will be reviewed when it becomes available.
	18.3	The only other comment is your baseline assessment places affordable housing in section 5 development and growth whilst the key sustainability issues places it in Healthy and inclusive communities.	Noted. The issue of affordable housing has been included in the 'Inclusive communities' section of the baseline assessment.
Mrs Lynn Forrester (Swindon Borough Council - Local Agenda 21 Co-Ordinator)	19.1	Review of relevant plans, programmes and strategies - include 'Climate Change - The UK Programme 2006'.	Noted. This document has been reviewed in Appendix 1.
	19.2	Review of relevant plans, programmes and strategies - include 'The Wiltshire & Swindon Renewable Energy Action Plan 2005'.	Noted. This document has been reviewed in Appendix 1.

Name of respondent	Ref. No.	Summary of representation	Council response
Mrs Lynn Forrester (Swindon Borough Council - Local Agenda 21 Co-Ordinator)	19.3	Pollution, Air and Climatic Factors - although it states we have to "plan for unavoidable climate change" in section 3.32, there is no further reference to necessary adaptation measures and far more detail could be included here on what must be done to prepare the Borough for unavoidable climate change eg UKCIP climate change data and scenarios predict broad climate changes in the South West up to 2050-2080. These predictions suggest we will have to ensure new development and transport infrastructure is 'climate-proofed'.	Noted. Paras. 3.38-3.40 have been amended in line with the comments received. It is acknowledged that climate change is one of the most important issues that the Borough faces.
	19.4	Section 3.38/9 could include much greater detail on existing and future RE capacity in line with the Wilts and Swindon Renewable Energy Action Plan.	Noted. Paras. 3.44-3.47 have been amended. The baseline assessment must highlight all of the social, environmental and economic sustainability issues in the Borough and it is not practical to go into great detail on every issue.
	19.5	Are there any other key sustainability issues affecting the Borough that have not been considered? Ensuring sufficient agricultural land is protected to enable growth of the local food economy and reduce 'food miles'.	Planned housing growth and its impacts on agricultural land has been acknowledged as one of the key sustainability issues in Appendix 3.
	19.6	Are the proposed sustainability objectives and decision-aiding questions appropriate for appraising the social, environmental and economic effects of a plan? Yes.	Noted.
	19.7	The Sustainability Appraisal framework contains a set of possible indicators. Which indicators do you think are most appropriate for monitoring the progress towards each objective? Can you suggest other more appropriate indicators? * CO ₂ emissions domestic dwellings (HECA) * % or quantity renewable energy generated within the Borough * % renewable energy use within the Borough.	Indicator 'CO2 emissions from domestic dwellings (HECA) has been added to replace 'Emissions of various greenhouse gases'. Further indicators regarding other relevant gases may be monitored in the future. Appendix 4 already includes an indicator '% energy production met by renewable sources'. '% renewable energy use within the Borough' has been added to Appendix 4.
Natural England	20.1	Information regarding the Character Areas in the South West is contained in Volume 8 of the Countryside Character series.	Noted.

Name of respondent	Ref. No.	Summary of representation	Council response
Natural England	20.2	A further tool which Natural England considers crucial in planning for landscape level change is Landscape Character Assessments (LCA). To the extent that this plan significantly affects the character or quality of landscapes, whether in the countryside or in more urban settings, this impact should be assessed.	Noted. Landscape Character Assessment has been discussed in paras. 3.101-3.102 of the baseline assessment.
	20.3	You should consider whether in your area there is land designated as conditionally exempt from capital taxes on the grounds of outstanding scenic, scientific or historic interest. These are considered to be designated landscapes of national importance and the impact of your plan on these should be assessed where appropriate.	Swindon Borough contains 2 relevant areas - Burderop Estate and Clouts Wood. Details of these have been included in the baseline assessment.
	20.4	Potential impacts on access land, public open land and rights of way should be fully considered.	There are a number of small areas of public access land, including at Roves Farm and Barbury Castle. These have been considered in the baseline assessment, together with rights of way.
	20.5	We would wish to see the various methodologies mentioned incorporated within the SA where appropriate as part of the identification of baseline indicators which will be used to monitor changes. We would expect details of the frequency with which monitoring and assessment of these indicators will take place.	These methodologies have been considered, where appropriate, and a series of relevant indicators for monitoring established. Details regarding monitoring will be included in the SA Report of each SPD/DPD.
	20.6	Does the baseline chapter deal with the issue(s) of landscape character and quality? Yes.	Noted.
	20.7	Does the baseline chapter deal with the issue(s) of designated landscapes (National Parks and AONBs)? Yes	Noted.
	20.8	Does the baseline chapter deal with the issue(s) of visual amenity and enjoyment of the countryside as a whole? Yes.	Noted.
	20.9	Does the baseline chapter deal with the issue(s) of value of the environment to the rural economy? No.	Amendments have been made to the baseline assessment - see para. 3.98.

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Natural England	20.10	Does the baseline chapter deal with the issue(s) of access/recreational opportunities of national, regional and local routes/trails? No.	Noted. See also 20.5. This issue has been discussed in the baseline assessment - particularly regarding the Thames Path and Ridgeway National Trails and the existing and proposed cycle network in the Borough.
	20.11	Does the baseline chapter deal with the issue(s) of availability of open space provision/demand? No.	This issue has been discussed in the baseline assessment - see para. 3.104.
	20.12	Does the baseline chapter deal with the issue(s) of community engagement/participation? Yes.	Noted.
	20.13	Do the Sustainability Appraisal objectives cover LAR's objectives, including the protection and enhancement of the landscape/townscape? Yes.	Noted.
	20.14	Do the Sustainability Appraisal objectives cover LAR's objectives, including the protection and enhancement of designated landscapes? Yes.	Noted.
	20.15	Do the Sustainability Appraisal objectives cover LAR's objectives, including achieving a high quality of design and construction suitable for 21st century living? No.	See sustainability objective 11 "Provide a high quality built environment" (Appendix 4) and decision-aiding question "Ensure high standards of design and construction in all new developments".
	20.16	Do the Sustainability Appraisal objectives cover LAR's objectives, including recognising the importance of the environment to the area's economy? No.	This has been added to sustainability objective 15 as a decision-aiding question "Will the policy recognise the importance of the environment to the Borough's economy?"
	20.17	Do the Sustainability Appraisal objectives cover LAR's objectives, including recognising local distinctiveness, sense of place and high quality design? Yes.	Noted.
	20.18	Do the Sustainability Appraisal objectives cover LAR's objectives, including supporting sustainable transport modes (public transport, cycling and walking)? No.	See sustainability objective 5 "Reduce the need to travel and promote more sustainable forms of transport".
	20.19	Do the Sustainability Appraisal objectives cover LAR's objectives, including supporting local needs and provision of local benefits? Yes.	Noted.
20.20	Do the Sustainability Appraisal objectives cover LAR's objectives, including promoting good governance? Yes.	Noted.	

Name of respondent	Ref. No.	Summary of representation	Council response
Natural England	20.21	Do the Sustainability Appraisal objectives cover LAR's objectives, including meeting the countryside recreational and leisure needs of communities? Yes.	Noted.
	20.22	Does the Scoping Report include indicators which relate to LARs objectives, including changes in the quality of AONBs and National Parks? No.	See indicator "No. of applications that make a positive contribution to the achievement of the North Wessex Downs AONB Management Plan". There are no National Parks in the Borough or in neighbouring authorities.
	20.23	Does the Scoping Report include indicators which relate to LARs objectives, including State of the Countryside - changes in countryside quality based on the Countryside Quality Counts data used to inform condition of Countryside Character Areas? No.	A relevant indicator may be added in future if data for the Borough becomes available.
	20.24	Does the Scoping Report include indicators which relate to LARs objectives, including percentage of the Rights of Way network in a "favourable" condition? No.	After discussion with the Council's Rights of Way Officer, the indicator "BVPI 178 - % length of rights of way easy to use by the public" has been added to Appendix 4.
	20.25	Does the Scoping Report include indicators which relate to LARs objectives, including availability, use and access to green spaces? No.	Indicator 'Quantity and proportion of new development designated as new strategic green corridor (Ha and % of area)' is included for Objective 1.
	20.26	Does the Scoping Report include indicators which relate to LARs objectives, including percentage of high quality, sustainably designed buildings? No.	This indicator may be added in future if data is available.
	20.27	Does the Scoping Report include indicators which relate to LARs objectives, including use of local materials in new developments? No.	This indicator may be added in future if data is available.