

Appendix 2: Responses to Draft SA Scoping Report

Organisation	Comment	Page	Paragraph	Comment	Council's Response
1 - Tees Valley Unlimited	1	14	7.24	A recent Stockton-on-Tees citizens panel survey contained 12 questions on climate change which would be useful to reference in the document.	Agreed - The survey has been referenced in the document and key statistics have been included in para. 7.24.
	2	15	7.30	It would be useful to acknowledge the role of ecosystem services in Stockton, for example where the natural environment can reduce flood risk through storing flood water/reducing run-off.	Agreed- Additional text added to paragraph 7.37 to highlight the multiple uses of green infrastructure.
	3	23	8.12	Paragraph 8.12 in relation to Durham Tees Valley Airport probably needs some updating as forecasts for growth in passenger numbers now seem to be less optimistic.	Paragraph 8.12 has been altered to refer to the draft third Local Transport Plan, which identifies rail connectivity as being a key issue.
	4	23	8.15	It may be useful to refer to the Tees Valley Climate Change Resilience Project – a summary is attached to the covering email. Although the project is still a work in progress and is not expected to be complete until September 2012, there may be interim data available that could usefully feed into the sustainability appraisal.	It is considered more appropriate to refer to the Tees Valley Climate Change Resilience Project within Appendix 1 which documents other relevant plans and programmes.
	5	30		Attached to the covering email is a copy of Tees Valley Unlimited's 'Outline of the policy context for action on climate change, July 2010'may provide some useful references. (other recommendations for documents to be referenced were also provided)	The contents of the suggested document have been noted and a number of plans and programmes mentioned within the document, and provided separately, have been included in Annex 1.
	6	53		2.i-iii) The Tees Valley Climate Change Strategy has been revised, and there should also be a reference to Stockton BC sustainable energy action plan.	Agreed- The target and data has been updated and reference made to the Sustainable Energy Action Plan.
	7	54		2vi) Stockton BC officers are involved in a GIS case study on adaptation and the planning system for the Adaptation Sub-Committee.	Comment noted.
	8	48		2vii) The Tees Valley Resilience project will provide GIS data that could potentially be used to assess and benchmark this indicator.	Comment noted.
	9	48		2x) Reference Arup's regional renewable capacity assessment, which should provide GIS data at Local Authority level.	The Regional Renewable Energy Capacity Assessment has been delayed from its original completion date and is not yet finalised or available for public use.
2 - Sport England	1	23	8.14	para. 8.14 states baseline information identifies that only 55% of the Borough's sports facilities are accessible. This statistic in isolation is capable of being mis-interpreted. What does accessible mean here, and how is it measured. There should also be a footnote to identify where the statistic has been drawn from.	This statistic originates in para 7.39. Explanation of its origin has been included in this paragraph, with cross reference to this in para. 8.14.
	2	42		Appendix 1 documents the requirements of other Plans and Programmes. On p42, documents 2 and 3 relate to sport. Document 2 should be attributable to Sport England, while document 3 has now expired. There is no regional replacement document for the North East Plan for Sport and Physical Activity, and instead you might replace it with a mention of our national strategy.	Agree- Suggested changes have been made.
	3	60		The indicators around participation and satisfaction with local authority sports provision remain valid.	Comment noted.
3 - Natural England	1	8	4.2	Annex 2 provides the details of the plans and programmes that we wish to be reviewed, where relevant, as part of the SA/SEA process.	The contents of Annex 2 have been noted. The plans and programmes considered to be most relevant to the Borough have been included.
	2	11		Stage A2- Annex 3 contains suggest natural environment targets and indicators and relevant data sources.	The contents of Annex 3 have been noted. The Scoping Report contains indicators that relate to biodiversity, landscape and access to natural greenspace and recreation.
	3	15		Suggest the Environmental Infrastructure should follow on from/ be part of the Natural Environment section with Health and Wellbeing moved before sustainable communities.	Agreed- The paragraphs have been rearranged as suggested.

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3 - Natural England		4	7.24	Typo - Appendix A should read Appendix 1.	Typo corrected.
		5	7.30	This section should refer to National Character Areas by number i.e. NCA 23 Tees Lowlands Character Area, NCA 15 Durham Magnesian Limestone Plateau, NCA 25 North Yorkshire Moors and Cleveland Hills.	Agreed - reference numbers have been included.
		6	7.38	Suggest it is worth noting that all the destroyed features are due to planning related matters i.e. development on the land.	Agreed - suggested text has been included.
		7	7.42	Natural England suggests that North East and regional comparisons do not add very much in relation to Stockton and would suggest an indication of the scale and coverage of the Borough as follows: 56 Environmental Stewardship agreements, of which 8 are of Higher Level Stewardship, Over 3,955ha covered by Stewardship (18% of your authority) and Contributions to the area of more than £2.9million (over the lifetime of the agreements).	Agreed - The provided data relating to Stockton Borough has been included in the paragraph.
		8	7.56	Suggest should add value to the economy from nature based tourism. Sites such as Teesmouth National Nature Reserve and Salthome RSPB Reserve.	Agreed - Reference has been made to the importance of nature based tourism and to the two sites suggested.
		9	8.7	Natural England notes that the growth of Durham Tees Valley Airport could have air emission impacts upon the SPA and nearby SSSIs.	Agreed- Reference to air pollution and the impacts of the growth of developments, such as Durham Tees Valley Airport, upon the SPA has been added to para. 8.19.
		10	8.11	Could add cycling and pedestrian links can be integrated into green infrastructure and should link to the Rights of Way Improvement Plan.	Agreed - Suggested text has been included.
		11	8.14	Natural England suggests that promotion of walking for health schemes should be considered here.	Walking for health schemes are organised, volunteer led walks and it is not considered appropriate for policies to require the promotion of these schemes. However, paragraph 8.14 has been amended to include increased access to safe pedestrian and cycle routes, to encourage increased activity and well-being.
		12	8.19	The sections should incorporate consideration and protection of protected species, refer to PPS9 and the LPA's NERC Act duty.	PPS9 does not consider that Local Development Frameworks should consider the protection of specific species that are protected by other legislation. Text has been added, however, to emphasise the requirement to consider opportunities for the protection or enhancement of biodiversity.
		13	51	SA2 -suggest should not only have considered flooding, but the provision of habitats allowing species to move.	Agreed - An indicator relating to the creation of BAP habitats and Local Sites has been included under SA2 to emphasise that habitat creation is also important for climate change adaptation.
		14	55	3.v) Housing developed on PDL could also have a biodiversity conflict, refer to PPS9 para13.	Recognition of the importance of previously developed land is included in paragraph 8.21. Indicators for the protection of habitats of local importance are included under objective SA7. Indicator 3v is to be retained as achieving sustainability will require a balance with all objectives.
		15	59	SA6 - suggest that the number of healthy walking schemes in the Borough could be used as an indicator.	Walking for health schemes are organised, volunteer led walks and it is not considered appropriate for policies to require the promotion of these schemes. The indicators do include a measure of participation in physical activity and the percentage of Public Rights of Way considered easy to use, to ensure that walking routes are maintained and health and well-being is supported.
		16	62	SA7 - 7iii) should include Local Geological Sites.	Agreed - Indicator has been amended to include Local Sites which cover both biodiversity and geological sites.

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3 - Natural England	17	68		SA10 - could include an indicator relating to nature based tourism e.g. visits to Teesmouth NNR and Saltholme RSPB Reserve.	Agreed - An indicator has been included to monitor visitor numbers to Saltholme Reserve.
4 - Environment Agency	1	30		Appendix 1 - Two additional documents produced by the Environment Agency should be made reference to appendix 1 - the River Tees Catchment Flood Management Plan and the Northumbria River Basin Management Plan.	Agreed - Documents considered and referenced.
	2	52		2 vi) We agree that this is an appropriate indicator to include, however the target does not seem to relate to it. Perhaps a numerical target would be more appropriate, such as 'no applications approved contrary to EA advice on grounds of flood risk' for example.	Agreed- Suggested target has been incorporated in the report.
	3	62		7vi) This target should be updated. The RBMP has been finalised and the targets can be found in appendix B of the document, which is available on our website.	Agreed - Indicator has been modified and updated in line with the Northumbria River Basin Management Plan.
	4	63		7ix) With regards to this indicator, I wonder whether the target could be linked with some of the foreseen outcomes of your Green Infrastructure Plan. Alternatively or in addition to this, it may be appropriate to add an additional indicator or two that links in with the GI Plan.	The indicator has been amended to allow a realistic target for access to urban natural greenspace to be set. The Green Infrastructure Strategy for Stockton is currently only in draft form and does not include any quantifiable targets. There are a number of key ambitions, which include increasing community access to greenspace and creating and enhancing natural habitats, that are outcomes of the proposed Green Infrastructure Strategy and that link with this indicator.
5 - Tees Archaeology	1	19	7.52	This should include a reference to the Historic Environment Record of the area. This might read 'Tees Archaeology holds the Historic Environment record for Stockton and this records the wide range of non-designated heritage assets of the borough.'	Agreed- Reference to the Historic Environment Record and Tees Archaeology has been included in this paragraph.
	2	19	7.52	This should also contain a reference to the recently completed Stockton Heritage Strategy.	Agreed- Reference to the Stockton Heritage Strategy has been included.
	3	24	8.23	This should also contain a reference to the Historic Environment Record and its role in alerting developers and planning authorities to the potential impact of development on non designated heritage assets.	Agreed- Reference to the HER has been included.
	4	30		Appendix 1- The Stockton Heritage Strategy should be added to the list of local documents in this table.	Agreed- Stockton Heritage Strategy has been included in the list of local documents.
6 - English Heritage	1	8	4.1	We are pleased to note the intention to consult Tees Archaeology on the document. We assume that your own in-house Conservation Officer will be given ample opportunity to comment.	Comment noted.
	2	8	4.2	PPS5 Policy HE3.1 states that Local Development Frameworks should set out a positive, pro-active strategy for the conservation and enjoyment of the environment in their area. (Policy HE3.1 is quoted). Policy HE3.4 advises local authorities to consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial visions in the LDF Core Strategy. It is therefore important that the Core Strategy Review meets this challenge.	Comment is noted-The Core Strategy Review has a limited scope and the majority of policies within the Adopted Core Strategy will remain. The protection and enhancement of heritage assets within the Borough is being considered further within the Environment DPD, which is progressing towards preferred options.
	3	8	4.2	Policy HE3.4 also states that heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats.	Comment noted. The Core Strategy Review has a limited scope and the majority of policies within the Adopted Core Strategy will remain. The protection and enhancement of heritage assets within the Borough is being considered further within the Environment DPD, which is progressing towards preferred options.

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6 - English Heritage	4	8	4.2	The Heritage at Risk Register for the Borough should be an important baseline document providing critical information regarding the extent to which the historic environment of the Borough and its heritage assets are at risk from harm or loss. To perform in the manner envisaged by PPS5 it is important that the Register contains the full range of asset types, including grade II listed buildings, any asset on a local list and non-scheduled archaeology.	The Council does not currently have a published Heritage at Risk Register for the Borough. However, the comments will be noted and consideration will be given to the preparation of such a document.
	5	12	7.9	Paragraph 7.9 opines that there is little remaining of Stockton's industrial heritage, yet paragraph 7.10 acknowledges that over time the town's unique historic landscape has helped to define and add considerable interest to the overall townscape. This is in effect a clear message that the heritage of the Borough which remains should be celebrated and safeguarded now and for future generations and made a key element of the strategic planning of the area. If so much of it has been lost it is even more important to look after that which remains.	Comment noted - Section 7 is confined to the provision of baseline information and characterises the Borough. Section 8 outlines the key sustainability issues for the Borough that have been identified from the information in Sections 7. Paragraph 8.23 refers to the need to protect the heritage of the Borough.
	6	14	7.21	The repair of the historic environment brings with it the need for a range of skills and crafts, and the opportunity for people to learn those skills should be recognised as an important element of delivering on this social objective.	The Report considers that improving the learning and skills base of the Borough is important for sustainability. The range of learnt subjects or skills that are of importance is too broad to allow mention of individual areas. The baseline information has therefore been necessarily restricted to qualification levels rather than subject areas. Any contribution to learning and skills training will be recognised within the Sustainability Appraisal.
	7	16	7.36	It is disappointing to observe that the historic component is not acknowledged. Our historic environment is a crucial part of the sustainability agenda, in the sense that it is a finite resource which, once gone, is gone forever. Existing buildings, many of which are of heritage value, constitute an enormous body of environmental capital which can, and should, be carefully managed to reduce the extent to which we generate waste and energy.	The Scoping Report acknowledges that the historic environment is an important part of the sustainability agenda. While it is not referenced with the section relating to Environmental Infrastructure, paragraphs 7.52 - 7.58 refer to the culture and heritage of the Borough.
	8	16	7.36	A great many heritage assets are part of the green infrastructure of the Borough too. Historic parks and gardens, conservation areas, archaeological sites, and large land holdings often associated with high status listed buildings are essentially part of the landscape and thereby an integral part of the network of eco-systems important to the environment as a whole.	Agreed - Reference has been made within paragraph 7.34 to the contribution of heritage assets to green infrastructure and the network of eco-systems.
	9	19	7.52	Although useful as a brief summary of the extent and state of the historic environment of the Borough, this section does not provide commentary as to the issues that arise as a consequence.	Section 7 is intended to provide baseline information and a characterisation of the Borough that may then be used to form key sustainability issues. Section 8 includes some reference to the importance of both green infrastructure and the built environment.
	10	22	8.8	Given the rate at which new housing is being built, the repair, adaptation and conversion of existing stock is crucial to maintaining the broadest possible housing offer. Such an approach chimes well with the desirability of making best use of the existing built fabric and I am pleased to observe reference to it in this Chapter.	Support welcomed.
	11	24	8.23	Although the section clearly deals with aspects of the heritage of the Borough, explicit reference to heritage is unhelpfully absent from the title. Again the full range of heritage assets is not addressed.	Reference to Heritage has been made within the section title. An larger range of heritage assets are referred to earlier in the Scoping Report, although reference has been made to the Historic Environment Record and the protection of non designated assets.

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6 - English Heritage	12	25	8.24	I welcome the reference to the contribution of the historic environment to the sustainable communities agenda, recognising in doing so that the nomenclature associated with it is now seldom referred to since there has been a change of Government. The Localism agenda has to all intents and purposes eclipsed it.	Support welcomed.
	13	26	9.6	English heritage welcomes SA Objective 10. This however, would be further improved by the inclusion of the word 'safeguard' or 'conserve'. With regard to linkages and cross-cutting issues that arise, I would expect the contribution of the heritage of the Borough in meeting other SA Objectives and the Strategic Objectives of the Core Strategy itself to be properly recognised in any matrix attempting to capture this process. PPS5 refers.	Comments noted, however, it is considered that Sustainability Objective 10 is sufficiently robust as to ensure that the value and conservation of heritage assets is recognised in any future appraisal.
	14	28	10.2	We are advised that the element of the Core Strategy most likely to require review is the housing section. In the light of PPS5 I would contend that the Strategy needs to deal in a more positive and pro-active way with the Borough's historic environment and its heritage assets.	The scope of the Core Strategy Review is narrow and many of the policies within the Adopted Core Strategy will be remain. The Environment DPD will include further policies relating to the historic environment and this DPD is currently being progressed towards Preferred Options.
	15	30		The appendix helpfully includes PPS5 but does not draw out one of its principal messages for the preparation or review of the Core Strategy, namely the need for it to contain a positive and pro-active strategy for the conservation and enjoyment of the historic environment of the area.	Agreed - The outline of PPS5 has been expanded to take into account the comment made.
	16	30		Although regarded here as a regional document, Heritage Counts, the regularly updated English Heritage document on the state of the historic environment in the north east should become a regional/local document, with the Council taking ownership of that part of it which contains evidential material gathered locally. It is important to ensure that the most up to date version (Autumn 2010) is referred to.	Agreed- The information in Appendix 1 has been updated to take into account the 2010 Heritage Counts document. Comments relating to formation of a local Heritage Counts document have been noted and will be considered.
	17	30		The Historic Landscape Characterisation work for the Borough has now been completed. It is important that it is used to help inform the Core Strategy and its approach to development.	Agreed - The Historic Landscape Characterisation has been included in Appendix 1.
	18	48		Although previously provided, please find enclosed a further copy of draft English Heritage guidance on the preparation of SEA. From it you should be able to produce a more robust and representative suite of targets and indicators more responsive to the particular issues affecting the historic environment of the Borough.	The contents of the provided document have been noted and an indicator to monitor the number of locally listed buildings has been added.
	19	80		PPS5 brings with it more precise, and quite fundamental, definitions of 'the historic environment' and 'heritage assets' which it would be useful to include in this glossary.	Agreed - definitions have been included in the glossary.