

APPENDIX III

RESPONSES FROM CONSULTees – SCOPING REPORT FOR THE SEA/SA OF DARTFORD AND GRAVESHAM LDF

Organisation	Type	Date	Response	Action
English Heritage	Letter	2/3/05	Lists databases (possibly available online), and recommends contacting the Heritage Conservation Unit at KCC (Kent Sites and Monuments Officer). Strategic assessment of Historic Landscape Characterisation across the Thames Gateway, is complete, contact David Went (Saville Row EH 020 7973 3141).	Searched web site and included Buildings at Risk results. Telephoned KCC Conservation Heritage Unit, who will forward databases recommended by English Heritage.
Dartford Borough Council (Phil Kessel)	E-mail	2/3/05	Commented on environmental issues arising as a result of development, and regulatory and enforcement implications of development	Incorporated into SA report
English Nature (Rebecca Moberly)	Letter	7/3/05	Enclosed copy of EN SEA guidelines (CD), and bullet point list of environmental issues	Incorporated into SA report
Groundwork Kent-Thameside	Letter	7/03/05	States that they have contributed to the Crayford and Dartford Marshes Technical, Environmental Case Study 04. Would be happy to respond to requests for info.	Noted.
Dartford, Gravesham	Letter	9/03/05	Offers a link to 'Healthy Sustainable Communities: A Spatial Planning Checklist'-key themes.	Noted. Key interests have been reflected

and Swanley NHS Primary Care Trust			<p>Key interests are:</p> <p>Social</p> <ul style="list-style-type: none"> ▪ Ensuring social cohesion with existing deprived/regeneration areas ahead of new housing growth ▪ Provision of lifelong housing ▪ Provision of low cost key worker housing ▪ Effective transport provision ▪ Healthy food policies, including local availability of fresh produce ▪ Local proximity of sport and leisure facilities <p>Economic</p> <ul style="list-style-type: none"> ▪ Lifelong learning and employment opportunities ▪ A need to ensure that we are not producing 'dormitory' villages <p>Environmental</p> <ul style="list-style-type: none"> ▪ Clean air and open space ▪ Transport policy with respect to encouraging the use of public transport and walking/ cycling opportunities <p>Interested in using section 106 to support key health and social care developments</p>	in SA Report and SA Appraisal tables.
Kent Wildlife Trust	Letter	11/3/05	Attached: Natural Regeneration; Biodiversity Conservation in the Thames Gateway Brief summary of issues in letter	Noted and included in updated Plans and Programmes review. Issues covered in Chapter 4 of SA Report.
Dartford	Email	14/3/0	Highlights key sustainability issues in terms of the economy and	Issues noted and

Borough Council (Ruth Merrifield)		5	<p>communities.</p> <ul style="list-style-type: none"> ▪ Provision of sufficient light industrial workspace within the new development sites to sustain the needs of the new communities (has been lost through new developments and increasing land prices. This kind of development is needed to service the needs of new residents and new business) ▪ Workspace for start up business in new developments ▪ Integration of new and existing communities ▪ Employment generated by new developments that meet the current skill base ▪ Create areas in which people can both live and work ▪ S106 agreements to provide community facilities- flexible and use maximised. 	included in Chapter 4 (where applicable). Considered in SA Framework and Appraisal under SA Objectives 1,2,5,6 and 9.
Environment Agency	Letter	8/4/05	Described data available from EA, recommended to contact Claerwyn Hughes to obtain data	Noted. Contacted for further information.
Environment Agency	E-mail	14/4/05	Data not listed in above letter, is not available. Referred to North Kent CAMS, providing link.	CAM is only applicable to neighbouring authorities. No further action necessary.
Gravesham Borough Council (Malcolm Doyle)	Email	19/04/05	Relates to workshop- modifications to objectives for SA framework Objective 7: refer to 'safe by design' 2 nd bullet- add 'by approved and agreed standards' need to give equal priority to designing out crime in new development and improving the situation in existing communities	Issues relating to safety by design are covered under SA Objective 8: Environmental Health. 'By approved and agreed standards' considered too

			<p>Objective 9 Add a further bullet point: 'Encourage provision of small, affordable workspace, in particular 'start-up' units' Need to provide for a range of employment spaces to increase job opportunities.</p> <p>Objective 10 Replace bullet point 3 with: 'Retain and enhance quality and diversity of open land/ countryside' Need to address problems associated with the urban fringe- more of a Dartford issues? The Design of planting schemes should take into account the need to prevent rodent infestation- more of a Gravesham issue?</p>	<p>detailed for SA Framework.</p> <p>Amended to include 'business startup.' Concerns addressed in decision aiding questions: 'range of jobs' and 'range of suitable business premises'.</p> <p>Agreed. Objective 10 amended accordingly.</p>
Environment Agency	Email	27/4/05	Gives links to information based on indicators from SA Framework	Noted.
Kent Wildlife Trust	email	5/5/2005	<p>Comments provided on scoping report including data gaps (includes a list of sites to be added to baseline, as well as indication at to where further information may be found).</p> <p>Environment Climate change may lead to 'changes and deterioration' rather than 'habitat loss and fragmentation' Environmental effects due to growth and development: should include the following:</p> <ul style="list-style-type: none"> ▪ Habitat loss and fragmentation 	Disagree. Habitat loss and fragmentation accepted as a likely consequence of climate change.

		<ul style="list-style-type: none"> ▪ Estuarine squeeze (new developments on shoreline habitat) ▪ Habitat damage due to changes in hydrology ▪ Negative impacts due to increase recreation pressure ▪ Negative impacts due to increase pollution (air, water and light) ▪ Addition issues: cumulative effects on biodiversity from indirect impacts of development <p>-Green grid opportunity should read: Redevelopment provides opportunity for green grid to connect metapopulations of priority species.</p> <p>-'Green Grid dual purpose regional park and flood overflow drainage network'. It is very unclear what is meant by this, and improbable that the green grid as currently envisaged could function as a flood overflow drainage network.</p> <p>- Welcome the recognition that 'the need to promote a sustainable balance between economic prosperity, environmental quality, social well-being and a high quality of life in the South East' is an important issue.</p> <p>Targets and Indicators</p> <p>11-Biodiversity. To reflect the objective to 'protect and enhance the diversity and abundance of semi-natural habitats and indigenous species' suggest two targets:</p> <ul style="list-style-type: none"> ▪ No net loss of semi-natural habitat ▪ Meet relevant local Biodiversity Action Plan targets <p>- Concerned that there is no reference to long term management of the environment. Is seen as a key element for the vision for Kent</p>	<p>Issues added to table of issues in chapter 4 of SA Report.</p> <p>Noted and amended. Disagree. Green Grid provides opportunities for flood risk management and improvements to drainage networks.</p> <p>Noted.</p> <p>Added to Targets and indicators in Sa Report.</p> <p>Agree. Long-term time-scales</p>
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			Thameside, but for this to be a sustainable goal the long-term management of this environment needs to be addressed at a strategic level.	considered in SA.
English Nature	Letter	12/5/05	<p>Response to scoping report.</p> <p>Plans and Programmes Review In addition to those plans and policies listed in appendix 1, suggest that the SA/SEA should consider PPS9 (says PPG9 and draft PPS9 but PPS9 now published)., the UK and Kent BAPs, the UK Sustainable Development Strategy, the Sustainable Development Framework for the South East: <i>A Better Quality of Life in the South East</i> and <i>Creating Sustainable Communities: Greening the Gateway</i>.</p> <p>Baseline Information Paragraph 3.12- flag up the importance of ancient woodland and chalk grassland habitats, particularly in Gravesham</p> <p>Appendix II EN provides various data sources for baseline data, including information on biological records; biodiversity; SNCIs, SSSIs; SPA; SAC; RIGS and Ramsar sites. NB- Ramsar sites, SACs, SPAs and SSSIs are all nature conservation rather than landscape designations.</p> <p>Proposed SA Framework- SA objectives and decision-aiding questions 5. Phasing of supporting infrastructure Flag up that supporting infrastructure should include 'green infrastructure'</p>	<p>Noted and included in amended Plans and Programmes review.</p> <p>Noted. Added to Issues table in SA Report.</p> <p>Noted.</p> <p>Agreed and incorporated into SA framework</p>

		<p>12. Biodiversity Suggest changing the objective to 'Protect and enhance the diversity and abundance of natural habitats and indigenous species' Suggest changing 'no net loss in general biodiversity' to 'result in no net loss <i>of</i> biodiversity' and 'Provide opportunities for new/natural space/open space' to 'Provide opportunities for <i>provision and enhancement of natural greenspace</i>' Add another question- 'provide opportunities for habitat creation'</p> <p>14. Minerals The importance of geological assets is not currently recognised in the framework. This is particularly significant for Dartford, given its nationally important geological sites. Suggest that the importance of protecting geodiversity could be included under 'minerals' as it is related to the Material Assets topic of SEA. An example question would be 'Does the option/policy protect and enhance sites of geological importance?'</p> <p>Sustainability Problems, Issues and Objectives</p> <ul style="list-style-type: none"> ▪ Protecting existing areas of nature conservation importance from development pressures and associated leisure and recreational impacts, particularly the internationally important sites of the Thames estuary and marshes (Schedule2, Point 4 of the SEA regulations points out that environmental problems should be reported, particularly those relating to any areas of particular environmental importance, such as areas designated by the Birds Directive) ▪ The importance of greenspace provision in association with 	<p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework, but under Land and Soils not in Material Assets</p> <p>Additions made to Chapter 4 of SA</p>
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			assessment was undertaken 9. The measures envisaged concerning monitoring in accordance with Article 10 of the SEAD.	
Barton Willmore Planning	Letter	13/5/05	<p>Suggests modifications to be made to scoping report.</p> <p>Section 2, paragraph 2.4</p> <p>Economic</p> <ul style="list-style-type: none"> ▪ <i>3rd bullet</i>- their view that infrastructure should be put in place to meet the needs of the new population generated by the development and that this should be appropriately phased in order to meet the identified needs ▪ <i>4th Bullet</i>- should be re-worded to read: '<i>need to revitalise town centres and to provide the necessary employment/retail/leisure opportunities within major developments to serve the new communities being created.</i>' <p>Social</p> <ul style="list-style-type: none"> ▪ <i>1st bullet</i>- affordable housing should be provided in line with an up-to-date Housing Needs Survey ▪ <i>3rd bullet</i>- reference should be made here to the identified needs of new development and the new population being created <p>Environment</p> <ul style="list-style-type: none"> ▪ <i>4th Bullet</i>- this bullet should be deleted and replaced with 'reduce the need to travel'; and ▪ An additional bullet point should be added to read 'promote higher densities in accessible locations' <p>Section 4, Table 2</p>	<p>Additions made to Chapter 4 of SA Report in reporting of sustainability issues.</p> <p>Additions made to Chapter 4 of SA Report in reporting of sustainability issues.</p>

		<p>Two general points:</p> <ul style="list-style-type: none"> ▪ There should be greater clarity in the first column of the table to identify which are problems, issues or objectives; and ▪ The comments referred to in respect of section 2.0, paragraph 2.4 above apply equally in relation to this table. <p>Economic</p> <ul style="list-style-type: none"> ▪ 4th row- there should be a recognition here of the general need to reduce the need to travel; ▪ 5th row- as stated above, such infrastructure should meet the identified needs of new developments/ populations, and should be appropriately phased <p>Social:</p> <ul style="list-style-type: none"> ▪ 8th row- as above, public transport infrastructure should be phased appropriately in line with the delivery of the development proposed and the identified needs, and not provided preceding the development; and ▪ 11th row- whilst we acknowledge the need to develop sustainable mixed communities, we do not consider it appropriate for the LDF process to dictate how new development should be marketed. <p>Section 5, Table 3</p> <p>1- Balanced Communities Add a new bullet 'provide sites for leisure and recreational opportunities'</p> <p>6- Housing There should be a general acknowledgement here of the need for any affordable housing to be provided in line with an up to</p>	<p>Noted.</p> <p>Additions made to Chapter 4 of SA Report in reporting of sustainability issues.</p> <p>Additions made to Chapter 4 of SA Report in reporting of sustainability issues.</p> <p>Agreed. 'Market' changed to 'Plan'.</p> <p>Agree. Already addressed in SA Framework.</p>
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			<p>date Housing Needs Survey.</p> <p>6- Sustainable Design and Construction At the end of the 3rd bullet point the following should be added <i>'ie public transport routes and nodes'</i> 6th Bullet- there should be an acknowledgement that this should only be where practicable</p> <p>9- Employment 1st bullet- this should be reworded to read 'Encourage the provision of jobs accessible to, but not limited to, local people'; and 4th bullet- as stated above, whilst we recognise that it is the responsibility of developers to bring forward sustainable new mixed communities, in order for economic development to be successful and sustainable it needs to reflect business needs. We do not believe that this fact is reflected in the 4th bullet point.</p>	<p>Agreed and incorporated into SA framework Already addressed by use of the word 'promote' rather than 'require'. Disagree, implicit in wording.</p> <p>Agreed and incorporated into SA framework</p>
Kent County Council	Email	13/5/05	<p>Comments provided on scoping report as follows:</p> <p>Chapter 3 Baseline Data -Link to further information from KCC SA of MWDF and LTP -Mention of South East Plan should also mention that it was a draft and further information is still to be published. Reference should be made in para 3.8 to the Kent Structure Plan 1996 (soon to be replaced (in 2006) by the Deposit Kent and Medway Structure Plan). Policies NK1 sets out locational policies; HP1 sets housing figures and FP1 sets employment land provision up to 2021.</p> <p>Chapter 4- Sustainability Problems Issues and Objectives Environment- (p15) whether water resources and flood prevention infrastructure will affect the phasing of development. The word</p>	<p>Addressed in updated Plans and Programmes review.</p> <p>Agreed and amended.</p>

		<p>'whether' should be removed as they both inevitably will affect phasing</p> <p>Climate Change- (p16) all the environmental impacts of climate change have been identified but socio-economic impacts are not included. Climate change shouldn't be just seen as a 'green issue' and should be a core issue underpinning sustainable development. General sustainability (p17) the need to promote a sustainable balance between economic prosperity, environmental quality, social well-being and a high quality of life in the South East. It is not however about balance but about reconciling potential conflicts.</p> <p>Chapter 5- Proposed SA Framework- Decision-aiding Questions</p> <p>Objective 7- <i>Promote sustainable design and construction practices</i></p> <p>Question 3- <i>Ensure high density in new development where appropriate.</i> Suggest removing 'where appropriate' as it weakens the meaning of the question.</p> <p>Objective 10- <i>Ensure that special and distinctive landscape and townscapes, and the features within them are conserved and enhanced.</i></p> <p>Question 1 <i>Preserve and where possible enhance diverse landscape and townscape character and value.</i> Suggest removing 'where possible' as for Objective 7, enhancement is almost always possible.</p> <p>Objective 15 Energy- Should include a policy on energy efficiency in existing stock, which is where the greatest gains are to be made</p>	<p>Agreed and amended</p> <p>Considered inherent in SA/SEA process.</p> <p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework, is within scope of LDF.</p>
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		<p>Objective 16- <i>Protect and improve local air quality</i> Question 2 <i>Reduce the number of trips made by private car per household.</i> Suggest removing reference to per household as to make real improvements in air quality the overall traffic volumes need to be reduced, irrespective of how many are made per household.</p> <p>Objective 18- <i>Protect and enhance the water environment (surface water ie rivers and lakes, groundwater, estuarine and wetlands) and manage water resources in a sustainable way.</i> Question 8 <i>Promote sustainable estuary and flood risk management that provides for climate change, where appropriate, in new developments.</i> Suggest removing 'where appropriate' as for objectives 7 and 10, impacts of climate change may occur anywhere.</p> <p>Table 4 Targets and Indicators</p> <ul style="list-style-type: none"> ▪ <i>Public Health-</i> Should include an indicator on access to open space, there are standards on this which are being measured ▪ <i>Phasing of Supporting Infrastructure-</i> Need to define 'infrastructure' better- could be anything and may create more sustainability problems rather than solving them if they are the wrong kind of infrastructure. ▪ <i>Housing-</i> should measure access to quality housing 	<p>Agreed and incorporated into SA framework</p> <p>Agreed and incorporated into SA framework</p> <p>Incorporated into Indicators and Targets in SA Report.</p> <p>Disagree.</p> <p>Disagree. Quality difficult to define and measure.</p>
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			<p>SEESTATS project</p> <ul style="list-style-type: none"> ▪ <i>Air Quality</i>- Additional indicators could include i) Number of days in the year when air quality is recorded as moderate or high for NO₂, SO₂, PM₁₀, CO and Ozone on average per site. This is to reflect the Air quality headline indicator for sustainable development set by DEFRA for both rural and urban sites. ii) Number of Air Quality Management Areas. 	Incorporated into Indicators and Targets in SA Report.
Environment Agency	Email	23/5/05	Provides baseline data as an attachment covering biodiversity topics	Noted.
Kent County Council	Email	31/5/05	Provides SMR data for the baseline	Noted.