

Appendix III: Responses from Consultees – Summary of responses to Scoping & 2006 Preferred Options Consultation

Table 1: Summary of responses to Scoping Consultation

Organisation	Type	Comment	Response/Action
English Heritage	Letter	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	Email	Commented on environmental issues arising as a result of development, and regulatory and enforcement implications of development	Incorporated into SA report
English Nature	Letter	Enclosed copy of EN SEA guidelines (CD), and bullet point list of environmental issues	Incorporated into SA report
Groundwork Kent-Thameside	Letter	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 and Swanley NHS Primary Care Trust	Letter	Offers a link to 'Healthy Sustainable Communities: A Spatial Planning Checklist'- key themes. Key interests are: Social <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 	Noted. Key interests have been reflected in SA Report and SA Appraisal tables.

Organisation	Type	Comment	Response/Action
		<ul style="list-style-type: none"> ▪ 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>	
Kent Wildlife Trust	Letter	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 Borough Council	Email	Highlights key sustainability issues in terms of the economy and communities. <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. 	Issues noted and included in Chapter 4 (where applicable). Considered in SA Framework and Appraisal under SA Objectives 1,2,5,6 and 9.
Environment Agency	Letter	Described data available from EA, recommended to contact Claerwyn Hughes to obtain data	Noted. Contacted for further information.
Environment	Email	Data not listed in above letter, is not available. Referred to North Kent CAMS,	CAM is only applicable to

Organisation	Type	Comment	Response/Action
Agency		providing link.	neighbouring authorities. No further action necessary.
Gravesham Borough Council	Email	<p>Relates to workshop- modifications to objectives for SA framework</p> <p>Objective 7: refer to 'safe by design' 2nd 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</p> <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>Issues relating to safety by design are covered under SA Objective 8: Environmental Health. 'By approved and agreed standards' considered too detailed for SA Framework.</p> <p>Amended to include 'business startup.'</p> <p>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	Gives links to information based on indicators from SA Framework	Noted.
Kent Wildlife Trust	Email	<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'</p>	Disagree. Habitat loss and fragmentation accepted as a

Organisation	Type	Comment	Response/Action
		<p>Environmental effects due to growth and development: should include the following:</p> <ul style="list-style-type: none"> ▪ Habitat loss and fragmentation ▪ 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. -‘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. - 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 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 Thameside, but for this to be a sustainable goal the long-term management of this environment needs to be addressed at a strategic level.</p>	<p>likely consequence of climate change.</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 considered in SA.</p>
English Nature	Letter	<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</p>	<p>Noted and included in</p>

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		<p>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>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 of 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>	<p>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>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>

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		<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 development ▪ The designation of Local Nature Reserves in the Boroughs is currently below average; ▪ The hydrological impacts of developments close to the marshes; ▪ The values of areas of nature conservation importance for local communities needs to be recognised and improved; ▪ Opportunities need to be taken to link existing wildlife habitats; ▪ Opportunities for sustainable flood-risk management need to be safeguarded; ▪ Brownfield development can have adverse impacts in biodiversity: brownfield sites are often important urban wildlife refuges, particularly for invertebrates and reptiles; ▪ Appropriate management of chalk grassland habitats needs to be ensured; ▪ The decline in sustainable land management (particularly agriculture and woodland industries) <p>Potential SA Targets and Indicators</p> <p>10. Land and soil quality Indicators relating to soil resources and quality should be included. (examples given in ODPM SA/SEA guidance). EA is the lead agency for soils.</p> <p>11. Biodiversity Change the objective to 'Protect and enhance the diversity and abundance of <i>natural</i> habitats and indigenous species' Some of the indicators will be difficult to measure. Suggest the following are used:</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 Report in reporting of sustainability issues.</p> <p>Noted, included in indicators and Targets.</p> <p>Agreed and incorporated into SA framework</p>

Organisation	Type	Comment	Response/Action
Planning		<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>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"> ▪ <i>4th row-</i> there should be a recognition here of the general need to reduce the need to travel; ▪ <i>5th row-</i> as stated above, such infrastructure should meet the identified needs of new developments/ populations, and should be appropriately phased <p>Social:</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>Noted.</p> <p>Additions made to Chapter 4 of SA Report in reporting of sustainability issues.</p> <p>Additions made to Chapter 4</p>

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		<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 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>of SA Report in reporting of sustainability issues.</p> <p>Agreed. 'Market' changed to 'Plan'.</p> <p>Agree. Already addressed in SA Framework.</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	<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</p>	<p>Addressed in updated Plans and Programmes review.</p>

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		<p>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</p> <p>Environment- (p15) whether water resources and flood prevention infrastructure will affect the phasing of development. The word '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.</p> <p>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>Objective 16- <i>Protect and improve local air quality</i></p> <p>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</p>	<p>Agreed and amended.</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> <p>Agreed and incorporated into SA framework</p>

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		<p>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></p> <p>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 ▪ <i>Environmental Health</i>- Noise complaints to the Councils- The Kent Environment Strategy states that measuring actual noise/tranquillity might be better than measuring complaints. The national noise strategy is addressing this through the national mapping exercise although this is taking longer than expected. ▪ <i>Employment</i>- Employment land provision- should be appropriate to the provision of other land uses to ensure development is sustainable. ▪ <i>Landscape</i>- Something should be included on quality as well as quantity eg through landscape character assessment. 	<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> <p>Incorporated into Indicators and Targets in SA Report.</p> <p>Agreed, but not an issue for Indicators.</p> <p>Disagree, Difficult to measure quality.</p>

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		<ul style="list-style-type: none"> <li data-bbox="506 310 1455 423">▪ <i>Land and Soil Quality</i>- 60% of development should be on previously developed land. This is the national target and in Dartford and Gravesham there is far greater potential. KMSP Policy HP3 suggest a target of 75% for Gravesham and 95% for Dartford. <li data-bbox="506 456 1455 553">▪ <i>Biodiversity</i>- Loss and damage to designated site % change in BAP priority habitats and species- this is very negative. Could there be a target for improving areas of woodland etc. <li data-bbox="506 586 1455 667">▪ <i>Energy</i>- Energy generated from renewable resources and installation of efficiency measures- the Kent Energy Centre is collecting this information for the county as part of the SEESTATS project <li data-bbox="506 699 1455 854">▪ <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. 	<p data-bbox="1472 334 1570 367">Agreed.</p> <p data-bbox="1472 456 1808 513">Incorporated into Indicators and Targets in SA Report.</p> <p data-bbox="1472 578 1829 667">Renewables added. Installation of efficiency measures difficult to measure.</p> <p data-bbox="1472 699 1808 756">Incorporated into Indicators and Targets in SA Report.</p>
Environment Agency	Email	Provides baseline data as an attachment covering biodiversity topics	Noted.
Kent County Council	Email	Provides SMR data for the baseline	Noted.

Table 2: Summary of responses to Core Strategy Preferred Options Consultation (SA Technical Report June 2006)

Organisation	Type	Comment	Response/ Action
Private Individual	Email/ letter	Document is easy to read but could be improved through less repetition and more importantly the illustrations should show the before and after effect of proposed policies	Document follows format suggested in SA guidance issued by government. Some repetition inevitable (although this has been reduced where possible).
		General: Well Researched and thorough documents.	Noted.
		Appendix 3 (III-11) chapter 5 question 3: "Ensure high density in new development" – Reinstate the phrase "where appropriate" – otherwise there could be high density high rise in existing low rise low density areas – surely not intended?	Changes made to framework at request of Kent County Council. Development planning process will ensure that new development is appropriate to context. Refer also new Policy Approaches.
		Appendix 5 Page 10: The summary states that a lower level of growth is preferred than the 'emerging' structure plan and the Thames Gateway housing targets. DBC intend to continue to implement the Governments unsustainable targets despite the findings of the sustainability report by Enfusion. Why?	Noted. Thames Gateway Housing targets are set at a national and regional level by Central Government and the Government Office of the South East. Previous recommendations made in the 2006 Preferred Options SA (relating to how to minimise impacts on existing communities and reduce resource use) have been

			taken on board such that the sustainability effects of an increased population growth are minimised.
		Appendix 5, Pages 1-4. Affordable Housing. Enfusion rates the sustainability effect as neutral or unknown; what is affordable now is beyond reach within a year or two. Government funded low cost social dwellings for rent by those who cannot afford the 'affordable' is the solution.	Ensuring the affordability of future housing is an important issue. Council may wish to consider how this can be assured in further policy drafting.
English Heritage	Email	Why are there data gaps for cultural heritage in respect of table 3.1 with regard for the numbers/grades of listed buildings or the number/extent of conservation areas? (Builds at Risk information is available to a 2006 base)	Noted. Has been removed from table as information is now contained within current baseline.
		It is surprising that nothing came out of the PP review that could have been included in paragraph 4.5/table 4.1 on the impacts on historic environment/landscape. Why does SO11 (October 2005) not feature in the revised LDF strategic objectives of May 2006?	Agreed, however, this matter has been addressed through the application of the SA Framework to the various policies (in particular SA objective 13). Impacts on historic environment and landscape are highlighted throughout the SA report. Noted: The absence of an LDF objective addressing heritage has been pointed out in the SA.
		Supports statement 5.35, which strongly recommends an additional strategic objective relating to the boroughs cultural heritage.	Noted. See comments above.
		Supports the analysis of 7.62-7.64.	Noted.

		The indicators in table 8.1 are very limited; consideration should be given to include more impacts on character and distinctiveness.	SA Framework prepared in consultation with a range of stakeholders. Character and distinctiveness addressed through SA objective on cultural heritage.
Kent County Council	Email	The two SA/SEA are very repetitive, is their scope to combine 2 documents? There is too much description of the process and the methodology which leads to long winded documents.	Agreed, however reports were separated as the Core Strategy and Site Specific Allocations DPDs are being progressed separately. Document follows format suggested in SA guidance issued by government. Some repetition inevitable (although this has been reduced where possible).
		A number of areas are highlighted where further attention is needed in order to increase the sustainability of the document. These related mainly to the Green Grid, climate change issues and preventing loss to; and enhancing, biodiversity. These issues need greater weight in the core strategy and would like to see the SA suggestions addressed.	Noted and agreed. The majority of SA recommendations have been progressed in the Preferred Options Document 2008.
		What exactly is meant by "the Borough is characterised by its historic environment"?	The Borough has an interesting heritage: environmental, industrial/port-related and also cultural heritage.
		Protection and enhancement of the Natural Environment and Heritage are not mentioned! Surely they are of key relevance to sustainability?	These matters are discussed throughout the Core Strategy SA and are well-represented in the SA Framework.

	<p>Paragraph 1.15 and 7.93: These refer to the short timescale that was available for the SA to influence the Core Strategy Preferred Policy Approaches and many of the recommendations are to be considered during the preparation of the Core Strategy Submission Document. It would have been preferable if potential modifications to the PPAs arising from the SA could have been included prior to issue of current consultation document.</p>	<p>Agreed, however the tight timeframe prevented this from occurring. The revision of the Preferred Policy Approaches has now allowed for previous recommendations to be considered.</p>
	<p>Concerns regarding the sustainability of policies in regard to biodiversity are brought up in the following areas; PPA 1-2: Scale of Growth, PPA 5-7: Balancing housing with employment growth, PPA 50-53: Green Grid, PPA 60: River Front. These must be addressed and the environmental/biodiversity sustainability increased.</p>	<p>Noted and agreed, however this will also need to be addressed in more detailed planning stages and the development of master plans and planning briefs.</p>
	<p>Paragraph 2.15: Kent County Council welcomes the inclusion of the significant likely effect architectural and archaeological heritage and landscape.</p>	<p>Noted.</p>
	<p>P14 Table 3.1: Suggest that the SA Scoping process does not have an information gap for archaeological sites.</p>	<p>Scheduled monuments listed, however information on non-scheduled sites is not provided.</p>
	<p>As part of its duties under Part IV of the Environment Act, Dartford Borough Council have had to review and assess air quality in the Borough therefore a considerable amount of air data both monitoring and modelling has been collated.</p>	<p>Noted. Baseline has been updated with relevant information.</p>
	<p>Paragraph 20: There are 6 AQMAs designated in Dartford (1) and Gravesham (5) with a further 7 likely to be designated in Dartford.</p>	<p>Noted. Contained within current baseline.</p>

	Table 4.1: There is no reference to the Kent and Medway Structure Plan, only the South East Plan.	This document is summarised in Appendix 1 of the SA Report.
	Page 21, Table 4.1: Potential loss of heritage assets is not mentioned in spite of 2.15 above. This is a significant omission. It needs to be addressed.	Agreed, however, this matter has been addressed through the application of the SA Framework to the various policies (in particular SA objective 13). Impacts on historic environment and landscape are highlighted in the SA report.
	Page 29, Table 2.4: Cultural Heritage – Agreed	Noted.
	Paragraph 5.10: Acknowledges that some SA Objectives including minerals, waste and flooding have not been progressed and that the draft LDF Strategic Objectives will help progress these aspects. This is welcomed although it would have been better if they had already been included in these documents.	Noted.
	Page 36, paragraph 5.3 SO11: Archaeological sites need to be specifically mentioned, perhaps in bullet 3 as Protect and enhance the historic environment including archaeological sites and historic landscapes.	Agree. Refer Enfusion's recommendation in chapter 5 regarding Strategic Objectives.
	Page 38, paragraph 5.35: The recommendations that there is need for an additional Strategic Objective relating to the protection and enhancement of the environment (including cultural heritage) is very much supported.	As above.

	<p>Pages 39 – 40: Recommendations provided by the SA are welcomed and will strengthen the existing objectives.</p>	Noted
	<p>Paragraph 6.8: The Strategic Topics listed and assessed in the Sustainability Appraisal are not clearly set out in the Core Strategy. Although paragraph 6.8 suggests they are. Strategic Topic 7 for example 'what type of community and retail facilities are needed to allow local communities to flourish' does not appear to be in the core strategy at all.</p>	The options were developed after consideration of the issues raised in the 'Issues paper', and have informed preparation of the preferred policy approaches.
	<p>Paragraph 6.12: This paragraph discussed how much growth is needed and relates to paragraphs 9-11 in the Core Strategy, which discusses how Option 1.1 would be more sustainable but would not be in conformity with the requirements of the Structure Plan. However, the Structure Plan is not even mentioned in paragraphs 9-11 of the Core Strategy, although it should be, which demonstrates a lack of consistency between the 2 documents.</p>	PPAs 1 and 2 were developed in response to the emerging South East Plan, which, when adopted, will replace the Structure Plan.
	<p>Paragraph 6.31: Suggests that recommendations of the Options Assessment have been taken into consideration in the more detailed Preferred Policy Approaches, it is disputed whether they are in fact more detailed.</p>	Disagree. The PPAs are assessed in more detail, with additional information provided as to the extent, duration and significant effects, where known. Additional evidence is also provided, where relevant to support the assessment given.
	<p>Page 50: The Appraisal of PPA14 and 15 has not been included.</p>	Noted. However, all policy approaches have since been revised and subject to SA.

	<p>Page 57 PPA 50-53: Green Grid: Paragraph 7.56 of the SA recommends that the policy wording includes acknowledgement of the important role the Green Grid plays in protecting and enhancing biodiversity, and in climate change mitigation and adaptation. It also suggests the policy has a stronger emphasis on promoting integration with 'blue' networks and Sustainable Urban Drainage Systems. This would be welcomed.</p>	Noted.
	<p>Page 58 Heritage: Supported, policies PPA 58 and PPA 59 need strengthening as previously mentioned.</p>	Noted.
	<p>PPA60: Riverfront; paragraph 7.67: Should be addressed further in policy and in decisions on development on the riverfront area.</p>	Agreed. The Town Centre Area Action Plan will consider this matter.
	<p>Paragraph 7.82: Kent County Council welcomes the statement that policies on sustainable Design should be prepared which include minimisation of the impacts of vehicular transport (particularly roads and parking) on biodiversity.</p>	Noted.
	<p>Page 70, 13: An archaeological target is required, perhaps "Reduce the number of significant archaeological sites lost through development"</p>	Noted and agreed. Although it is questioned whether a quantitative target is appropriate. Further consideration of archaeology will be given in the preparation of the Annual Monitoring Strategy (which will cover the SA and the LDF).
Atkins Heritage	<p>Agreement with option 2.2, page V-11.</p>	Noted.
	<p>Agreement with flood provision being made stronger, pages VI-7 and VI-83</p>	Noted.

		Agreement with mixed tenure housing page V-17, 3.1.	Noted.
		Concern that the Ebbsfleet cultural attraction will affect Dartford considerably. But approves of the Ebbsfleet station (page VI-86).	Noted and agreed. This matter was raised in para 7.70 of the 2006 Preferred Policy Approaches Core Strategy SA : 'Any cultural development at Ebbsfleet would need to be sensitively managed to ensure it does not compete with the existing facilities on offer in the Town Centre, nor compromise regeneration objectives for the Town Centre.'
		Found the document difficult to read as it is very long winded.	Noted. Document prepared in accordance with requirements of Government SA guidance. Non-technical summary prepared to ensure document's findings are more accessible and easier to read.
London Green Belt Council	Letter	Concern over the lack of reference to the Green Belt in the report considering the extent of the Green Belt within the Borough. It should be a very important framework element or dimension.	Policies performed well with regard to preserving the green belt, with development concentrated in existing built-up areas. No problems were identified with regard to preserving the green belt.
Bean Residents Association.	Email	PPA46: Supported	Noted.

	PPA50-53: Supported but the policy should include a commitment to reinstate footpaths severed by the A2 and quarrying at Bean and Swanscombe. The section also needs a map.	Noted. Matter for the LDF, rather than SA. Issue may be too detailed for Core Strategy Policy Approaches level.
	PPA122: Support the principle of an Ancient Woodlands Country Park, but see it as a priority to enhance the environment and create for example: woodland access in advance of growth in Thames Gateway. PPA122 refers to a "proposals plan"; has there been consultation about it? Needs a Map of DAWCP.	Noted. Matter for the LDF, rather than SA.
	PPA3 and PPA4: are weak on regard for effects on existing communities. Thames Gateway development must only proceed when acceptable infrastructure is in place. PPA3: Request that the suggestion for a reservoir west of Bean be omitted as it is more appropriate for the site specific allocations. It is also requested that no comment be made that might encourage this development in the Country Park, and instead support the extension or rebuilding of existing provisions.	Issues of impacts on existing communities have been raised in the SA in a number of the appraisals. Noted. Matter for the LDF, rather than SA.
	PPA7 and PPA74 do not recognise the need to urgently tackle noise and air pollution problems affecting residents along the A2 Trunk Road. An information gap is shown on noise complaints; isn't your EHO aware of complaints?	Agreed. Baseline will be updated to consider noise complaints.
	PPA76 refers to monitoring, but direction and control is also needed.	Noted. Matter for LDF.
	PPA100: The 7250 homes for the Eastern Quarry should be split EQ1 and EQ2. Ensure EQ1+EQ2 is split proportionate to area and does not exceed the total of 7250 homes. Current revised EQ1 application has 9120 made up of 3200 in West Village, 2900 in Central Village and 120 in Peninsular. Why 150 in Longfield?	Noted. A detailed matter for LDF.

		PPA107: Safeguarding shouldn't just reserve land for transport schemes, but also designate areas for mitigation measures (planting, noise mounding, noise screens, traffic calming).	Agreed. However this matter would be addressed through more detailed DC policies.
		PPA108: Cycle Routes map is incorrect. No cycle route exists over Bean Bridge.	Matter for LDF.
		PPA120: "Map 1" should be "Map 2"	Matter for LDF.
		Green CS page 36, section 105 and red SSA page 14, section 29 shows no regard for interests of residents. Wording in section 29 states "Bean Interchange ...without improvement the junction will experience operational difficulties.." This is misleading and understates the long-standing problems for drivers and residents, which started in 1999. Your highways section wrote in 2003 "The existing capacity problems at Bean Interchange are to be acknowledged at the outset". It is essential that local residents are involved in the Optioneering. The solution is not based on financial limitations, as it was the original flawed design.	Noted. This is a matter for Council to consider in the LDF
		Inadequate data, listed in Appendix II Baseline Matrix and uncertainties, 3.22 page 14, of SA TR, to inform some aspects of the LDF when there are so many "info gaps".	As the first 'baseline' produced, some info gaps were inevitable. Baseline has since been updated to fill many of the gaps.
Thames Gateway Women's multifaiith Forum / North Kent Council for Inter Faith Relations : Kent Thameside.	Letter	The TGWMF and the NKCIFR: KT support the document and appendices VI, VII, VIII, IX and X and trust that the Planning Policy Team will remain committed and empowered to ensure it is acted upon. The issues raised will have an enormous impact on the life of our community and our organisations which to be kept informed as sites are appraised for allocation.	Noted.

Manor Gospel Trust	Letter	A balanced community contains places of worship; many of these contribute to the prosperity of the Borough. The fourth bullet point should have the word "religion" as a decision aiding question after the word health.	Objective aims to encourage participation in cultural activities, which may include religious activities; however the provision of religious infrastructure is not within the remit of local government.
		Paragraph 5.26: places of worship function in the locality as everyday facilities hence the following should be added after "community centres", "places of worship" or alternatively "appropriate religious facilities".	Document considers cultural activities, which may include religious activities; however the provision of religious infrastructure is not within the remit of local government.
		Strongly approve of the comments on objective 9 – issues relating to sustainable villages and the rural economy because this will allow the statement in PPS7 and various views of the Countryside Agency to be given more weight.	Noted
		Strongly approve of the comments on objective 9 – issues relating to sustainable villages and the rural economy because this will allow the statement in PPS7 and various views of the Countryside Agency to be given more weight.	Noted
Batcheller Thacker	Letter	Objection to paragraphs 6.14 and 7.50 on the Green Belt as the council has not undertaken a review of the Green Belt.	Noted. Matter for LDF, not SA.
Environment Agency	Email	The Environment Agency are happy with how the report clearly sets out the stages and steps take through the assessment process, and that the Environmental Report elements of the SA are clearly sign posted.	Noted.
		Paragraph 5.33: Agreement with the assertion in this paragraph that the revised LDF Strategic Objectives no longer progress SA Objectives 11, 12 and 13. Also agree that SA Objectives 18 and 19 should be addressed better, and issues relating to mitigation and adaptation to Climate Change should be further considered.	Noted.

	<p>Paragraphs 6.28 and 6.27: No reference is made to the conflict between developing residential sites in riverside locations, and the obvious flood risk implications. Disagree that there is a neutral/unknown effect (as stated in the appraisal), there obviously is a sustainability conflict and this needs to be acknowledged even if it is then decided that the issue can be mitigated.</p>	<p>Noted. Further information on flooding has informed the SA of Preferred Options (2008).</p>
	<p>Topic Option 9.3: In assessing this option you state that "increased recreational development in flood plains may lead to higher risk in the case of floods", and it is scored orange and yet increased residential accommodation in the flood plain in the case of topic 8 is scored blue. The appraisal seems inconsistent and doesn't appear to consider the vulnerability of different uses in relation to their location, which is an approach that will be recommended in the new PPS 25.</p>	<p>Noted. The SA of Preferred Options (2008) has dealt with this matter consistently and in more detail.</p>
	<p>There should be further reference to the Kent Thameside Strategic Flood Risk Assessment in the appraisal.</p>	<p>Noted. Further consideration has been given to this in the SA of Preferred Options (2008).</p>
	<p>Agree that the best option is 9.2</p>	<p>Noted.</p>
	<p>PPA 1-2: The Agency welcomes the suggestion that supplementary planning documents be prepared to control sustainability impacts of this growth and to minimise the overall impacts.</p>	<p>Noted.</p>

	<p>Paragraph 7.12: The Agency welcomes the suggestions in this paragraph especially the impact proposals on water quality. In considering water quality it is important to consider the impact on groundwater sources. No reference has been made in the documents to Source Protection Zones (SPZ), the majority of the Borough is sited within an SPZ and due to the Boroughs reliance on the underlying groundwater environment, this should therefore be acknowledged.</p>	<p>Noted. Awaiting further information to be provided through water cycle study commissioned by EA.</p>
	<p>PPA 60: The Agency welcomes the Council's commitment to regenerating the River Darent and its locality. Particularly if the council promotes riverside uses that are less vulnerable in terms of flood risk.</p>	<p>Noted.</p>
	<p>Paragraph 7.90: It is stated that 'Flood risk is a particular issue for Dartford and further policy will need to be developed to minimise risk and consider the link between flood defences in Dartford and the need to safeguard London from Flooding. Further SA work would occur once these policies are drafted'. This idea could be progressed alongside the Kent Thameside SFRA.</p>	<p>Noted.</p>
	<p>Overall Comment: The Agency feels that the report has been successfully kept strategic, and has met the necessary requirements.</p>	<p>Noted.</p>
Highways Agency	<p>There is a high risk that the proposed development with the LDF will exacerbate the air quality problems currently identified. The Highways Agency therefore suggests that the sustainability Appraisal should contain evidence as to the effect of development in the LDF on air quality, with particular reference to Directive 1999/30. The Agency may be able to assist with specialist advice on the most appropriate assessment methodology.</p>	<p>Further work has been undertaken on air quality including update of PP Review, Baseline and detailed SA of Preferred Options. Air quality is also being considered as a</p>

			cumulative effect.
Kent Thameside Delivery Board	Letter/ Email	I note that due to timing constraints the recommendations from the SA of the Preferred Policy Approaches, have not yet been considered by the Council. I would fully endorse their recommendation that minimum standards are prescribed for sustainable energy, waste and water management in order to achieve eco-efficient new development. Their suggestion that SUDS role in supporting the Green Grid (but I would also add in reducing run-off, improving water quality and enhancing amenity), could be mentioned in policy wording is also supported".	Noted. Agreed SUDS has a multifunctional role and this is reflected in the detailed appraisal of Preferred Approach 27: Flood Risk.