

## **Appendix 1**

Consultation comments received in relation to the SA Scoping Report (March 2013)

**Table A1.1: Scoping Report Consultation Comments and Responses**

Note that references within this table to page numbers, paragraph numbers and appendices all refer to those in the March 2013 SA Scoping Report.

Consultee Comment	Response/comment
<p><b>Natural England</b></p> <p>Natural England is generally supportive of the Sustainability Appraisal Report and considers that it correctly identifies the main issues within Rugby Borough. We are satisfied that the Baseline information in chapter 3 includes a comprehensive range of information on the natural environment which covers our interests. We also welcome sustainability objective 16 which covers conservation and enhancement of the Borough's biodiversity, flora and fauna.</p>	<p>Noted.</p>
<p>We would suggest that the SA Objectives could be improved by considering the importance of Green Infrastructure (GI) and its multifunctional benefits either as an objective on its own or within objective 16 or objective 8 (regeneration of urban areas). This would assist in the delivery of a range of SA topic areas, e.g. biodiversity, landscape, health and wellbeing and climate change and ensure that GI is an integral, cross-cutting theme throughout the local plan policies. We would particularly like the SA to emphasise the importance of good quality local accessible green spaces as they can offer a range of benefits, e.g.:</p> <ul style="list-style-type: none"> <li>• Access to local greenspace can reduce health inequalities.</li> <li>• Increased and improved accessibility to greenspace can help increase physical activity.</li> <li>• Contact with greenspace can help improve health and wellbeing.</li> <li>• Green space contributes to functioning ecosystem services that can have a positive influence on health. Ecosystem services can assist in adapting to the extremes of climate change, e.g. green areas have less heat-island effect than built up areas.</li> <li>• Greenspace can also help improve air quality and respiratory irritants. Ecosystem services can also include the mitigation of the risks associated with flooding from extreme rainfall events.</li> </ul>	<p>Noted. An additional 'decision making criterion' has been added to SA objective 16 to address the provision of green infrastructure, in recognition of the multiple benefits that GI can provide.</p>

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<p>The provision of accessible semi-natural greenspace within green infrastructure in and around urban areas significantly contributes to creating places where people want to live and work. Its provision is therefore vital to sustainable development and communities. Natural England's Accessible Natural Greenspace Standards (ANGSt) provides a set of benchmarks for ensuring adequate access to natural and semi-natural greenspace near to where people live. The ANGSt methodology provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision. Natural England's most recent wording of the standard is:</p> <ul style="list-style-type: none"> <li>• No person should live more than 300m from their nearest area of accessible natural green space of at least 2ha in size.</li> <li>• There should be at least one 20ha accessible natural green space within 2km from home.</li> <li>• There should be one 100ha accessible green space site within 5km.</li> <li>• There should be one 500ha accessible natural green space site within 10km.</li> <li>• At least 1ha of statutory Local Nature reserve should be provided per 1000 population.</li> </ul> <p>Further information on delivering and managing natural and semi-natural greenspace can be found in our report Nature Nearby - Accessible Natural Greenspace Guidance (Natural England 2010)</p> <p><a href="http://publications.naturalengland.org.uk/publication/40004">http://publications.naturalengland.org.uk/publication/40004</a></p>	
<p><b>English Heritage (now Historic England)</b></p>	
<p>Firstly you emphasise that the SA Framework has already been consulted on in 2007. We presume the scope of the consultation is not limited as a consequence as it has to be said that in the last six years SA practice has developed considerably and the policy context within which it operates has also changed. We trust this SA will benefit from this review and that national good practice can be acknowledged and exploited.</p>	<p>Noted. It is recognised that SA practice has developed considerably since the SA framework was originally produced in 2007, which is one of the reasons that the Scoping Report has been updated. The fact that the SA framework was consulted on at that time does not prohibit amendments being made to that or any other part of the Scoping Report as appropriate.</p>
<p>In summary and in response to you specific questions I consider that the information provided does not appear to be robust, comprehensive and</p>	<p>Noted. Please see our responses to the more specific comments below.</p>

Consultee Comment	Response/comment
<p>therefore a suitable baseline for the SA of these Plans. As a consequence I do not feel that the key sustainability issues have been included. I would also suggest the Objectives and Framework are critically reviewed to determine whether the content needs to/has been revised in light of changes to the national planning policy context.</p>	
<p>It is surprising the reassuring Rugby Development Management DPD SA Scoping Report (UE Associates September 2011) hasn't been utilised. The defined sustainability issues were particularly well honed.</p>	<p>Noted. The key sustainability issues as set out in that Scoping Report have been reviewed and taken into account as the key issues for this report were revised and updated (the updated set are presented in <b>Chapter 3</b> of this SA Report).</p>
<p>There are a number of general principles that English Heritage recommends are considered throughout this SEA/SA process:</p> <ul style="list-style-type: none"> <li>• The importance of a broad definition of the historic environment covering a wide range of heritage assets including areas, buildings, features and landscapes with statutory protection, together with those parts of the historic environment which are locally valued and important, and also the historic character of the landscape and townscape.</li> <li>• Heritage assets and the wider historic environment are finite resources that are irreplaceable.</li> <li>• The historic environment is more than an environmental and cultural asset; it is an important driver for economic development and delivering social objectives. The historic environment contributes positively to all aspects of sustainable development.</li> <li>• The concept of significance requires careful consideration in the context of the historic environment and the SEA/SA process, which is focused on the identification and assessment of 'significant effects'.</li> <li>• The National Planning Policy Framework (NPPF) requires that heritage assets are conserved in a manner appropriate to their significance. The concept of significance in relation to heritage refers to the value of a heritage asset, because of its heritage interest which may be archaeological, architectural, artistic or historic. The</li> </ul>	<p>Noted. These principles are recognised and are being taken into account throughout the SA/SEA as relevant. For example, the fact that heritage assets are finite resources is recognised as the SA categorises potential impacts on the historic environment (SA objective 13) as permanent. Some of the principles raised by English Heritage are not being directly addressed in this SA, for example the point regarding community engagement.</p> <p>The SA needs to be undertaken in a way that is proportional to the plan in question. The plan is not proposing new development locations for employment land, housing etc. The amount and location of development were dealt with through the Core Strategy which itself was subject to SA. With the exception of the issue of whether or not to protect specific existing employment sites from changes of use, Ansty Park which is subject to an extant planning consent, and the delineation of the town centre and the primary shopping area, the plan is not spatially specific.</p> <p>The plan will focus on the criteria that will be used to determine whether development will be acceptable or not. The historic environment is one of the topics that will be included in the criteria-based policies, and the SA will take into account the points raised by EH in determining whether the historic environment is given due weight.</p>

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<p>setting of a heritage asset can also contribute to its significance.</p> <ul style="list-style-type: none"> <li>• The SA process is iterative in that the findings of each stage should be used to inform the next and this progression is clearly documented. The assessment of potential impacts on the historic environment and heritage assets should include the consideration of cumulative effects.</li> <li>• An effective SA should avoid or minimise any adverse effects created by the plan in respect of the historic environment. It should also maximise potential benefits for the historic environment.</li> <li>• All appropriate mitigation, enhancement and monitoring for the historic environment and heritage assets should be clearly identified for delivery at the implementation stage.</li> <li>• Local authority conservation staff are typically a key resource when developing an SA.</li> <li>• These professionals are well placed to provide baseline information on the historic environment and heritage assets and advise on: <ul style="list-style-type: none"> <li>- The significance of heritage assets.</li> <li>- Local historic environment issues and priorities.</li> <li>- How a policy or proposal can be tailored to avoid or minimise potential adverse impacts on the historic environment.</li> <li>- The nature and design of any required mitigation measures.</li> <li>- Opportunities for securing wider benefits for the future conservation and management of heritage assets.</li> </ul> </li> <li>• Engaging local heritage groups and societies, and the wider community, in the SA process can also bring benefits. This might include an improved understanding of the historic environment of a place and what is locally valued and why.</li> </ul>	<p>Noted. The baseline and key sustainability issues have been revised following the consultation on the Scoping Report and the revised versions are presented in <b>Appendices 2 and 3</b> of this report. Specific targets and indicators may be considered at a later stage of the SA as part of the proposals for monitoring the effects of the Plan if this is found to be appropriate; however it is not the role of the SA to set specific targets although were targets exist that are</p>
<p><b>Scoping</b></p> <p>You should reconsider whether you have demonstrated the report has adequately:</p> <ul style="list-style-type: none"> <li>• Established the baseline for the historic environment, including any</li> </ul>	<p>Noted. The baseline and key sustainability issues have been revised following the consultation on the Scoping Report and the revised versions are presented in <b>Appendices 2 and 3</b> of this report. Specific targets and indicators may be considered at a later stage of the SA as part of the proposals for monitoring the effects of the Plan if this is found to be appropriate; however it is not the role of the SA to set specific targets although were targets exist that are</p>

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<p>trends and targets and gaps in the existing information.</p> <ul style="list-style-type: none"> <li>Identified sustainability issues and opportunities for the historic environment and heritage assets.</li> <li>Identified indicators and targets.</li> </ul>	<p>relevant at the local level these will be referenced.</p>
<p><b>Policy /Plans/Programmes</b></p> <p>The National Planning Policy Framework (NPPF), paragraph 126, requires Local Planning Authorities to set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area. The SA Scoping Report can demonstrate support for this duty by helping ensuring that impacts on heritage assets and the wider historic environment can be effectively identified, mitigated against and monitored over the lifetime of the plans.</p> <p>Great care must be taken in the drafting of the SA to ensure this role of the historic environment is fully appreciated and that consistency with the NPPF is ensured. For example on page 37 you state that the consequence of the NPPF is the need to include a sustainability objective relating to the “conservation of historic features”. This perhaps illustrates a need to more clearly appreciate an understanding of the NPPF in respect of the historic environment.</p>	<p>Noted. The reference to the relationship between the NPPF and the historic environment has been reconsidered in the revised version of the PPP review, which can be found in <b>Appendix 2</b> of this report.</p>
<p><b>Baseline information</b></p> <p>English Heritage recommends that the baseline information describes the current and future likely state of the historic environment. This provides the basis for identifying sustainability issues, and predicting and monitoring effects.</p> <p>Maps, charts (current and historic) and photographs and other images can be very effective in synthesising data and illustrating its relevance to the plan area as well as demonstrating historic environment effects, particularly where supported by an analytical narrative. When collating and analysing the baseline data on the historic environment, it is also useful to identify relevant trends and targets. This process can be informed by the plan review and drawn from national, sub-national and local data sets - baseline information can be both quantitative and qualitative, and needs to be kept</p>	<p>Noted. The baseline information has been revised in line with English Heritage’s more specific comments (see below) and the updated version can be found in <b>Appendix 3</b> of this report.</p> <p>The level of detail that English Heritage suggests should be included is, in our view, too detailed for the plan that is being appraised and its likely significant effects, given that the plan will primarily be focusing on strategic level policy guidance with respect to certain topics, and not to identify specific sites for development. However, the principles that English Heritage suggests in terms of ensuring that the historic environment is properly dealt with will be borne in mind.</p> <p>No specific gaps in data that will hinder the SA have been identified.</p>

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<p>up-to-date.</p> <p>It is important that meaningful conclusions can be drawn from the baseline information, particularly what it means for the plan and how the historic environment is to be dealt with. Where there are gaps in information, we recommend that these are explained as part of the baseline description. Ways of tackling any identified gaps in the baseline can then be included in proposals for monitoring the implementation of the plan.</p>	
<p><b>Designation and Beyond</b></p> <p>There is concern by the narrow consideration of the historic environment in section 3.53/4. The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, including landscaped, planted or managed flora. Consequently, covering statutory designations is just one part of the baseline information on this topic.</p> <p>Other important considerations include: information held on Historic Environment Records; locally listed heritage assets; the character of the wider historic landscape, townscape or seascape and other valued historic landscapes; areas of archaeological importance and the potential for unrecorded archaeology. The condition of the historic environment is also an important consideration, especially when analysing and updating the baseline and monitoring frameworks. Existing data sources include the English Heritage 'Heritage at Risk' Register, which includes Grade I and II* listed buildings at risk, (also Grade II listed buildings at risk in London), scheduled monuments, registered parks and gardens, registered battlefields, and conservation areas:</p> <p><a href="http://risk.english-heritage.org.uk/register.aspx">http://risk.english-heritage.org.uk/register.aspx</a></p> <p>Appendix 1 to this letter provides an extensive list of sources for a wide variety of historic environment information.</p>	<p>Noted. <b>Appendix 3</b> in this SA report presents the updated baseline information which includes a revised and slightly expanded section on the historic environment which has drawn on the suggested sources as relevant. However, it is noted that many of the sources listed are high level documents and do not provide specific information of relevance to the baseline situation in Rugby Borough. The SA is being undertaken in a way that is proportionate to the plan in question (i.e. one that does not allocate new sites for employment and housing development) and the scope of the baseline information is considered to be appropriate in order to determine likely significant effects on the historic environment.</p>
<p><b>Testing Baseline Information</b></p> <p>To determine the adequacy and scope of the baseline information, English Heritage recommends that you are able to positively respond to the</p>	<p>Noted. These questions have been taken into account as the baseline information has been revised and updated (the updated version is presented in <b>Appendix 3</b> of this SA report). However, the baseline information (including in relation to the historic environment) should be proportional to</p>

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<p>following questions:</p> <ul style="list-style-type: none"> <li>• Which parts of the Borough are rich in heritage assets (designated and non-designated)?</li> <li>• Are there areas which may have the potential for sites of historic or archaeological interest which are currently unidentified?</li> <li>• Has the landscape and townscape character of the plan area been defined, if so, what are its distinctive features (has the Warwickshire Extensive Urban Survey and Warwickshire Historic Landscape Characterisation Study been identified, considered and applied?)</li> <li>• In what ways does the historic environment contribute to local character and distinctiveness?</li> <li>• Are there any areas where change is affecting the distinctive character of the place and the significance of heritage assets, including cumulative, small-scale changes?</li> <li>• Are there expected to be such effects in the future?</li> <li>• Are there implications for the setting of heritage assets? Are there important views and vistas?</li> <li>• In what ways does the historic environment deliver other social, cultural, economic and environmental benefits?</li> <li>• Which areas or features should be conserved or enhanced? How good or bad is the condition or quality of heritage assets and historic places (a reference is made to Heritage at Risk at 3.54 but nowhere else – surely if there are assets at risk this should be a sustainability issue?)</li> <li>• Do trends show that it is getting better or worse?</li> <li>• Are heritage assets at risk from damage or neglect? How far is the current situation from any established thresholds or targets?</li> <li>• Are existing problems reversible or irreversible, permanent or temporary?</li> </ul>	<p>the plan in question, one which does not allocate specific sites for employment and housing development. Therefore, some of these very detailed questions are considered to be outside of the scope of the SA.</p>



Consultee Comment	Response/comment
<p><b>Sustainability issues</b></p> <p>Analysis of such baseline information for the historic environment will help identify sustainability issues relating to the historic environment. Together with the development plan community consultation this will also be an effective means of identifying environmental threats and opportunities.</p> <p>There is a need to understand the contribution of the historic environment to sustainable development and its role in delivering wider social, cultural, economic and environmental benefits. For example, heritage-led regeneration can provide opportunities for sustainable tourism, leisure and recreation activities, and help to strengthen the character of a place.</p> <p>Environmental problems, issues and opportunities affecting the historic environment, and to be addressed in the SEA/SA process may include:</p> <ul style="list-style-type: none"> <li>• Heritage assets at risk from neglect, decay, or development pressures.</li> <li>• Areas where, on current trends, there is likely to be further significant loss or erosion of landscape/ townscape character or quality.</li> <li>• Areas where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it.</li> <li>• Traffic congestion, air quality, noise pollution and other problems affecting the historic environment.</li> <li>• Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings.</li> <li>• Conserving specific types of heritage assets, such as the industrial, or rural heritage of a place.</li> <li>• Accommodating change and growth whilst sustaining and enhancing the significance of heritage assets and the valued character of a place.</li> <li>• Integrating climate change mitigation and adaptation measures into the historic environment appropriately.</li> </ul>	<p>Noted. The key sustainability issues have been revised and an updated set are presented in <b>Chapter 3</b> of this SA report. The list of issues suggested by English Heritage has been taken into account; however as with the comments above relating to baseline information, the very detailed issues listed are not all considered to be proportionate to the scope of this SA.</p>

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<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Developing a stronger sense of place, local distinctiveness and community engagement.</li> <li>• Promoting the innovative reuse of the existing building stock for social, cultural and or economic purposes.</li> <li>• Achieving appropriate climate change resilience.</li> <li>• Improving awareness, involvement, and understanding of, and access to, the historic environment.</li> <li>• Delivering heritage-led regeneration opportunities.</li> <li>• Supporting the vitality and viability of town centre regeneration. Promoting heritage based tourism.</li> <li>• Contributing to green infrastructure networks.</li> <li>• Encouraging traditional building and craft skills development.</li> <li>• Using the historic environment as an educational resource.</li> </ul>	
<p><b>Sustainability Framework</b></p> <p>It is recommended that the application of the framework to the assessment of the historic environment is clear and iterative. Whatever method is used to review the framework and carry out the appraisal (i.e. use of a panel and/or consultants), there is a need to ensure the application of appropriate heritage expertise.</p> <p>While an objectives-based approach has generally been used, the Planning Advisory Service suggests that an alternative approach can be to base the framework on a series of identified topics and/or sub-areas. English Heritage considers that this narrative based approach, focusing on an assessment against the baseline situation, would avoid pages of matrices resulting from an objectives-based approach. This alternative approach can include a historic environment topic paper; something we also recommend for the objectives approach, as a way of interpreting the information set out in matrices.</p>	<p>Noted. It is considered that an objective-based approach is appropriate for this SA as it allows for a clear assessment of the likely effects of the plan against the comprehensive set of sustainability aims. This approach will also then be consistent with other SA work that has been carried out in Rugby Borough, including in relation to the adopted Core Strategy. The approach suggested by English Heritage may have been useful for the SA of a plan that is about determining how much and where development should be delivered, but given the topics to be covered by the plan it is considered that the detailed approach suggested is greater than is needed to determine likely significant effects on the historic environment.</p>

Consultee Comment	Response/comment
<p><b>Objectives</b></p> <p>English Heritage considers that for the SEA/SA to meet the requirements of the SEA Directive it needs to include a specific objective:</p> <p>“Conserve and enhance the historic environment, heritage assets and their settings”.</p> <p>Sustainability Objective no.13 states that the historic environment should be conserved and ‘where possible’ enhanced. This qualification no longer appears in the NPPF and the Objective should be revised accordingly.</p> <p>In addition to the headline objective for the historic environment the following may also be appropriate as sub objectives.</p> <p><i>Environmental Objectives</i></p> <ul style="list-style-type: none"> <li>• Protect, enhance and manage the character and appearance of landscapes/townscapes, maintaining and strengthening local distinctiveness and sense of place.</li> <li>• Achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality.</li> <li>• Minimise waste and encourage the sustainable use of natural resources by reusing existing buildings.</li> <li>• Promote appropriate energy efficiency and energy generated from renewable energy resources.</li> </ul> <p><i>Social Objectives</i></p> <ul style="list-style-type: none"> <li>• Improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings.</li> <li>• Provide better opportunities for people to access and understand local heritage and to participate in cultural and leisure activities.</li> </ul> <p><i>Economic Objectives</i></p> <ul style="list-style-type: none"> <li>• Foster heritage-led regeneration.</li> <li>• Optimise the use of previously developed land, buildings and existing infrastructure.</li> </ul>	<p>Noted. The SA framework has been revised following the consultation on the Scoping Report and the revised framework is presented in <b>Chapter 2</b> of this report. The detailed list of objectives suggested by English Heritage has been cross-checked with the SA framework, and a number of additional sub-questions were added to the framework as a result, for example under SA objective 13 an additional question was added - ‘<i>will it increase the economic benefit derived from the historic environment?</i>’</p> <p>It is also recognised that some of these objectives may be relevant as the Council is developing objectives for the plan itself.</p>

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<ul style="list-style-type: none"> <li>Promote heritage based sustainable tourism.</li> <li>Support the sustainable use of historic farmsteads.</li> </ul>	
<p><b>Decision-making Criteria</b></p> <p>I note that eight decision making criteria are proposed to help to ensure that all the key heritage issues to be considered in the SA are incorporated in the SA framework. In view of the further baseline/issues work suggested to be undertaken you may also appreciate examples of decision-making criteria which may be used (Appendix 2 to this letter).</p>	<p>Noted. The decision-making criteria have been revised and the updated SA framework is presented in <b>Chapter 2</b> of this SA report.</p>
<p><b>Indicators and monitoring</b></p> <p>It may be useful to consider the indicators for the assessment and monitoring of the significant effects of this plan to clearly demonstrate the impact(s) of the plan on the historic environment. English Heritage’s annual series of national and regional reports, Heritage Counts: State of the Historic Environment, includes a suite of data sets for monitoring heritage assets and the historic environment. It is recommended that these be supplemented, wherever possible, by locally derived indicators.</p> <p>In devising historic environment indicators for the appraisal and monitoring of the significant effects of a development plan English Heritage recommends that:</p> <ul style="list-style-type: none"> <li>the indicators clearly relate to the appraisal process, such as the accompanying objectives/sub-objectives (decision-making criteria), the baseline for the historic environment, and any identified effects and proposed mitigation measures;</li> <li>the indicators address positive and negative effects;</li> <li>consideration is given to cumulative, secondary and synergistic effects;</li> <li>use is made of both qualitative and quantitative data.</li> </ul> <p>Selecting indicators which are directly linked to SA objectives is a complex process which is exacerbated in respect of the historic environment by the relative lack of consistently monitored data when compared to other topic areas. Notwithstanding this, a robust monitoring framework for the historic</p>	<p>Noted. The SA is required to develop a framework for monitoring significant effects. As the plan is in its early stages of development, the SA has not yet reached the point where indicators for monitoring significant effects can be defined. Monitoring will therefore be considered at a later stage in the SA process and English Heritage’s comments will be taken into account at that stage. The potential challenges associated with data availability are recognised, and the SA will need to work as well as possible with the data that are available at that time.</p>

Consultee Comment	Response/comment
<p>environment must be included to meet the requirements of SA in terms of:</p> <ul style="list-style-type: none"> <li>• Identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken.</li> <li>• Testing the accuracy of predictions made in the appraisal and improving future practice.</li> <li>• Determining whether the plan is contributing to the achievement of the desired objectives and targets for the historic environment.</li> <li>• Checking the delivery and performance of mitigation measures.</li> <li>• Collecting information for future planning documents.</li> </ul> <p>Appendix 3 to this letter presents select examples of indicators which may be appropriate for you. The priority should be the inclusion of indicators which clearly demonstrate the significant impact(s) of the plan on the historic environment, whether positive or negative.</p>	
<b>Environment Agency</b>	
<p><i>No comments received.</i></p>	<p>N/A</p>