



## **Sustainability Appraisal Scoping Report**

### **Schedule of Responses to Statutory Consultation**

**(October/November 2008)**

**Municipal Offices  
Promenade  
Cheltenham  
GL50 9SA**



## Sustainability Appraisal Scoping Report

### Schedule of Responses to Statutory Consultation (October/November 2008)

<b>Name/Reference Number</b>	<b>Section/ Paragraph</b>	<b>Comment</b>	<b>Officer Response</b>	<b>Amendment</b>
Nicky Conway Forum for the Future	Tables 4 and 5	Merge for the purposes of improving clarity.	Agree. The information in Table 5 duplicates information in Table 4.	Table 5 deleted.
Nicky Conway Forum for the Future	Baseline tables	Remove all baseline data to appendices	Agree. Further key information has been pulled out of the baseline data tables and summarised in the main text, to provide a better picture of where the issues that have been derived for the Joint Core Strategy have come from.	Baseline data has been moved to Appendix 3. Additional paragraphs have been included to explain the issues arising from the data.
Nicky Conway Forum for the Future	Paragraphs 2.15 and 2.16	Remove reference to climate change strategies and Nottingham Declaration	Disagree. These make a positive contribution to the document and represent a central theme of the Sustainability Appraisal for the Joint Core Strategy.	Additional text added to emphasise the importance of climate change to the Sustainability Appraisal process.
Nicky Conway Forum for the Future	Baseline data	Provide more baseline data to show the issues have come from. Further clarification to be provided.	Agree. Data will be provided where possible.	Additional data has been included in Appendix 3. Key Sustainability Issues have been amended to reflect the new data.
Nicky Conway	Chapter 2 – The Local	Provide an illustrative map of the Joint Core Strategy area	Agree.	Map – showing constraints – added to Chapter 2.

Forum for the Future	Context			
Nicky Conway Forum for the Future	Non-technical summary	Make amendments to the 'non-technical summary'. Provide more information about why the process has been undertaken and not how the process has been undertaken. Provide a summary of the key issues identified through the Scoping Report.	Agreed. The Non-Technical Summary will be amended to reflect purpose and outcomes rather than process.	New Non-Technical Summary has been produced focussing on the need for Sustainability Appraisal and the key findings of the Scoping Report.
Nicky Conway Forum for the Future	Paragraph 3.9	Equality Impact Assessment, paragraph 3.9 – currently written negatively and should be written in positive manner	Agree.	This section has been redrafted to explain the purpose of Equality Impact Assessment and explain its positive benefits. Text has been amended to reflect that Equality Impact Assessment will be undertaken independently of Sustainability Appraisal.
Nicky Conway Forum for the Future	Paragraph 5.1	Paragraph 5.1 – should say why we are doing what we are doing in terms of the process.	Agree. The Scoping Report should reflect the benefits of Sustainability Appraisal and not only its processes.	This paragraph has been deleted. Chapter 3 now contains information on the benefits of performing a Sustainability Appraisal on the Joint Core Strategy.
Nicky Conway Forum for the Future	Paragraph 5.4	Paragraph 5.4 – shouldn't use the word 'sustainable in the definition in sustainable economy	Disagree. This definition is widely accepted and comes from national strategies.	None.
Nicky Conway	Chapter 6	Chapter 6 – missing themes	Partially agree. The relevant	The Key Sustainability Themes

Forum for the Future		(education and skills, equality and diversity, governance (refer back to UK strategy))	plans, policies and programs (Appendix 2) will be re-examined for evidence that of these themes.	have been amended to account for a variety of consultation comments.
Nicky Conway Forum for the Future	Climate Change	Climate change could be split into mitigation and adaptation. Add reference to the Climate Change Act.	Agree. Climate change is a crucial element of the Sustainability Appraisal process. Mitigation and adaptation should be represented.	Reference to the Climate Change Act added. Climate Change has been retained a single Theme with 2 separate Objectives.
Nicky Conway Forum for the Future	Plans/Policies/ Programmes	Add references to Sustainable Communities Act, the Gloucestershire Waste Management Strategy and the Waste Emissions and Tradings Act 2005.	Agree.	All three plans have been added to the relevant plans, policies and programmes listed in Appendix 2. They have been added as sources for Themes where appropriate.
Nicky Conway Forum for the Future	Transport	Transport – report focuses on accessibility rather than transport.	Agree. The report focuses on improving accessibility. Climate change impacts are covered elsewhere. The Scoping Report focuses on choice and reducing the need to travel by improving accessibility by less polluting modes.	None.
Nicky Conway Forum for the Future	Layout	Make a decision about how the information is presented. Needs to be more cohesive so that there is a direct correlation to plans. Add an appendix on how the Objectives have been arrived at (they reflect all of these themes).	Partially agreed. The layout of future scoping reports will be reconsidered. The layout of this Scoping Report will be amended and processes documented within appendices.	The layout of the document has been extensively changed to reflect consultation comments. Baseline Data has been removed to Appendix 3. The revisions should make the development of the Objectives more transparent.

Nicky Conway Forum for the Future	Affordable Warmth	Add Gloucestershire Affordable Warmth Strategy under Section 3.	Agreed.	The Strategy has been added to the relevant plans, policies and programmes in Appendix 2.
Nicky Conway Forum for the Future	Chapter 7	Chapter 7. Refer to data gaps and explain whether permanent or temporary. Local Area Agreement targets for waste are monitored and need adding. Add where the trend is going.	Agreed. There needs to be greater clarity as to where there are data gaps and how these are being addressed.	Local Area Agreement targets have been added where appropriate and the relationship with Sustainability Appraisal explained.
Nicky Conway Forum for the Future	Baseline Targets and Indicators	There are regional targets on renewable energy which state what we are starting to achieve and data is available on this. Carbon Emissions per head, information is available for Joint Core Strategy area. Add national indicators as these are being collected. Ecological footprint would enable you to compare the local authority areas. Have all the right issues been picked up?	Agreed. There needs to be greater emphasis on carbon emissions and renewable energy.	New baseline data (Appendix 3) has been added where available. This data has been analysed and issues have been identified and included in the Key Sustainability Issues.
Nicky Conway Forum for the Future	Green belt	Should the green belt be sustainability theme/issues?	The Green Belt is a significant issue in the Joint Core Strategy Area.	Green Belt has been amalgamated into a revised Theme encompassing the natural environment and resources.
Nicky Conway Forum for the	Baseline data	Add ecological footprint, gas consumption and waste generation, water consumption,	Agreed.	Where available, these indicators have been added to the Baseline Data in Appendix 3.

Future		water quality, carbon emissions, renewable energy and allotment provisions.		
Nicky Conway Forum for the Future	Table 10	Table 10, page 52. There are discrepancies and they need to be merged into the table framework.	Partially agreed. Discrepancies will be addressed but tables will remain separate to demonstrate the derivation of Objectives.	Objectives have been significantly amended to take account of consultation comments. Tables remain distinct but a narrative has been provided to explain the process by which Objectives have been defined.
Nicky Conway Forum for the Future	Table 11	Table 11. Reduce number of objectives to 15 or 16 maximum.	Partially agree. Objectives should reflect the local situation and it may be impossible to restrict the number of objectives. Objectives will be merged where appropriate.	Objectives have been significantly amended to take account of consultation comments. The revised Sustainability Appraisal Framework contains 18 Objectives.
Nicky Conway Forum for the Future	Decision Aiding Questions	Decision aiding questions. These need to include enough detail to be meaningful.	Noted.	Decision Aiding Questions have been amended to reflect changes made to the Objectives.
Nicky Conway Forum for the Future	Chapter 9	Chapter 9. All this has already been said therefore a lot of the text can be deleted.	Agree.	Repeated text has been removed.
Nicky Conway Forum for the Future	Objectives – Local Distinctiveness	Need to add local distinctiveness to objectives.	Partially agree. Local distinctiveness should be addressed within the Key Sustainability Issues and followed through in Decision Aiding Questions.	The Sustainability Appraisal Framework has been significantly altered to take account of consultation responses.

Nicky Conway Forum for the Future	Appraisal Methodology	Include new chapter on appraisal methodology.	Agreed.	The appraisal methodology has now been outlined under "Remaining Stages of the Sustainability Appraisal". Examples of the Appraisal Matrix and the Predicted Significant Effects Analysis tool are included in Appendix 4.
Nicky Conway Forum for the Future	Appendix 2	Appendix 2 is welcomed.	Noted.	None.
Nicky Conway Forum for the Future	Local Area Agreements/Sustainable Community Strategy	More reference needs to be provided to Local Area Agreement targets and the Sustainable Community Strategy.	Agreed.	Chapter 2 has been amended to include details of the relationship between the Local Area Agreement, the Sustainable Community Strategies and the Joint Core Strategy and its Sustainability Appraisal.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Climate Change Strategies	Should provide more detail on the climate change strategies that have been approved.	Agreed.	Details have been added to Chapter 2.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Sustainable Community Strategies	The sustainable community strategies for each of the three authorities should be discussed under a new heading in Chapter 2.	Agreed.	Details have been added to Chapter 2.

Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Chapter 7	Future predictions and trends including local/regional/national targets for baseline data should be provided where possible.	Agreed.	This data has been included in Appendix 3 where available.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Environmental Baseline Data	<p>Environmental baseline data should include a lot more information on environmental issues including the following:</p> <ul style="list-style-type: none"> <li>• Allotments provision</li> <li>• Per capita water use</li> <li>• Waste</li> <li>• River Quality</li> <li>• Ecological footprint</li> <li>• CO2 emissions</li> <li>• Electricity and gas consumption</li> <li>• Renewable energy</li> </ul> <p>Some of these are national indicators that each of the three authorities will be reporting on over the next year. For many of them the information already exists in a single spreadsheet.</p> <p>As a minimum LAA indicators should be reported.</p>	Agreed. Appropriate LAA targets and indicators will be added where available.	This data has been included in Appendix 3 where available. Information on the relationship between the Local Area Agreement and the Joint Core Strategy and its Sustainability Appraisal has been added to Chapter 2.
Carol Rabbette	Key Environmental	This section should include conclusions derived from	Agreed.	This data has been included in Appendix 3 where available and

Sustainability Advisor, Cheltenham Borough Council	Issues	additional datasets highlighted above, including; <ul style="list-style-type: none"> <li>• Allotment provision</li> <li>• Water consumption and river quality</li> <li>• Waste</li> <li>• Ecological footprint</li> <li>• Carbon emissions</li> <li>• Renewable energy</li> </ul>		the Key Sustainability Issues amended accordingly.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Key Environmental Issues	Reference to Code for Sustainable Homes is too specific. Would be better to flag up as an issue that there is little evidence that new development is meeting the Government's targets for implementing the Code for Sustainable Homes.	Agreed.	This issue has been removed and replaced with an issue relating to meeting targets for Code for Sustainable Homes.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Social Baseline Data	This section should include more recent travel to work data, road casualties and traffic flows.	Agreed.	Where available, this data has been updated in Appendix 3.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Key Social Issues	This section should include crime as a key issue.	Disagree. Crime has not been highlighted as a key as the most up-to-date information shows that levels are currently lower than those in both the region and nationally. Crime will be included as an Objective in the Sustainability Appraisal	A revised Objective relating to crime has been included within the revised Sustainability Appraisal Framework.

			Framework as it is a Key Sustainability Theme derived from the relevant Plans, Policies and Programmes in Appendix 2.	
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Sustainability Objectives	This table would be improved by sub-dividing it into three categories; living within environmental limits; a sustainable economy; and a strong, healthy and just society.	Disagree. The Sustainability Objectives identified in this table cannot be subdivided into three distinct categories given their cross-cutting nature between the three sustainability strands.	None.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Sustainability Objectives	More information should be provided on each of the Key Sustainability Issues, rather than just a list of headings.	Disagree. Further information on each of the Key Sustainability Issues is provided elsewhere in the document. Table 10 is designed to show the derivation of the Sustainability Objectives and would be overcomplicated if it were to include detailed information on Key Sustainability Issues and Themes. This information is included elsewhere in the document.	No change to Table 10 but further explanation of its role has been included in an accompanying narrative.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Table 10 and 11	There are inconsistencies between Table 10 and Table 11.	Agreed.	Objectives have been significantly amended to take account of consultation comments. Revised table no longer contain inconsistencies.
Carol Rabbette Sustainability Advisor,	Table 11 – Sustainability Appraisal Framework	Table 11 should include the same suggested subdivisions as Table 10.	Disagree.	None.

Cheltenham Borough Council				
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Climate change Objective – Table 11	The Climate Change Objective should be split into Mitigation and Adaptation Objectives, with a commitment to a low carbon or carbon neutral area.	Agreed. Distinction is necessary for clarification.	Separate Objectives have been included in the revised Sustainability Appraisal Framework.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Renewable Energy Decision Aiding Question – Table 11	Table 11 should include a renewable energy decision aiding question; increase the proportion of renewable energy both purchased from and generated by renewable energy and micro-generation’.	Agreed.	This Decision Aiding Question has been added to the revised Sustainability Appraisal Framework.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Objective 3 – Table 11	Objective 3 needs Decision Aiding Questions on reducing the use of natural resources, for example ‘support people and businesses in reducing their carbon footprint and the use of natural resources, both globally and locally’ and ‘support low carbon procurement of local goods and services’.	Agreed.	These Decision Aiding Questions have been added to the revised Sustainability Appraisal Framework.
Carol Rabbette Sustainability Advisor, Cheltenham Borough Council	Objective 4 – Table 11	Decision Aiding Question needed ensuring that water resources are conserved.	Agreed.	‘...and water is conserved.’ added to the Decision Aiding Question in the revised Sustainability Appraisal Framework.
Carol Rabbette	Objective 5 –	Objective 5 is too specific to the	Agreed.	Suggested wording has been

<p>Sustainability Advisor, Cheltenham Borough Council</p>	<p>Table 11</p>	<p>floodplain and should be reworded. Suggest reworded to read 'Manage and reduce flood risk and surface water run-off',</p> <p>Add associated Decision Aiding Questions 'not increase surface water run-off', 'support SUDS' and</p> <p>Add associated Decision Aiding Question 'help adaptation to the reality and aftermath of flooding'.</p>	<p>Disagree. Decision Aiding Question is in accordance with Planning Policy Statement 25 and the Strategic Flood Risk Assessment Level 1.</p> <p>Disagree. Not an issue for the JCS to address.</p>	<p>included as Objective 4 in the revised Sustainability Appraisal Framework.</p> <p>None.</p> <p>None.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 6 – Table 11</p>	<p>Objective should include Decision Aiding Question on reducing traffic accidents and improving road safety.</p>	<p>Disagree. The Joint Core Strategy cannot directly influence this. However, may contribute to a reduction in road traffic accidents through reduced volume of traffic.</p>	<p>None.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 10 – Table 11</p>	<p>Objective 10 should include 'to reduce landfill' at the end of the objective.</p>	<p>Agreed.</p>	<p>The Objective has been amended in the revised Sustainability Appraisal Framework.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 11 – Table 11</p>	<p>Objective 11 should include a mention of soil quality, and a Decision Aiding Question 'improve the quality of contaminated land'</p>	<p>Agreed. Soil quality is an important consideration.</p>	<p>Soil quality has been added to a revised Objective on the natural environment and resources in the revised Sustainability Appraisal Framework.</p>

<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 13 – Table 11</p>	<p>Objective 13 should include reference to ‘achieving a low carbon economy which improves prosperity whilst respecting environmental limits’ and Decision Aiding Questions to ensure that new economic activity minimises impact on carbon emissions and supports low carbon innovations and environmental technologies.</p>	<p>Disagree.</p>	<p>These issues are dealt with under revised Objectives on Climate Change and their Decision Aiding Questions.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 12 – Table 11</p>	<p>Under Social Cohesion Objective there should be another Objective ‘promote inclusion and a more self-contained communities to reduce the need to travel’, with Decision Aiding Questions ‘to support the role of local neighbourhood centres to meet everyday needs’ and ‘encourage the provision of local services and facilities to help communities become more self-contained’.</p>	<p>Disagree.</p>	<p>These issues are dealt with under revised Objectives on Sustainable Communities and their Decision Aiding Questions.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 17 – Table 11</p>	<p>The first Decision Aiding Question should include reference to reducing obesity and others on improving levels of health care and encouraging development of more healthy workplaces.</p>	<p>Agreed. Reducing obesity should be an important element of all planning.</p>	<p>Decision Aiding Questions have been amended and added to a revised Objective on health in the revised Sustainability Appraisal Framework.</p>

<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 18 – Table 11</p>	<p>This Objective should not be about the availability of housing, but about ‘ensuring everyone has access to a decent home that they can afford and which meets their needs, ensuring that best use is made of existing stock’. Additional Decision Aiding Questions are needed for reducing the risk of homelessness from flooding and promoting a mix of tenure and access to good quality, well located and affordable housing.</p>	<p>Partially agreed.</p> <p>Disagree. Flooding is considered elsewhere.</p> <p>Agreed.</p>	<p>The Objective on housing has been amended in the revised Sustainability Appraisal Framework.</p> <p>None.</p> <p>Decision Aiding Question added to Housing Objective in the revised Sustainability Appraisal Framework.</p>
<p>Carol Rabbette Sustainability Advisor, Cheltenham Borough Council</p>	<p>Objective 19 – Table 11</p>	<p>This Objective should minimise development of open land, and reference to protecting biodiversity and opportunities for local food production should be included.</p>	<p>Disagree. Biodiversity is covered elsewhere.</p> <p>Agreed. Local food production and agriculture are important sustainability concerns.</p>	<p>None.</p> <p>A Decision Aiding Questions have been added to the Objective on Natural Environment and Resources.</p>
<p>Savills</p>	<p>Table 11: Water</p>	<p>To maximise water collection opportunities is an unrealistic Objective for the Joint Core Strategy. Re word to “Ensure that all reasonable measures are taken to collect and recycle water.”</p> <p>Suggest additional indicator which reads “minimise the scale</p>	<p>Disagree. The Sustainability Objectives should be aspirational and the decision about whether this is practical should be made by the Joint Core Strategy.</p> <p>Partially agreed. The second suggested indicator is covered</p>	<p>This Objective has been amended in the revised Sustainability Appraisal Framework.</p> <p>The first Decision Aiding Question has been added to the</p>

		<p>of future development within flood risk areas.” And a further indicator “number of dwellings permitted within the functioning flood plain contrary to the guidance in PPS25.”</p> <p>Recommend that the SUDS indicator is revised to monitor the effective drainage of development rather than simply calculating the number of schemes with SUDS.</p>	<p>by existing indicators on number of applications approved contrary to EA advice.</p> <p>This data is unavailable.</p>	<p>amended Objective on Flooding in the revised Sustainability Appraisal Framework.</p> <p>None.</p>
Savills	Sustainable Transport	<p>A more realistic Objective for the Joint Core Strategy is to “enhance the desirability of alternative modes of transport to the private car and encourage modal shift.” Replace Decision Aiding Question with “Will the Joint Core Strategy incorporate all reasonable measures to encourage the use of sustainable modes of transport?”</p>	<p>Disagree. Existing wording is sufficient and clear.</p>	<p>None. This Objective has been amended in the revised Sustainability Appraisal Framework to account for other consultation responses.</p>
Savills	Natural Environment	<p>Additional Decision Aiding Question relating the enhancement of biodiversity through new development proposals would improve the Sustainability Appraisal. This could be augmented with an indicator used to monitor the</p>	<p>Agreed.</p>	<p>Decision Aiding Question added under the Biodiversity Objective in the revised Sustainability Appraisal Framework.</p>

		<p>area of land set aside for biodiversity improvements in development proposals.</p> <p>Decision Aiding Questions are repetitive and unduly weighted towards landscape character. Suggest combine 3 and 5 or delete 5.</p> <p>Suggest following additional indicator 'Scale of development on land designated as green belt'.</p>	<p>Disagree.</p> <p>Agree. However, the Joint Core Strategy will provide a review of greenbelt boundaries and therefore any development outside those reviewed boundaries would no longer be development in the green belt.</p>	<p>'...and other designated landscapes" removed from existing Decision Aiding Question.</p> <p>None.</p>
Savills	Waste	<p>Suggest second and third Decision Aiding Questions are replaced with 'will the Joint Core Strategy promote development which enables future occupants to minimise waste and maximise reuse, recycle and compost'.</p> <p>Decision Aiding Question on waste disposal is a matter for the minerals and waste Local Development Framework, therefore the Decision Aiding Question is a matter for that document and not the Joint Core</p>	<p>Agree.</p> <p>Disagree. There is overlap between the documents in terms of facilitation.</p>	<p>These Decision Aiding Questions have been revised.</p> <p>None.</p>

		Strategy.		
Savills	Pollution	Third Decision Aiding Question should be revised to read 'will the Joint Core Strategy reduce the amount of contaminated land' – related indicator would then assess area of land decontaminated per annum.	Agreed.	The issue of contaminated land and soils has been reviewed and dealt with under the Natural Environment and Resources Objectives. The suggested Decision Aiding Question has been included.
Savills	Economic Development	Propose an additional Decision Aiding Question 'will the Joint Core Strategy ensure the provision of sufficient housing to deliver economic growth objectives.	Disagree. This issue is covered elsewhere.	None.
Savills	Sustainable Construction	Add reference to BREEAM sustainable construction standards for non-residential buildings.	Agreed. It is important to consider non-residential buildings.	This Objective has been amalgamated into the Climate Change Objectives in the revised Sustainability Appraisal Framework.
Savills	Housing	First Decision Aiding Question should read 'Will the Joint Core Strategy plan for the delivery of the housing requirement contained within the RSS'. The related indicator this would be housing completion levels.	Disagree. This is a matter for the Joint Core Strategy and not its Sustainability Appraisal. Housing targets are monitored elsewhere.	None.
Savills	Green space	Third Decision Aiding Question on green space should read 'Will the Joint Core Strategy promote the integration of SUDS into new green spaces'	Disagree. The existing wording is clear.	None.

Tim Quinton Natural England	Key Sustainability Themes	Add “create” and “connect” to the theme “Protect and enhance and restore habitats, species and sites of wildlife or geological interest”. Also add to the corresponding objective.	Agree.	Theme and Objective amended accordingly.
Tim Quinton Natural England	Key Sustainability Themes	Sustainable construction theme should be renamed to “Quality Design”.	Disagree. Quality of design is covered elsewhere.	None.
Tim Quinton Natural England	Biodiversity	Too little information on Biodiversity within the baseline data set. It is suggested that information of County Wildlife Sites is included as a minimum. Data from the current Biodiversity Action Plan should also be included in more detail.	Agreed. This area is deficient in data. Little data on the quality or condition of County Wildlife Sites is available at present, however, their size and locations are known and this data will be added.	Data on County Wildlife Sites has been included within the Baseline Data in Appendix 3. Data on Biodiversity Action Plan habitats and species will also be added.
Tim Quinton Natural England	Landscape Character	Current baseline data is insufficient. The Gloucestershire Landscape Character Assessment is mentioned but not within the baseline.	Partially agreed. The Gloucestershire Landscape Character Assessment is included as a Relevant Plan, Policy and Programme in Appendix 2 and is carried forward into a Key Sustainability Theme.	Data from the Gloucestershire Landscape Character Assessment has been added to the Baseline Data in Appendix 3. This has been carried forward into a Key Sustainability Issue on Landscape Character.
Tim Quinton Natural England	Landscape Character	The Area of Outstanding Natural Beauty Landscape Character Assessment should be included in the baseline.	Agreed.	Added to the Relevant Plans, Policies and Programmes in Appendix 2. This has been carried forward into a Key Sustainability Issue on Landscape Character.
Tim Quinton	Landscape	Should include data on	Agreed.	This data has been added to the

Natural England	Character	landscape change. Suggest using Countryside Quality Counts data on changes within Joint Character Areas.		Baseline data in Appendix 3. This has been carried forward into a Key Sustainability Issue on Landscape Character.
Tim Quinton Natural England	European Protected Sites	Natural England is concerned that the Joint Core Strategy may lead to increased abstraction from the River Severn that may, in combination with increases made upstream, will lead to a negative impact on the Severn Estuary Special Protection Area/ proposed Special Area of Conservation. It is recommended that this potential negative effect is included as a Key Sustainability Issue.	Agreed. The Joint Core Strategy will be subject to a Habitats Regulation Assessment on its potential effect on all Natura 2000 sites within or in close proximity to its borders. However, the potential for an effect should also be flagged up within the Sustainability Appraisal.	The presence of 2 Special Areas of Conservation and a Special Protection Area in and adjoining the Joint Core Strategy area has been included as a Key Sustainability Issue.
Tim Quinton Natural England	Social Baseline Data	There could be more information on health and wellbeing included within the baseline data. Suggest National Obesity Observatory or South West Public Health Observatory.	Agreed. Health and Wellbeing is an important issue. However, there is little data locally available at present.	Information from the National Obesity Observatory has been added to the Baseline Data in Appendix 3.
Tim Quinton Natural England	Green space	Natural England note that there is a Green Space Strategy in production for Cheltenham Borough and suggest that this be included when available. They also suggest that similar work be commissioned by Gloucester and Tewkesbury. As a minimum a quantitative study	Agreed. This data is not yet available in a useable format.	None. This data is not yet available in a useable format. It will be added to the Baseline Data in Appendix 3 in the future.

		is required.		
Tim Quinton Natural England	Rights of Way	Natural England would like to information on Public Rights of Way within Gloucester, Cheltenham and Tewkesbury in the Baseline Data.	Agreed.	Information from Gloucestershire Rights of Way and Countryside Access and Improvement Plan 2006. – 2011 has been added.
Tim Quinton Natural England	Sustainability Appraisal Framework - Biodiversity	Propose additional indicator recording number of sites and area gained for nature conservation.	Disagree. Information is not currently collected and is unlikely to be.	None.
Tim Quinton Natural England	Sustainability Appraisal Framework – Sustainable Transport	Suggest number/mileage of new footpaths and cycle paths created through the planning process.	Disagree. Information is not currently collected and is unlikely to be.	None.
Tim Quinton Natural England	Sustainability Appraisal Framework – Natural Environment	Indicators for Objective 8 should include data from Landscape Character Assessments and the Countryside Quality Counts indicator.	Agreed. Will be added.	Indicators added to the revised Sustainability Appraisal Framework.
Tim Quinton Natural England	Sustainability Appraisal Framework - Built Environment	Suggest indicator to monitor the promotion of good design could be Commission for Architecture and the Built Environment Standard 'Building for Life'.	Agreed. This will be monitored.	Indicator added to the revised Sustainability Appraisal Framework.
Tim Quinton Natural England	Sustainability Appraisal Framework - Green space	Number of parks gaining Green Flag status is an inappropriate indicator. Suggest alternative indicator measuring loss of green space, monitored by Development Control.	Agreed. In the short term this data may not be available. However, efforts will be made to monitor it in the future.	This Indicator will be removed.
Gloucestershire	Sustainability	Suggest adding 'connect' to	Agreed.	The Objective on Biodiversity

Wildlife Trust	Objectives	objective 'Protect, Enhance, Restore, Create, Habitats, Species and Sites of wildlife or geological interest'.		has been significantly amended to take account of consultation responses. "improved connectivity" has been added.
Gloucestershire Wildlife Trust	Methodology	The Trust recommends that a study be commissioned to provide up to date data on the state of the environment. Otherwise data in the Sustainability Appraisal will be incomplete and considerably out of date.	Agreed. A study has been commissioned for Cheltenham Borough and further data gathering will be required for Gloucester and Tewkesbury. This data will be added to the baseline when available.	None. This data is not yet available in a useable format. It will be added to the Baseline Data in Appendix 3 in the future.
Gloucestershire Wildlife Trust	Plans, Policies and Programmes	Suggest addition of Gloucestershire Nature Map to the Relevant Plans, Policies and Programmes. In addition the Gloucestershire Biodiversity Action Plan will be revised in 2009 and should be added.	Agreed.	Gloucestershire Nature Map added to the Relevant Plans, Policies and Programmes in Appendix 2.
Gloucestershire Wildlife Trust	Baseline Data	Commentary states that SSSI's represent the County's very best wildlife and geological sites. This should more accurately read 'SSSI's are a sample of the county very best...'	Agreed	Commentary has been amended.
Gloucestershire Wildlife Trust	Habitats	Figures are incorrect as they relate to number of Biodiversity Action Plan habitats and species and not protected species. Suggest replacement with national indicator NI 197.	Agreed.	Replace by NI 197 in the Baseline Data in Appendix 3.
Gloucestershire	Key	The condition of SSSI's is listed	Agreed. However, data is not yet	Key Sustainability Issue

Wildlife Trust	Environmental Sustainability Issues	as a sustainability issue. This should be expended to cover all designated sites including County Wildlife Sites.	available for all County Wildlife Sites.	amended.
Gloucestershire Wildlife Trust	Social Baseline Data	Support to propose indicator relating to access to public open space, however suggest that this be expended to all important habitats and open spaces under the title Green Infrastructure.	Noted.	None.
Gloucestershire Wildlife Trust	Sustainability Appraisal Framework	Add the word “connect” to the objective on biodiversity. In addition, add a Decision Aiding Question on “ensures that wildlife sites are not further isolated and opportunities to establish connection between wildlife sites are not compromised”.	Agreed.	The Objective on Biodiversity has been significantly amended to take account of consultation responses. “improved connectivity” has been added. The suggested Decision Aiding Question has also been added.
Caroline Power English Heritage	Local Context	Mention should be made of the Gloucestershire Historic Urban Regeneration Company and of Civic Pride in Cheltenham.	Agreed.	A brief overview has been included in the revised Chapter 2 on Local Context.
Caroline Power English Heritage	Key Sustainability Themes	Planning Policy Statement 1 should be mentioned within the derivation of many of the Key Sustainability Themes outlined.	Agreed.	Planning Policy Statement 1 has been listed as a source for all relevant Key Sustainability Themes.
Caroline Power English Heritage	Key Sustainability Issues	English Heritage suggest the following potential Key Sustainability Issues:  1. Reusing the historic	Noted. Many of the suggested issues are relevant to the Joint Core Strategy more than its Sustainability Appraisal. However, many elements within	Suggested issue 5 has been added as a Key Sustainability Issue.  Decision Aiding Questions have

		<p>environment, particularly buildings, lies at the heart of creating sustainable communities;</p> <ol style="list-style-type: none"> <li>2. The historic environment adds value to regeneration projects;</li> <li>3. The historic environment is a proven source of local employment and helps underpin the local economy;</li> <li>4. An attractive environment can assist in attracting external investment as well as maintaining existing businesses of all types, not just tourism;</li> <li>5. Heritage is a fundamental element that contributes towards local character and distinctiveness;</li> <li>6. The historic environment is a powerful focus for community action;</li> <li>7. Outcomes such as increased community involvement and greater social inclusion can be achieved through a</li> </ol>	<p>the suggested issues could be incorporated and will be considered. Suggested issue 5 will be added and is welcomed.</p> <p>These suggested issues will be passed to the Joint Core Strategy Policy Development Group for consideration.</p>	<p>also been added to Objectives on the Built Environment and Culture and Tourism.</p>
--	--	--	--	--

		<p>greater focus on the historic environment;</p> <p>8. The historic environment is a local educational resource for all ages; and</p> <p>9. Local environments that are understood and valued tend to be better looked after than these that are not linked to communities, and can help foster civic responsibility and citizenship.</p>		
<p>Caroline Power</p> <p>English Heritage</p>	<p>Baseline Data Collection and Indicators</p>	<p>English Heritage suggests the following Baseline Data is added to the Scoping Report:</p> <ul style="list-style-type: none"> <li>• Historic Parks and Gardens;</li> <li>• Registered Battlefields;</li> <li>• Non-designated features of local historic interest;</li> <li>• Potential for unrecorded archaeology;</li> <li>• Further data from the local Historic Environment Register; and</li> <li>• Further indicators on the changing historic environment from</li> </ul>	<p>Partially agreed. Data on the historic environment is identified as a gap within the Scoping Report. Further data will be identified and analysed to improve the understanding of the historic environment.</p> <p>Some of the suggested data is hard to quantify.</p>	<p>Information on Historic parks and Gardens and Battlefields have been added to the Baseline Data in Appendix 3.</p>

		“Heritage Counts – State of the Historic Environment”.		
Peter Stacey Turley Associates	Sustainability Themes – Biodiversity	It would be more appropriate to refer to habitats and species of “value” rather than “interest” and to consider qualitative judgements as well as quantitative.	Disagree. All habitats and species are of “value” and such wording would require further exploration, which is unnecessary when defining broad sustainability themes. Qualitative judgements should be made within Decision Aiding Questions or within the Appraisal of the Joint Core Strategy.	None.
Peter Stacey Turley Associates	Sustainability Themes – Economic Development	Remove the reference to “without harming environmental quality” as it is already contained within other themes.	Agree. Environmental quality is considered elsewhere and should not be appended to other themes.	This reference has been removed.
Peter Stacey Turley Associates	Sustainability Themes – Sustainable Construction	Remove this theme from Economic Sustainability Themes as it is covered within other environmental themes.	Partially agree. Sustainable Construction will be amalgamated with Climate Change.	Key Sustainability Theme deleted and considered under Climate Change within the revised Sustainability Appraisal Framework.
Peter Stacey Turley Associates	Economic Sustainability Themes	Additional themes required: <ul style="list-style-type: none"> <li>• Rural economies;</li> <li>• Economically disadvantaged areas; and</li> <li>• Existing businesses and sectors.</li> </ul>	Partially agree. Rural economies should be added, referencing Planning Policy Statement 7. Economic inequalities are considered elsewhere. Existing businesses and sectors within the Joint Core Strategy area are considered within the locally distinctive Sustainability Issues	Rural economies have been considered as part of a revised Key Sustainability Theme on The Economy. Economic Inequalities have been added to a revised Key Sustainability Theme on Sustainable Communities.

			arising from Baseline Data.	
Peter Stacey Turley Associates	Key Environmental Sustainability Issues	Land Designated as Green Belt is should not be highlighted as a sustainability issue. Green Belt is a strategic planning tool and its loss should not be accorded a negative sustainability score.	Disagree. The Green Belt is a significant issue in the Joint Core Strategy Area. Its loss will not necessarily be accorded a negative score. That judgement should be made in the Joint Core Strategy and not its Sustainability Appraisal.	Green Belt has been amalgamated into a revised Theme encompassing the natural environment and resources.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Biodiversity	The objective should reference species and habitats of “value” rather than “interest”.	Disagree. All species and habitats are of “value”. Consideration of the quality of environments may be undertaken using Decision Aiding Questions and in the appraisal of specific policy options.	None.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Climate Change	The objective should not reference the “unavoidable” consequences of Climate Change. Number of properties at risk from flooding should not be considered as an indicator as it is too difficult to measure. The number of properties achieving Code for Sustainable Homes standard should not be set as a target.	Partially agreed. The reference to the “unavoidable” is inappropriate. The number of properties at risk from flooding is readily available from the Environment Agency and is a recognised indicator. The number of properties built to Code of Sustainable Homes Standard is used in this context as an indicator not a target.	The reference to “unavoidable” has been removed.  None.  None.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Natural	Typographical error. “Landscaped character” is presumed to be “landscape character”.	Agreed.	Error has been amended.

	Heritage			
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Economic Development	Objective 12 should refer to “economic growth” specifically to accord with earlier themes and issues. Economic Development Objectives should also refer to the provision of housing, services, facilities and infrastructure required to support economic growth.	Agreed.  Decision Aiding Questions on the provision of infrastructure – including housing – will be added.	Reference to “growth” added to revised Objective on The Economy. Suggested Decision Aiding Question has been added.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Sustainable Construction	Sustainable construction should not be included as a specific sustainability objective; it is implicit within other objectives.	Partially agreed. This issue can be dealt with under Climate Change.	Objective deleted. An additional Decision Aiding Question will be added to the Objectives on Climate Change to ensure sustainable construction is considered.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Social Cohesion	The Objective to “reduce inequalities in wellbeing and opportunity” is vague and not well supplemented by its Decision Aiding Questions. If it is to be retained it should be supplemented by links to housing supply, affordability, education and employment.	Partially agree.	The Objective on Social Cohesion has been removed as a result of all consultation comments. In the revised Sustainability Appraisal Framework a new Objective on Sustainable Communities includes issues of inequality.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Housing	The Objective should not refer to meeting local need as Cheltenham and Gloucester are identified in the Regional Spatial Strategy as a focus for growth.	Agreed. The reference to local need is inappropriate.	This Objective has been amended to take account of consultation comments.
Peter Stacey	Sustainability Appraisal	The Objective should not seek to “minimise development on open	Partially agreed. Green space should be protected but this	This Objective has been amended to take account of

Turley Associates	Framework – Green Space	space and green spaces” as this says nothing of the quality of the space that is lost.	Objective needs to be reconsidered.	consultation comments.
Peter Stacey Turley Associates	Sustainability Appraisal Framework – Land Resources	The Objective is confused and should be reworded. Minimising the use of green filed land should not be included as an Objective. Maximising the use of Previously Developed Land is considered a valid Objective.	Partially agreed.	The Objectives on Land Resources have been amalgamated with those under Natural Environment within the revised Sustainability Appraisal Framework.
Peter Stacey Turley Associates	General Comment	The Sustainability Appraisal Scoping Report for the Joint Core Strategy strongly reflects that produced by Cheltenham Borough Council. It is considered that this approach is not as clear and concise as that utilised by Gloucester City Council previously, which included a set of fewer “Headline Objectives” and then further sub-objectives.	Partially agreed. The approach utilised has been peer reviewed and is drawn from best practice. However, it is agreed that the number of Objectives included in the Sustainability Appraisal Framework is too high.	The number of Objectives in the revised Sustainability Appraisal Framework has been reduced to 18 and more use has been made of Decision Aiding Questions.
Meyrick Brentnall Gloucester City Council	Key Sustainability Themes	Questions the need for Key Sustainability Themes?	Disagree. Key Sustainability Themes are a useful way of summarising the Relevant Plans, Policies and Programmes and their common objectives and issues.	Key Sustainability Themes will remain within the revised Scoping Report, however an improved explanation of their purpose is now provided.
Meyrick Brentnall Gloucester City Council	Baseline Data Tables	Should these tables be split into be split into three – this confuses the reader.	Disagree. The tables are split according to the three strands of sustainability.	Baseline Data Tables have been placed within Appendix 3.

Meyrick Brentnall Gloucester City Council	Environmental Baseline Data	Should consider important habitats and the National Indicator relating to them. Biodiversity Action Plan targets could also be used.	Partially agreed. The National Indicator will be included once the data is available. Biodiversity Action Plan data is useful.	The National Indicator has been added to the Baseline Data in Appendix 3 as a current gap. Biodiversity Action Plan data is also included.
Meyrick Brentnall Gloucester City Council	Green Flag Award	This data does not add anything.	Agreed.	Data removed.
Meyrick Brentnall Gloucester City Council	Surface Water Run-off	What does this add and how will it be measured?	Disagree. Run-off rates are important in demonstrating the liability of an area to surface water flooding.	None.
Meyrick Brentnall Gloucester City Council	Developments Incorporating SuDS	This information is very hard to monitor and may not add value to the process.	Noted. SuDS play an important role in preventing or slowing surface water run-off.	None.
Meyrick Brentnall Gloucester City Council	Rainwater Butts	This information is largely not monitored and is unlikely to be.	Agreed. This indicator is unlikely to be monitored.	This indicator has been removed.
Meyrick Brentnall Gloucester City Council	Code for Sustainable Homes	This data should be collected rather than concentrating on SuDS and Rainwater Capture.	Agreed.	Properties achieving Code for Sustainable Homes 3 or higher will be collected.
Meyrick Brentnall Gloucester City Council	Climate Change	Data relating to climate change is largely absent.	Agreed.	Significant data has been added to the Baseline Data in Appendix 3.
Meyrick Brentnall Gloucester City	SSSI	Questions the value of this data. It would be more appropriate to use landscape quality	Partially agreed. SSSI data is valuable. Landscape designations will also be	Gloucestershire and AONB landscape Character Appraisal data has been added to the

Council		designations.	recorded.	Baseline Data in Appendix 3.
Meyrick Brentnall Gloucester City Council	Car Ownership and Transport Data	Question whether this should be listed as an economic indicator, should it not be environmental.	Partially agreed. This data sits easily within both classifications.	Also included within the Environmental Baseline Data in Appendix 3.
Meyrick Brentnall Gloucester City Council	House Price Data	Questions the usefulness of collecting this data. It would be more meaningful to collect data on social housing.	Disagree. This data provides a very important insight into the affordability of property across the area.	None.
Meyrick Brentnall Gloucester City Council	Table 10 - Biodiversity	Focuses too heavily on protected sites. Should not include greenbelt and should focus on habitats.	Partially agreed. Focus should be spread between sites as well as habitats and species.	This Objective has been thoroughly revised. Decision Aiding Questions relating to habitats and species have been added in the revised Sustainability Appraisal Framework.
Meyrick Brentnall Gloucester City Council	Table 10 – Natural Environment	Suggests removing reference to SSSI and including Flooding and Healthy Lifestyles.	Disagree. SSSI quality is an important target. Flooding and Healthy Lifestyles are covered elsewhere.	None.
Meyrick Brentnall Gloucester City Council	Table 10 – Green space	No mention of Green Infrastructure.	Agreed. Green Infrastructure is an important element of green space strategy.	The Objective has been thoroughly amended in the revised Sustainability Appraisal Framework.
Meyrick Brentnall Gloucester City Council	Table 11 – Climate Change	Recommend splitting this into two Objectives; Adaptation and Mitigation.	Agreed.	Separate Objectives have been included in the revised Sustainability Appraisal Framework.
Meyrick Brentnall Gloucester City Council	Table 11 - Water	Should include a reference to water pollution to link with earlier sections of the report.	Agreed. Water pollution should be considered.	Water Pollution and water quality have been added to Objectives on Waste and Pollution and Natural

				Environment and Resources.
Meyrick Brentnall Gloucester City Council	Table 11 – Natural Environment	Biodiversity should be considered as part of the Natural Environment. A Decision Aiding Question on increasing tree cover should be added.	Disagree. Biodiversity is considered important enough to justify its own Objective. Trees and tree cover are an important element of Natural Environment.	A Decision Aiding Question on trees and tree cover has been added to the revised Objective on Natural Environment and Resources.
Meyrick Brentnall Gloucester City Council	Table 11 - Biodiversity	Add a Decision Aiding Question to maintain ancient woodland.	Agreed.	Decision Aiding Question added.
Meyrick Brentnall Gloucester City Council	Table 11 – Waste	Indicators for this are already closely monitored.	Noted.	Indicators have been added.
Meyrick Brentnall Gloucester City Council	Table 11 – Green space	This should include a Decision Aiding Question on Green infrastructure.	Agreed.	Decision Aiding Question added.
Meyrick Brentnall Gloucester City Council	Table 11 – Green space	Suggest removal of Decision Aiding Question relating to the integration of SuDS into green space.	Disagree. Use of SuDS as an element of green space is considered best practice.	Decision Aiding Question revised to promote the adoption of SuDS as green space.
Sue Walker Strategic Land Partnerships	Key Sustainability Themes - Housing	Planning Policy Statement 7 should be included as a source of evidence for the Housing Theme.	Agreed.	Planning Policy Statement 7 added as source.
Sue Walker Strategic Land Partnerships	Key Sustainability Themes – Gypsies and Travellers	Gypsies and Travellers are not mentioned. Specific mention should be made of the Regional Spatial Strategy requirement for Gypsy and Traveller sites and Travelling Showpeople sites.	Agreed. This should be considered under Housing.	A Decision Aiding Question on the supply of sites is included under the Housing Objective in the revised Sustainability Appraisal Framework.

Sue Walker Strategic Land Partnerships	Population Over 75	No mention is made of the specific needs of people over 75, despite Department of Communities and Local Government statistics showing a marked rise in this population in the Joint Core Strategy area.	Agreed. This information is useful and will be included and followed up.	Information added to the Baseline Data in Appendix 3 and included within a Key Sustainability Issue on Ageing Population. A Decision Aiding Question dealing specifically with this issue has been added to the Housing Objective in the revised Sustainability Appraisal Framework.
Sue Walker Strategic Land Partnerships	Table 7A – Environmental Baseline Data	This table should include the need for housing land and Regional Spatial Strategy housing targets.	Agreed. However, it is considered that this information would sit better in Social Baseline Data as housing need.	The Regional Spatial Strategy Housing figures have been included and followed through as a Key Sustainability Issue.
Sue Walker Strategic Land Partnerships	Table 7B – Key Environmental Sustainability Issues	The need for development land should be included as an issue in this table.	Agreed. However, it is considered that this Issue would be better dealt with under Economic or Social Key Sustainability Issues.	“Housing land to meet defined needs” has been added as a Key Social Sustainability Issue with employment considered as a Key Economic Sustainability Issues.
Sue Walker Strategic Land Partnerships	Table 8B – Key Economic Sustainability Issues	Employment Land is included – this creates an imbalance as Housing Land is not included.	Agreed.	See previous 2 amendments.
Sue Walker Strategic Land Partnerships	Table 9A – Social Baseline Data	Greater numbers of affordable housing must be provided by the Joint Core Strategy to address long term shortages. Land Provision for housing should be included as it is impossible to achieve affordable housing without provision of land.	Noted.	See previous amendments.

Sue Walker Strategic Land Partnerships	Table 9B – Key Social Sustainability Issues	Careful consideration should be given to the need to phase development to ensure that housing is delivered. False barriers to the delivery of sustainable development should not be introduced ie. Green Belt and Area of Outstanding Natural Beauty.	Noted. Phasing of development is not a matter for the Sustainability Appraisal of the Joint Core Strategy. Neither Green Belt nor the Area of Outstanding Natural Beauty are considered to be false barriers as both are protected by natural policy.	None.
Sue Walker Strategic Land Partnerships	Table 11	Housing availability has been omitted as a Potential Detailed Indicator.	Noted.	None.
Sue Walker Strategic Land Partnerships	General Comment	There seems to be a theme of denial running through the document. Major Housing releases are needed and inevitable in the area as shown by the numerous mentions of affordable housing.	Noted. There is a need for housing land to be released but the Joint Core Strategy to achieve the figures set out in the Regional Spatial Strategy. Achieving these figures will be a key issue for the Joint Core Strategy. The Sustainability Appraisal process is about ensuring that the Joint Core Strategy provides for sustainable redevelopment including the provision of housing land.	Providing Housing Land has been added as a Key Sustainability Issue and an objective on the provision of housing is included in the revised Sustainability Appraisal Framework.333w78787
Ruth Clare Environment Agency	General Comment	Please note that this response should be considered within the context of the consultation responses made to the councils' individual Scoping Reports.	Noted.	No direct change.
Ruth Clare	Water Quality	There is a concern that Water	Agreed. Water Quality is an	Water Quality has been included

Environment Agency		Quality is not addressed within the Scoping Report. Specifically, it could be added to the Key Sustainability Theme for Water. Water quality data is widely available and would contribute to the Baseline Data to give a more accurate picture. The Severn Trent draft Water Resources Management Plan 2010-2015 should be included in Appendix 2 as a Relevant Plan, Policy and Programme.	important issue in the Joint Core Strategy area and, in particular, Cheltenham.	<p>within a new Objective on the quality of Natural Resources in the revised Sustainability Appraisal Framework with links to a revised theme on Natural Resources. Water Quality data has been added to the Baseline Data in Appendix 3 and followed through as a Key Sustainability Issue.</p> <p>The draft Water Resources Management Plan has been added to the Relevant Plans, Policies and Programmes in Appendix 2.</p>
Ruth Clare Environment Agency	Climate Change	Climate Change was successfully integrated into the Sustainability Appraisal process for Cheltenham Borough but has not been carried forward into this joint Scoping Report.	Noted. Climate Change should be at the heart of Sustainability Appraisal and should be a cross cutting theme.	<p>Significant additional baseline data on energy use and CO2 emissions has been included within the Baseline Data in Appendix 3 and this has been carried forward in the Key Sustainability Issues. A section on Climate Change has been added to Chapter 2, building on the information already provided about Climate Change Strategies.</p> <p>The revised Sustainability Appraisal Framework includes 2 Objectives on Climate Change;</p>

				Mitigation and Adaptation.
Ruth Clare Environment Agency	Strategic Flood Risk Assessment	The Scoping Report needs to include Baseline Data and Key Sustainability Issues derived from the Level 1 Strategic Flood Risk Assessment.	Agreed. This document was unavailable previously.	Baseline Data has been added in Appendix 3 and carried forward into a revised Key Sustainability Issue on Flooding. The Flooding Objective has also been amended in the revised Sustainability Appraisal Framework.
Ruth Clare Environment Agency	Renewable Energy and Energy Efficiency	The importance of renewables and energy efficiency does not come across in the Scoping Report.	Noted.	The revised Sustainability Appraisal Framework includes 2 Objectives on Climate Change including one on mitigation. Decision Aiding Questions on the use of renewables, energy efficiency and sustainable construction have been added.
Ruth Clare Environment Agency	Planning Policy Statement 1	The summary of Planning Policy Statement 1 should include mention of the “precautionary principle” and the requirement to “maintain and enhance”.	Noted.	The Key Messages from Planning Policy Statement 1 have been revised.
Ruth Clare Environment Agency	Land Contamination	This should be considered in conjunction with the Objective on Soil Quality.	Agreed. These topics are linked.	Contaminated Land is considered under Objectives on Natural Environment and Resources and Waste and Pollution in the revised Sustainability Appraisal Framework.
Ruth Clare Environment	Flooding	The Flooding Objective could be revised to “Manage and reduce flood risk and surface water run-	Partially agreed. It is important to include the need to reduce flooding and surface water run-	The Flooding Objective has been amended in the revised Sustainability Appraisal

Agency		off to protect people, property and the floodplain itself".	off.	Framework.
Ruth Clare Environment Agency	Waste	The Objective on Waste would be improved by including the word "avoid".	Agreed. The Waste Objective has been redrafted. The reference to the waste hierarchy is now included in a Decision Aiding Question.	"Avoid" has been included within a Decision Aiding Question on the waste hierarchy under a new Sustainability Objective on Waste and Pollution in the revised Sustainability Appraisal Framework.
Ruth Clare Environment Agency	Sustainable Drainage Systems	Sustainable Drainage Systems are not directly mentioned in the Sustainability Appraisal Framework. They play a valuable contribution to Sustainable Construction and could be included in its Objective.	Partially agreed. Sustainable Drainage Systems are important and should be encouraged.	A Decision Aiding Question on the need for Sustainable Drainage Systems will be added to the Objective on Flooding. Sustainable Construction has been included as a Decision Aiding Question within the Climate Change Mitigation Objective and a Decision Aiding Question of Sustainable Drainage Systems has also been added.
Ruth Clare Environment Agency	Natural Environment	The Objective on the Natural Environment should not relate only to "good quality" land and soils but to all.	Agreed.	Soil, water and landscape quality are all included within an objective on Natural Environment and Resources.
Ruth Clare Environment Agency	Geology	Geology should be considered within the Baseline Data and carried forward within the Key Sustainability Theme and Objective on Biodiversity.	Agreed.	Geodiversity added to Biodiversity Key Sustainability Theme and the Objective on Biodiversity within the revised Sustainability Appraisal Framework.
Ruth Clare	Tables 10 and	There are discrepancies	Noted.	Table have been synchronised.

Environment Agency	11	between the two tables.		
Ruth Clare Environment Agency	Table 6	The Source/Evidence is said to not be exhaustive. It would be helpful to refer to Appendix 2.	Agreed.	Text amended.
Ruth Clare Environment Agency	Relevant Plans, Policies and Programmes	The following should be added to the Relevant Plans, Policies and Programmes in Appendix 2: the Strategic Flood Risk Assessment for Gloucestershire, the River Basin Management Plan, the Catchment Area Management Plan and the Code for Sustainable Homes.	Agreed.	These documents have been added to the Relevant Plans, Policies and Programmes in Appendix 2.
Ruth Clare Environment Agency	Indicators	The proposed indicator "Number of applications approved against EA advice" is welcomed. However, it would be clearer if the words "on flood risk" could be added.	Agreed.	Indicator has been amended.
Ruth Clare Environment Agency				

