

# Local Development Framework

## Core Strategy

SA/SEA Site Assessment Methodology and Criteria  
Consultation Statement

March 2011

# Responses to the Consultation on SA/SEA Site Assessment Methodology & Criteria

## Introduction

The consultation on the draft Site Assessment Methodology and Criteria lasted for five weeks (2<sup>nd</sup> July – 6<sup>th</sup> August 2008). 32 statutory and specialist organisations were invited to comment on the draft.

The consultees' responses are set out in this document, in question order. Any amendments to be made to the methodology and criteria as a result of this consultation are listed against the consultation responses.

### Question 1 Do you agree with the scoring scheme? If not, please suggest an alternative.

Organisation	Their view	Comments	Officer Response/Changes
Castle Point Borough Council	Agree	Castle Point Borough Council employed a similar scheme of scoring to assess the sustainability of sites on the urban periphery.	-
Environment Agency	Agree		-
Essex County Council	Disagree	The criteria scoring scheme set out in Table 1 (page 8) is agreed subject to the addition of the category +/- as described in paragraph 5.11.  Paragraph 5.11 acknowledges that a category +/- would measure identifiable or significant effects which would have both a positive and negative effect. It is important that such an outcome is captured by the scoring scheme.	Agree. The +/- category has been added to the table.  As mentioned, in our response to the County Council's view for question 8, changes have been made to paragraph 6.2 to deal with this point.
Natural England	Agree	Natural England agrees with the scoring system as set out in the SA/SEA document.	-

**Question 2 Do you agree / disagree with the assessment criteria?  
Are there any others we should include?**

Organisation	Their view	Comments	Officer response / Changes
Environment Agency	Agree	<p>We are pleased to see that the assessment criteria considers a number of environmental constraints including flood risk, site biodiversity, water quality and efficiency, and previously contaminated land.</p> <p>Further criteria could include the drainage capacity of the site (this information may be included within your revised SFRA) and water availability of the area.</p>	<p>Drainage Capacity – Criteria 16b–e does consider the capacity of the sewerage system.</p> <p>We will investigate the availability of geological data of sufficient detail to inform site assessments.</p> <p>Water availability - Criterion 16a deals with this indirectly, by considering the pumping required to supply potable water</p> <p>The Water Cycle Study and SFRA Review will look at drainage capacity and water availability, which will be considered when land allocations are proposed.</p>
Essex County Council	Disagree	<p>The assessment criteria are generally agreed subject to the following specific views</p> <p>A. Objective 1 An additional criterion should be included which assesses sites in terms of the sensitivity to change of the Historic Environment. The mechanism for assessment of this additional criterion would be the scoring for sensitivity to change from the Historic Environment Characterisation Study of Basildon. Further comment on the priority to be accorded to this proposed additional criterion and to existing criterion 1-e is set out in response to Question 3.</p>	<p>A. Agree. New criterion to be added on “the sensitivity to change of the Historic Environment.” Include “Historic Environment Characterisation Study” in mechanism of assessment list.</p> <p><b>New criterion:</b> 1-f. The site is in a Historic Environment Zone where the Sensitivity to Change (vulnerability of the historic environment asset) is scored as:</p> <ul style="list-style-type: none"> <li>· 1 (low) [0]</li> <li>· 2 (medium) [-]</li> <li>· 3 (high) [- -]</li> </ul> <p>Medium priority</p> <p>Renumber rest of the criteria</p>

Organisation	Their view	Comments	Officer response / Changes
		<p>B. Objective 2 There are 2 criteria for impact on an EU designated site only differentiated by a distance measure. By comparison there are 4 criteria for impact on a SSSI differentiated both by distance and potential impact. The reason for this variation in approach is not clear.</p>	<p>B. For EU sites: Unlike SSSIs, there are no EU designated sites within the Borough, therefore only a distance from these sites can be considered. The distance of 5km is considered as a generally accepted zone of influence and is agreed by Natural England.</p> <p>Any potential effect on EU designated sites is assessed under the Habitat Directive's Assessment. It is not the role of the SA/SEA to assess potential effect on European sites. Appropriate Assessment and SA/SEA are two separate processes. Therefore at this stage no potential impact will be considered.</p> <p><b>Revise criteria for SSSIs:</b> Delete 2-e, as it is not required.</p>
		<p>C. Objective 3 The criteria for this objective do not acknowledge that some sites may be proposed for employment uses or may be capable of making a contribution to the local economy and regeneration. Additional criteria should be drafted that acknowledge that some sites will positively contribute to achieving SA Objective 3 through enabling new job and business creation.</p>	<p>C. Agree. Add a positive criterion to objective 3.</p> <p><b>New Criterion</b> 3-c) The development of the site would positively contribute to the economy through enabling new job and business creation [++] Low priority</p> <p><b>Revised criterion</b> 3-b) The site is within an existing employment area and is proposed for non-employment uses. [- -]</p>
		<p>D. Objective 4 It is not clear how sites not within or not accessible to town centres will be scored.</p>	<p>D. Criteria will be clarified.</p> <p><b>Revised criteria</b> 4-c) Town centre is accessible by bus from this site [+]</p> <p><b>Add new criterion</b> 4-d) Town centre not accessible by bus from this site [-]</p> <p>Renumber criterion 4-d to 4-e.</p>

Organisation	Their view	Comments	Officer response / Changes
		<p>E. Objective 5 This objective currently does not have a measure. Nevertheless there is a link here between the proximity of development to 'successful' schools as opposed to those that have been judged by Ofsted to be in need of improvement. It is suggested that the distance to school criteria currently identified as part of the assessment of Objective 11 could be amended and moved against Objective 5.</p> <p>However the important distance measure is not 'as the crow flies' but by available 'safe walking route'.</p> <p>Also the distance measure as currently expressed in Objective 11 appears rather blunt with measures simply above and below a single distance. Accordingly it is suggested that five 300m divisions for pre-school /primary school and similarly five 750m divisions for secondary school be adopted as assessment criteria for Objective 5.</p> <p>Pre-school should be covered also in line with the suggestion that evidence of availability of Early Years and Childcare services should be incorporated into the Scoping Report (see response to Question 6).</p> <p>The effect of these suggestions would enable definition of assessment criteria for Objective 5 in the following terms for pre-school with the format repeated in line with the above suggestions for primary schools and secondary schools respectively:</p> <p>++ Less than 300m by a safe walking route from a pre-school last judged by Ofsted to be good or excellent  + Less than 600m by a safe walking route from a pre-school last judged by Ofsted to be good or excellent  0 Less than 900m by a safe walking route from a pre-school last judged by Ofsted to be good or excellent  - Less than 1200m by a safe walking route from a pre-school last judged by Ofsted to be good or excellent  -- 1200m or more by a safe walking route from a pre-school last judged by Ofsted to be good or excellent</p>	<p>E. Agree. Will move the distance to schools criteria (11-r to 11-u) to objective 5 and revise them.</p> <p>The measures will be against good or outstanding schools (using Ofsted's "Overall effectiveness of school" grade 1 or 2), as suggested. It is recognised, that if schools need to be expanded, those rated outstanding or good will be prioritised.</p> <p>Five distance bands of 300m for primary schools and 750m for secondary schools will replace the 600m and 1,500m band widths in 11-r to 11-u</p> <p>It is recognised that the "safe walking route" is the ideal measure for measuring distance to schools. Due to limited resources, it is not possible to do this. Therefore we will continue to use the "as the crow flies" measure. The reduction in distance bands will, in part, alleviate any issues arising from this.</p> <p><b>Revised Distance to School criteria (replace 11-r to 11-u)</b></p> <p><b>Primary Schools</b>  [Medium priority unchanged]  5-a) Site is less than 300m from a primary school last judged by Ofsted to be good or outstanding [++]  5-b) Site is less than 600m from a primary school last judged by Ofsted to be good or outstanding [+]  5-c) Site is less than 900m from a primary school last judged by Ofsted to be good or outstanding [0]  5-d) Site is less than 1,200m from a primary school last judged by Ofsted to be good or outstanding [-]  5-e) Site is 1,200m or more from a primary school last judged by Ofsted to be good or outstanding [- -]</p>

Organisation	Their view	Comments	Officer response / Changes
		<p>F. Objective 11 It is suggested that the distance to school criteria currently identified as part of the assessment of Objective 11 could be amended and moved against Objective 5 and linked to the proximity of development to 'successful' schools (see comment on Objective 5).</p> <p>The criteria within Objective 11 relating to school capacity of primary schools and of secondary schools should be retained but with amendment. The phrase 'reasonable number' is subjective and an objective measure should be set relative to the impact of the site and other new development on the school.</p> <p>Also although priority admissions areas are important in the case of larger developments and particularly at primary level, other local schools may need to be brought into play and 'catchment' areas amended accordingly.</p> <p>Further, the ability of a school to expand is only relevant if there are insufficient places.</p>	<p><b>Secondary Schools</b>  5-f) Site is less than 750m from a secondary school last judged by Ofsted to be good or outstanding [++]  5-g) Site is less than 1,500m from a secondary school last judged by Ofsted to be good or outstanding [+]  5-h) Site is less than 2,250m from a secondary school last judged by Ofsted to be good or outstanding [0]  5-i) Site is less than 3,000m from a secondary school last judged by Ofsted to be good or outstanding [-]  5-j) Site is 3,000m or more from a secondary school last judged by Ofsted to be good or outstanding [- -]</p> <p>F. Criteria 11-r to 11-u will be replaced by new criteria 5-a to 5-j. (see above)</p> <p>It is not possible at this stage to estimate how many pupils each of the sites to be assessed may generate. Therefore, the suggestion that the criteria are revised is not being taken up. However, in the assessment table, the name of the school(s) and actual number of surplus places will be given against these criteria as extra information.</p>

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		<p>It is suggested that the following assessment criteria are substituted with a separate set each for primary schools and secondary schools respectively:</p> <p>++ The site is within an area served by a [primary/secondary] school or schools with a sufficient number of surplus places to accommodate the anticipated pupil numbers from new development</p> <p>+ The site is within an area served by a [primary/secondary] school or schools with a number of surplus places and the capacity to expand to serve the anticipated pupil numbers from new development</p> <p>0 The site is within an area served by a [primary/secondary] school or schools with no surplus places but the potential to be expanded sufficiently to serve the anticipated pupil numbers from new development</p> <p>- The site is within an area served by a [primary/secondary] school or schools with some surplus places and/or some potential to expand but insufficient potential capacity to serve anticipated pupil numbers from new development</p> <p>-- The site is within an area served by a [primary/secondary] school or schools with no surplus places and no significant potential to expand.</p> <p>G. Objective 14 It should be noted that development on a currently Greenfield site would increase greenhouse gases as flora act as a sink for these gasses.</p>	<p>G. Greenfield criteria have been added to Objective 14, and the text in the "Assessment Criteria" box has been modified.</p> <p><b>New criteria</b>  [Low priority]  14-a) Site is PDL [+]  14-b) Site is a Greenfield site [-]</p>

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		<p>H. Objective 15 In terms of Air Quality assessment criteria could be based on the proximity of proposed sites to areas with high emissions for example roads with an existing potential problem or employment areas fume outlets or dust issues. Such criteria would mirror the approach taken toward assessment criteria 15-e for noise.</p> <p>Also whilst no AQMAs are currently designated in the Borough, the assessment criteria should consider the extent to which location of a site when combined with existing development could negatively on existing air quality or contribute to the need to designate an AQMA.</p>	<p>H. Agreed. Replace informative at 15-a with a new criterion.</p> <p><b>New criterion</b>  15-a) The site is located in a:  High risk area for air quality [--]  Medium risk area [-]  Low risk area [0]  Medium priority</p> <p><b>Revised criterion</b> – contaminated land. Replace “would” with “may.”  15-d) Development of the site may provide the opportunity to remediate contamination (e.g. of a former landfill site) [+]</p> <p><b>Revised criterion</b> – Noise – replace 15-e  15-e) The site is close to an existing or likely noise source e.g. major roads, rail lines, industrial areas, Festival Leisure Park etc. [--]  15-f) The site is at a moderate distance of an existing or likely noise source [-]  15-g) The site is distant from an existing or likely noise source [+]  Medium priority</p>

Organisation	Their view	Comments	Officer response / Changes
		<p>I. Objective 17 No assessment criteria have been set for this objective. However, assessment criteria could be devised that indicate the potential of sites to contribute to renewable energy schemes or otherwise access locally produced renewable energy.</p>	<p>No assessment criteria have been given for this objective, as all sites could potentially contribute to renewable energy (eg solar panels) – therefore all sites would get the same score.</p> <p>At this early stage it is not possible to estimate how much contribution each site could make, therefore it is not possible to include a rated/graduated criteria.</p>
		<p>J. Withdrawn</p>	<p>-</p>
		<p>K. Objective 19 It would be beneficial to include assessment criteria based on the potential impact of development on traffic movement and road space on neighbouring roads.</p>	<p>This is a good point but no change will be made, because without knowing the type and density of development that could take place on a site, it would be hard for an SA/SEA Site Assessment to judge this. There are already criteria for access to schools, transport and services etc. that could mean reduced traffic from a site. When potential land allocations for development are proposed, traffic impact and the capacity on neighbouring roads, as well as those further away, will be a factor to be considered.</p>

Organisation	Their view	Comments	Officer response / Changes
EEDA	No opinion	<p>EEDA receives a number of requests of this kind as a statutory consultee and unfortunately cannot reply in detail to each one. However our experience to date suggests a number of points on sustainability appraisal reports which your authority may wish to consider.</p> <p>EEDA's principal role is to improve the East of England region's economic performance. Our main concern with sustainability appraisal reports is therefore that they address whether or not the LDF to which they refer will help deliver and provide the spatial framework for:</p> <ul style="list-style-type: none"> <li>• sustainable economic development and regeneration in the East of England and in particular,</li> <li>• the Regional Economic Strategy (A Shared Vision: the regional economic strategy for the East of England 2004).</li> </ul> <p>In our experience sustainability appraisal reports usually provide only limited reference to the "socio-economic" impacts of the proposed LDF. EEDA considers that they usually need to be expanded to identify the wider socio-economic issues benefits and costs.</p>	<p>The Regional Economic Strategy was one of the documents reviewed for the review of policies and programmes in the SA/SEA Scoping Report.</p> <p>To ensure that the RES had been taken into account, the Objectives have been reviewed against the issues EEDA highlighted (their bullet points). The results are as follows:</p> <ul style="list-style-type: none"> <li>• provision for businesses (particularly based in science and technology research and innovation) including the supply of high quality business premises in sustainable locations; <b>Objective 3</b></li> <li>• improving the region's skills base and human capital (and especially to address skills gaps and shortages); <b>Obj 5</b></li> <li>• tackling deprivation and social exclusion equality and diversity ... <b>Obj 6, 7, 8</b></li> <li>• improving provision of port airport and transport infrastructure so as to enable corridors of economic activity and deliver growth and sustainable communities; <b>Obj 11, 19</b></li> </ul>

Organisation	Their view	Comments	Officer response / Changes
		<p>The Regional Economic Strategy (RES) is an important policy and reference source and point of comparison in this respect. RES provides a vision for the region as a leading economy with high and growing levels of wealth increasing levels of economic participation and inclusion and sustainable and dynamic rural economies.</p> <ul style="list-style-type: none"> <li>• improving provision of port airport and transport infrastructure so as to enable corridors of economic activity and deliver growth and sustainable communities;</li> <li>• promoting sustainable development urban renaissance and rural vitality including the supply of high quality and affordable housing/ residential environments balanced with provision for employment;</li> <li>• managing growth and development sensitively and effectively;</li> <li>• complementing and enhancing the position of London as a world city; and</li> <li>• protecting and enhancing the region's landscapes and environmental assets</li> </ul> <p>In particular your sustainability appraisal report should take account of the following Sub-regional Policies contained in the RES for the Thames Gateway South Essex area (see p. 90 of RES):</p> <ul style="list-style-type: none"> <li>• improving aspirations and the skills base through better outcomes in schools and through increased participation in further and higher education supported by a university presence for the sub-region particularly in Southend</li> <li>• focusing on the existing and future skills needed by businesses through work-based and lifelong learning initiatives such as the Transport and Logistics Academy in Thurrock</li> <li>• supporting employment entrepreneurship business growth and inward investment in key sectors through skills development and provision of appropriate employment locations and supporting service infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• promoting sustainable development urban renaissance and rural vitality including the supply of high quality and affordable housing/ residential environments balanced with provision for employment; <b>Obj 3, 6, 8, 9, 10</b></li> <li>• managing growth and development sensitively and effectively; <b>All obj</b></li> <li>• complementing and enhancing the position of London as a world city; <b>All obj</b></li> <li>• protecting and enhancing the region's landscapes and environmental assets. <b>Obj 1, 2</b></li> <li>• improving aspirations and the skills base through better outcomes in schools and through increased participation in further and higher education... <b>Obj 5</b></li> <li>• focusing on the existing and future skills needed by businesses through work-based and lifelong learning initiatives such as the Transport and Logistics Academy in Thurrock <b>Obj 5</b></li> <li>• supporting employment entrepreneurship business growth ... <b>Obj 3</b></li> <li>• tackling deprivation and building community cohesion ...and improving access to services and facilities <b>All obj</b></li> <li>• maximising investment in strategic transport infrastructure to address current deficits and meet future requirements including the proposals for the Shellhaven London Gateway and Southend Airport expansion <b>N/A</b></li> <li>• developing the Green Grid South Essex to protect enhance and increase access to environmental assets and underpin the sustainability of communities and employment areas <b>Obj 2</b></li> <li>• supporting local delivery vehicles .... <b>Obj 9</b></li> </ul>

Organisation	Their view	Comments	Officer response / Changes
		<ul style="list-style-type: none"> <li>• tackling deprivation and building community cohesion through integrated programmes to increase social capital community leadership and improving access to services and facilities</li> <li>• maximising investment in strategic transport infrastructure to address current deficits and meet future requirements including the proposals for the Shellhaven London Gateway and Southend Airport expansion</li> <li>• developing the Green Grid South Essex to protect enhance and increase access to environmental assets and underpin the sustainability of communities and employment areas</li> <li>• supporting local delivery vehicles such as the Southend urban regeneration company that have the capacity to enable a step change in the quality and speed of delivery.</li> </ul> <p>By addressing these key elements of RES the sustainability appraisal will provide the context needed to appraise whether the LDF will help maintain the prosperity of the East of England enhancing its regional competitiveness and giving support to business growth</p>	
Highways Agency	Disagree	<p>There are no trunk roads in the Basildon Borough area.</p> <p>However, the Highways Agency would support a criterion for policies to allocate land for different uses (housing employment and recreation) with good access to services and public transport particularly where development is situated around key transport hubs that have the greatest potential to minimise the impact on the wider highway network.</p> <p>The Highways Agency recommends a mixed-use development approach is adopted to ensure that the developments are as sustainable as possible in transport terms. Transport is a key factor in the criteria.</p>	No change. Objectives 4, 7, 11 and 19 already consider these issues.

Organisation	Their view	Comments	Officer response / Changes
English Heritage	Disagree	<p>We note that the intention of the process is to gain a strategic sifting of sites.</p> <p>It is vital that flexibility is retained to question the results and add more specific information and judgements as appropriate. PPGs 15 and 16 provide the guiding principles for consideration of the historic environment in planning new development.</p>	<p>Criteria on heritage assets have been revised in light of ECC comments, as set out earlier.</p> <p>Also PPG 15 PPG 16 have been replaced by PPS 5 Planning for the Historic Environment.</p>
Natural England	Agree	Natural England agrees with the assessment criteria as set out in the document.	-

**Question 3 Do you agree / disagree with the priority ratings the criteria have been given?  
If you disagree, please explain why and suggest alternatives.**

Organisation	Their view	Comments	Officer Response / Changes
Environment Agency	Agree	<p>We are particularly pleased to see that flood risk has been given a high priority rating. As the majority of Basildon Borough Council falls within Flood Zone 1 we would expect to see all the site allocations within this area.</p> <p>Any allocations in Zones 2 and 3 would have to be supported by the Sequential/ Exception Test.</p>	<p>Agree - To emphasise the importance of building in areas not at risk from flooding, criterion 13-d is being revised:</p> <p><b>Revised criteria</b> 13-d) Site is in the remainder of the Borough (Flood Zone 1). Criteria is being upgraded to [++]</p>
Essex County Council	Disagree	<p>The priority ratings given to the assessment criteria are generally agreed subject to the following specific views</p> <p>A. General Three of the assessment criteria (2-e 6-b 15-c) have not been accorded a priority rating. It is not clear how the assessment of these criteria will be taken forward in the subsequent stages of the appraisal.</p>	<p>A. Revise criteria priority for 6-b, 15-c to Low. 2-e has been deleted.</p>
		<p>B. Objective 1 The priority rating should be increased for assessment criteria 1-e and the additional criteria suggested for archaeology (see response to Question 2). The significance of the assessment criteria for a site will depend on the archaeology of the site and the composition of the archaeological finds. This suggests a priority rating ranging from High through Medium to Low to reflect the sensitivity to change scoring in the Historic Environment Characterisation Study.</p> <p>However if for the practical purposes of the assessment the priority has to be restricted to just one scoring type then both criteria should be accorded at least a Medium priority.</p>	<p>Agree. See response to ECC comments to question 2.</p>
		<p>C. Objective 5 The assessment criteria suggested for this Objective (see response to Question 2) should be given a priority rating of medium or high.</p>	<p>C. Agreed. Priority rating = Medium</p>

Organisation	Their view	Comments	Officer Response / Changes
		D. Objective 11 The assessment criteria suggested for this Objective (see response to Question 2) should be given a priority rating of medium or high.	D. Agreed. 11-j – 11-m school capacity rating increased to Medium
English Heritage	Disagree	<p>(1) We note that Section 5.3 setting out the site assessment criteria identifies sites with an adverse impact on listed buildings scheduled monuments and conservation areas as having high priority in terms of consideration of the negative impact. The extent to which this should be judged slightly negative or very negative will depend on judgement being exercised.</p> <p>(2) We are also concerned that archaeological finds are given low priority and assigned a neutral impact. Unscheduled archaeological finds could potentially be of national significance. We suggest that you contact the Essex Historic Environment Team to discuss how these criteria might be refined.</p>	<p>1) We acknowledge that judgement will need to be used on this issue.</p> <p>2) An additional criterion on heritage assets has been added in response to ECC's comments to question 2.</p>
Natural England	Disagree	<p>Natural England broadly agrees with the priority ratings.</p> <p>However we draw your attention to Obj No. 12 (12-a) Natural England urges your Council to consider the biodiversity value of brownfield land as opposed to greenfield on a site by basis and score accordingly.</p>	We feel that the issue of biodiversity is adequately dealt with under Objective 2.

**Question 4 Do you agree / disagree with using both the weighting scores proposed, or do you prefer just one of the alternatives?  
If so, please state which one.**

Organisation	Their view	Comments	Officer response / Changes
Environment Agency	Agree	Have no preference to either alternative.	-
Essex County Council	Disagree	<p>Both sets of weighting methods should be used in the appraisal. This will allow for some sensitivity testing and appreciation of how the values attached to particular criteria influence the exercise.</p> <p>However greater clarity is required as to how the outcome of the weighting exercise will be interpreted and the implications for the appraisal of individual sites</p> <ol style="list-style-type: none"> <li>Section 5.2 with Table 1 details the criteria scoring scheme. The criteria scoring scheme identifies a 7-fold classification in Table 1 - increased to 8 by the commentary in paragraph 5.12.</li> </ol> <p>By contrast the proposed criteria weighting in Table 3 only identifies a 5-fold classification. Clarification is required as to how the missing 3 categories (i ? +/-) will be handled. Each of these three additional categories carries a degree of uncertainty about the sustainability status of a site. It is important that such uncertainties are not masked by the apparent objectivity of the weighting schemes adopted for the other categories.</p> <ol style="list-style-type: none"> <li>It is not clear how the weighting scores will assist comparison of the sustainability merits of sites between different objectives. The objectives have a variable number of assessment criteria attached to them. This could unduly influence the scoring system by automatically generating high scores for those objectives with a high number of assessment criteria and low scores for those with a low number of criteria. Consequently the number of assessment criteria attached to an objective introduces the potential for some objectives to unduly dominate and bias the outcome of the appraisal.</li> </ol>	<p>1) +/- has been added to table 1. Explanatory text has also been added to paragraph 6.2 "+ and - elements of the +/- category will be weighted accordingly". Categories [i] and [?] are informational categories. They are used when the necessary data is unavailable. They do not have a score or priority weighting. Therefore they do not need to be included in table 3.</p> <p>A note will be added to the foot of the table: Some objectives/criteria are more important than others, eg flood risk, so that some sites may not be rated highly in terms of allocating land for development, even if overall in SA terms, they score well.</p> <p>2) This is a valid point. However, although objectives have several criteria, they can only be scored once (e.g. a site will not fall into and be scored against 11-n to 11-q). Some objectives do not have any score at all (e.g obj 8) The site allocations will not be only based on this Sites Assessment scoring; as mentioned in paragraph 1.2 in the introduction, before land allocations can be proposed and appraised "a basic level of site assessment" for all potential sites is necessary. Other factors will need to be taken into</p>

Organisation	Their view	Comments	Officer response / Changes
			consideration (e.g. viability) before a land allocation can be made. Therefore a simple high score arising from a basic level of assessment is unlikely to determine which sites are developed.
Natural England	Agree	Natural England is satisfied that the use of both of the proposed weighting scores will provide a measurable assessment of individual scores/proposals	-

**Question 5 Do you agree with the way we are proposing to present the assessment results?  
How would you prefer the results be presented?**

Organisation	Their view	Comments	Officer response / Changes
Environment Agency	Agree	The appraisal matrices and tables would be our preference.	-
Essex County Council	Disagree	<p>The proposals in paragraph 6.5 for presentation of the assessment results are generally acceptable but consideration should be given to:</p> <ol style="list-style-type: none"> <li>1. The appraisal matrices setting out the assessment of each site against each criteria being available using all of the symbols indicated in Table 1 and paragraph 5.12;</li> <li>2. Colour-coding the results set out in the appraisal matrices to allow for easier visual appreciation of the balance of the appraisal;</li> <li>3. The appraisal matrices including or being accompanied by a commentary sufficient to clarify for each site as far as is appropriate and necessary <ul style="list-style-type: none"> <li>• the reasoning behind an assessment;</li> <li>• the nature of any re-testing of a site (as indicated by paragraph 5.8);</li> <li>• uncertainties on sustainability outcomes that would require additional assessment;</li> <li>• possible mitigation measures.</li> </ul> </li> <li>4. Illustrations and tabulations of aggregated data and results providing clear reference to the location of the detailed source data and results.</li> </ol>	Your suggestions will be taken into account when the results are prepared.
Natural England	Agree	Natural England is satisfied that the presentation of results as currently proposed is adequate for the purpose.	-

**Question 6 Do you wish to make any comments about the SA/SEA Scoping Report?  
If so, please add them here.**

Organisation	Their view	Comments	Officer response / Changes
Essex County Council	Disagree	<p>The Scoping Report is a comprehensive document. The inclusion of a summary of the previous consultation response; a jargon buster; and the series of national key messages is fully supported. The SA/SEA Scoping Report is generally agreed subject to the following</p> <p><b>A. Early Years and Childcare Services Evidence</b> should be added of the availability of Early Years and Childcare services. The relevant document is ECC's 'Childcare Sufficiency Assessment' which may be accessed at <a href="http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/gui.jsp?channelOid=14657&amp;guideOid=114577">http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/gui.jsp?channelOid=14657&amp;guideOid=114577</a></p> <p><b>B. Historic Environment</b> The following schedule of suggested amendments should be incorporated into the SA/SEA Scoping Report</p> <ul style="list-style-type: none"> <li>• Page 31 3.18 - The Basildon Historic Environment Characterisation should be added to the list of bullet points.</li> <li>• Page 35 3.52 - A final sentence should be added to state that "The Borough's archaeological heritage is a finite and fragile resource and should be protected and where possible enhanced."</li> <li>• Page 41 3.94 - Additionally this paragraph should note that Historic Environment Characterisation has been undertaken for the Thames Gateway area.</li> <li>• Page 50 Item 24 - In the Baseline Sustainability Issue column add "or cultural heritage" after biodiversity. In the Relevant Plan Policy or Programme column add PPG 15 and 16.</li> <li>• Page 53 Item 34 - Remove the word "limited"</li> <li>• Page 65 Ref 1 Column 3 - Add Essex Historic</li> </ul>	<p>A. The ECC Childcare Sufficiency Assessment will be added to the Contextual Baseline where it is more appropriately placed than in the Scoping Report. A criterion could be added to objective 5 to take into account the Childcare Sufficiency Assessment draft ward level data. However, while Day Nurseries and Pre-Schools can be permanent, the availability and location of childminders in an area can be variable and so this is not a reliable measure. Any such criterion would be a dated "snap-shot" of the level of childcare provision available.</p> <p>B. Agreed</p> <p>Changes requested in the first five bullet points have been made in the Scoping Report</p> <p>PPS 5 "Planning for the Historic Environment" has been added, as this PPS replaces PPG15 and PPG 16.</p> <p>Changes requested in these last four bullet points, will be made when the Contextual Baseline Report is reviewed.</p>

Organisation	Their view	Comments	Officer response / Changes
		<p>Environment Record sites In addition the following schedule of suggested amendments could be beneficially incorporated into the SA Contextual Baseline Report</p> <ul style="list-style-type: none"> <li>• Page 9 3.10 - Add that Essex County Council maintains the Historic Environment Record for Basildon</li> <li>• Page 89 bullet-point 4 - Replace the existing sentence with "Archaeological sites (and their setting) constitute a finite non-renewable resource vulnerable to damage. New sites should be preserved and/or recorded appropriately".</li> <li>• Page 97 Contextual Summary - The correct title is "The Essex Thames Gateway Historic Environment Characterisation Project"</li> </ul>	
East of England Development Agency	Agree	EEDA has no further comments to make on the revised Core Strategy SA Scoping Report.	-
Natural England	Disagree	We refer you to our comments with regard to the SA/SEA scoping report as set out in our letter of 17 September 2007 a copy of which is attached with the covering e-mail.	These previous comments have been incorporated into the Scoping Report.

## Consultees

The following organisations were invited to comment on the draft methodology:

- Go-East
- EEDA
- EERA
- ECC – incl. Planning, Minerals & Waste, Archaeology; Schools, Highways, Community Planning & Regeneration
- Brentwood District Council
- Castlepoint Borough Council
- Southend on Sea Borough Council
- Rochford District Council
- Thurrock Borough Council
- Chelmsford Borough Council
- Thurrock Thames Gateway Development Corporation
- English Heritage
- Environment Agency
- Natural England
- EWT
- Friends of the Earth
- Sustainable Development Commission
- RSPB
- Network Rail
- Highways Agency
- Sustrans
- Housing Corporation
- Shelter
- Home Builders Federation
- National Housing Federation
- Essex & Suffolk Water
- Anglian Water
- Basildon & Thurrock University Hospitals NHS Foundation Trust
- South West Essex Primary Care Trust
- Essex Fire Authority
- Essex Police
- Learning & Skills Council