

## Scoping Report: consultee comments and the proposed response to these

Consultee Comment	Response/comment
Chelmsford City Council	
Agree that all relevant policies, plans and programmes have been reviewed.	Noted. No response required.
Baseline data: The documents listed are appropriate. However, without seeing the content of these documents it is hard to confirm if they are at the right level or if they will produce sufficient coverage for the area.	Noted. No response required.
There wouldn't appear to be any obvious errors [in the data presented] but it is hard to say that there are NO errors.	Noted. No response required.
Agree with the list of key sustainability issues facing Basildon Borough.	Noted. No response required.
Sustainability Objectives: Would request that work previously commenced on the A130 Corridor Landscape Strategy, between Castle Point, Basildon and Chelmsford Council's, be progressed and considered as forming an evidence base for objective 1.	Any evidence in this regard which comes forward during the preparation of the Sustainability Report will be considered, as appropriate, as part of Objective 1.
Agree that the draft Sustainability Appraisal Framework of objectives and indicators is suitable and thorough enough to produce a rigorous and accurate Sustainability Appraisal.	Noted. No response required.
Agree that the proposed baseline indicators provide a relevant measure for the associated objective.	Noted. No response required.
Agree (at this stage of the process) that the Core Strategy Scoping Report and Sustainability Appraisal Framework meet the requirements of the NPPF and SEA Directive.	Noted. No response required.
Agree that the Scoping Report has been well structured and clearly written to ensure it's understandable.	Noted. No response required.
English Heritage	

Consultee Comment	Response/comment
<p>Overall, we find the report well structured, clearly written and appropriate in terms of the requirements of the National Planning Policy Framework (NPPF) and the SEA Directive.</p>	<p>Noted. No response required.</p>
<p>Section 2 Stage A Contextual Review Local Plans, Programmes and Proposals, 2.16 onwards</p> <p>The box of local key messages does not reflect the need to protect and enhance the Borough's historic environment. This is, however, reflected in current plans and programmes such as the adopted development plan and in documents relating to the Borough's designated conservation areas.</p>	<p>Noted. This will be added to the list of key messages in the SA Report prepared for consultation alongside the Local Plan Core Strategy</p>
<p>Section 3 Stage A2 Baseline information Local Plan Evidence Base</p> <p>We support the reference to the Basildon Historic Environment Characterisation Assessment. We recommend that the Borough's Conservation Area Appraisal and Management Plans should also provide part of the basis for a positive strategy for the historic environment in the local plan policies.</p>	<p>Noted. The Conservation Area Appraisals and Management Plans already form part of the baseline data. This however, will be clarified in the SA Report.</p>
<p>Section 3 Stage A2 Baseline information Cultural Heritage and Landscape</p> <p>We are content with the summary of the Borough's cultural heritage assets. In para 3.57, third sentence, the reference could be amended to read: <i>'There are four Conservation Areas, all of which have Conservation Area Appraisals and Management Plans.'</i></p>	<p>Noted. This will be amended in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>
<p>Section 3 Stage A2 Baseline information</p> <p>Under Sustainability Issues for cultural heritage, we would suggest that Issue 32 should read: <i>'There is a need to protect the cultural heritage resource in the Borough from further destruction or degradation, and conserve and enhance heritage assets through a positive strategy for the historic environment'</i> (para 126,</p>	<p>Noted. This will be amended in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>

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NPPF).	
<p>Section 4 Stage A3 Sustainability Issues and their Likely Evolution without the Plan</p> <p>Table 4.1 provides an assessment of how the principal sustainability issues would evolve without the support of local plan policies.</p> <p>The judgement in relation to issue 32 relating to cultural heritage (bottom page 50) needs slight clarification, and perhaps is intended to read 'Destruction or degradation trend would be likely to continue and may be exacerbated by ....'</p>	Noted. This will be reviewed and amended as necessary in the SA Report prepared for consultation alongside the Local Plan Core Strategy.
<p>Section 5 Stage A4 Core Strategy Sustainability Appraisal Objectives</p> <p>Paras 5.4 and 5.5 – We note the splitting of the original landscape and cultural heritage objective into two, and support this. Consequently, we support sustainability objective 2, in para 5.5.</p> <p>Table 5-1 Sustainability Appraisal Framework – we support the evidence identified and prompt questions for SA objectives 1 and 2.</p>	Noted. No response required.
<p>Section 6 Proposed Approach to SA</p> <p>Para 6.2 – we recommend that the Historic Environment Record GIS information is consulted to identify both designated and undesignated heritage assets.</p>	Noted. GIS will be used to consider designated assets as well as undesignated assets as far as possible. The Historic Environment Characterisation Study provides a useful source of information on undesignated assets which will be reviewed.
Environment Agency	
<p>Agree that all relevant policies, plans and programmes have been reviewed. We are pleased to see reference to the National and Regional documents we previously highlighted.</p>	Noted. No response required.
<p>Agree that the baseline data presented is appropriate for the Core Strategy Sustainability Appraisal and that it is at the right level and of sufficient coverage.</p>	Noted. No response required.
<p>Agree that there are no errors in the data presented.</p>	Noted. No response required.

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<p>We agree with the list of key sustainability issues; however we consider that if possible it would be appropriate to include the following:</p> <p>Biodiversity, Flora and Fauna – paragraph 3.71</p> <p>Sustainability issues – 35</p> <p>Water Quality and Foul Water Capacity can have significant impacts on the status of SSSI's and other designated / sensitive sites and the water environment in general.</p> <p>Water, Soil and Geology</p> <p>Sustainability issues – 43</p> <p>Need to provide adequate foul water capacity to meet existing and future domestic and commercial needs to ensure the water environment is protected.</p>	<p>Noted. This will be amended in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>
<p>Agree that the proposed Sustainability Objectives are suitable in the context of Basildon Borough and the Core Strategy.</p>	<p>Noted. No response required.</p>
<p>Agree that the draft Sustainability Appraisal Framework of objectives and indicators is suitable and thorough enough to produce a rigorous and accurate Sustainability Appraisal.</p>	<p>Noted. No response required.</p>
<p>Agree that the proposed baseline indicators provide a relevant measure for the associated objective.</p>	<p>Noted. No response required.</p>
<p>Agree that the Core Strategy Scoping Report and Sustainability Appraisal Framework meet the requirements of the NPPF and SEA Directive.</p>	<p>Noted. No response required.</p>
<p>Agree that the Scoping Report has been well structured and clearly written to ensure it's understandable.</p>	<p>Noted. No response required.</p>
<p>Essex County Council</p>	
<p>Baseline data</p> <p>The baseline data provided in relation to education/ schools needs to be</p>	<p>Noted. The baseline section of the SA Report prepared for consultation alongside the Local Plan Core Strategy will be updated to reflect this.</p>

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<p>updated to reflect what is a changing situation.</p> <p>Para 3.29 (page 23) could be amended to read as follows:</p> <p><i>There are 55 primary schools and 9 secondary schools in the Borough serving 15,032 and 10,099 pupils respectively. (Source: Department for Education Annual School Census January 2013.)</i></p> <p>Para 3.30 (page 29) could be updated to read:</p> <p><i>The number of pupils attending primary schools has increased since 2009 by around 400 whilst the number of pupils attending secondary schools has fallen by around 750 pupils over the same period.</i></p> <p>Para 3.31 could be amended to read as follows:</p> <p><i>Capacity figures for primary schools indicate that there are currently enough surplus places within schools in the Borough to accommodate new pupils arising from new housing developments or new people moving into the area. However, it is recognised that the level of surplus school places vary in different parts of the Borough. Thus, it cannot be assumed that because there is a borough-wide surplus that any school has the capacity to accommodate further pupils. The increased birth rate over recent years has started to put pressure on the available school places in Basildon town, Laindon/ Langdon Hills and Pitsea/Bowers Gifford areas. This pressure will be increased by new housing in these areas. Capacity figures for secondary schools indicate that the schools in Billericay and Wickford are currently operating at close to their capacity, whilst there is a significant level of surplus places in Basildon town.</i></p>	<p>NB Basildon Borough Council have clarified this further with Essex County Council as the Local Education Authority and the following information should be used:</p> <p>The Borough has 11 secondary schools in total (10 ECC funded and 1 privately funded) and 55 primary schools.</p>
<p>Disagree that there are no errors in the baseline data presented – see above.</p>	<p>Noted. Amendments will be made as per comment above.</p>
<p>Agree with the list of key sustainability issues facing Basildon Borough. However, Issue Ref. 14 (page 41) could be updated to read: <i>There is currently some spare capacity in a number of the Borough’s primary schools, however, an increasing number of schools are experiencing pressure on available places due to the recent increases in the birth rate, their popularity and additional housing.</i></p>	<p>Noted. The baseline section of the SA Report prepared for consultation alongside the Local Plan Core Strategy will be updated to reflect this.</p>

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<p>Agree that the proposed Sustainability Objectives are suitable in the context of Basildon Borough and the Core Strategy.</p> <p>Suggest an additional objective under 6. as follows: Ensure that there are sufficient primary and secondary school places for every child that requires one.</p>	<p>It is not considered necessary to provide an additional objective to cover this issue. SA Objective 6 (<i>Improve educational attainment and social inclusion, especially in the most deprived areas of the Borough</i>) covers education issues.</p> <p>This Objective is supported by a number of key prompt questions including: <i>Will it result in capacity issues, in for example, local schools?</i></p> <p>It is considered that this prompt question will enable the SA to consider the issue of school capacity adequately.</p>
<p>Agree that the draft Sustainability Appraisal Framework of objectives and indicators is suitable and thorough enough to produce a rigorous and accurate Sustainability Appraisal.</p> <p>See above. If an the additional objective was added then the List of Evidence would include 'Commissioning School Places in Essex 2013-18' and the Key Prompt Question would be 'Are there sufficient school places available in schools that Ofsted judged at least good that parents/ carers wish to send their children to?'</p>	<p>See response above. The document cited can form part of the evidence base for the SA and the Local Plan Core Strategy. An additional SA objective to reflect this issue is not considered necessary.</p>
<p>Agree that the proposed baseline indicators provide a relevant measure for the associated objective.</p>	<p>Noted. No response required.</p>
<p>Agree that the Core Strategy Scoping Report and Sustainability Appraisal Framework meet the requirements of the NPPF and SEA Directive.</p>	<p>Noted. No response required.</p>
<p>Agree that the Scoping Report has been well structured and clearly written to ensure it's understandable.</p>	<p>Noted. No response required.</p>
<p>The main reference document referred to in the Scoping Report Update: 'Commissioning School Places in Essex 2012-17' will be updated and published in October 2013.</p>	<p>Noted. No response required.</p>
<p>Essex Wildlife Trust</p>	
<p>Agree that all relevant policies, plans and programmes have been reviewed.</p>	<p>Noted. No response required.</p>

Consultee Comment	Response/comment
<p>Essex Wildlife Trust disagrees that the ecological evidence baseline data is appropriate. In the 2011 Scoping Report Update, Natural England recommended consultation with Essex Wildlife Trust and reference to the Essex Biodiversity Action Plan (BAP) to establish that the ecological evidence is robust and credible enough to support the Core Strategy. The Council have cited as their evidence baseline the review of Local Wildlife Sites conducted by Essex Wildlife Trust as part of the 2007-2009 Service Level Agreement (this included yearly monitoring of Local Wildlife Sites, site condition assessments and site extent of all UK BAP Priority Habitats in the Borough). However, this review is now out of date; the Local Wildlife Site system is dynamic and subject to constant change and it is strongly recommended that a review is conducted every 3 years. In order for the Council's ecological evidence baseline to be robust and credible enough to support the Core Strategy a further review of Local Wildlife Sites and BAP Priority habitats is required. Such a review should include a condition assessment of all sites. This is essential to prevent the evidence base from losing its integrity.</p>	<p>It is noted that within the 2009 Basildon District Habitat and Biodiversity Service Level Agreement Report it was recommended by Essex Ecology Service Limited (EECOS) that Local Sites in the Borough should be reviewed after an interval of no more than three years. However, DEFRA Local Sites Guidance, 2006 on the identification, selection and management of sites states that a review period of between five to ten years is recommended for Local Sites. Therefore the Council's evidence complies with Government guidance and is therefore robust to support the preparation of the Local Plan Core Strategy.</p> <p>Maps showing the location of UK BAP Priority Habitats are held and maintained by DEFRA: <a href="http://magic.defra.gov.uk/">http://magic.defra.gov.uk/</a></p>
<p>Agree that there are no errors in the data presented.</p>	<p>Noted. No response required.</p>
<p>Agree with the list of key sustainability issues facing Basildon Borough.</p>	<p>Noted. No response required.</p>
<p>Agree that the proposed Sustainability Objectives are suitable in the context of Basildon Borough and the Core Strategy.</p>	<p>Noted. No response required.</p>
<p>Agree that the draft Sustainability Appraisal Framework of objectives and indicators is suitable and thorough enough to produce a rigorous and accurate Sustainability Appraisal.</p>	<p>Noted. No response required.</p>
<p>Disagree that the proposed baseline indicators provide a relevant measure for the associated objective. See above.</p>	<p>Refer to response provided above.</p>
<p>Agree that the Scoping Report has been well structured and clearly written to ensure it's understandable.</p>	<p>Noted. No response required.</p>
<p>Highways Agency</p>	

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<p>Evidence base</p> <p>We note the recognition within the Scoping Report of the importance of a robust and credible evidence base to inform the Core Strategy (paragraph 1.10). We also note from paragraph 3.6 that the Council has or will commission studies to provide this evidence base including Transport Modelling. We would expect the transport modelling evidence to be robust enough to assess the impacts of the Local Plan on the SRN (strategic road network). We note from paragraph 6.6 of the Scoping Report the Council's commitment to develop and assess options using the most up to date evidence base including transport modelling due for completion later in 2013. We would encourage the Council to submit its transport modelling for review by the HA at the earliest opportunity to ensure agreement on the modelling and its suitability to inform impacts on the SRN. Early agreement on the modelling is important to ensure that the modelling evidence base does not undermine the soundness of the Core Strategy and/or subsequent development plan documents with potential consequent delays to adoption of the Local Plan.</p>	<p>Noted. Basildon Borough Council is working in partnership with Essex County Council as the Highways Authority to carry out transport modelling and testing of the Local Plan Core Strategy. The impact on the local road network of development scenarios containing the housing and employment proposals for Basildon Borough is being modelled using standard techniques, which are a combination of SATURN for the urban area of Basildon, and spreadsheets for Billericay and Wickford. This methodology will be sufficient to model the impact of the local plan on the local road network. With regard to the wider impacts Essex County Council will continue to liaise with the Highways Agency and discuss the likely high level impacts on the Strategic Road Network (i.e. M25 and A12) as the modelling progresses. However, it is understood that studies are being undertaken on behalf of the Highways Agency to review the operation of these strategic roads, the results of which will not be available within the Basildon Local Plan development timescales.</p>
<p>Marine Management Organisation</p>	
<p>Section 2 of the document sets out the policy context within which the Core Plan will sit. In paragraph 2.1 the National Planning Policy Framework is mentioned as a piece of national-level policy with which the Basildon Core Strategy must be consistent. We would recommend that the Marine and Coastal Access Act (2009) and the Marine Policy Statement are also included within this. Similarly, when discussing regional-level plans of relevance we would recommend that reference be made to Marine Plans being taken into consideration, once in place for the South East inshore area, which includes Basildon.</p>	<p>Noted. The legislation and policy statements and plans referred to will be included in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>
<p>Until such time as a marine plan is in place for the South East plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the UK Marine Policy Statement unless relevant considerations indicate otherwise.</p>	<p>Noted. Not an issue for the SA.</p>



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<p>The Marine Policy Statement will also guide the development of Marine Plans across the UK. More information can be found at <a href="http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/">http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/</a></p>	
<p>The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible.</p>	<p>Noted. Not an issue for the SA.</p>
<p>Natural England</p>	
<p>Comments on policies, plans and programmes</p> <p>Natural England note the omission of both the Country Side and Rights of Way (CRoW) Act 2000 and Natural Environment and Rural Communities (NERC) Act 2006. We advise that these key pieces of environmental policy in the UK should be considered as part of this assessment.</p>	<p>Noted. The CRoW Act and NERC Act will be included in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>
<p>Baseline data: You may wish to consider using the information presented within the National character Profiles (<a href="http://www.naturalengland.org.uk/publications/nca/default.aspx">http://www.naturalengland.org.uk/publications/nca/default.aspx</a>) within the Sustainability Appraisal.</p> <p>NE do not have the resources to check the accuracy of the baseline data.</p>	<p>Noted. This information will be reviewed and included as necessary in the SA Report prepared for consultation alongside the Local Plan Core Strategy.</p>
<p>Sustainability issues: Regarding para 3.63, please note that Crouch and Roach Estuaries (Mid Essex Coast Phase 3) is designated as a Special Protection Area (SPA) and Ramsar wetland site, as described, but not as SAC. However the more extensive Essex Estuaries Special Area of Conservation (SAC), not mentioned in the report, lies approximately 1.5km of the borough boundary, overlapping with the above SPA/Ramsar sites at</p>	<p>Noted. The baseline section of the SA Report prepared for consultation alongside the Local Plan Core Strategy will be updated to reflect this point of detail.</p>

Consultee Comment	Response/comment
<p>this point.</p>	
<p>Sustainability issues: We consider that sustainability issue 35 to be potentially misleading and suggest that the first sentence is amended to read:</p> <p>'Unsympathetic grazing methods, ditch management and water level management are regarded as factors that negative effects on existing SSSI units.'</p>	<p>Noted. The baseline section of the SA Report will be amended.</p>
<p>Sustainability Objectives: Regarding the removal of former objective 10, para 110 of the NPPF states that '<i>Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework</i>'. We would question whether this aspect of the removed objective is addressed elsewhere in the objectives as suggested in para 5.4 of the Scoping Report Update.</p>	<p>We are still of the opinion that previous objective 10: '<i>Ensure all development is delivered in the most sustainable and suitable locations and to high standards of design and construction</i>' is captured by other SA objectives and it is appropriate to remove this from the overall SA framework.</p> <p>For example, SA objectives 1, 2 and 3 seek to protect and enhance the Borough's landscape and green spaces, cultural heritage and biodiversity and habitats respectively. Furthermore, objective 12: (<i>Improve efficiency of land use, through the re-use of previously developed land and existing buildings, including the re-use of materials from previous buildings</i>) seeks to direct development to previously developed land (the potential biodiversity value of brownfield sites would be picked up in objective 3: Biodiversity).</p> <p>There are also a range of SA objectives which deal with accessibility issues and seek to direct development to more sustainable locations (for example, objective 5: Sustainable Town Centres; 11: Accessibility to and Enhancement of Local Services and Facilities and 19: Improving Travel Choice and Channelling Development to Sustainable Locations).</p>
<p>Natural England broadly agree [that the draft Sustainability Appraisal Framework of objectives and indicators is suitable and thorough enough to produce a rigorous and accurate Sustainability Appraisal] with respect to the natural environment subject to our comments above and below.</p>	<p>See our comment above.</p>
<p>Baseline indicators: Natural England is surprised to note that the report does not appear to include baseline indicators at this stage. We advise that clear quantifiable indicators are a key part of the assessment process that</p>	<p>Noted. Indicators will be developed in conjunction with Basildon Borough Council to ensure these are consistent with existing monitoring arrangements and in order to monitor the likelihood of significant and</p>

Consultee Comment	Response/comment
we would expect to see these at this stage.	uncertain effects. Draft Indicators will be set out in the SA Report prepared for consultation alongside the Local Plan Core Strategy.
Subject to the comments made this response we broadly agree [that the Core Strategy Scoping Report and Sustainability Appraisal Framework meet the requirements of the NPPF and SEA Directive] with respect to the natural environment.	Noted. No response required.
Agree that the Scoping Report has been well structured and clearly written to ensure it's understandable. Clear and well presented.	Noted. No response required.
Natural England advise that assessment of the impact of the plan on the Greater Thames Marshes Nature Improvement Area (NIA) which lies within the boundary of the borough should be included. Nature Improvement Areas are being designated to deliver coherent and resilient ecological networks. Where they are in place, Local Plans should identify them on proposals maps and include policies to ensure that any development that affects them is compatible with their purpose and makes a positive contribute to their enhancement. This is backed up by para 157 of the National Planning Policy Framework (NPPF). The Duty to Cooperate may be key to ensuring coherent and effective policies and proposals across NIAs.	Noted. The Local Plan Core Strategy will not have a Policy Map (previously known as a Proposals Maps), which would be updated for Site Allocations and Development Management Policies instead; however the NIA will be taken into account in future sustainability appraisal work.
In addition we consider that collaboration between Local Nature Partnerships (LNPs) on LNP priorities will be important for the delivery of cross-boundary strategic priorities for the natural environment. Paragraph 180 of the National Planning Policy Framework (NPPF) makes it clear that Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships.	Noted. The LNPs priorities will be taken in to account in future sustainability appraisal and the Partnership will be engaged in Local Plan making.