

Sustainability Appraisal Scoping Report Schedule of Responses, June 2007 Appendix A

Organisation	Scoping Report Reference	Comments	Officer Response
English Heritage	Section 5 - relevant policies and documents	Please note : Guidance on Tall Buildings- EH/CABE joint publication (2003), and its emerging revision(consultation draft Jan 2007) This guidance is supported by Govt and should be treated as a material planning consideration. Also, Guidance for Management of Conservation Areas (2006) and Guidance on Appraisals of Conservation Areas (2005). As well as Conservation Area Audits)	Noted and will be referred to in the published Scoping Report.
	Section 6 - Baseline Information	Baseline information seems sufficiently robust. However, all historic assets should be considered together with potential impacts on non-designated features of nonetheless local historic or architectural interest and value as they all contribute to sense of place and local identity. Include buildings, historic open spaces and historic features, for example.	Noted. Will amend published Scoping Report to embrace a wider definition of historic environment to pick up this point.
		Statutory Designations include: World Heritage Sites, Listed Buildings, Scheduled Ancient Monuments, Archaeological Priority Areas, registered historic parks and gardens, Conservation Areas and the settings of all these. Information sources <ul style="list-style-type: none"> • www.heritagecounts.org.uk • Greater London/Sites and Monuments records • National Monuments record centre, Swindon • Magic website www.magic.gov.uk • English Heritage Annual Buildings at Risk Register • Local Authority conservation teams for locally listed buildings and other heritage issues • Local History/Studies Centres 	noted
	7.1 Sustainability Objectives	Range of Sustainability Objectives considered acceptable.	Noted and welcomed

		Should also consider impact of development on setting of heritage assets and wider historic environment in adjoining boroughs. - consider maintenance along and across administrative boundaries.	Agreed to consider
Natural England	NTS	NE broadly supportive of SA and nine issues identified. They cover areas that NE would wish to see considered. NE broadly supportive of Sustainability objectives, in particular: <ul style="list-style-type: none"> • To reduce greenhouse gas emissions and support climate change adaptation • To minimise flood risk, promote sustainable urban drainage and protect surface water and ground water • To protect, enhance and create environments that encourage and support biodiversity • To reduce the need to travel and use private motorised vehicular transport as well as encouraging walking, cycling and the use of public transport • To enhance public realm and street environment • to protect, enhance and seek opportunities to increase open space throughout the City 	Noted and welcomed
	Appendix 1 Analysis of relevant plans, programmes and environmental objectives	The plans and policies identified are appropriate, and NE pleased to see European Directives considered in the Scoping report together with the Mayor's Biodiversity Action Plan, which is commended.	Noted and welcomed

The Westminster Society	General	Combining 9 sustainability issues with 17 sustainability objectives may be simply too much at the early stages of consultation. Simplify.	Acknowledge that document is overbearing and difficult to absorb, but information needs to be as comprehensive as possible so regrettably it is impossible to simplify it.
	5 relevant policies etc	Range of relevant priorities will almost certainly clash. To some this could appear overkill.	Noted
	Figure 2	"identifies all too well the complexity and conflict between the sustainability objectives. Drop Figure 2 in favour of higher status for table 8 supported if necessary by an enhance narrative	Will consider making this adjustment, even though tensions between objectives should be made known
	Appendix 1 Analysis of relevant plans, programmes and environmental objectives	Add Mayor's View Management Strategy ' this would update item on "high buildings and conservation areas" in Appendix 1 where the Mayor's Strategy Document enhances the total number of protected views that are listed in the document.	Agreed
	Appendix 2	Add Mayor's View Management Strategy ' this would update item on "high buildings and conservation areas" in Appendix 2 where the Mayor's Strategy Document enhances the total number of protected views that are listed in the document.	Agreed
	Appendix 4	Gaps in both tables where Westminster's sustainability objectives not match Mayor's objectives in the London Plan. Some explanation needed as to why different.	Will clarify choice of objectives for Westminster – distinctiveness of city reflected in the selection
The Knightsbridge Association	Relevant plans etc	Very impressive document full of information that has been obtained from innumerable reports from International, European, National and City Council sources. All relevant plans and programmes appear to have been considered and the basic information reflects current environmental conditions in Westminster. The sustainability objectives are relevant to Westminster. The Document should provide a strong base from which to develop the City Council's	noted

		Development Plan Document.	
Covent Garden Community Association	Relevant plans etc	All relevant plans considered with the exception of licensing policy statement. This is relevant to the area of noise nuisance associated with Licensed premises which is mentioned	Will pick up in further monitoring reports. A Noise Strategy is being prepared for publication in 2008, which will cover this issue.
	Baseline Data	reflects current environmental conditions with exception of noise associated with people leaving licensed premises	
		This has a major impact on residents but is unlikely to be capture in NSR or baseline noise surveys. There is unfortunately no reliable source of data on this. However WCC licensing have conducted street surveys which are, we understand being repeated in the future and this type of data could be included.	Where the data exists it will be included.
	Sustainability Objectives	Broadly reflect the significant social, economic and environmental issues in Westminster. We however believe that the section on noise needs to specifically be mentioned the issue of noise from people in the street (associated with licensed activities). The current "noise impact from licensed and commercial activities" could be interpreted as restricted to noise from the premises themselves.	Will amend to reflect this point about noise from people on streets not just from within premises
	General	Document very general and it is difficult to make meaningful comments. Looking forward to being involved in consultation process as it continues.	

Environment Agency	NTS	<p>Sustainability issues identified - under this section the following additional bullet point should be added - Flooding, water resources and water quality</p> <p>The Mayor has set a minimum water efficiency target of 110 litres per head, per day. The City Council needs to manage the supply and demand of water and improve water quality. Water efficient design, for example, water appliances, fittings and rainwater re-use, should be requirements in all new developments. This should be in line with the London CAMS</p> <p>Part of Westminster is classified as Flood zone 3, or in other words at high risk of flooding. Although in large Westminster is protected by tidal defences there is a real risk of breaching or over-topping of the flood defences in the future particularly with the predicted sea level rise. Owing to this and to meet the requirements of PPS 25 it is suggested that the City Council carries out a SFRA.</p> <p>PPS 25 has stepped up the level of assessment that is required for new development. Not only do developers and LPA's need to consider flood risk from sea and river but they should increasingly take into account flood risk from canals, reservoirs and surface water flooding. Developments need to be designed and informed by FRA's in order to make them safe, sustainable and adaptable to changing climatic conditions.</p> <p>Therefore it is essential that these elements are listed in sustainability issues.</p>	<p>Agreed</p> <p>Agreed. Will include in policy review</p> <p>Strategic Flood Risk Assessment in preparation</p> <p>Noted and agreed</p> <p>Agreed</p>
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	Sustainability Objectives	<p>The EA supports objectives v, vi, vii, viii, ix x, xi and recommend objective vii be split into two separate objectives to make it easier to measure i.e. vii a) to minimise flood risk and promote sustainable urban drainage vii b) to protect surface water and ground water.</p> <p>An additional objective should be added to read; xviii) to ensure development does not pose a risk of contaminating the environment.</p> <p>Parts of the borough have a legacy of land contamination. This may present a risk to a range of water receptors and potentially a risk to humans. The EA needs to work with Westminster to ensure that contaminated soil or water is dealt with using appropriate engineering techniques in line with the requirements of Planning Policy Statement 23; Planning and Pollution control.</p> <p>The biggest risk of pollution often comes during construction when contaminants can be mobilised e.g. dewatering, digging foundations, discharging to rivers, wheel washing. However, pollution can occur at any time of the development which is why it is vital that it is identified and prevented. For example settlement ponds can be used to remove silty water, activities that cause pollution are banned and drainage plans are drawn up to locate manholes to prevent water reaching the surface water sewers.</p>	<p>Agreed</p> <p>Noted</p> <p>Agreed</p>
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	Introduction	<p>The following points should be addressed in the introduction:</p> <p>a) The environment and location of Westminster should be reflected in relation to the Thames. The Thames is a site of Metropolitan and Conservation Importance and this should be recognised.</p> <p>b) Reference has been made to the 5 Royal parks but no reference has been made to the habitat that these parks provide for birds and other species.</p> <p>3) Flood risk also need to be addressed as it will affect the way in which Westminster grows in the future.</p> <p>4) the Grand Union Canal runs through part of Westminster. The Canal provides an important corridor for wildlife and opportunity for enhancement.</p>	Agree all points made and will make changes to Scoping Report to reflect points made
	Table 4	Recommend adding - North London River Restoration Strategy p22 of the strategy has selected the Grand Union Canal for 'in channel enhancement'	Agreed
	Assessment of PPPs	EA requests that Flood Risk is added as a bullet point. This could read - Reduce flood risk and steer development away from areas at high risk of flooding	agreed

	6 Collecting Baseline information	<p>As above the following bullet point should be added to list of SI's specific for Westminster</p> <p>EA recommend the following bullet points- Need to protect, enhance and increase biodiversity and increase habitat.</p> <p>Specific reference to Grand Union Canal as an opportunity for in channel enhancement.</p>	Agreed
	Table 5	<p>Bullet point 2 - Climate change, climate change adaptation and air quality.</p> <p>An area of Westminster is in Flood Zone 3, high risk. Although the area has a degree of protection from fluvial flooding due to the presence of flood defences there is still a risk of breaching or overtopping of the tidal defences. Breaching is when the defences fail and water is able to enter the area. This could come with little or no warning and will pose significant risk to people and property. The strategic Flood Risk Assessment (SFRA) that Westminster are undertaking should take into account the presence of defences and the risk of breaching or overtopping so that you can make more informed decisions about allocation of land and permission for development.</p>	
	7.1 Sustainability Objectives	The EA supports objectives 6, 7, 8, 9 and 12.	Noted and welcomed
	Appendix 1 Analysis of relevant plans, programmes and environmental objectives	National PPS 9 - the EA supports the close linking of PPS1 on delivering sustainable development to the sustainability appraisal	

		<p>the EA supports the linking of PPS 9 on Biodiversity and Geographical conservation and the policy options that have the most positive effect on biodiversity and contribute to sustainable development will be included.</p> <p>PPS 23 - under implications for SA ' that development would be allowed that minimises the cause of environmental pollution. This should be strengthened to read; SA will identify options that allow development which protects the environment from pollution and seeks to remedy existing pollution using approved methods.</p> <p>PPS 25 - The EA supports the link to this policy and would wish to see a stronger reference to flooding throughout the SA.</p> <p>The emerging SFRA must be taken into account in the SA and all LDF Documents otherwise the EA will find it unsound. This will have implications for the plans at submission and examination stage.</p>	Noted
	Appendix 2 Baseline data	<p>The EA supports the statement that the SFRA must inform policies and provide a framework for applications. The SFRA should make it easier for individual FRA to be carried out as they should be able to rely on the data such as breach analysis modelling. This should save applicants time and money. The SFRA will make it easier for Westminster to carry out the Sequential Test on all new major applications as required by PPS 25.</p>	noted

		In terms of basement dwellings the effects of PPS25 should be outlined to applicants. Under PPS25 basement dwellings are considered to be Highly Vulnerable. The EA will object to new self contained basement dwellings within Flood Zone 3 and require any new basement dwelling within FZ3 to be accompanied by a flood risk assessment. The EA are currently producing guidance to assist local planning authorities and applicants specifically on this type of application.	
Highways Agency		Do not wish to comment on SA Draft Scoping Report.	noted