

Wandsworth Council

# IIA Scoping Report – consultee responses

March 2017

Consultation body	IIA Topic (where applicable)	Issues Raised	Required Action	Reason for rejecting comments or recommendations	Summary of action taken
Natural England	Pressure on the natural and built environment	We agree with the potential significant effects on Wimbledon Common Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and Richmond Park SSSI and SAC that you have identified.	No action	Noted with regards to HRA	
Natural England	Pressure on the natural and built environment	IIA1: as well as avoiding the loss of designated sites, we advise to include conserving and enhancing internationally and nationally designated nature conservation sites. We also advise to include priority habitats (alongside priority species).	Revise framework		Changed IIA1 to read 'IIA1: Avoid loss of designated ecological sites, priority habitats and species.'
Natural England	Pressure on the natural and built environment	IIA2: we advise to include geodiversity.	No action	Geodiversity has not been identified as a key issue in Wandsworth through the scoping exercise	
Natural England	Pressure on the natural and built environment	We advise including baseline information on designated sites with regards to air quality, water quality and water supply.	No action	We are not aware that this data is available	
Natural England	Pressure on the natural and built environment	The proposed monitoring indicators, such as SSSI condition, appear to monitor wider changes, rather than the effects of the plan itself. We thus advise that the monitoring indicators proposed are not sufficient to meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 to include suitable monitoring indicators in the SA, Local Plan, or post adoption statement. Whilst this can be deferred to the post adoption statement, we advise it would be best to resolve such matters at an earlier stage (see email for specific suggestions and examples).	No action	Proposed monitoring indicators are not included in the Scoping Report and these will be proposed in the formal IIA Report later in the plan making process. Indicators are included within the baseline data tables in Appendix 2 and these have been used to gather and update the baseline data. The baseline	

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				data indicators provide useful information which presents the baseline situation at present and in the future. The suggested monitoring indicators provided by NE will be reviewed later in the IIA process	
Natural England	Pressure on the natural and built environment	under the conservation objectives of Wimbledon Common SAC 'The structure anfunction ' should read 'The structure and function'.	Revise scoping report		amended text as suggested
Natural England	Pressure on the natural and built environment	when progressing to the next stages of the IIA, we advise including alternatives and measures to prevent, reduce and offset any significant adverse effects on the environment of implementing the plan.	No action	Noted	
Natural England	Pressure on the natural and built environment	With regards to 'Appendix 3: Baseline and scope of the HRA', Natural England concurs with the European designated sites that have been scoped into an HRA. The only information included into the table on the state of the designated sites is based on the SSSI condition, but these are a moment in time and do not necessarily reflect trends or the most up-to-date situation. In addition, because SSSIs are designated for national nature conservation interest (as opposed to European), you will need to ensure that the notified features you are comparing are identical. When proceeding with the HRA, we advise to gather	No action	Noted	

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		additional evidence to correctly identify the baseline.			
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 13, para3): Whilst I recognised that access to nature/ greenspace is reflected on page 21, I also feel a sentence on “areas of deficiency in access to nature” would sit well at the end of this para to offer balance about the distribution of the open space you refer to.	Revise scoping report		amended as suggested
Enable Leisure & Culture	Waste reduction and sustainable consumption of resources	(Pg 19, T4.1): I would recommend that “soil” is also included as an SEA topic in relation to “pressure on the natural and built environment”. Soil is fundamental element of some of the other SEA topics here listed and will have a direct effect on them if it is adversely impacted.	Revise framework		We had previously decided to scope out soil and then found some additional information about contamination in the borough. Contamination and remediation is well controlled through development management policies, however, and therefore a decision has been made to scope out soil from the assessment.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 19, T4.1): I would also suggest that “population” is included as an SEA topic in relation to “pressure on the natural and built environment”. I am aware we lack firm data to underpin trends but anecdotally I increasingly believe that the quality and condition of biodiversity, flora and fauna is decreasing as a direct result of increasing accessibility by a larger population.	Revise scoping report		added 'population' alongside "pressure on the natural and built environment" to table 4.1 as suggested. Biodiversity data included as a data gap using text provided by Valerie Selby.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 21, F4.1 & Para below): This would read better if it was move to sit between pages 22 and 23 – it refers to the built environment whereas the preceding introductory paragraph and the following information	Revise scoping report		Rearranged as suggested.

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		on page 22 refer to the natural environment and it would make more sense for them to sit together.			
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 22, F4.2): Omission: you have failed to add SINCs to the map. It is important to reflect these here both in and of themselves and to demonstrate existing Green Infrastructure and connectivity.	Revise scoping report		amended figure added to the scoping report showing SINCs
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg22, Para1): It is unclear to the general reader whether your reference to Areas of Biodiversity Importance is inclusive of SSSI & SAC or not?	Revise scoping report		It is inclusive of SSSI and SAC and this has been clarified within the report.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg22, Para1): Omission: you have omitted to refer to Barn Elms Wetlands SSSI in the text – this is an important site especially when we are considering Green Infrastructure and connectivity and particularly in relation to “dark sky” issues and European Protected Species.	Revise scoping report		included reference to Barn Elms Wetlands SSSI which lies in the neighbouring Richmond upon Thames borough
Enable Leisure & Culture	Climate change and air quality	(Pg 24, Para3): I believe there are revised measures for the AQAP published in 2016 <a href="http://www.wandsworth.gov.uk/info/200485/air_quality/1584/monitoring_and_assessment/7">http://www.wandsworth.gov.uk/info/200485/air_quality/1584/monitoring_and_assessment/7</a> Speak to David Kennett Environmental Protection Team Manager at Wandsworth Council for more information	Revise scoping report		Checked the source and there is no data in the document. It is already in PPP review and relevant objectives have been highlighted.
Enable Leisure & Culture	Business and employment	(Pg 26,Para2): Would it be more accurate if you changed the last sentence to read “69.7% of adult residents hold a degree level education.....”	Revise scoping report		Revised as suggested
Enable Leisure &	Transport and	(Pg 27, F4.6): This key is meaningless to the general reader – for example; is an accessibility level of 1 good	No action	The levels are clearly explained in the	

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Culture	access	or bad?		accompanying text	
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 29, 4.4 bullet 3): By including the word “published” you imply there may be unpublished trend data on biodiversity – this is disingenuous. The information on trends is being analysed specifically for this project, it doesn’t already exist in any format published or unpublished.	Revise scoping report		Text relating to this data gap has been clarified.
Enable Leisure & Culture	Pressure on the natural and built environment	IIA1 (Pg 30, T5.1): what is the rationale for the “particular focus on nationally important habitats and priority species”? I would strongly caution against this narrow approach.	Revise framework		Changed IIA1 to read 'IIA1: Avoid loss of designated ecological sites, priority habitats and species.'
Enable Leisure & Culture	Pressure on the natural and built environment	IIA4 (Pg 30, T5.1): you merely refer to “enhancement” in relation to multi functional green infrastructure. I would strongly advocate for the inclusion of the “establishment / creation of and retention of” of GI in additional to enhancement.	Revise framework		Revised as suggested
Enable Leisure & Culture	Pressure on the natural and built environment	IIA17 (Pg 32, T5.1): access per se is not the issue – adequate accessible space is the issue. What is required is more space not alterations to the access to existing space.	Revise framework		Creation of new green space is now included in IIA4. IIA17 has now been deleted.
Enable Leisure & Culture	Public health	(Pg 32, T5.1): Omission: you have omitted to refer to play / adequate access to play facilities for children and young people to ensure good public health for that age group	No action	This will be addressed through revised objective"IIA11: Ensure people have access to essential community services and facilities, including open space". Information about areas which are deficient in	

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				play space is out of date (2007) and known to be inaccurate. Planning can ensure that facilities are kept open and maintained through s106 agreements.	
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 37, TA.1): Omission: you have omitted to include the Water Framework Directive (200/60/EC) having instead included it under Water Quality, Flooding and Climate Change. It belongs in both categories.	Revise scoping report	Many of the PPPs are cross-cutting but are only included in one category to avoid the summary becoming any more unwieldy.	Changed introductory text for Table A.1 to make this clear.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 63, TA.1): Omission: you have made no reference to a council Play Strategy to guide provision and identify need? Perhaps the "Wandsworth's children and young people s plan 2011-2015" supersedes this?	No action	There is no Play Strategy available online and there is no target for play provision in the Children & Young People's Plan.	
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 106, App2): % of people living in open space deficiency area: The data showing areas of deficiency in access to open space is available to WBC under the SLA agreement between GiGL and Enable and is updated annually. WBC would need to plot this against updated population figures but more recent figures than 2001 should be calculable.	Revise baseline / PPP review		Up to date data is not available and this has been added as a data gap for now. There is potential for it to be plotted on GIS in the future.
	Pressure on the natural and built environment	The "City of London BAP 2016- 2020" is still only draft format and does not apply to the borough of Wandsworth.	Revise baseline / PPP review		Reference to London BAP removed
Enable Leisure &	Pressure on the natural and built	(Pg 109, App2): I am not aware of the "London Biodiversity Audit" – what is this and who undertook	Revise baseline /		This is a legacy from the previous SA. We are unable to

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Culture	environment	it? I am curious as to why it only deals with “wet” habitats ?	PPP review		clarify the source. Data removed from baseline.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 109, App2): Omission: you have not made reference to the GiGL Habitat Suitability Assessment which identifies areas which would give the best benefit to biodiversity, if used to create nine BAP priority habitats in London. <a href="http://www.gigl.org.uk/our-data-holdings/habitat-data/bap-habitat-suitabilitydata/">http://www.gigl.org.uk/our-data-holdings/habitat-data/bap-habitat-suitabilitydata/</a>	Revise baseline / PPP review		Data has been added to the baseline.
Enable Leisure & Culture	Pressure on the natural and built environment	(Pg 115,App2): Omission: you have not mentioned the Catchment Management Plans for Beverley Brook (hosted by the Environment Agency) and River Wandle (hosted by Wandle Trust <a href="http://www.wandletrust.org/about-us/community-catchmentplan/">http://www.wandletrust.org/about-us/community-catchmentplan/</a> )	Revise baseline / PPP review		The Wandle Catchment Management Plan has been added to the PPPs review. However, there doesn't appear to be a separate PPP for Beverley Brook. The Thames river basin management plan has been added
Enable Leisure & Culture		(Pg 118, App3): Conservation Objectives – para 3: typing error	Revise scoping report		corrected text
RBKC	Waste reduction and sustainable consumption of resources	(Section 3.2): ‘key messages from the review of PPP’: the bullet point relating to enabling sufficient and timely provision of sustainable waste management facilities should make clear this relates not only to Wandsworth’s waste arisings but also waste arisings from other waste planning authorities in the WRWA.	Revise scoping report		amended text



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Environment Agency	Population and household growth and housing demand and supply	<p>Growth and Infrastructure Act 2013</p> <ul style="list-style-type: none"> <li>· The Act allows the modification or discharge of the affordable housing elements of section 106 planning gain agreements in order to make developments more viable.</li> <li>· Contains measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</li> <li>· Introduces measures to allow developers to take planning applications to the Planning Inspectorate where a council has "consistently failed to meet statutory requirements to consider applications on time".</li> <li>· Removes the need for the communities' secretary to approve local development orders (LDOs), which relax planning rules in specific areas, after they have been drawn up by local authorities.</li> <li>· Includes measures to speed up the planning application process.</li> <li>· reduces the volume of extra paperwork required with a planning application; removing over-lapping development consent regimes that require multiple extra permissions from different government agencies</li> </ul>	Revise baseline / PPP review		Added to PPPs
Environment Agency	Public health	Civil Contingencies Act 2004 (CCA) – Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country.	Revise baseline / PPP review		Added to PPPs
	Climate change	The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare	No action	Already included	

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	and air quality	<p>flood action plans and link with the Cabinet Office’s initiative to develop wider community resilience to threats and hazards.</p> <p>Part 1 of the Act and supporting Regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> <li>· assess the risk of emergencies occurring and use this to inform contingency planning; put in place emergency plans;</li> <li>· put in place Business Continuity Management arrangements;</li> <li>· put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency;</li> <li>· provide advice and assistance to businesses and voluntary organisations about business continuity management (Local Authorities only);</li> <li>· share information with other local responders to enhance co-ordination; and</li> <li>· co-operate with other local responders to enhance co-ordination and efficiency</li> </ul>			
Environment Agency	Climate change and air quality	<p>National Flood Emergency Framework</p> <p>In planning and preparing for a flooding emergency, the Government’s strategic objectives are to:</p> <ul style="list-style-type: none"> <li>· protect human life and alleviate suffering; and, as far as possible, property and the environment;</li> <li>· support the continuity of everyday activity and the</li> </ul>	Revise baseline / PPP review		Added to PPPs

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		<p>restoration of disrupted services at the earliest opportunity; and</p> <ul style="list-style-type: none"> <li>· uphold the rule of law and the democratic process.</li> </ul> <p>The National Flood Emergency Framework is intended to cover the development, maintenance, testing and, when necessary, implementation of operational response arrangements that are:</p> <ul style="list-style-type: none"> <li>· able to respond promptly to any changes in alert levels;</li> <li>· developed on an integrated basis, combining local flexibility with national consistency and equity;</li> <li>· capable of implementation in a flexible, phased, sustainable and proportionate way;</li> <li>· based on the best available scientific evidence;</li> <li>· based on existing services, systems and processes wherever possible, augmenting, adapting and complementing them as necessary to meet the unique challenges of a flood emergency;</li> <li>· understood by, and acceptable to, emergency planners and responders;</li> <li>· designed to promote the earliest possible return to normality.</li> </ul>			
Environment Agency	Climatic factors and energy	<p>Building regulations</p> <p>The Department for Communities and Local Government is responsible for policy on Building Regulations. These exist to ensure the health, safety, welfare and convenience of people in and around buildings.</p> <p>Part H of the Building Regulations specifically covers drainage. It strongly recommends a more sustainable</p>	Revise baseline / PPP review		Added to PPPs

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		<p>approach to surface water management with a hierarchy that suggests disposal to watercourses and sewers is the last resort. There is no current advice directly on flood risk in the Building Regulations, with some references to the management of moisture and contamination should there be flooding. Sir Michael Pitt's review of the 2007 flooding suggested that Part H of the Building Regulations should be amended to include property level flood resilience and resistance measures. A number of measures have been included to help reduce flood risk:</p> <ul style="list-style-type: none"> <li>· requirement of planning permission to pave over front gardens with impermeable surfaces</li> <li>· Flood and Water Management Act calls for new developments to no longer connect directly to sewerage systems for surface water runoff. Instead sustainable drainage systems (SuDS) are encouraged.</li> </ul>			
Environment Agency	Pressure on the natural and built environment	<p>River Basin Management Plans (RBMP) The RBMP is the over-arching source of information on the water environment and the actions we and others are undertaking. The NPPF states in para 165 that RBMPs should be used as evidence on which to base planning decisions. This promotes the use of “up-to-date information about the natural environment” which should be useful to inform the action needed to manage water resources in Local Plans. All public bodies, including local authorities are required to “have regard to the River Basin Management Plan and any supplementary plans in exercising their functions”. More information on the Water</p>	Revise baseline / PPP review		Thames river basin management plan added to PPPs

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		<p>Framework Directive is available on GOV.UK at: <a href="https://www.gov.uk/government/policies/improving-water-quality/supporting-pages/planning-for-better-water">https://www.gov.uk/government/policies/improving-water-quality/supporting-pages/planning-for-better-water</a>.</p>			
Environment Agency	Climatic factors and energy	<p>Climate change allowances</p> <p>Recent updates to climate change allowances may have an impact upon the development sites in terms of flood risk. The National Planning Practice Guidance refers planners, developers and advisors to the Environment Agency guidance on considering climate change in Flood Risk Assessments (FRAs). This guidance was updated in February 2016 and is available on Gov.uk</p> <p>The guidance can be used for planning applications, local plans, neighbourhood plans and other projects. It provides climate change allowances for peak river flow, peak rainfall, sea level rise, wind speed and wave height. The guidance provides a range of allowances to assess fluvial flooding, rather than a single national allowance. It advises on what allowances to use for assessment based on vulnerability classification, flood zone and development lifetime.</p> <p>National planning policy and guidance states that site-specific flood risk assessment should be carried out by (or on behalf of) a developer to assess the flood risk to and from a development site. The assessment should demonstrate to the decision-maker how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users.</p>	Revise baseline / PPP review		Added to PPPs

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Environment Agency	Climatic factors and energy	<p>River flows</p> <p>The guidance on Gov.uk provides central, higher central and upper end allowances for peak river flow over three different timeframes up to the year 2115. Use the Environment Agency River Basin District maps to determine the applicable river basin. The range of allowances is based on the following percentiles:</p> <p>Central –50th percentile Higher central –70th percentile Upper end –90th percentile. See Appendix 1 for an explanation of the percentiles.</p>	Revise baseline / PPP review		Added to PPPs
Environment Agency	Climate change and air quality	<p>Peak rainfall</p> <p>The guidance on Gov.uk shows anticipated changes in extreme rainfall intensity in small catchments (&lt;5 sq. km) and urban catchments. Central and upper end estimates are provided. The new allowances and supporting advice in 'Flood risk assessments: climate change allowances' are relevant when preparing strategic flood risk assessments for development plan documents and flood risk assessments for planning applications falling within the Town and Country Planning Act 1990 (as amended).</p>	Revise baseline / PPP review		Added to PPPs
Environment Agency	Various	Additional background information supplied with regard to the EA's role in water resources and quality; waste management; flood risk; soil and contaminated land; and biodiversity	No action	Noted	
Historic England	Pressure on the natural and built	<p>Chapter 1 Introduction</p> <p>It is worth noting that the Sustainability Appraisal/IIA – in seeking to reconcile economic, social and</p>	No action	Noted	

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	environment	environmental objectives - should aim to avoid, not just mitigate, significant effects in considering alternative options, and seek environmental enhancement where possible (NPPF in paras 8, 126 and 152). Historic England would like to see this positive approach incorporated within the IIA ambitions (for instance, in section 1.2, opening paragraph and, importantly, within the process.			
Historic England	Pressure on the natural and built environment	<p>Chapter 3 Review of Policies Plans and Programmes Section 3.2 Summary of key messages, p16</p> <p>It is important that the cultural heritage dimension within the SEA/IIA remains a distinct part of the analysis, and is not subsumed within townscape generally. A distinction is needed so that the impact of new development (or new townscape) can, through the SEA/IIA, be measured for its impact on the historic environment, whether beneficial or harmful.</p> <p>With respect to the categories on p16, it would therefore be helpful to refer to 'Landscape, townscape and heritage'. The first bullet is welcome, but would be more aligned with the terminology and scope of the NPPF if it were amended to:</p> <ul style="list-style-type: none"> <li>- 'Conserve and enhance heritage assets and their settings, and the wider historic environment'</li> </ul>	Revise issues		Issues revised as suggested
Historic England	Pressure on the natural and built environment	<p>With respect to the second bullet, it is unclear why pollution is selected as the key threat. We suggest this is amended to:</p> <ul style="list-style-type: none"> <li>- 'Protect the most vulnerable heritage assets from harm and seek sensitive re-use and repair to sustain</li> </ul>	Revise issues		Issues revised as suggested

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		assets into the future'			
Historic England	Pressure on the natural and built environment	Chapter 4 Baseline data and key sustainability issues Table 4.1 Coverage of IIA topics We suggest the first topic refers to 'Pressure on the natural, built and historic environment' to align with the NPPF (paras 7 and 9).	Revise framework		revised as suggested
Historic England	Pressure on the natural and built environment	We welcome figure 4.1 showing key heritage assets. To provide a more comprehensive picture a map of the borough's Archaeological Priority Areas should be included as well as scheduled monuments.	No action	We're not aware that these are available on GIS. We could add them if WBC can provide them.	
Historic England	Pressure on the natural and built environment	Historic England encourages boroughs to provide a rounded picture in the baseline heritage information, both characterising the resource and identifying the key issues and trends that need to be addressed. In so doing the process can engage with the heritage of the borough in a positive, practical way and secure sustainable outcomes. We comment below on the information in the Appendices. At present, the information relating to the historic environment is insufficient.  At this stage it may be helpful to provide a heritage topic paper for the partial review, targeting the heritage of the industrial and employment land. This could be built on for the full review of the local plan, perhaps through a borough characterisation report. We consider that the gap in heritage information should be identified within section 4.4. Should you wish to discuss this further, we would be pleased to	Action for planning policy team	WBC to liaise with HE on this issue.	A gap with regards to heritage information has been added to section 4.4.



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		do so.			
Historic England	Pressure on the natural and built environment	Chapter 5 Proposed Assessment Framework Table 5.1 Key – We recommend that the IIA objective for the historic environment is amended to read: 'Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains'	Revise framework		revised as suggested
Historic England	Pressure on the natural and built environment	We welcome the statement following table 5.1 that emphasises the simultaneous achievement of all the IIA objectives, and that no one objective should be achieved at the cost of others. This reflects paras 8 and 152 of the NPPF.	No action	Noted	
Historic England	Pressure on the natural and built environment	Appendix 1, Table A1 Review of Policies, Plans and Programmes We welcome the inclusion of Historic England's Good Practice Advice Notes 1-3 (p44). Points that could be drawn out for the sustainability objectives column from the GPAs: - understanding the significance of heritage assets in order to conserve and enhance - avoiding, as well as minimising and mitigating impacts on heritage assets - including assessment of cumulative impacts	Revise issues		Issues revised as suggested. Cumulative effects will be addressed for all topics in the next stage of the IIA.
Historic England	Pressure on the natural and built environment	In terms of the 'Local overarching documents' (pp61) and the Council's own strategies for landscape and townscape (p65) there appears to be a gap in relation	Action for planning policy team	WBC to liaise with HE	

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		<p>to heritage – although the cultural strategy objective to foster a sense of place is welcome. A heritage strategy for the borough, or a borough-wide characterisation study, would be of great assistance in taking a strategic approach to the historic environment. Many London boroughs have characterisation studies in place and these provide helpful baseline information. We would be interested in discussing if such analysis could be brought forward.</p>			
Historic England	Pressure on the natural and built environment	<p>Appendix 2: Baseline data  P105/6 Landscape and Townscape – It is useful to have a number of heritage-related indicators. The listed buildings ‘at risk’ indicator could be re-worded to ‘Heritage Assets at Risk’ – as the national Heritage at Risk register covers conservation areas, listed buildings, historic parks and gardens and scheduled monuments. Although the entries for Wandsworth are currently listed buildings, this would future-proof the indicator. Additionally, it would be helpful to include a more qualitative indicator to measure the impact of development on the borough’s heritage assets – perhaps through monitoring harm identified in development management decisions. Lastly, we note that two indicators - the number of conservation areas and the area of Historic Parks and Gardens - are included. Although part of the ‘baseline’ factually, these are not useful in terms of measuring change.</p>	No action	The suggested monitoring indicators provided by Historic England will be reviewed later in the IIA process, when preparing formal IIA report	