

Comments Arising from the Consultation on the Woodville – Swadlincote Town Centre Area Action Plan Scoping Report

Comment	Consultee	Change to SA / Action	Comment
No comment regarding scope of the Sustainability Appraisal, but recommend consulting the County Historic Environment Record (sites and monument record) to identify sites of interest within AAP.	English Heritage	None	The District Council's Heritage Officer has provided a detailed appraisal of the industrial history of the site. This incorporates a review of locally significant buildings and other sites of interest.
Generally support the the sustainability objectives detailed in the appraisal but would support suggest object 12 is amended from "to improve the health and well-being of the population and reduce inequalities in health", to: "to improve the health and well-being of the population and reduce health inequalities and encourage healthy lifestyles"	Countryside Agency (Landscape Access and Recreation)	✓ Alteration made to Objective 12 to take account of comments received	None
Suggest inclusion of additional Strategy documents within plans and strategies identified as influencing the production of the AAP. These include: "Environmental quality in spatial planning, incorporating the natural, built and historic environment and rural issues in plans and strategies"; and "The Countryside in and around towns".	Countryside Agency (Landscape Access and Recreation)	✓ Alteration made to include these documents within the plans, policies and programmes identified as being relevant to the Swadlincote Town Centre Area Action Plan	Subsequent to adding these documents to the list of plans, policies and programmes identified as being relevant to the Swadlincote Town Centre Area Action Plan, review of the policies and information in these documents did not raise any significant issues regarding baseline data, key issues or the content of the Sustainability Appraisal Report. No further changes, in addition to amending the list of relevant plans or policies have been made to the Scoping Report as a result of this comment.
Suggest inclusion of further information on open spaces and green infrastructure, which is particularly relevant in redeveloping the AAP area. Further recommend the measurement of Accessible Natural Green Space Standards (ANGST) data as a indicator within baseline section.	Countryside Agency (Landscape Access and Recreation)	✗ No alteration made to baseline as data not currently available. However the District Council recognises the importance of monitoring its performance in delivering open space and will amend the Sustainability Appraisal Framework indicators to reflect this comment	Changes made to SAF as follows: Replacement of proposed indicator ("Number of planning applications delivering new, or improvements to existing, open space or play areas"). To two separate indicators: "Number of major planning applications delivering new, or improvements to, existing play areas" and "Proportion of new major planning applications which meet English Nature's Accessible Natural Green Space Standards".

<p>Suggest the inclusion of data to measure the length of new cycleway would be appropriate</p>	<p>Countryside Agency (Landscape Access and Recreation)</p>	<p>✓ Alteration to the Sustainability Appraisal Framework has been made to reflect this comment</p>	<p>Detailed indicator and source added under headline Objective 17 ("to make best use of existing infrastructure reduce the need to travel and increase opportunities for non car travel (public transport walking and cycling") as follows: "Length of new cycle path secured through new development annually"</p>
<p>The Countryside Agency Support inclusion of baseline data on sustainable construction and applications incorporating renewable energy schemes and would suggest new development meeting BREEAM and eco-homes standard may be another source of data collected through the Development Control system</p>	<p>Countryside Agency (Landscape Access and Recreation)</p>	<p>✓ Alteration to Baseline Information Table and the Sustainability Appraisal Framework has been made to reflect this comment</p>	<p>An additional detailed indicator has been inserted in the Sustainability Appraisal Framework as follows "Proportion of new homes meeting BREEAM and eco-homes very good standard"</p>
<p>The Countryside Agency suggests that the Landscape Character Assessment should be used guide development and ensure that new buildings are in keeping with the intrinsic nature of the AAP and thus help reduce the negative impact of any new development</p>	<p>Countryside Agency (Landscape Access and Recreation)</p>	<p>✗ No change required</p>	<p>The LCA will be used to help inform detailed design and layout within the AAP where appropriate.</p>
<p>Loss of employment land within the wider Swadlincote and Woodville area should not be considered as a key issue as:</p> <ol style="list-style-type: none"> 1. The AMR for 2005 indicates that the loss of employment land to other uses has been 'modest' 2. no trend based data within baseline information section 3. the AMR for 2005 indicates that the average annual rate of employment land development since 1991 has been less than has been anticipated within the Derby and Derbyshire Joint Structure Plan <p>On the basis of this information it is not considered that the loss of employment uses should be included as a key sustainability issue.</p>	<p>Andrew Martin Associates</p>	<p>✗ No change required</p>	<ol style="list-style-type: none"> 1. The AMR refers to a table that indicates losses over the 12 months to 31 March 2005, rather than to the period since the Structure Plan base date of 1st April 1991. Since the base date the scale of loss of employment land to other development has been significant. 2. The requirement to record the loss of land with an established business / industrial use to other uses was introduced recently as part of the regional employment land monitoring process. There is thus no trend-based data available at present although this indicator will now be monitored on an annual basis. New employment development has been monitored annually since 1st April 1991 and the data has been published in the 2005 Annual Monitoring Report. 3. Whilst the rate of employment land development to 2005 had been less than anticipated, activity in this area has recently accelerated and the Council's Economic Regeneration Service has expressed concern regarding the dwindling supply of available employment land in the Swadlincote area. It should also be noted that the combined total of sites completed since the beginning of the Structure Plan period, those currently under construction and those currently available falls some 9 ha below the strategic target for this part of the district

			<p>It is considered that loss of employment land should continue to be included as a key sustainability issue for the reasons described above and because established industrial and business sites often provide employment in close proximity to:</p> <ul style="list-style-type: none"> ▪ Existing residential areas that are more easily accessible by sustainable transport modes ▪ Areas of relative deprivation where there is a need to retain local employment opportunities. Access to the private car is more limited in these areas than is the case elsewhere. As such there is need to retain jobs that are accessible by less costly transport modes, such as walking and cycling
Objectives should include reference to mixed use development as promoting more efficient use of land advised within PPS1	Andrew Martin Associates	✗ No change required	<p>There is already an existing sustainability objective to promote “sustainable forms of development and sustainable use of natural resources”. Whilst it is noted that this objective lacks detail regarding the mechanisms through which sustainable forms of design, will be bought forward, this is necessary in order to keep the sustainability appraisal process manageable. However it should be noted that Sustainability Objectives are distinct from Plan Objectives. As such in drawing up the Plan Objectives relevant planning guidance (including PPS1) will be used to draw up specific Plan Objectives for the AAP. The Council will consider the need for including a Plan Objective that promotes mixed use development and relevant policies capable of delivering mixed use schemes during the preparation of the AAP)</p>
There is no reference to making the best use of previously developed land within the Sustainability Objectives set out in the Scoping Report.	Andrew Martin Associates	✗ No change required	<p>Whilst the need to make the best use of previously developed land is not set out as a Headline Objective (the Council considers it more appropriate to have an objective to make the best use of all land), there are a number of detailed indicators regarding the reuse of land within Sustainability Appraisal Framework. These detailed indicators will ensure that the reuse of PDL is pursued as part of wider objectives set out in the Scoping Report. Detailed indicators regarding PDL include:</p> <ul style="list-style-type: none"> ▪ (Amount of) vacant land and properties and derelict land ▪ (Proportion of) homes built on previously development land ▪ Area of greenfield land lost to development (annually)
Suggest that Objective 14 should be amended to refer to ‘sustainable’ levels of economic growth rather than ‘high’ levels of economic growth.	Andrew Martin Associates	✓ Alteration to objective 14 made in respect of change put forward.	<p>Objective 14 amended from: “to achieve high and stable levels of economic growth and sustain economic competitiveness” to: “to achieve sustainable and stable levels of economic growth and maintain economic competitiveness”</p>
It is recommended that consideration is given to the Government’s Strategy for	Sport England	✓ Alteration made to include these documents within the	<p>Subsequent to adding these documents to the list of plans, policies and programmes identified as being relevant to the Swadlincote Town</p>

Sport , "Game Plan".		plans, policies and programmes identified as being relevant to the Swadlincote Town Centre Area Action Plan	Centre Area Action Plan, review of the policies and information in these documents did not raise any significant issues regarding baseline data, key issues or the content of the Sustainability Appraisal Report. No further changes, in addition to amending the list of relevant plans or policies have been made to the Scoping Report as a result of this comment.
Sport England suggest comments set out in appendix 1 concerning Change4Sport under the heading implications for the Woodville – Swadlincote AAP are a little pessimistic.	Sport England	✓ Comment noted. Minor alteration to the text set out in appendix 1 to improve clarity.	Reworked statement to read: The LDF AAP could play a <u>spatially</u> limited, but important role in helping to tackle the objectives set out in this strategy through tackling health inequalities spatially , for example through the provision of new sports facilities associated with new development.
Suggest inclusion of a specific reference to sport and physical activity within Sustainability Objectives listed.	Sport England	✓ Alteration to objective 16 made in respect of comments raised	Reword objective 16 from: "To improve accessibility for everyone to all services, facilities, recreational facilities (including open spaces) and employment " to "To improve accessibility for everyone to all services, facilities, recreational resources (including physical activity and sports facilities and open spaces) and employment ".
Sport England urge caution on the use of the proposed indicator set out at Appendix 2 (section 2.3) as this indicator, whilst valid could hide local deficiencies as well as deficiencies in particular types of facility or quality of facilities.	Sport England	✗ No change presently undertaken, although comments have been noted and changes likely following the release of new performance (KPI) indicators in Autumn 2006.	The Council has identified a number of shortfalls in its provision of recreation facilities with the proposed AAP boundary. The types of facilities where such shortfalls in Woodville and Swadlincote have been identified include parks and gardens, allotments and children's play areas. This information is based on the Council's PPG17 assessment and is referenced elsewhere in the scoping report. The Council further notes the comments regarding the indicator set out at Appendix 2 (section 2.3) and will consider refining or revising this indicator or adding additional indicators following the release of new performance indicators expected in Autumn 2006.
Sport England is satisfied that the sustainability objectives identified in the Scoping Report provide an appropriate framework for the sustainability appraisal.	Sport England	✗ No change required	None
Sport England identify that there are no indicators reflecting KPI indicators, or those set out in the regional document Change for Sport	Sport England	✓ Alteration to Sustainability Appraisal Framework to include key performance indicators identified by sport England	KPI (detailed) indicator inserted into Framework as follows: Percentage of population within 20 minutes travel time of three different sports facilities (walking in urban areas and by car in rural areas) of which one is quality assured. This indicator is added under Objective 16: accessibility Percentage of adults participating in at least 3 x 30 minutes of moderate intensive sport per week. This indicator will replace a previous indicator 'number of visits to leisure centres in South Derbyshire per 1000 people' set out under Objective 12 (Health)

Note that detailed local indicators should be capable of being related to regional and national indicators and highlight that an existing indicator ('number of visits to leisure centres in South Derbyshire per 1000 people') is too specific and may miss other ways in which progress towards national and regional targets for participation in sport are being met.	Sport England	✓ Alteration to detailed indicator under Objective 12 made to reflect this comment	As above
Sport England are disappointed that there is no headline objective identified for Objective 12 (Health and well being)	Sport England	✓ KPI indicator regarding Percentage of adults participating in at least 3 x 30 minutes of moderate intensive sport per week added as Headline Indicator within SA Framework	No data is currently available. Data to be released Autumn 2006.
State that the sustainability appraisal report must show the requirement of the SEA directive have been met and the Local authority as competent authority should sign post this information within the sustainability appraisal report	Government Office for the East Midlands	✓ These comments have been noted.	None:
The Environment Agency notes that the potential impact of the development on the River Mease SAC should be included as a key issue	Environment Agency	✓ This comment is noted and the Potential impact of the river Mease SAC will be considered	This impact is considered in more detail as part of the Appropriate Assessment screening Matrix.
Sustainability objective 8 seeks to reduce the impact of climate change. The management of risk associated with climate change should be included within the sustainability objective.	Environment Agency	✓ Alteration to objective 8 made.	The former objective "to reduce the impacts of climate change and the District's contribution to the causes' has been amended to: to reduce and manage the impacts of climate change (including floodrisk) and the District's contribution to the causes
A detailed indicator considering planning consents incorporating requirements for SuDS should be included to monitor the headline objective to reduce water, light, air and noise pollution.	Environment Agency	✓ Detailed indicator added as proposed	The following detailed indicator has been added to the Sustainability Appraisal Framework (under Objective 8: Pollution: Proportion of new development/dwellings incorporating Sustainable Urban Drainage techniques.
The EA requests that reference to flood defence should read flood risk management within a detailed indicator set out under objective 8: (climate change)	Environment Agency	✓ Detailed indicator amended as proposed	The detailed indicator set out at Objective 8 (Climate Change) to Number of planning applications granted contrary to Environment agency advice defence or water quality grounds; of Number of planning applications granted contrary to Environment agency advice on flood risk management or water quality grounds.

Notes that in considering how the AAP can contribute to PPS22 <i>Renewable Energy</i> the potential for using wood fuel for combined heat and power should be assessed.	The National Forest	✓ These comments have been noted.	None
Implications for below ground archaeology should be assessed, given the areas past industrial heritage	The National Forest	✓ These comments have been noted.	The District Council's Heritage Officer has provided a detailed appraisal of the industrial history of the site. This incorporates a review of locally significant buildings, past and present and other sites of interest. The District Council will keep under review the need for further information.
The national forest notes that PPS7 is not referred to within the list of related plans and programmes and suggests the inclusion of this PPS within appendix 1	The National Forest	✓ Alteration made to include PPS7 within the plans, policies and programmes identified as being relevant to the Swadlincote Town Centre Area Action Plan	Whilst the site is located in close proximity to Swadlincote Town centre and other largely developed area, the District Council accepts that the site is on the urban fringe. As such PPS7 has been referenced in the list of relevant plans and policies. There have been no additional changes made to the Scoping Report as a result of this consultation response.
Highlight a number of objectives that are omitted from the stated objectives of the National Forest Strategy (Appendix 1 related policy, plans or programmes).	The National Forest	✓ Alteration made to the objectives set out in the National Forest Strategy (2004-14) within the plans, policies and programmes appendices	In brief the additional objectives have been added <ul style="list-style-type: none"> ▪ The delivery of new woodland creation and green infrastructure ▪ The Provision of new facilities for local residents linked to the Forest's creation and the provision of National Forest green space close to where people live. ▪ Protecting existing habitats and protected species and creating new habitats that contribute to Green infrastructure provision ▪ Addresses derelict and underused land and improves the image of the area for tourists and local residents
The National Forest acknowledges good references to the National Forest Biodiversity Action Plan and the National Forest Cycling Strategy	The National Forest	None	None
The National Forest holds data on woodland creation sites within the National Forest	The National Forest	✓ These comments have been noted.	None
Appendix 2 could include an indicator for the area of new woodland created within new development.	The National Forest	✓ Alteration made Appendix 2.	This indicator has been inserted into Appendix 2 at 6.8. The Council has not, however amended the Sustainability Appraisal Framework as an appropriate indicator (as follows) is already proposed: Total Area of National Tree Forest Planting or open space provision secured through new development
Suggest widening the scope of the detailed indicator to measure national forest tree planting and open space provision to include 'other habitats'.	The National Forest	✓ Alteration made the detailed indicator set out in the SA framework	Detailed indicator set out within Objective 4 (Biodiversity and geodiversity) has been amended from Total Area of National Tree Forest Planting or open space provision secured through new development to:

			Total Area of National Tree Forest Planting, other habitat or open space provision secured through new development
The National Forest suggest adding an additional sustainability appraisal objective to the SA framework as follows: To integrate the Plan and its proposals within its setting within the National Forest	The National Forest	✗ There are already general objectives which seek to conserve and enhance biodiversity and landscape character. It is however, accepted that the objective highlighted by the National Forest could be inserted as a sub-objective within the Sustainability Appraisal Framework	The following detailed decision making criteria (sub objective) will be added under Objective 4: (Biodiversity and Geodiversity) Will it integrate new development within the setting of the national Forest? The detailed indicator that will be used to monitor this decision making criteria will be: "Total Area of National Tree Forest Planting, other habitat or open space provision secured through new development"
No comment regarding scope of the Sustainability Appraisal	Derbyshire County Council	None	None
The Region Assembly uses RSS8 (policy 1) (Regional Core Objectives) as a checklist for sustainability scoping criteria/objectives	East Midlands Regional Assembly	✓ These comments have been noted.	Notes the 17 sustainability objectives set out in the Swadlincote – Woodville Town Centre Area Action Plan have been cross checked with the 10 objectives set out within the Regional Spatial Strategy (RSS) * and are considered to generally conform with these Regional Core Objectives
Supports Objective of reducing CO2 emissions within the District,	East Midlands Regional Assembly	✓ These comments have been noted.	None
EMRA states that the redevelopment process can provide opportunities to minimise waste by requiring that on site materials like concrete are reduced to aggregates and brick and tiles are reclaimed.	East Midlands Regional Assembly	✓ These comments have been noted.	None
The targets and indicators set out in RSS8 are currently being reviewed and a revised set of targets will appear in the revised RSS8 in September	East Midlands Regional Assembly	✓ These comments have been noted.	The Sustainability Appraisal and Strategic Environmental Assessment processes are iterative in nature. As such any revised indicators or targets that are published within the draft version of RSS8 will be considered and where necessary the indicators and targets set out in the sustainability appraisal framework modified to take account of changes.
The Conservation of Wild Birds Directive should be referenced as a relevant plan or programme within Appendix 1.	English Nature	✓ Alteration made to include the Conservation of Wild Birds Directive within the plans, policies and programmes relevant to the Swadlincote TC AAP	Appendix 1 has been altered to include this omission.

Suggest that within the implications for the Woodville – Swadlincote TC AAP set out for the UK Biodiversity Action Plan reference should be made to the Lowland Derbyshire BAP as well as the National Forest BAP	English Nature	✓ Suggested alteration made Appendix 1.	None
English Nature concur with the key issue set out in table 1 relating to poor biodiversity within the proposed AAP and agree with the District councils identification of the future evolution of the site with or without the implementation of the Area Action Plan	English Nature	✓ These comments have been noted.	None
English Nature concur that the site is largely developed and there are likely to be few sites with any biodiversity interest	English Nature	✓ These comments have been noted.	The District Council has now received back a Phase 1 habitat survey (undertaken by the Derbyshire Wildlife Trust) for all parts of the AAP with public access. This has confirmed that the site has been degraded by historic development and contains very little biodiversity resource of any note.
EN agree with the proposed sustainability objectives and support the inclusion of the recognition that there may be conflict with respect to conserving and enhancing biodiversity and the objective of economic growth and agree that biodiversity gain should be sought within new developments	English Nature	✓ These comments have been noted.	
English nature are able to provide baseline data	English Nature	✓ These comments have been noted.	None
English Nature support the objective to maximise biodiversity gain through the implementation of the AAP	English Nature	✓ These comments have been noted.	None