

Comment	Response	Action
Ken Burgin		
The River Leadon is in Herefordshire on the opposite side of the River Severn so I think we can be very confident that the restoration of the Cotswold Canals will not have much of an effect there.	Agreed. The source of the comment was referring to the Hereford-Gloucester canal and not the Cotswold Canals.	The comment will be removed.
Cotswolds Conservation Board		
In the list of Conservation Areas in 9.4.2 it would be helpful to indicate which of these have had CA appraisals undertaken and adopted. The designation of a CA is only the first stage of effective conservation and enhancement of these Areas.	Agreed. This information is available at: http://www.stroud.gov.uk/docs/planning/conservation_area_appraisal.asp	This information will be included.
A better indication of the scale and importance of the archaeological resources - SAMs etc - should be provided. This is equally as important for cultural heritage as the numbers of listed buildings and historic parks and gardens.	Agreed, but the difficulty is in sourcing this data. The Stroud Local Plan (Deposit Draft, 1999) lists 59 Scheduled Monuments, however archaeological sites are more difficult to find.	Details of Scheduled Monuments will be included.
In paragraph 15.2.5 it should be noted that the CROW Act also brings into being the possibility of Conservation Boards for AONBs, gives AONB Management Plans a statutory basis, and in Section 85 requires public bodies to have regard to the purposes of designation of AONBs	Agreed.	It will be so noted.
In the context review of the Landscape section, there is no mention of the Cotswolds AONB Management Plan. This is a statutory plan, adopted by the Council as its policies for the conservation and enhancement of the AONB	Noted.	The AONB Management Plan will be reviewed.
The Board notes with some disappointment that in the Landscape section no mention is made of the contribution to quality of life provided by the extensive areas of public access provided by the large expanses of Commons	Noted.	Some words to this effect will be added in the SA Reports.
In the Landscape SEA objective set out in 15.3.1 "conserve" should be used instead of "protect" to better comply with PPS 7	Agreed.	The objective will be altered.
Natural England		

Comment	Response	Action
The neglect of habitats can also have a detrimental impact on their ecological value	Noted.	The text will be amended in the SA Reports
Include The Wildlife and Countryside Act (1981), The Countryside and Rights of Way Act (2000), The Hedgerow Regulations (1997), and The Natural Environment and Rural Communities Act (2006) in legislation	Agreed.	This information will be included in the SA Reports
UK BAP Priority Habitats in Stroud District also include ancient hedgerows, beech/yew woodland, grazing marsh and calcareous grassland	Noted.	The text will be amended in the SA Reports
PPS 9 key messages should also include reference to the integrated approach to be taken by local authorities, the importance of protecting designated sites and protected species, and the importance of restoration of habitats with particular reference to the South West Nature Map	Disagree. This is an issue for the local authority and not the SA / SEA.	None.
South West RSS key messages should include reference to restoration projects under the SW Nature Map and the importance of green infrastructure	Agreed.	This information will be included in the SA Reports
You should also refer to the South-West Regional Biodiversity Action Plan for some key messages too. This will provide some useful statistics for the Baseline section too.	Disagree. The Gloucestershire BAP is the most relevant to Stroud.	None.
Each Natural Area is also home to important habitats that are subject to Habitat Action Plans and other initiatives	Agreed.	The text will be changed for inclusion in the SA Reports.
Walmore Common is not in Stroud District	Noted.	Will be checked and corrected.
There needs to be a clear definition of European sites and their legislation	Disagree. The key point about the European sites, as far as SA / SEA is their very high importance as a receptor. The legislation is already included.	None.
There needs to be a clear definition of Sites of Special Scientific Interest and their legislation.	Disagree. The key point about the SSSIs, as far as SA / SEA is their high importance as a receptor.	
Also Garden Cliff SSSI and Juniper Hill, Edgeworth SSSI are not in Stroud District	Noted.	Will be checked and corrected.

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The reasons for unfavourable condition on SSSIs/European sites in Stroud District are varied, however a lack of appropriate management would probably be the most common problem	Noted.	This will be made clear in the SA Reports
Biodiversity is threatened by climate change so it is important to have robust habitats in which species can adapt to the changes. Inappropriate development, agriculture and infrastructure are also major threats but can make a positive contribution if properly managed. Measures to control pollution, vandalism and the spread of non-native species need to be considered. The appropriate management of habitats is vital to their long-term survival	Agreed.	This will be made clear in the SA Reports
The fragmentation of habitats and the isolation of species is certainly a problem, hence the need for the restoration of habitats to be given more prominence in the Biodiversity section	Agreed.	This will be made clear in the SA Reports
The objective should mention enhancement as indicated above. Also, as with all of the objectives in the Scoping Report, they are not SMART so there is no way of monitoring/measuring success or otherwise	Indicators are supposed (ideally) to be SMART, not SA Objectives.	The SA Objective will be amended to refer to enhancement.
Under likely future conditions we recommend the use of information generated as part of the Countryside Quality Counts project run by Natural England, English Heritage and Defra.	A good suggestion, however if the data for Stroud only refers to 1990-98 it is not current enough to use.	If Stroud has been assessed more recently than 2000, this information will be examined.
The term “valued landscape” is a bit subjective and could do with more clarification. Also, as with the biodiversity section, there is nothing on restoration of landscapes	Agreed.	Will aim to address these points in the SA Reports
There is no objective relating to access to the countryside, leisure etc	Agreed. The SA Objective does not fully reflect all of these issues, although some were identified as problems	The Objective will be revised
The Cotswold Canals Restoration is an environmentally led initiative co-ordinated by British Waterways and as such environmental objectives need to take priority. This does not come over in the Appendix with biodiversity seemingly tagged on the end.	The SA Framework includes many objectives concerning the environment and it is against these benchmarks that the AAP will be assessed.	None.

Comment	Response	Action
The term “sustainable” seems to be used to mean almost anything. I am not sure a Sustainability Appraisal should really be about a sustainable local economy.	Disagree. Government guidance is very clear that economic, social and environmental issues should be treated equally in SA.	None.
Environment Agency		
10.1.1 should be more prescriptive that it is human activity that has caused greenhouse gas emissions and climate change.	Agreed.	This will be made clear in the SA Reports.
10.1.4 states that ‘there may be impacts on the economy’. This should state that ‘it is likely that there will be significant impacts on the economy’. The recent Stern Report would support this claim.	Mostly agree. The significant effects are likely in the longer term.	This will be made clear in the SA Reports.
The recent PPS1 draft supplement on climate change should support this section of the document, and indeed the whole SA report. As such the SA report should pay regard to the likely impact once the PPS supplement is adopted.	Agreed.	Will aim to address this issue in the SA Reports.
The third row of the table on flood risk (informed by PPS25) recognises that flood risk is likely to increase and that some existing development may not be appropriate. It should include the following: “Policies should avoid placing new development in unsustainable flood risk locations.” This is so that the risks to existing and new development are recognised.	Agreed.	This will be amended in the SA Reports.
The sixth row of the table on carbon neutral development (informed by Draft South West RSS) could also make reference to PPS1 draft supplement on climate change.	Noted.	This will be amended in the SA Reports.
The seventh and ninth rows of the table refer to renewable sources of energy in MW. It would be useful to show these figures in the form of percentages so that it is easier to understand for the general public. Similarly, in section 10.4.1, it would be useful to show the Borough’s (should this be District?) emissions (1,191,000 tonnes) in a percentage of the UK’s total emissions.	A helpful suggestion. However the figures may not be strictly comparable.	Will investigate this further.
Suggest revising objective To <u>require</u> [or ‘implement’] energy efficiency through building design to maximise the re-use of <u>land and</u> buildings, recycle building materials and use renewable sources of energy.	Agreed.	The Objective will be revised
Recommend a third objective: To reduce the use of the private car by implementing strategies to locate development in the most sustainable locations and improve public transport through developer contributions	Disagree - this issue is addressed by the second objective in section 10.7 and also (as the Agency notes) in the Transport section.	None.

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Sections 11.5 and 11.6 need to acknowledge that any general increase in car use (for M5 motorway) and specifically in Stroud District (for town centres), will exacerbate air quality pollution.	Agree with the point, however this is already implicitly acknowledged in section 11.5.	None.
We generally concur with the key messages in the table in Section 12.3. The first row of the table regarding brownfield land should also refer to PPS3 (Housing) in the evidence source column.	Agreed.	This will be amended in the SA Reports.
There is no mention of PPS1 in the table, specifically the central objective of the prudent use of natural resources (PPS1, paragraph 4). This should be included in this section.	Agreed.	This will be amended in the SA Reports.
The seventh row of the table regarding PPS23 should make reference to the precautionary approach to development and land contamination advocated in the PPS	Agreed.	This will be amended in the SA Reports.
The eighth row regarding warmer temperatures (from Draft South West RSS) could acknowledge that water supply will also be affected by climate change which could impact on opportunities to grow new crops	Disagree. This belongs in the climate section of the report (and is, in fact, addressed in 10.1.4)	None.
Table 12.2 showing new homes (is there information on non-residential development too?) built on previously developed land could usefully be updated with more recent results for 2004-5 and 2005-6. (If not available from the DCLG yet, the Development Control department of the Council may be able to provide this data.)	Agreed.	Will investigate this further.
“Therefore a key aim of land use planning is <u>to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, using SuDS in development to avoid increasing flood risk and to direct development away from areas at highest risk.</u> ”	Disagree. SuDS is a possible response to an identified flood risk problem and should be viewed as a mitigation measure rather than be specified in the SA Objectives.	None.
PPS25 should be included in this section as a key piece of legislation on water. Reference should be made to the requirement to reduce and manage flood risk and use SuDS in development.	Agreed.	This will be amended in the SA Reports.
The Water Framework Directive (WFD) paragraph (13.2.5 should refer to the key intention of the WFD to improve water quality; the first bullet point could be worded: “Aims to <u>improve water quality and promote the sustainable use of all UK water bodies...</u> ”	Agreed.	This will be amended in the SA Reports.

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<p>We generally concur with the Context Review in 13.3, but again the PPS25 section needs to be improved by adding the following: “Policies should avoid placing new development in unsustainable flood risk locations so that neither the development, third parties or the floodplain itself are unacceptably impacted.” This is so that the risks to existing and <u>new</u> development are recognised as well as the need to protect floodplains themselves.</p>	Agreed.	This will be amended in the SA Reports.
<p>We generally concur with the baseline. There is however an error and omission in 13.4.8 on flood risk: Reference is made to areas at ‘greatest risk of flooding’ in ‘Map1’, however Map 1 shows Indices of Multiple Deprivation. Map 2 shows areas in Flood Zone 2 (Medium Risk), but there is no map showing Flood Zone 3 (High Risk). A map showing Flood Zone 3 should be included as well (we send this information to all Councils via CD on a quarterly basis), as this zone is the zone where people are ‘at greatest risk’ from flooding.</p>	Agreed, although this information could not be obtained from our usual sources.	This will be amended in the SA Reports.
<p>We have been in discussions with the Council regarding the need for a Strategic Flood Risk Assessment (SFRA), to sequentially inform allocations, as required by PPS25. Once the SFRA is complete it will need to form part of the evidence base for the SA so that the LDF meets tests of soundness 4 (in accordance with National Planning Policy) and 7 (based on robust and credible evidence).</p>	Noted.	This is really an issue for the LDF programme rather than the SA. SDC is aware of the issue.
<p>We concur with the proposed SA/SEA objectives, and would recommend altering slightly the second objective to read: ‘To <u>manage and</u> reduce the risk of flooding in new and existing development’</p>	Agreed.	This will be amended in the SA Reports.
<p>We generally concur with the introduction. The list of threats to biodiversity in paragraph 14.1.3 should include climate change.</p>	Agreed.	This will be amended in the SA Reports.
<p>The Context Review in 14.3 seems to miss the methodology of ‘protect <i>and enhance</i>’ advocated in PPS1, and the ‘avoid, mitigate, compensate’ methodology of SEA. These are particularly relevant where there is a conflict between use of brownfield land and ecological interest/assets often associated with such sites. Mention should therefore be made of this in rows 5-8 of the table.</p>	Agreed.	This will be amended in the SA Reports.
<p>Section 16.2.2 <i>describes</i> the waste hierarchy, but it would be useful to state the name of the principle in this section. The proximity principle should also be identified/referred to in this section. This is important as both the waste hierarchy and proximity principle are environmental protection objectives. (We note that both are mentioned in the Context Review.)</p>	Agreed.	This will be amended in the SA Reports.

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<p>The steady rise of household waste identified in the Baseline (16.4) is very concerning, and this is an issue that should be focused on by the Council, and planning and development has a key role to play in this regard. As such we concur with the environmental and sustainability problems identified, and consider the proposed SA/SEA objective to be appropriate.</p>	<p>Agreed, however SDC are hardly in a position to do more than respond to this increase.</p>	<p>None.</p>
<p>We do not concur with the statement in 16.4.1 that 'clearly the Council has little direct control' over waste reduction and meeting the government's objectives. There is scope to have a positive impact on this issue through Council activities (some planning related, though not all) such as:</p> <ul style="list-style-type: none"> · Improved domestic recycling facilities in the District for a wider range of materials (including encouragement of private composting) · Improved recycling facilities in the public realm · New development to adopt high standards of recycling provision · Scope for local initiatives on packaging used in retail <p>Therefore "limited direct control" would be a more appropriate wording.</p>	<p>Disagree. None of the measures proposed would actually reduce waste arisings, other than the 'local initiatives on packaging used in retail'.</p>	<p>None.</p>
<p>Paragraph 17.2.1 makes reference to the SA Framework. The Scoping Report produced is a good starting point for identifying issues, baseline and objectives. However it has not set out the results in a SA Framework. We would expect the production of a SA Framework to be the next step and would wish to be consulted on the Framework in its draft format before it is used to assess the plan objectives and LDDs.</p>	<p>Agreed, strictly speaking the SA Objectives that make up the SA Framework have not been presented in a single table. However all have been seen and commented upon by the EA. Where amendments have been proposed they have generally been accepted, or reasons for their rejection have been given.</p>	<p>The amended versions of the SA Objectives will be e-mailed to the EA along with a copy of this response matrix.</p>
<p>In addition, the SA Framework should more specifically identify trends and target indicators. We hold various information and data sets (such as Flood Zone Maps, water quality information, Catchment Abstraction Management Strategies (CAMS), State of the Environment Reports and data on the amount of EA objections to planning applications on flood risk) which may be of use in identifying trends and target indicators, and in the monitoring process. We note that you have already made use of some of this information, and would be happy to supply further information on request.</p>	<p>This information is available in at least 39 distinct indicators contained in the report. These include trend information where this was available. Many of them are further subdivided (e.g. statistics on health and crime) to present data by subgroups. Further there are several maps that show information spatially.</p>	<p>None.</p>

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Section 17.3.1 states that 'SA reports will be produced for each LDD'. This is appropriate, however we would stress the need to appraise LDDs for their sustainability criteria in conjunction with and alongside the production of the LDD itself. The SA process should be an informative process, and not done in a retrospective, 'add-on' or 'after-thought' way.	Agreed.	None. This has always been the intention.
Finally, section 17.3.2 on what the reports will consider should add the following requirement: "Ways in which positive impacts can be maximised and negative impacts can be avoided, mitigated and/or compensated."	Agreed.	The Scoping Report is not going to be revised and republished however, so there will not be an opportunity to make this amendment.
A final general point is that the introduction sections tend to be quite general. This provides a good overview of issues, however it could be criticised as not being locally relevant. Whilst the Baseline sections go on to show how the issues occur in the District, it may be of use to include a brief paragraph in each introduction explaining the local relevance of each issue.	An interesting point.	Will give this further consideration.
South West Regional Assembly		
We request that the Regional Economic Strategy for the South West (and supporting evidence and research) be considered during the preparation of the LDF documentation. This can be found on our website: http://www.southwestrda.org.uk/what-we-do/policy/res-review2005/draft-res.shtm	Agreed.	This will be included in the SA Reports.
Garden History Society		
Responded with a document requesting that a policy on historic parks / gardens should be included in the LDF.	Noted, although really a matter for the LDF not the SA.	Brought to the attention of SDC.
Gloucestershire County Council		
In section 10.3 the Context Review should include 'Planning and Climate Change – Supplement to PPS1'. Currently this is a consultation draft only.	Agreed.	This will be amended in the SA Reports.
In section 14.2 on Environmental Protection the Wildlife and Countryside Act 1981 (as amended) and CRoW Act 2000 should be added. These Acts are concerned with the 'additional protection of SSSIs and certain species'.	Agreed.	This will be amended in the SA Reports.

Comment	Response	Action
Somewhere in Chapter 14 the Natural Environment and Rural Communities Act (NERC) 2006 should be quoted – particularly sections 40 and 41.	Agreed.	This will be amended in the SA Reports.
In section 14.4 there should be a mention of statutory Local Nature Reserves in Stroud District. Those declared by Stroud DC should be listed in addition to part of Cooper's Hill LNR which has been declared by the County Council.	Agreed, if the information is readily available.	This will be amended in the SA Reports.
It is noted that the documents which have informed the 'Key Messages' in the Context Review of the Waste chapter (Ch. 16) do not include the adopted Gloucestershire Waste Local Plan (2004) or the very recently adopted SPD on Waste Minimisation in Development Projects (2006). These are key waste related documents for Stroud and for the whole of Gloucestershire and should be included. Consideration should also be given to Gloucestershire County Council's emerging Waste Core Strategy.	Possibly, however it is not clear that this would alter the conclusions of the chapter.	Will give this further consideration.
Whilst the District Council has initially defined the scope of this topic appropriately, the consultants have failed to make further reference to archaeological sites, whether those which are the subject of statutory designation (Scheduled Monuments) nor the unscheduled majority. This is a significant element of the Cultural Heritage that has been omitted entirely from the Scoping Report (Chapter 9 Cultural Heritage). Information on scheduled and unscheduled sites is available from the County Council Archaeology Service, who can also advise on current management issues affecting this resource.	Agreed, if the information is readily available.	This will be amended in the SA Reports.
The only comment that I would make at this stage regarding the transport Chapter (Ch. 6) would be that there is no mention of the potential roles of increasing walking, cycling, car sharing, car clubs and community transport provision.	Agreed, however the SA Objective calls for the use of more sustainable alternative forms of transport, which would encompass these modes.	This will be amended in the SA Reports.
Andrew O'Brien (SDC Housing Strategy Manager)		
Whilst the Scoping Report focuses on Stroud District, the Housing related Context Review (8.2) focuses on the Regional perspective. The table of Evidence Source (8.2.1 on page 33) contains two bullet points citing High Levels of Homelessness and Poor Quality Homes, and in my view neither of these are a particularly accurate reflection of the position within Stroud District.	Agreed.	This will be amended in the SA Reports.

Comment	Response	Action
<p>This refers to the Gloucestershire Traveller Policy and considers the benefit of minimising any impact of this 'nuisance' on the local environment.</p> <p>A more appropriate focus (in terms of this being a Housing context) would be reference to the adequacy of housing provision for Gypsies, Travellers, and Showpeople. The context also refers to the relative acceptability of small sites, which presumes that this is what might be provided. The G&T Assessment might find that larger sites are required. The context correctly reflects our current policy that provides for enforcement action, but does not have regard to the reality that powers are eroded until our duties under the 2004 Housing Act are satisfied. Suggest that the G&T Assessment be included in the scoping report.</p>	Agreed.	This will be amended in the SA Reports.
<p>References are made to figures in the Housing 2005 Needs Survey, but 8.3.2 and 8.3.3 (correctly) draw on data from the July 2006 Update. There seems little benefit in referring to the former?</p>	Agreed.	This will be amended in the SA Reports.
<p>Arguably, the baseline used (homeless households as a proportion of all those on the Housing Register) does not reflect an accurate context. The number of homeless households against all households is obviously much lower, and in my view a more accurate reflection of the degree of homelessness in the district. Our Housing Investment Programme return to DCLG indicates an annual figure of 214 households that were accepted as homeless and in priority need, and that there were 2 roughsleepers. This represents 0.0045 % (less than half-percent) of all households. In terms of a Context, my view is that in accepting X number of households who fall under the legal definition of homeless, and then housing them as a result, does not fit the perception of a Context that infers there might be a "high level of homelessness" in the district.</p>	Agreed.	This will be amended in the SA Reports.
<p>Reference in 8.5.6 to a continuing shortfall is correct, but ignores improvements made. A "reducing but continuing shortfall" might be better?</p>	Agreed.	This will be amended in the SA Reports.
<p>The definition of 'local needs' should be clarified. Sub-regionally, local means the District, but a more popular interpretation of 'meeting local needs', and one predominantly favoured by Members, is more parochial.</p> <p>Whilst we have identified housing need at Parish Group level, our overall affordable housing shortfall is expressed as a district-wide figure, and gains measured against this - yet we already know that the scale of affordable housing required, and the greatest proportion of forecast supply of it, will not be in locations that some will consider to be 'meeting local needs' i.e. in very local or preferred locations.</p>	Agreed.	Will attempt to do this in the SA Reports.
<p>If relevant, where does the proposed Strategic Housing Market Assessment fit into the Sustainability Appraisal process?</p>	It should be used as evidence, if available.	Will give this further consideration.

Comment	Response	Action
Andrew Stumpf , British Waterways		
Include reference to the Landscape Character Assessment, and other studies part funded by SDC for the canals restoration project.	Agreed	This will be included in the SA Report
The geographical coverage of the SA report is unclear “Had the Sustainability Appraisal been District wide (and it is not clear what area is covered by the LDF) I would have included comments on the Gloucester and Sharpness Canal too If it is covering the canal corridor I am very surprised and disappointed that the Gillespies Baseline and Feasibility Study is not included in the references.”	The Core Strategy is the District wide planning framework, therefore the SA will also be district wide. Reference to the Gillespies Baseline and Feasibility Study will be included in the SA Report.	Will attempt to clarify the scope of the SA and LDF documents in the report.
The Canal Project has identified that it would contribute towards the focus on healthy lifestyles in Section 3 Health, paragraph 3.6.1	This comment is noted	None
Section 4, Economy should reference the positive potential that the landscape, built environment and natural heritage of the canal corridor brings to the high quality environment upon which tourism and inward investment relies. The current poor quality of the canal, lack of protection and inaccessibility is having a negative effect.	The poor quality of the canal environment should be recognised as a key issue (in the Scoping Report) for investment in the area. The future likely conditions can reflect the aspiration of improvements to the canal corridor and the positive effect on the tourism industry. This is only in relation the area of canal corridor covered by the AAP.	These will be amended in the SA reports.
Expect to see that as an objective under 4.6.1. (Proposed SA/SEA Objectives) to ensure that Stroud and Stonehouse become or remain vibrant market towns.	A specific objective relating to market towns is not felt to be required however, reference to the market town status of Stroud and Stonehouse should be included within the baseline information section and the likely future conditions section.	This will be included in the future SA reports.
Endorse the need to capitalise on what makes the district unique and promote the canal corridor.	Agreed	None.

Comment	Response	Action
Use of statistics for the District as a whole masks relative deprivation and lower wage levels in the canal corridor (as can be seen by the IMD maps where deprivation closely tracks the canal line).	Areas of particular deprivation and low wage should be identified through the Scoping Report.	Update for the future SA reports if data is available.
The objective needs to recognise the significant challenges in bringing brownfield sites back into use and in converting historic buildings for alternative uses while recognising that the retention of that historic character is necessary to attract employers, employees and, in tourism and leisure, paying customers	Bringing brownfield sites back into use and conversion of historic buildings is considered through the cultural heritage and Soil sections but not in the context of employment opportunities. The likely future conditions section of this chapter will be revised to reflect the attraction for employers, employees and paying customers.	Update for the SA report if data is available.
Future employment trends are not identified.	Will be updated if information is available	Update for the SA report if data is available.
The waterways should be recognised as transport corridors in their own right, not just for freight but also for their level, quiet towpaths which can be used for informal commuting and a means of encouraging modal shifts with modest investment.	Noted, however this role is likely to be limited in practice	Include in the transport chapter introduction
6.4.2 Integrated and sustainable policies are required to ensure that the desired economic growth is accompanied by reduced commuting and a transport modal shift	This is identified as key objective of the SA and the LDF DPDs.	No further action required
6.5.1 We object to the canal restoration being singled out as placing demands on the road network as these demands will come from economic growth and not the canal per se. Further the towpaths provide a sustainable transport route themselves for walkers and cyclists, safe routes to school, etc.	Comment noted, however it is likely that the canal restoration will make it a focus for visitors travelling by road and will contribute to traffic.	No further action required
6.6.1 Include a new bullet point: To restore, manage and promote the canal towpaths as part of the sustainable transport infrastructure.	Agreed.	This will be incorporated into the future SA reports.

Comment	Response	Action
Housing Ch 8. 8.2.1 The focus for “significant development” in the market towns is supported on brownfield sites. Targets for housing 2001 to 2016 should be challenged through the RSS and specifically where housing is essential to regenerate brownfield sites	No response required	Comments passed to the SDC planning policy team as housing targets are an LDF issue.
Make specific reference to the Cotswold Canals Heritage Survey	Add to the context review	This will be incorporated into the future SA reports.
Make reference to the heritage protection for the 21 st Century	Add to the context review	This will be incorporated into the future SA reports.
Waterways for Tomorrow policies under section 13 would be more appropriate here.	Noted	This will be incorporated into the future SA reports.
There is also no mention of the concept of the non-statutory ‘Local Lists’ intended to protect buildings of local historical and architectural importance.	Add a summary to baseline information section and Appendix 2 if the information is available from SDC.	This will be incorporated into the future SA reports.
9.3.1 Herefordshire & Gloucestershire Canal is not in the District at all	This comment is noted	This will be incorporated into the future SA reports.
9.3.1 Reference to Severn-Thames Canal from Rural Economic Strategy for Gloucestershire appears to be incomplete	This comment is noted and will be updated.	This will be incorporated into the future SA reports.
There is no mention in section 9 or in section 15 (Landscape) of the Historic Landscape Characterisation undertaken by GCC and extended by the 2003 Heritage Survey which should inform all Management and Conservation plans.	This comment is noted and the documents will be researched.	This will be incorporated into the future SA reports
The industrial heritage has been under recognised and while 3 canal structures are listed there are an additional 30 structures of high to medium regional significance which need to be taken account of.	This comment is noted and consideration will be made to adding further information to the baseline review.	This will be incorporated into the future SA reports if data is available.

Comment	Response	Action
9.4.7 and 9.4.8 are naïve and require rewriting to reflect the varied character of the two canals and the significance of locations such as Brimscombe and Wallbridge. Of almost equal importance in the corridor are railway and mill structures which are not specifically mentioned.	Acknowledged, these paragraphs will be revisited.	This will be incorporated into the future SA reports.
Stroud's significance will only be protected if there is an adequate policy background to apply and enforcement of that policy. The existing Conservation Area has been eroded since its creation and the built heritage continues to be damaged as can be seen in the new development at Ebley. Its significance is also threatened by a dearth of suitable knowledge and skills locally, regionally and nationally as identified by the National Heritage Training Group among others.	This comment is noted.	None
9.6.1 Add a new bullet point - there is a need to generate and support the growth of skills necessary to adequately care for, repair, maintain and restore the built heritage.	Agreed, this will be cross referenced to skills development and local trades under the employment section.	This will be incorporated into the future SA reports.
<p>9.7.1 Add new objectives:</p> <ul style="list-style-type: none"> - to encourage and support the Cotswold Heritage Academy, the Cotswold canals training group and others in developing an adequate skills base in the District. - use planning policies, codes of practice and, where necessary enforcement to support the demand for specialist skills and the conservation of the existing heritage. - create and enforce Industrial Heritage Conservation Area policies which protect and enhance the historic character. - adopt the Canal Conservation Management plan as best practice for works undertaken by the District or third parties on the canal infrastructure 	These are not SA objectives but the substance of the comments will be considered in the SA report and in the preparation of the LDF documents.	Brought to the attention of SDC and incorporated into the SA report
<p>Section 12 Soil.</p> <p>A great deal of information is available through the Canals project. Parts of the canal are infilled with household waste, many areas alongside the canal are old waste tips.</p>	This comment is noted	Brought to the attention of SDC for future data collections.
<p>Section 13 Water</p> <p>13.3.1 Gloucestershire BAP – the reopening of phase 1 will not intensify water demands. A licence for a modest abstraction at Brimscombe has been agreed in principle by the EA.</p>	This comment is noted	This will be incorporated into future SA reports

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13.4.8 Map 1 is actually IMD. Flood risk should be adjusted for the new SFRA	This comment is noted. The District is in discussions about a SFRA. This data will inform the SA when its available.	This will be incorporated into the future SA reports, in particular the SFRA findings.
13.61. I would be surprised if the canal corridor to Saul at any rate is vulnerable to tidal flooding.	This comment is noted	Further investigation of tidal flooding required through the SFRA.
13.7.1. The canal objective is that flood risk should be “no worse” upon completion. Calculations are modelled using the latest data and with an allowance for climate change. An objective to reduce flooding may not be achievable in new developments anywhere.	This comment is noted, the flood risk objectives have been commented upon by the EA.	None
13.3.1 River Leadon is not in the District and would certainly not be affected by the restoration of the Cotswold Canals	Agreed	This will be incorporated into the future SA reports.
<p>Section 15 Landscape</p> <p>We welcome the references to the Countryside Character Initiative. It would be useful if in the introduction if there was specific references to documents which define landscape character in the canal corridor, for example:</p> <p>‘Landscape Character Assessment of the Cotswold Canal Corridor’. (June 2005) – BW / Scott Wilson</p> <p>‘Stroud District Landscape Assessment’ (Nov 2000) – SDC</p>	Landscape Character Assessment of the Cotswold Canal Corridor’. (June 2005) – BW / Scott Wilson. This will be added to the context review, but it is not felt the detail is required in the introduction.	This will be incorporated into the future SA reports
“the scoping should list the different sub-character types noted in Stroud’s District Landscape Assessment so that the document can then describe what action is required to preserve and enhance the essential character of each.”	These are listed in the baseline information review, paragraph 15.4.5	This will be incorporated into the future SA reports

Comment	Response	Action
15.2 Protection Objectives – included should be a commitment to other recognisable designations e.g. Historic Parks and Gardens, and other less easily recognisable tracts of landscape with special qualities is required, for example the rural character of the western part of the canal corridor..	The Protection Objectives are meant to summarise the European, and National objectives. Specific information to these designations and more local information is better placed in the baseline information section.	None
Support the context review content and the baseline data section, in particular the different district wide character areas. However there is a need to recognise the Landscape Character areas as there is a danger that they will be lost and that the landscapes will become polarised.	This comment is noted	No action required
The SA appears to have a ‘top down’ approach regarding landscape matters. It is the retention and enhancement of the ‘micro character’ areas which presents the greatest challenge to any local authority. BW is more than happy to assist SDC in its SA of the canal corridor.	The SA has considered both high level and local level issues.	BW assistance is referred to SDC
15.5 We agree with Natural England that under likely future conditions we recommend the use of information generated as part of the Countryside Quality Counts project run by Natural England, English Heritage and Defra.	This comment is noted	None
The term “valued landscape” is a bit subjective and could do with more clarification. Also, as with the biodiversity section, there is nothing on restoration of landscapes.	This comment is noted, restoration of landscapes will be included in future SA reports. The SA objective will not be revised but clarification will be provided on terminology.	This will be incorporated into the future SA reports
Provide further focus on specific areas of ‘micro character’ identifying the Strengths, Weaknesses, Opportunities and Threats facing each one and to devise appropriate strategies and policies to ensure their retention and enhancement in the Problems section.	This is too detailed for the Scoping Report.	None
It is assumed that the Industrial Heritage Conservation Area, incorporating design guidance, will go on to do that in which case specific reference needs to be made in section 15.7.	SA objectives do not reference initiatives but reference is made earlier in the Scoping Report to the CA.	None
We would like to see the Sustainability Appraisal making greater reference to the Canal and the part it will play in helping to regenerate the Stroud Valleys and beyond. Our Design Review (November 2006) reviewed 25 documents in order to identify ways in which we considered the regeneration process should proceed. No reference is made to this document and we would expect to see the findings of the Review referred to in this Appraisal.	Reference will be made to the design review document.	This will be incorporated into the future SA reports

Comment	Response	Action
<p>15.7 The proposed objectives should include: The creation of the IHCA Statement and Design Guidance to protect and enhance the landscape, townscape and waterscape. The identification of land uses and development zones (as identified in the Design Review) to protect the landscape character of the corridor. Reference to the design review The creation of canal specific policies including a waterspace strategy.</p>	<p>These are not SA objectives but the substance of the comments will be considered in the SA report and in the preparation of the LDF documents.</p>	<p>This will be incorporated into the future SA reports and inform SDC</p>
<p>17 Next steps Clearly monitoring and evaluation is a key “next step” if the document is to have any meaning. Natural England has suggested one mechanism and we routinely use Quality of Life criteria to monitor our projects. Whatever monitoring system is used it should fit a nationally acceptable and used criteria against quantifiable outputs.</p>	<p>This comment is noted. Monitoring and evaluation is a key aspect of the SA process. Monitoring mechanisms are included in the final SA report that accompanies the Submission DPDs.</p>	<p>Not required</p>
<p>Appendix 5 – Cotswold Canals The Cotswold Canals Restoration is conservation led therefore natural, built and social heritage should feature strongly. Economic outputs will come from the “working heritage” of the canal and also from changed perceptions of the canal context.</p>	<p>This comment is noted</p>	<p>It will inform further work on the Canals AAP</p>
<p>Stroud Green Party</p>		
<p>The Scoping Report fails to address sufficiently key sustainability issues of robustness of the local economy, climate change and local food and fuel security (energy production).</p>	<p>Noted</p>	<p>None</p>
<p>Sections on waste and climate change appear less robust than Stroud DC own Environmental Strategy paper and are not satisfactorily integrated into other sections.</p>	<p>Noted</p>	<p>None</p>

Comment	Response	Action
The issue of reducing carbon emissions is so important that it should be included in the majority of SA/SEA objectives.	SA objectives are required to cover the broad spectrum of sustainability, (social, economic and environmental) The principle of carbon reduction is included in the Climate Change section, and the climate change objective. See comment later in table on mitigation proposals with regard to carbon emissions.	None
Section 3 Health 3.6 An increased focus on healthy lifestyles is required.	This comment is noted – future SA reports should include a focus on healthy lifestyles.	This will be incorporated into the future SA reports
3.7 Suggested objectives - Increase in cycling and pedestrian activity, increase in independent mobility for children. - Address the design of streets and roads and traffic speeds so people will cycle and walk from choice.	These are not SA objectives but the substance of the comments will be considered in the SA report and in the preparation of the LDF documents.	None
Section 4 Economy Promoting tourism makes no mention of the environmental impact of tourism. CO2 emissions from extra travel.	This comment is noted. However the issue is raised in the transport chapter at 6.4.2	None
No mention of help to industry to reduce its environmental impact or support environmental initiatives.	This comment is noted	Future SA reports will be updated to reflect this.
No mention of how climate change is likely to affect the economy, no mention of localisation of markets, energy supplies or food production.	This comment is noted	Future SA reports will be updated to reflect this.
Tourism expansion seems to contradict the aim in section 5 to provide high paid employment to help reduce commuting out of the district.	There is a need in the District for high paid employment but also for employment in slightly lower paid employment such as the tourist industry to meet the needs of the whole District.	None

Comment	Response	Action
Further promotion of tourism locally is viewed as a positive way forward yet there is no analysis quoted to support this: tourism can have a negative impact on the economy, availability of housing and the environment as noted in section 14.	This commented is noted. Further local tourism data is difficult to obtain.	This will be incorporated into the future SA reports where data is available.
Require an analysis of how the economy will develop, whilst acknowledging how difficult this is. Reference should be made to the draft RSS commentary on economy section 2.3.1. This SA should contain an analysis of the price of fuel, declining oil availability and declining oil and gas production worldwide.	It is felt that this is not appropriate detail for the LDF as it is concerned with local sustainability.	None
Objectives – this SA should adopt the RSS SSA alternative approach to the regions development. The draft aim to develop the economy within environmental limits.	Agreed.	This will be incorporated into the future SA reports.
In section 4.33 of the SSA it is noted: “There is no evidence that the UK pattern of economic development is making people happier or giving them a better quality of life.” It is vital that indicators for measuring happiness are developed and implemented as part of policy. Stroud District Council's submission to the draft RSS called for a look at this alternative.	SDC did not comment on “indicators of happiness” to the RSS. Comments were made to the RSS regarding their over emphasis on global markets and not local ones. In this context the alternative approach referred to related to economic forecasts, their basis and their realism.	None
5 Employment We would question the assumption that economic growth is required and that it needs to be employment led.	Economic growth is fundamental to the Districts economy.	None
5.3.1 Specific mention of Creative Industries and their growing contribution to the economy has been omitted from this section and the Employment section. Yet they currently contribute £808 million annual turnover in Gloucestershire (i.e. 4.2% of total turnover).	Comment noted.	The future SA reports will reflect this.
Objectives – To develop employment that is less dependent upon national and international links, which has reduced exposure to external factors, making it more resilient to outside shocks, and at the same time reduces its ecological footprint.	The driver for this objective is noted but it is felt more appropriate to keep the original SA Objective.	None

Comment	Response	Action
<p>6 Transport and Accessibility There is no mention of cycling.</p>	<p>Table 6.2 illustrates the proportion of people using bicycle as a means of travel to work. Further discussion will be recommended for the future SA reports in the supporting text.</p>	<p>To be included in future SA reports.</p>
<p>Falling levels of pedestrian activity and cycling is not identified as a problem, neither is the reduction in child independence due to parental assessment of roads as too risk for children to access without supervision.</p>	<p>Comment noted and reference is recommended for inclusion if supporting baseline data can be found.</p>	<p>To be included in future SA reports.</p>
<p>There is no acknowledgement that increased pedestrian and cycle rates can help meet health and environmental targets.</p>	<p>Agreed.</p>	<p>To be included in future SA reports.</p>
<p>No identification of social street activity as a fundamental use of the road network. Social street activity helps to form community relations and reduce feelings of isolation.</p>	<p>Include number of 'home zones' in the District as a baseline indicator, and reflect in supporting text.</p>	<p>To be included in future SA reports.</p>
<p>Proposed Objectives -</p> <ul style="list-style-type: none"> • Increase cycle journeys taken by all age groups • Increase pedestrian journeys by all age groups • Ensure cycle and pedestrian routes form a fundamental not negotiable part of all new development. • Identify social street activity as part of building sustainable communities • Reduce journeys taken by private car 	<p>These are not appropriate for SA objectives but the substance of the comments will be considered in the SA report and in the preparation of the LDF documents.</p>	<p>To be included in future SA reports.</p>
<p>7 Crime and Safety What steps will be taken to ensure that a reduction in road fatalities and casualties figures is based on roads being safer and not on vulnerable road users retreating from or limiting their access to the network?</p>	<p>This is not for the SA to consider. Road safety is a key issue within the Local Transport Plan and section 5.4 clearly sets out the road safety objective. The County Council are also a statutory consultee on any LDF documents and will have the opportunity to inform the planning process on road safety aspects.</p>	<p>The comment is noted.</p>

Comment	Response	Action
<p>The feeling and ambiance of roads needs to be addressed rather than relying of figures to prove that roads are safe. There is a need to socialise roads rather than relying on speed and casualty figures, this is an important safety concern which is quite literally on residents doorsteps and regularly tops their list of concerns.</p>	<p>As above, Include number of 'home zones' in the District as a baseline indicator, and reflect in supporting text.</p>	<p>To be included in future SA reports.</p>
<p>Proposed Objectives – To provide pleasant roads and streets designed to accommodate all traffic at 20 mph in all residential areas with a minimum of signage and heavy engineering.</p>	<p>This is not appropriate for an SA objectives but the substance of the comments will be considered in the SA report and in the preparation of the LDF documents.</p>	<p>To be included in future SA reports.</p>
<p>8 Housing Proposed Objectives:</p> <ul style="list-style-type: none"> • Zero carbon development • Micro energy generation at source, • Tackling the current housing stocks CO2 emissions 	<p>The section of the Scoping Report on Climate Change covers these objectives.</p>	<p>None</p>
<p>9 Cultural Landscape The importance of architecture that is not listed should also be recognised.</p>	<p>Agreed. This is linked to high quality design in the built environment.</p>	<p>To be included in future SA reports.</p>
<p>The appearance of streets and the affect of signage and road furniture should become more important and a recognised civic function of one statutory body.</p>	<p>This is not an issue for SA. The issues regarding signage are a County Highways matter. The Council are aware of these matters and will use them to inform other future strategies, where they are relevant to their remit. The comment is noted.</p>	<p>No further action required.</p>

Comment	Response	Action
Entrances to civic areas and public buildings should be improved eg, parks.	This is not an issue for SA. Accessibility and enhancement aspects are considerations in current local planning policy and building regulations . Good design is sought in national planning advice and informs other Council strategies. The comment is noted.	No further action required.
Locally important and distinctive buildings should be recognised.	Agreed. Include reference to these buildings and an indication of numbers if SDC has undertaken a survey of locally important buildings and structures. .	To be included in future SA reports if the data is available.
<p>10 Climate Change</p> <p>It is our consideration that this section should be relatively small and that all other sections of this document should contain climate change objectives. Each sections objectives should state how they will contribute towards meeting CO2 reduction targets.</p>	This comment is noted. It is proposed that a mitigation section in the Final SA should be proposed for each policy of the LDF DPDs with regard to carbon emissions.	To be included in future SA reports.
Climate change is not an exact science, many scientists are now calling for a 60% cut in emissions by 2025.	This comment is noted	No further action required
With regard to vehicle use in the district it is worth considering that all of the out-lying villages in the district developed without the provision of private motorized personnel transport.	This comment is noted. There is now a need to ensure that sustainable transport is a key consideration for new development and existing communities.	No further action required

Comment	Response	Action
<p>Proposed Objectives:</p> <ul style="list-style-type: none"> • Remove bio-fuels target, evidence suggests that the production of bio-fuels produce large amounts of CO2 • Reduced the mileage for undertaken by SDC staff, reduce the amount of fossil fuel used • Use electric cars supplied by renewable resources 	<p>These are not appropriate for an SA objective. The Council is unable to ignore the published bio-fuel objectives of the EU. The Green Party has the opportunity to lobby at the European level. Staff mileage and electric cars are an issue that the Green Party can raise at Council Meetings. The substance of the comments are noted and can inform the preparation of the LDF documents and other Council strategies.</p>	<p>No further action required</p>
<p>12 Soil Organic farming has a key role in soil protection and should be supported. Organic farming also does not require the massive energy inputs in the form of fertilisers, pesticides etc and so can help tackle climate change and reduce our reliance on oil.</p>	<p>Agreed, comments noted and the comments will be considered if any opportunities arise from the implementation of our planning controls.</p>	<p>No further action required</p>
<p>13 Water We need improved community access to rivers and streams, improved water quality and greater application and emphasis on Sustainable Urban Drainage Systems (SUDs).</p>	<p>Noted, the Council support SuDS initiatives and this is reflected in existing planning policies. The Council will continue to work with the Environment Agency in improving water quality. Access to rivers and streams will be explored as opportunities arise through the exercise of our planning functions. The comments can inform the preparation of the LDF documents and other Council strategies such as linear parks, river corridor access for example...</p>	<p>No further action required</p>

Comment	Response	Action
The likely increase of drought and flood conditions resulting from climate change will have a massive impact which has not been satisfactorily explored	Water resources and availability are discussed in section 10.1.4	No further action required
Other issues that have not been taken into account sufficiently: • £313m spent each year dealing with pesticides, nitrates and other contaminants ie 10% of costs of drinking water	Ground water contamination is covered under section 13.4.6, it is not felt necessary to include the national cost information.	No further action required
• raw sewage is regularly discharged into our brooks and streams	Water quality is discussed in this section, evidence is required to make the suggested statement. Therefore further baseline is required before this comment can be considered.	Further baseline research required for future SA work.
• clean-up of water supplies uses chemicals and energy intensive ultra-violet treatment: the water industry emits 2.6% of UK carbon emissions	Noted, although not felt to be required in the SA Scoping Report.	No further action required
• most of us flush 50 litres of water down the loo everyday: need for more greywater solutions and water conservation measures	Agreed. To be included in future SA reports linked to water efficiency discussions in the water chapter.	To be included in future SA reports.
• power station cooling accounting for 39% of national water	There are no power stations in Stroud, therefore it is not felt that this reference is required.	No further action required
• consumption: our current methods of sewage treatment and water supply are very energy intensive - a move towards more reed beds and other SUDs solutions would have a significant impact.	Agreed. Management of water is recommended by the EA to be included in the SA objective.	No further action required
15. Landscape - a wider debate is needed about what constitutes a valued landscape. Gloucestershire Highways last year cut down many hundreds if not thousands of roadside trees justifying it as " <i>Maintaining and restoring the character of a distinctive landscape</i> " - yet the Cotswold landscape is itself, man-made and once upon a time was wooded. The loss of the significant wildlife benefits from mature trees that also filter transport pollution and tackle climate change should be part of the equation.	This comment is noted, restoration of landscapes will be included in future SA reports. The SA objective will not be revised but clarification will be provided on terminology.	To be included in future SA reports.

Comment	Response	Action
<p>16 Waste Failure to mention 'Pay as you Throw' or discounts for those who produce less waste as a way of reducing the increasing in tonnage.</p>	Not relevant to SA	No further action required
<p>Proposed Objectives • Consideration of strategies to reduce quantity of waste produced</p>	Comments received by Gloucestershire CC have recommended reference be made to the Gloucester Waste Local Plan (2004), SPD on Waste Minimisation and the emerging Waste DPD.	Consideration to be made on inclusion in future SA reports.
<p>• Introduce a 'pay as you throw' scheme</p>	This is not within the remit of the SA process. The comment is currently being considered at the national level and is noted by SDC. .	No further action required at present.
<p>• Introduce financial incentives for those who produce small amounts of waste</p>	This is not within the remit of the SA process. The comment is currently being considered at the national level and is noted by SDC as a matter to keep under review.	No further action required at present.
<p>• We need to state opposition to incineration. Incineration has a number of issues associated with the process, including concerns over air quality and highly contaminated residual by-product. Incineration contracts can lead to the production of waste to meet legally set quantities.</p>	This is not within the remit of the SA process. Note that the potential of incineration forms part of the adopted Gloucestershire Waste Local Plan strategy. The County Council are due to review their planning document on waste and the Council will formulate a response at that time. Equally the Green Party can also comment separately.	No further action required at present.

Comment	Response	Action
<ul style="list-style-type: none"> Pyrolysis might be acceptable for a small limited amount of waste. 	<p>This is not within the remit of the SA process as it relates to thermal degradation of waste in the absence of air to produce char, pyrolysis oil and syngas, eg the conversion of wood to charcoal. While this type of recycling is rarely economically attractive under current market conditions, these technologies do offer the scope for increasing recycling rates to achieve government targets or address environmental concerns. The comment is however noted by SDC. The County Council are due to review their planning document on waste and the Council will formulate a response at that time. Equally the Green Party can also comment separately..</p>	<p>No further action required at present.</p>