

Representations made following consultation on South Oxfordshire's Revised Sustainability Appraisal Scoping May 2013.

Comment No.	Organisation	Organisation's Comment	Council Response
General comments			
1	Oxfordshire County Council	<p>Fire and Rescue: Oxfordshire County Council Fire and Rescue Service (OFRS) provides an important range of prevention, protection and emergency response services that help to reduce the environmental, societal and economic risks highlighted in the report, as well as mitigate the impacts of those risks, if they materialise.</p> <p>In order to understand more fully where OFRS is able to promote and maintain sustainability across the county, please refer to our recently published Community Risk Management Plan, which is available on the Oxfordshire County Council website: http://www.oxfordshire.gov.uk/cms/public-site/about-oxfordshire-fire-and-rescue-service</p> <p>In addition, the Service is keen to engage with local partners in promoting, supporting and developing sustainability initiatives and projects.</p> <p>It is good to see several references to lifelong learning. The County Council's Skills and Learning Service would be happy to work with South Oxfordshire to develop appropriate programmes to take this agenda forward.</p>	Noted.

2	Oxford City Council	<p>Evidence based on their own 2011 SA Scoping Report review found that adopting a new topic based approach, alongside a review of the objectives, indicators and targets provided them with a greater understanding of the sustainability issues facing their area.</p> <p>Council suggests the possible adaptation of the reports structure to follow the updated advice given by the Planning Advisory Service (PAS) on the production of Sustainability Appraisals.</p> <p>Consider scoping out some areas from the current planning document if they have been previously assessed in sufficient detail at the Core Strategy stage.</p> <p>The acknowledgement, at Paragraph 23 of indicators requiring priority action is welcomed. The Scoping Report could focus more on these as priority issues to be considered through the Sites and General Policies Document.</p>	<p>Noted.</p> <p>There may be an overlap between the topics on environmental, economic and social issues. In terms of understanding sustainability issues we feel it is clearer to see all environmental, economic and social challenges in one place. Table 2 splits South Oxfordshire's sustainability challenges into these three categories. The sustainability objectives cover all types of development apart from those which refer to a specific topic (housing employment etc...)</p> <p>The Local Plan: Sites and General Policies will have policies which cover a broad range of topics. The core strategy also covered a broad range of topics. We therefore consider that the SA framework should have the same broad scope as the framework for the core strategy.</p> <p>Noted.</p>
3	Little Milton Parish Council	<p>Need for any future housing developments within Little Milton or other surrounding villages e.g. Great Haseley, Chalgrove, to have investment in the infrastructure, given the current problems with sewerage and drainage within the village already.</p> <p>Additional concerns of future housing increasing traffic volumes, given Little Milton straddling the A329. Future development in Chalgrove is likely to cause problems as it is believed that Little</p>	<p>Noted.</p>

		Milton is a rat run to the M40 which is likely to impacts the sustainability of future housing developments.	
4	South Oxfordshire Sustainability Group SOS	<p>We generally welcome much in the Proposed Sustainability Appraisal Scoping Report. In particular we fully support, subject to comments below, the sustainability objectives set out in Table 3. However we are concerned at the following weaknesses and Omissions</p> <p>The report has rather limited ambitions, mostly worthy but reactive rather than proactive. There is no sense that SODC wish to become a national leader or trail blazer in sustainability, no commitment to initiatives which could excite the wider public – eg supporting a demonstration eco-house in each of our three market towns. We believe that one or more such proposals should be incorporated and stand ready to discuss possible options.</p> <p>While recognizing (pp 97-98) the extent of public disillusionment about their ability to influence local decision making it makes no suggestions for strengthening public involvement.</p> <p>With a multitude of objectives to be delivered It fails to address the inevitable difficulties and ambiguities about how trade-offs will be established between the various priorities set out in the strategy. We need a clear, published strategy for resolving conflicting objectives when these arise. We consider that action to reduce greenhouse gas emissions and energy consumption should be a priority when set against other objectives.</p> <p>There are no proposals for securing expert outside advice from independent professionals or specialists within the local community on those occasions when the Council (weakened by financial cuts and sometimes lacking the manpower, intellectual knowledge and fire power) needs to challenge</p>	<p>Noted.</p> <p>Noted. This comment is site specific. Objective 9 seeks high quality design and objective 10 seeks sustainable building practices which maximises the proportion of energy generated from renewable sources.</p> <p>Objective 18 is to support community involvement in decisions affecting them and enable communities to provide local services and solutions.</p> <p>Noted. Part of the planning process is the consideration of conflicting issues in order to come to an informed decision.</p> <p>Noted. This is not an issue for the SA Scoping Report.</p>

		developers effectively on the “viability” of elements of a proposed scheme.	
5	South Oxfordshire Sustainability Group SOS	<p>Introduction, para 5, p2. Replace last sentence as follows: “In addition to this we will establish new ways of involve local people in consultations and decision making on larger scale planning proposals.”</p> <p>Amend text in pp 14-19 accordingly (see also parallel SOS Overall Proposals on Planning System)</p>	<p>This is not appropriate for the SA Scoping Report. Task A5 relates to consultation on the scoping report itself.</p> <p>Overall Proposals on Planning System relate mostly to community involvement. It also proposes a new panel to be set up to advise the local planning authority on sustainability issues relating to major applications. These comments do not relate to the SA Scoping report and will be considered separately.</p>
6	Riki Therivel	Include in introduction a clear explanation of the decisions of the decisions that will be made in the plan.	Noted. Explanation added.
Task A1: Identifying other relevant plans, programmes and sustainability objectives. Appendix 1			
7	Oxford City Council	<p>The review of plans and programmes seems a bit lengthy. There is a degree of duplication of international objectives and national policy, some of which is unnecessary. For instance, the objectives from the World Summit on Sustainable Development in Johannesburg, probably does not need referencing if the UK Sustainable Development Strategy is also included. Other notable duplicates include the Water Framework Directive and its corresponding UK implementing legislation.</p> <p>It is also worth noting that some of the plans seem a little out of date. Several national level strategies are included from 2002-06. These could be revised, updated or if necessary removed from the list altogether.</p>	<p>Noted. Appendix 1 updated.</p> <p>Noted. Appendix 1 updated.</p>

		Finally, other plans and programmes in the “local level plans” section could include the adopted Core Strategies of neighbouring districts, for instance, Oxford and Reading.	Conformity with neighbouring authority plans will be covered by duty to cooperate requirements.
8	South Oxfordshire Sustainability Group SOS	<p>Local Plan response to UK Carbon Transition Plan and UK Climate Change Programme pp. 32-33. These three responses are disappointing, unduly vague and depressingly unambitious. There is a vast amount more that can and should be done – in terms of, eg, action to increase public awareness of the need for more sustainable living, support for local community renewable energy initiatives (eg WCEL, hydro projects on Thames, SOS/Earth Trust initiatives for promoting local food).</p> <p>Water Resources for the Future – Local Plan Response, p34. Amend to make water conservation mandatory in all new development, rather than as seems the case at present, one possible trade off against other ecologically desirable features.</p> <p>Encourage developers to include SWALEs as part of the control of rain water run off from hard surfaces within developments. This can also provide local green space and help encourage 4 bio-diversity.</p> <p>Bio-diversity 2020 – local plan response. P.37. Amend to make clear that every larger scale development must at the least maintain and if possible enhance quality of bio-diversity previously found on the site – or if that is not possible provide/fund compensatory action elsewhere.</p>	<p>Note. The council has a sustainability officer to cover this. The adopted core strategy has policies to deliver sustainable development. The SA Scoping report states that policies in the local plan need to be in accordance with the UK Carbon Transition Plan and UK Climate Change Programme.</p> <p>Not an SA Scoping report issue. All housing development is now required to meet Code for Sustainable Homes Level 4 which requires water conservation measures.</p> <p>Not an SA Scoping report issue.</p> <p>Noted. Policy CSB1 Conservation and improvement to bio-diversity states</p> <p>‘A net loss of biodiversity will be avoided, and opportunities to achieve a net gain across the district will be actively sought.</p> <p>Opportunities for biodiversity gain, including the connection of sites, large scale habitat restoration, enhancement and habitat re-creation will be sought for all types of habitats, with a primary</p>

			focus on delivery in the Conservation Target Areas.'
9	West Waddy ADP	Under the section on Village Appraisals and Village Plans reference is made to the Benson Plan of 1992. Benson Parish Council produced a Benson Parish Plan in 2004, so reference should be made to this document. Reference should also be made to the forthcoming Benson Neighbourhood Plan, which is being prepared alongside the Local Plan: Sites & General Policies.	Noted. Reference to 2004 plan and Neighbourhood Plan added. As Neighbourhood Plan is at a very early stage it cannot be scoped at this time but it should appear in future updates of the scoping report.
10	Riki Therivel	Include a more up to date PPP analysis, and in particular removal from Appendix 1 of those PPPs that are out of date.	Noted – PPPs updated.
Key messages for South Oxfordshire from the context review			
Table 1			
11	Oxfordshire County Council	P11, Sustainability Challenge 11. The Challenge currently states: 'Social exclusion caused by poor access to services and jobs in the rural areas'. This should read: 'Social exclusion due to remote location of some residential development and services'.	Noted. Amendment made.
12	West Waddy ADP	In Table 1 under number 25 and 27 the local plan information states is out of date based on its references to the expired South East Plan and Oxfordshire Structure Plan 2016. As the South Oxfordshire Core strategy has replaces the two previously stated documents and work is currently being undertaken on the updating the Strategic Housing Market Assessment (SHMA) is has been advised to replace this statement (alternative wording suggested)	Noted. Use wording from National Planning Policy Framework (NPPF). Amend 23 to read: 'Ensure that new housing development is planned, monitored and managed so as to meet an objectively assessed need.'
13	Gillots School	In table 1 wish to add 'education' to point 9 and 'schools and colleges' to point 10.	Noted. In Table 1 add 'education' to item 9 and 'education' to 'health and leisure facilities' in item 10.
14	London Property & Capital Estates Ltd	Pages 2-3, Paragraph 10: Identify settlement boundaries both as existing and, where relevant if development allocations are suggested, through part of the A2 and A3 SA process. Without such identification cause further problem on stages B1-B6.	South Oxfordshire does not have settlement boundaries. Development in villages is controlled by policy CSR1 in the adopted core strategy which only allows infill development. Allocations will be made through the local plan process.

		<p>Page 5, Paragraph 15, Table 1: Point 6 - Support requirement for new residential developments of at least 30dph net.</p> <p>Page 6, Paragraph 15, Table 1: Point 25 - Support requirement to meet all of the previously identified new housing needs in the District.</p> <p>Page 7, Paragraph 20: Grey traffic light status - Action is needed to produce data that would then aid the Task A3 challenges of identification, analysis and comparison.</p>	<p>Noted. This needs to be amended to 25dph to be in-line with policy CSH2 in the adopted core strategy.</p> <p>Noted. This will be amended to reflect the NPPF see West Waddy ADP comment above.</p> <p>In some cases historic data is not available so a clear trend can not be identified. This is identified by a grey traffic light status in Appendix 2 of the scoping report.</p>
15	South Oxfordshire Sustainability Group SOS	Table 1, objective 1, p.5. Add at end: "But in cases of otherwise irresolvable conflict reducing greenhouse gas emissions and energy use must always be the top priority".	Part of the planning process is the consideration of conflicting issues in order to come to an informed decision.
16	English Heritage	In Table 1, 11 should be "Conserve and enhance the historic environment: buildings, monuments, sites, places, features or landscapes of historic, architectural, archaeological or cultural interest, both designated and undesignated".	Amended to suggested wording.
Task A2: Collecting baseline information. Appendix 2: Baseline Review and Sustainability Appraisal Framework			
17	Oxfordshire County Council	P88 - Appendix 2, Objective 12. The indicators should also include diversion of waste from landfill.	The percentage of total tonnage of household waste recycled is indicator 1 of Objective 12.
18	Oxford City Council	<p>Objective 1, Indicator 4 has data for up to 2007-08, and states that there is a favourable trend. We suggest that the status should be "uncertain" rather than "good", as there is insufficient recent data to determine the current state of the environment.</p> <p>Considered that certain documents, e.g., from 2004, too old and do not accurately reflect the state of the environment. In such cases, where it is not possible to update the data with more up-</p>	<p>This indicator is no longer monitored so has been removed.</p> <p>Agreed. Baseline data has been updated.</p>

		to-date information, either remove that particular indicator and target, or find another that represents the objective that you are looking at.	
19	Chilterns Conservation Board	Objectives 8 and 9, (pg 80, 81) use inconsistent terminology when compared to the objectives listed in the column detailing comparators and targets.	The words 'protect' have been changed to 'enhance' for Objectives 8 and 9.
20	South Oxfordshire Sustainability Group SOS	Involvement of local residents in decision making , pp. 97-98. See comments above. Amend to read: 'Council will, in consultation with relevant parish councils and local groups, establish comprehensive and effective consultation mechanisms with local citizens and interest groups on all larger scale planning proposals. [The model proposed for the Wallingford Slade End site could, if successful, be a prototype for similar mechanisms elsewhere]. Council will establish an Expert Advisory Panel to provide , where needed, with relevant advice in dealing with developers.'	Noted. How the council consults in terms of planning is covered in their Statement of Community Involvement. Consultation requirements for planning applications are also set in planning legislation. SOS proposals on community involvement will be considered separately to the SA scoping report.
21	Riki Therivel	Some of the baseline data seems a little out of date – consider updating again. Table 2 may need updating as a result. Add a constraint map.	Noted – base-line data updated and Table 2 updated. Noted – constraint map added.
Task A3: Identifying sustainability problems: Table 2,			
22	Oxfordshire County Council	P10, Table 2 – Environmental Challenges. Drought and flood risk are covered in sections 4 and 5; it would be useful if this section considered reduction in carbon emissions against Oxfordshire 2030 and the risks of over-heating in buildings which is not covered elsewhere.	Amend title of sustainability problem to Energy Consumption and Carbon Emissions
23	Oxford City Council	The sustainability issues, problems and challenges facing South Oxfordshire do not appear to have been reviewed and updated.	South Oxfordshire's sustainability challenges are listed in Table 2 of the report including evidence of the problem. The report explains that the evidence shows these problems still exist and that the challenges haven't changed since the last scoping

			report update in 2009.
24	West Waddy ADP	Table 2 More up to date traffic figures needed as Table 2 references is data from 1991-2000.	<p>Add new text:</p> <ul style="list-style-type: none"> • 'Oxfordshire County Council's 10 Year Traffic Growth showed the following changes between 2002 and 2012 = M40: 0.09% Trunk: -4.45% A Road: -1.13% B Road: 0.33% • These changes are shown as an overall total. Changes on specific are a lot higher • Over the ten year period the greatest increase in traffic was for B roads. This is particularly relevant to a rural authority like South Oxfordshire which has many B roads. <p>(Source: OCC traffic monitoring webpage)</p>
25	London Property & Capital Estates Ltd	Pages 9-10, Paragraph 26, Table 2: Social Challenges 9-11 If the main shortfall for both affordable and general housing is for smaller 2-bed units, such accommodation ought to be focused on the most sustainable central sites with best accessibility to services and facilities.	Noted.
26	English Heritage	In Table 2, the conservation and enhancement of the district's historic environment, particularly those heritage assets on English Heritage's Heritage at Risk Register, is a sustainability challenge for South Oxfordshire – the National Planning Policy Framework (NPPF) makes it quite clear that the conservation and enhancement of the historic environment is an integral component of sustainable development.	Indicator 1 under Objective 9 suggests it is not a challenge yet in South Oxfordshire as the vast majority of assets are not at risk but it will continue to be monitored.
Task A4: Developing the SA Framework			
27	Natural England	Would like to see a sustainability objective which specifically refers to the promotion, protection and creation of accessible open space and green infrastructure.	Policy CSG1 Green Infrastructure in the adopted core strategy seeks green infrastructure including biodiversity through developer works and contributions.

		<p>Would like an additional indicator to monitor UK and European protected species on top of the existing indicator referring to populations of UKBAP priority species. Wish for this to be included within indicator 3 which covers UKBAP species.</p> <p>Suggest that to give an indication of the extent to which SSSIs are being considered through the planning system it could be monitored using numbers of planning applications resulting in SSSI protection or enhancement.</p> <p>In order to receive a higher level of protection it is recommended that the action related to this indicator should be specific to SSSIs rather than duplicated from indicator 2 which relates to UKBAP priority habitats.</p> <p>Also advise local plan should not allocate land within the SSSIs and sites adjacent to or in the vicinity should be required to provide mitigation or compensate for any impacts.</p>	<p>There is a risk of double counting as the majority of UK and European protected species are also UKBAP protected species. We currently do not have the mechanism to monitor specific species but this is always under review.</p> <p>The council currently monitors the percentage change of areas designated as a SSSI in the district. Adopted core strategy policy CSB1 and saved local plan policy C7 protect SSSIs from development which would have an adverse effect. Natural England would be consulted on an application where there were concerns of possible negative impacts on a SSSI. This should give Natural England an indication of the extent to which SSSIs are being considered through the planning system.</p> <p>Action for Indicator 4 of Objective 7 to read 'Local Plan should protect SSSIs from any adverse effects of development'.</p> <p>Noted.</p>
28	Environment Agency	<p>Pleased with the inclusion of draft sustainability objective 7 which commits to 'conserve and enhance biodiversity' and that the review international plans, programs and objectives includes both European and National Biodiversity plans and legislation.</p> <p>The plan should contain a planning framework which seeks to protect and enhance biodiversity resources.</p> <p>Flood Risk Welcome objective 11, 'reduce the risk of flooding and resulting</p>	<p>Noted.</p> <p>Noted. Policy CSB1 Conservation and improvement of biodiversity in the adopted core strategy states that 'A net loss of biodiversity will be avoided and opportunities to achieve a net gain across the district will be actively sought.'</p> <p>Noted.</p> <p>Noted.</p>

		detriment to public well being, the economy and the environment'. Data used to inform objective 11 is sufficient.	
29	Oxfordshire County Council	<p>P13, Table 3, Objective 6. The objective currently states: 'To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.' Consideration should be given to rephrasing this along the lines of 'new residential development and services should be encouraged in locations which can be accessed by means other than the car'.</p> <p>P14 – Table 3, Objective 13. The mineral resources aspect of this objective also has an economic dimension.</p>	<p>The adopted core strategy recognises that the rural nature of the district means that many residents will be dependent on car travel for some or all of their journeys. Objective 6 is worded to look at options that could reduce these trips as well as the need to use a car.</p> <p>Add tick in 'ECON' box.</p>
30	Chilterns Conservation Board	<p>For AONBs the objective should be to 'conserve and enhance' not 'protect and enhance' areas designated for their landscape importance in order to reflect the National Parks and Access to the Countryside Act 1949 and the Countryside and Rights of Way Act 2000.</p> <p>Include the most up to date Chilterns AONB Management Plan which was adopted in 2008 and not 2005.</p>	<p>Amend Objective 8 to 'Conserve'.</p> <p>Appendix 1 – Review of relevant plans, programmes and objectives does scope the most up to date management plan (2008 to 2013 version)</p>
31	Providence Land Ltd	The Sustainability Objectives should be reviewed and updated with reference to the current Government's interpretation of the role of the planning system in delivering sustainable development as set out in the NPPF.	The NPPF is scoped in Appendix 1 – Review of relevant plans, programmes and objectives to ensure the requirements of the guidance are covered by the objectives. This is a requirement of Task A1: Identifying other relevant policies, plans, programmes and sustainability objectives.

		<p>Sustainability problems in Table 2 do not clearly link to corresponding sustainability objectives in Table 3.</p> <p>For example: Objective 3 should refer to accessibility to services and jobs; the list of public services and the term 'community facilities and services' is too narrowly cast. In rural communities, local shops and other commercial enterprises are often vital for sustainability.</p> <p>Additional objective to maintaining and enhancing the vitality of communities, that could specifically refer to retaining local services and community facilities, as it's a key sustainability issue in the NPPF</p>	<p>All sustainability challenges in Table 2 are covered in the objectives in Table 3.</p> <p>It is not appropriate to list separately all public services in an SA objective. Objective 3 is specific as it refers to improving accessibility to 'health, education, recreation, cultural and community facilities and services'.</p> <p>This is covered by objectives 3, 4 and 18 which all relate to and seek community vitality.</p>
32	Grainger PLC	<p>Objective 1 amended to strengthen the Council's role of delivering sufficient housing for both existing and future residents.</p> <p>Amend the wording from; 'To help to provide....', to 'To ensure that existing and future residents have the opportunity to live in a decent home'.</p> <p>As shown within Appendix 2, the level of completions within Didcot continues to fall significantly below that required. In respect of Objective 1 and 'Indicator Status', position should be shown to be 'poor' and coloured red given the extent of the shortfall instead of being stated as deteriorating. This will provide a more accurate position from which to test the Local Plan against the SA/ SEA.</p>	<p>The objective is worded that way to assess how far an option goes in <u>helping</u> achieve the objective of delivering new housing.</p> <p>Housing completions in Didcot are increasing but action is still required to improve level of completions. This is indicated by the colour yellow.</p>
33	South Oxfordshire Sustainability Group SOS	<p>Table 3, objective 16, p.14. Amend to read: " Establish a process of community consultation, conducted and planned with key stakeholder groups"</p>	<p>This is not an objective that can be used to assess the sustainability of options. Objective 18 is to support community involvement in decisions affecting them and enable communities to provide local services and solutions.</p>

		Table 3, add new Objective 17; “to provide, or resource Oxfordshire Rural Community Council (ORCC) to provide, a focal point to promote discussion and dissemination of information among local parish councils involved in drawing up Neighbourhood Plans.”	This is not an objective that can be used to assess the sustainability of options. Objective 18 is to support community involvement in decisions affecting them and enable communities to provide local services and solutions.
34	Riki Therivel	If as with the core strategy further detailed site assessment is to be carried out in background papers this should be referred to in the scoping report with an indication of the criteria and how this fits with the SEA directive requirement. Also explain why you are using this criteria.	Noted. This has been added to the scoping report.
35	English Heritage	In Table 3, we are pleased to see draft Sustainability Objective 9, but it should be “conserve and enhance.....” as terminology more consistent with the NPPF.	Noted. ‘Protect’ changed to ‘conserve’.
Appendix 1: Review of Relevant Plans, Programmes and Sustainability Objectives			
36	Environment Agency	Recommend that the Wildlife and Countryside Act 1981 (as amended) is included within the national plans, programs and objectives. Pollution Control/Water Quality Approve of the principle of objective 05 which commits to ‘reduce harm to the environment by seeking to minimize pollution of all kinds’ but	Add Wildlife and Countryside Act 1981 (as amended) to Appendix 1 of the scoping report (as shown in EA response). Noted.
37	Oxfordshire County Council	P23, Appendix 1– International Plans, Programmes and Objectives. The European Directive of Waste (2008/98/EC) should also be listed. P33, Appendix 1 — Environment Agency GP3 Groundwater Protection Policy and Practice 2008. The Environment Agency	Noted. Add International Plans, Programmes and Objectives. The European Directive of Waste (2008/98/EC), Noted. Add Groundwater Protection: Principles and Practice (GP3) November 2012, Version 1

		<p>has published a revised version of GP3: Groundwater Protection: Principles and Practice (GP3) November 2012, Version 1.</p> <p>P45, Appendix 1 – Oxfordshire Minerals and Waste Core Strategy. The plan title should be amended to: Oxfordshire Minerals and Waste Core Strategy: Submission Document, October 2012. (NB. The objectives are unchanged in this later version of the document).</p> <p>P43 - In the Oxfordshire County Wide section of the review there is a lack of reference to the Oxfordshire Joint Municipal Waste Management Strategy.</p>	<p>Noted. Appendix 1 change title of Oxfordshire Minerals and Waste Core Strategy to Oxfordshire Minerals and Waste Core Strategy: Submission Document, October 2012.</p> <p>Noted. Add Oxfordshire Joint Municipal Waste Management Strategy.</p>
38	West Waddy ADP	<p>Makes no reference to the 2007 Oxfordshire Strategic Housing Market Assessment (SHMA); the 2008 Council's Housing Needs Assessment; nor the updated SHMA which is currently being produced. This reference needs to be made to these documents given the emphasis that Government places in The National Planning Policy Framework on meeting housing needs in Local Plans. Stating that Local Plans need to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area' (para 47).</p> <p>Additionally The Core Strategy Inspector also stated in his report, paragraph 4 that from the updated SHMA greater clarity about whether or not early reviews of Local Plans in the county need to be commenced. The findings of the updated SHMA will therefore need to be taken into account, both in preparing the 'Local Plan: Sites & General Policies' and the accompanying Sustainability Appraisal, and the housing figures in the Core Strategy may need to be reviewed.</p>	<p>The updated SHMA is another part of the evidence base and will be considered separately when completed.</p>

Appendix 2: SEA/SA Baseline Review and Sustainability Appraisal Framework			
39	Environment Agency	Concerned that Appendix 2 SEA/SA Baseline Review and Sustainability Appraisal Framework section on 'river water quality' (page 72) doesn't include recent WFD assessment data. Advise to refer to the River Basin Management Plans (2009) (RBMPs), the Water Framework Directive (WFD) and their associated data when determining river water quality given RBMP setting the 'benchmark'.	Add reference and link to this data under indicator 2 for Objective 5. Also add the Water Framework Directive to Appendix 1 of the scoping report. .