

Appendix 2 – Comments received during consultation on the Scoping Report and the District Council’s response to those comments.

Respondent	Date received	Comment	District Council Response
Government Office for the South East	17/08/2006	You will need to ensure that the Sustainability Appraisal (SA) clearly identifies those elements that are required for SEA. With this in mind, you may wish to tag or otherwise highlight those of your sustainability objectives that relate to SEA.	The SA objectives that relate to SEA will be specifically identified in the SA Report that accompanies the Core Strategy – Pre-submission Document.
Government Office for the South East	17/08/2006	You will need to identify plan objectives at an early stage so that you can compare them with the sustainability objectives	These plan objectives will be identified in the Pre-submission Document and this SA Report.
Government Office for the South East	17/08/2006	We suggest these plan objectives need to be open and transparent, setting out for example what the plan is expected to achieve by way of development requirements and addressing the drivers for change.	These plan objectives will be identified in the Core Strategy Pre-submission Document and this SA Report.
Government Office for the South East	17/08/2006	We note the review of plans and programmes in Appendix A addresses the five guiding sustainable development principles and the implications for the core strategy.	Noted.
Government Office for the South East	17/08/2006	You may find it helpful to go further and provide a cross reference between your sustainability and plan objectives and those paragraphs in national guidance that are relevant to your circumstances. That way, you may find that you are better able to demonstrate succinctly and transparently through the SA process how the plan has had proper regard to national policy.	To be demonstrated in Appendix 3 of the SA Report.
Government Office for the South East	17/08/2006	You will need to be very clear by the time you reach preferred options how national policy has been applied to the assessment of alternative spatial options (including broad locations) and how it has informed decisions made at preferred options and submission stages. You will be aware for example that we had concerns about the SA of the East Grinstead Area Action Plan with regard to the hierarchy of nature conservation and landscape designations in PPS9 and PPS7.	To be taken into consideration in the assessment of all policy options, particularly options for the broad locations of housing.
Government Office for the South East	17/08/2006	We would urge you strongly, by the way, to avoid the temptation to repeat or paraphrase national policy in development plan documents; it is the application of national guidance to the decisions made in the plan that matter. Lack of local distinctiveness has been a contributory factor to a core strategy failing the tests of soundness at examination.	To be taken into consideration in the preparation of the Core Strategy – Pre-submission Document.

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Government Office for the South East	17/08/2006	We expect to see evidence that genuine spatial options are being canvassed and tested through SA. Referring to Figure 27 of SA Guidance, we expect to see the issue of "location: where should it go?" thoroughly tested at this stage so that the core strategy can meet the requirements set out in the last sentence of paragraph 2.10 of PPS12: Local Development Frameworks.	This has and will be undertaken in the stages leading up to the publication of the Core Strategy – Pre-submission Document and the accompanying SA Report.
Sussex Biodiversity Record Centre	10/08/2006	Re. SA objective 10 'To conserve and Enhance the District's Biodiversity' - the first three items on this list are relatively easily achieved particularly in light of Mid Sussex's excellent decision to invest in its Ancient Woodland Inventory.	Noted.
Sussex Biodiversity Record Centre	10/08/2006	Re. SA objective 10, 4th indicator - thanks to the contribution that Mid Sussex makes to the Sussex Biodiversity Record Centre we are able to gradually improve the information that is available to you in terms of species and habitats. The information that we hold on priority habitats has some limitations but we can certainly use the data available to us to help you with this objective. However there are numerous priority species found in your district, the records of many of these will be recorded on an ad hoc basis and as such do not reflect change in a meaningful manner.	Noted. The monitoring of this indicator has since been developed through the 2005/06 Annual Monitoring Report
Sussex Biodiversity Record Centre	10/08/2006	Focus on just a few species and take a look at what the information that we currently hold can show us. Is this something that you have already considered? If this is something that you have not yet considered please get in touch and we can discuss it further.	This comment was followed up with the Biodiversity Record Centre, see additional comments received on the 21/08/2006
Sussex Biodiversity Record Centre	21/08/2006	A pdf showing all Priority Species records for Mid Sussex was received. Please note that breeding season data for Schedule 1 birds is not included in this report. For this data you will need to contact the Sussex Ornithological Society on mailto:conservation@sos.org.uk	Noted. The monitoring of the indicator relating to priority habitats and species has since been developed through the 2005/06 Annual Monitoring Report
English Nature	23/08/2006	SA objective 9 - Mid Sussex would be better prepared for the impacts of climate change if it could prevent or minimise any further habitat fragmentation. It would also be advisable to take every opportunity to reconnect semi-natural habitat e.g. hedgerows and small woods that connect or act as stepping-stones between larger woods. This will mean that as and when it becomes necessary, species will be able to migrate through and on to other areas, as well as the habitat being available and of a high enough quality that new species can move in.	Considered in the development of policy options for the Pre-submission Document.

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English Nature	23/08/2006	English Nature supports the inclusion and contents of Sustainability Objectives 10, 12 and 16 and their related indicators.	Noted.
English Nature	23/08/2006	Sustainability Objective and Indicators 11 - ANGST (Accessible Natural Greenspace Standards) could be used as an indicator of Objective 11.	The indicator 'percentage of new dwellings within 300 metres of accessible green space', which is currently used for sustainability objective 3 will also be applied to sustainability objective 11. The District Council will consider the feasibility of monitoring this indicator.
English Nature	23/08/2006	Appendix A - Review of plans etc. - Living within Environmental Limits - English Nature recommends the inclusion at the local level of the Mid Sussex Ancient Woodland Survey due for launch in October 2006.	This work will be considered in the preparation of the Pre-submission policy proposals for the Core Strategy and will be highlighted in the appendix that lists the review of plans etc, in the accompanying Sustainability Appraisal Report.
English Nature	23/08/2006	English Nature's comments on baseline data it can provide or assist with, made in its response of 7 February 2005 still stand.	Taken into consideration in the formulation of the Sustainability Appraisal framework detailed in the Scoping Report for the Core Strategy.
South East England Regional Assembly	21/08/2006	At the moment, the Assembly's focus is to comment on Core Strategy Development Plan Document at the Preferred Options Stage and Secretary of State Submission stage. We are therefore unable to comment in detail at this stage on the scoping report.	Noted; the Council will anticipate comments from SEERA during the consultation period on the Core Strategy – Pre-submission Document.
Cllr Edward King	12/08/2006	Please check: 4.2 - Population and balance in age and gender. The Scrutiny Report October 2003 refers to Mid Sussex having greatest % of over 60 year olds (25%) in Sussex and second highest over 80 year olds. If correct then population not balanced. See also 4.24.	See, http://www.midsussex.gov.uk/page.cfm?pageID=4315 #, this shows that the percentage of over 60 year olds is 21.5% for Mid Sussex. This is considerably lower than the overall percentage for West Sussex (25.3%) and only slightly higher than the national percentage. This data is taken from the 2001 Census.
Barrie Watson, Sussex Ornithological Society	30/08/2006 and 18/09/2006	Following the Sussex BRC's comments, this organisation were contacted concerning data for the priority habitats and species indicator for SA objective 10. Information sent on barn owls in the district.	Noted. The monitoring of the indicator relating to priority habitats and species has since been developed through the 2005/06 Annual Monitoring Report

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English Heritage	11/09/2006	In terms of baseline data, it is important that the historic environment is broadly defined. All designated historic assets and their settings should be considered, together with potential impacts on non-designated features of local historic or architectural interest and value, since these can make an important contribution to creating a sense of place and local identity. PPS12, para. 4.8/4.9 makes it clear that policies prepared by the local planning authority should be founded on a thorough understanding of the needs of their area and the opportunities and constraints which operate within that area. The evidence base is critical to the preparation of local development documents.	The evidence base for the Core Strategy will consider information on the historic environment in the district.
English Heritage	11/09/2006	There are, however, problems in representing the historic environment spatially in an appropriate way. Point data provided by individual designations provides only a partial overview. Historic Landscape Characterisation (HLC) and urban characterisation broaden the understanding of the historic environment by describing the evolution of the present day landscape/townscape and through this develop understanding about what gives a place its distinctive character and sense of place. Data is available from the county HLC projects, Extensive Urban Survey (EUS) and Urban Characterisation projects. Countryside Quality Counts will provide some measure of the erosion of historic landscape features.	In preparing the Core Strategy and Sustainability Appraisal work the county Historic Landscape Characterisation work and the Sussex Extensive Urban Survey work will be considered and used as part of the evidence base.
English Heritage	11/09/2006	The condition of the historic environment is an important consideration. Existing data sources include the National Buildings at Risk Register. English Heritage is undertaking a review of the national at risk methodologies as applied to listed buildings (Grade I & II*), Scheduled Monuments and Registered Parks and Gardens. Developments in this work should be taken into account in updating baseline and monitoring frameworks.	Once this data/work has been made available it will be used to update the baseline of the district as well as monitoring to be undertaken.
English Heritage	11/09/2006	It is important for the baseline information to be relevant to the particular plan/programme, and there may be a need to look at the wider geographic area in order to assess the likely significant environmental effects (e.g. traffic generation, setting issues).	Impacts on areas outside of the district will be considered when assessing options for the Core Strategy. Consultation with neighbouring authorities will be undertaken to ensure that any impacts on the wider geographical area are picked up.
English Heritage	11/09/2006	Any gaps in information on the historic environment should be highlighted as part of the baseline description e.g. "Not all information may be available immediately. The SA team should consider whether improvements are needed to current information collection to fill existing gaps. Ways of improving the availability of information can be included in proposals for monitoring the implementation of the plan." (ODPM 2005b, Appendix 6 p93).	The District Council are continuously looking to further expand the level of baseline data for the district. Where gaps in current baseline data exist, ways of obtaining this data in the future are being explored (see; http://www.midsussex.gov.uk/page.cfm?pageID=4314)

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English Heritage	11/09/2006	Additional sources of information suggested, including; www.heritagecounts.org.uk , www.magic.gov.uk , Listed Buildings online, County Historic Landscape Characterisation and Extensive and Intensive Urban Surveys.	Many of these sources of information have been examined in compiling the Scoping Report (see Appendix A). For the ones that were not used, they will be examined to see if they will impact on the Core Strategy or are able to provide further baseline data in the district. If this is the case these sources of information will be documented in the Sustainability Appraisal Report for the Pre-submission stage of the Core Strategy.
English Heritage	11/09/2006	I note that para. 1.5 refers to the SEA being incorporated into the SA process and that an assumption can be made that where reference is made to SA it also means SEA. In order that the European Directive on Strategic Environmental Assessment can be shown to be met, there will be a need for clear 'signposting', rather than reliance upon 'assumptions'. Para. 4.15 identifies a number of features associated with the historic environment, but in doing so, relies upon designations, and could do more to recognise the contribution of the wider historic environment. The importance of the settings of the identified features is worthy of mention. It is important that these features are not presented merely as a constraint upon development and that the potential to provide for future development is recognised. Para. 5.9 refers to the potential for adverse effect, but could also recognise the potential for development to extend the life of historic properties and for development to be conservation-led. It seems to me that the issue is one of assessing the capacity of the environment to accommodate levels of change anticipated. The UK strategy on Sustainable Development and PPS1 both recognise the importance of environmental capacity and the draft RSS (South East Plan) places a great emphasis upon the need to retain character and distinctiveness through good design.	The Sustainability Appraisal Reports will provide clear signposting for where the requirements of the SEA Directive have been met. With regards to the comments on para. 4.15, the value of the wider historic value does need to be recognised. Hence, the Sustainability Appraisal Reports will recognise this with reference being made to the Areas of Townscape Character and the Conservation Area Appraisals and Management Guidelines. An attempt will be made to provide an indicator that refers to the setting of historic features for objective 11. Concerning para. 5.9, the issue that development can extend the life of historic properties and development can be conservation led will be recognised in the Sustainability Appraisal Reports.
English Heritage	11/09/2006	In terms of the proposed SA objectives, I note that Objective 11 refers to the historic environment. I appreciate that this may have been derived from the RSS IRF, but there remains a concern to ensure that the historic environment is not just coupled with the countryside and that due regard is paid to the urban dimension.	Objective 11 has since been sub-divided. Hence, there is now one objective that relates to the historic environment and one that relates to landscape value/countryside.

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English Heritage	11/09/2006	With regard to decision-making criteria, "Planning authorities may also choose to include more detailed decision making criteria and related indicators in their SA framework. Detailed decision making criteria can help to ensure that all the key issues to be considered in the SA are incorporated in the SA framework. Care must be taken to ensure that the requirements of the SEA Directive... are met. Planning authorities are however encouraged to ensure that the number of objectives is manageable." (ODPM 2005b, Appendix 9, p105).	Noted.
English Heritage	11/09/2006	<p>Page 113 of Appendix 9 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM 2005b) provides one overarching decision-making criterion that relates to the historic environment...</p> <p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>For detailed interpretation and for the purposes of clarification, English Heritage recommends the following menu of questions to support environmental objectives;</p> <p>Will it protect and/or enhance environmental assets?</p> <p>Will it preserve and/or enhance the historic environment?</p> <p>Will it preserve archaeological remains and their settings?</p> <p>Will it preserve listed buildings and structures and their settings?</p> <p>Will it preserve or enhance the character or appearance of conservation areas and their settings?</p> <p>Will it protect Registered Parks and Gardens, Registered Battlefields and their settings?</p> <p>Will it conserve locally important buildings and townscapes?</p> <p>Will it conserve distinctive historic landscapes?</p> <p>Will it improve the quality of the built and historic environment?</p> <p>Will it conserve and/or enhance the character and appearance of the townscape and countryside, maintaining and strengthening local distinctiveness and sense of place?</p> <p>Will it respect and improve the distinctive character of the locality?</p> <p>Will it promote high quality urban design?</p> <p>Will it improve the satisfaction of people with their neighbourhoods as places to live?</p> <p>Will it provide for increased access to, and understanding of, the historic environment?</p>	Where possible, this menu of questions will be used to contribute to the assessment of policy options against sustainability objective 11.

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English Heritage	11/09/2006	Additional PPPSI's suggested; at the international level I would recommend inclusion of The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention). The Convention contains provisions for the identification and protection of archaeological heritage, its integrated conservation, the control of excavations, the use of metal detectors and the prevention of illicit circulation of archaeological objects, and the dissemination of information. It was ratified by the UK in September 2000, and provides for a broad definition of 'archaeological heritage' that includes 'structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water. At the national level, I have already made reference to 'The Historic Environment: A Force for our Future'. In addition, 'Culture at the Heart of Regeneration' (DCMS, June 2004), provides guidance on what has been shown to work well where culture acts as a catalyst to regeneration.	These additional PPPSI's (plans, programmes, policies, strategies and initiatives) will be examined. If relevant to the production of the Core Strategy then these documents will be included in Appendix A (or equivalent) in the Sustainability Appraisal Report.
English Heritage	11/09/2006	I welcome inclusion of reference to the Mid Sussex Historic Landscape Characterisation project.	Noted.
Environment Agency	11/09/2006	Groundwater: The document discusses the water demand in Mid Sussex and the quality of water within watercourses. There is mention of abstraction from chalk aquifers but not their protection, with regard to new development and the use of brownfield sites and this is of particular importance. Mid-Sussex has a large area of Major Aquifers and Source Protection Zones and therefore development will have an impact on the quality of groundwater/drinking water. Therefore the protection of groundwater from pollution is essential. This must be recognised in the Strategy and we suggest that objective 15 be adapted to incorporate this issue.	Agree with this point. To amend objective 15 to read, 'to maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.'
Environment Agency	11/09/2006	Land Contamination: Further, the use of brownfield sites in development and the subsequent remediation of any contamination would bring the land back into beneficial usage, aiding the protection and assurance of the quality of watercourses and groundwater.	To include an indicator for objective 15 of 'number and area of developments where appropriate remediation of contaminants has taken place.' Ways of monitoring this indicator will be explored.
Environment Agency	11/09/2006	Paragraph 4.12, Mid Sussex also contains areas of importance to BAP Habitats, notably wet woodland which is represented within the significant areas of ancient and Ghyll (gill) woodland within the stream valleys of the High Weald.	To refer to this when setting the environmental characteristics of the district in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	Paragraph 4.16, The Scoping Report should consider a broader range of waste streams. There are opportunities to integrate the management of waste under the control of local authorities and that from businesses, achieving significant efficiencies, and positive economy of scale.	Noted.

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Environment Agency	11/09/2006	A figure for industrial and agricultural waste accounting for 20% of all waste produced does not conform to other data sources. Agricultural and industrial waste accounts for around 33% of all of the UK's waste produced (Source: Defra, EA, Water UK). See the EA website for more information and statistics on waste.	The figure of 20% applies to Mid Sussex District. The figure quoted by the Environment Agency is a national figure.
Environment Agency	11/09/2006	No consideration appears to have been given to the issues of waste crime and fly tipping.	If the EA can provide evidence that this is an issue in the district then it can be documented in the Sustainability Appraisal process.
Environment Agency	11/09/2006	The LDF should also recognise the commitment to delivering the Joint Municipal Wastes Management Strategy 2004-2009 and the emerging Joint Materials Resources Strategy 2005-2035.	To examine these strategies. If they are of relevance to the Core Strategy they will be referred to in Appendix A (or equivalent) in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	In addition the LDF should also make a commitment to safeguarding sites allocated to minerals and waste operations within the Waste Local Plan and the emerging West Sussex Minerals & Waste Development Framework.	It is the purpose of the Waste Local Plan and West Sussex Minerals & Waste Development Framework to safeguard these sites, not the LDF. The LDF, however, will need to be in conformity with these documents.
Environment Agency	11/09/2006	Paragraph 4.19: This section should acknowledge the importance of the aquifers in the District and the water quality within these, particularly with reference to the threats to these from pollution and over-abstraction. Threats to river/stream quality also exist as a result of over-abstraction in combination with treated sewage discharges.	Agree - to include reference to this in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	We note that this section quotes 2002 water quality data, when 2005 data is available and would be more relevant. In addition GQA biology data has been referred to but not the chemistry component. We feel that it would be appropriate to give more depth to the RQO Grades to provide a better overview of the current situation.	To obtain updated data from the Environment Agency and refer to it in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	We also suggest that your section on Environmental Characteristics of Mid Sussex (pages 9-11) makes reference to the characterisation of the wet habitats within the District. There is a significant representation of standing water and wetland habitats, such as ponds (including historical mill sites and hammer ponds), lakes, reservoirs, and water meadows that needs to be acknowledged. In addition, recognition should be given to the linear/running water habitats of small streams (e.g. Upper Adur streams) and ditches, providing a network of wildlife corridors through the District.	To include mention of this in the Sustainability Appraisal Report.

Respondent	Date received	Comment	District Council Response
Environment Agency	11/09/2006	Paragraph 5.7, the second sentence of this paragraph states that the LDF should "ensure that countryside and townscapes in the District are not adversely affected by development". We highlight the importance of the LDF also requiring developments to promote the enhancement of the countryside and biodiversity, as well as mitigating adverse effects. It would also be pertinent to include reference to the water environment in this section.	Sustainability objective 11 seeks to enhance the District's countryside and historic environment. This means that the Core Strategy will need to aim to achieve this objective. The water environment is covered in paragraph 5.12 of this section, as well as paragraph 5.11 in part.
Environment Agency	11/09/2006	Paragraph 5.8, the second sentence of this paragraph states that "Development may lead to the loss of habitats and species". Taken alone, this indicates that this is acceptable, therefore it should be made clear that development should be used to enhance the countryside and biodiversity, and any adverse effects be mitigated for.	This is made clear in policies concerning biodiversity contained within the Core Strategy – Pre-submission Document.
Environment Agency	11/09/2006	Paragraphs 5.10 & 5.11, although these paragraphs deal with a number of the consequences of climate change and specify the reduction of emission of greenhouse gases, we also stress the importance of promoting efficient water use and water conservation measures (i.e. grey water systems and water re-use systems within new and existing developments). There should be more emphasis on flood risk either within these paragraphs or alternatively a new paragraph should be added to recognise flooding is a major environmental issue. In addition the implementation of SuDS (Sustainable Drainage Systems) should be encouraged.	The promotion of efficient water use and water conservation measures is seen as a way of tackling the issues identified in paragraphs 5.10 and 5.11. Hence, sustainability objective 15 seeks to achieve such measures and efficiencies. Similarly the implementation of SuDS is a way of tackling the issue of increased flood risk (as identified in paragraph 5.10) and will therefore be an important aspect in achieving sustainability objective 2.
Environment Agency	11/09/2006	Paragraph 5.11 Sentence 4 The point made here should not be that space in landfill sites is running out, but that this is the most unsustainable option by which to manage waste arising.	Noted. This point will be recognised in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	Paragraph 5.12, we highlight that both water quality and quantity are important issues for the District. Water quality in watercourses, water bodies, wetlands and aquifers will contribute significantly to the achievement of the target of "good status" under the Water Framework Directive (WFD). The WFD requires measurement of the status of a wet habitat through both chemical and biological (invertebrates, plants and fish) means. The biological status (noticeable in the long term) of a wet feature can particularly be affected by low water levels, not just through decreases in water quality. We suggest that other commitments should also be noted in this paragraph, such as the requirement to achieve favourable status in SSSIs by 2010, and targets for BAP habitats and species, which could affect the progress and form of development within Mid Sussex.	The issue of achieving the targets for the status of SSSI's as well as the targets contained within Biodiversity Action Plans will be highlighted in the Sustainability Appraisal report. It is considered that the indicators listed for sustainability objective 10 reflect this issue.

Respondent	Date received	Comment	District Council Response
Environment Agency	11/09/2006	<p>Sustainability Objective 10, this should include the number and area of National Nature Reserves (NNRs)? The indicator 'change in 'priority' habitats and species' is unclear and what is meant by 'priority' needs to be clarified. Additional indicators suggested:</p> <ul style="list-style-type: none"> -No net loss or degradation of locally important biodiversity features such as ponds, wet linear features or Ghyll woodland. -Achievement of the targets within the WFD, for SSSIs, BAP habitats and (protected and rare) species. -Number of developments providing enhancements -Number of planning applications approved contrary to advice given by the Environment Agency on biodiversity or fisheries issues. 	<p>There are no National Nature Reserves within Mid Sussex; therefore it is not appropriate to have an indicator concerning this designation for sustainability objective 10. The indicator 'change in priority habitats and species' is derived from Core Indicator 17 that is required to be included within Annual Monitoring Reports. With regards to the additional indicators suggested the District Council will explore the practicalities of being able to monitor them. If it is practical then they will be added to the list of indicators.</p>
Environment Agency	11/09/2006	<p>Sustainability Objective 14, there is no indicator for measuring waste arising. There is also no indicator to measure the quantity of Biodegradable Municipal Waste (BMW) sent to landfill, this will be required to measure progress against achieving the Landfill Directive targets implemented through Waste Strategy 2000/2006.</p> <p>The Core Strategy SA needs to consider other waste streams - i.e. Commercial & Industrial. The Local Authority in their role as Waste Collection Authority will be handling at the very least some commercial waste arising from those businesses within the district that have requested such a service from them. There are opportunities to integrate the management of waste under the control of local authorities and that from businesses with potential for achieving significant efficiencies and positive economy of scale.</p> <p>The following indicators could be added: - Waste collected (tonnes) by waste type (Household/Municipal, Commercial & Industrial, Construction Demolition & Excavation), Biodegradable Municipal Waste sent to landfill (tonnes). The first two existing indicators reworded: Percentage of waste recycled by waste type (Household/Municipal, C&I, CD&E), Percentage of waste composted by waste type (Household/Municipal, C&I, CD&E).</p>	<p>We will explore if any of these additional/amended indicators are already monitored by the District Council or any other authority/organisation. If so, these indicators will be added to sustainability objective 14. If not, we will explore the practicalities of being able to monitor them. If any of them are practical they will be added to the list of indicators.</p>
Environment Agency	11/09/2006	<p>SA Objective 15 Proportion of time where water supply exceeds demand – measure of our efficiency of water use and control of supply.</p>	<p>If the EA or the relevant water company(ies) can provide data for this indicator then it will be used in the Sustainability Appraisal process.</p>

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Environment Agency	11/09/2006	Appendix A - Living within Environmental Limits - include the following: International - the Landfill Directive (Council Directive 1999/31/EC), and consider including "Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of waste". National - the Review of England's Waste Strategy 2006. Regional/County - the emerging West Sussex Minerals and Waste Development Framework. Regional/County - Catchment Flood Management Plans (CFMPs).	These additional documents will be considered in the production of the Core Strategy and identified within Appendix A, or equivalent, in the Sustainability Appraisal Report.
Environment Agency	11/09/2006	We are currently undertaking a programme to produce Catchment Flood Management Plans (CFMPs) for the major river catchments in the Southern Region. A CFMP is a large-scale plan that covers an entire river catchment or group of catchments. There will be 2 CFMPs relevant to Mid Sussex: Adur CFMP and Ouse CFMP. The Adur CFMP Scoping Report was published for consultation in March 2006. A Draft Plan for the Adur catchment area is being developed which will include an Environmental Report that assesses the potential impacts of the policies that are adopted in the final CFMP (due to be completed in early 2007). The aim of CFMPs is to identify long-term, sustainable policies to manage flood risk within the catchment. These policies will form the basis for development of Strategy Plans, covering all or part of the overall catchment area, which will identify in more detail appropriate flood defence measures.	The Core Strategy will be considering the content of the emerging Catchment Flood Management Plans, in particular with the production of the District Council's Strategic Flood Risk Assessment, which is a key evidence base document for the Core Strategy. Any formal CFMP documentation that informs the content of the Core Strategy will be documented in Appendix A, or equivalent, in the Sustainability Appraisal Report. Although the EA state that there are 2 CFMP's that are relevant to Mid Sussex, there are in fact 4, Adur CFMP, Ouse CFMP, Medway CFMP and the Thames CFMP.
Countryside Agency	11/09/2006	Appendix A: List of other plans, policies or programmes - We welcome the reference to the High Weald AONB Management Plans.	Noted.
Countryside Agency	11/09/2006	Baseline - We support generally the baseline, particularly the reference to the Areas of Outstanding Natural Beauty, to the landscape character areas and to sustainable transport and open spaces. However, we would like to see more details on the quality and quantity of the networks of cycle routes and footpaths in paragraph 4.23 and about energy consumption in the environmental characteristics of Mid Sussex.	This data has been received from WSCC and will be documented in the Sustainability Appraisal reports (total length of Rights of Way: 597.8km, which is made up of 117.2km of bridleways, 475.2km of footpaths, 4.8km of byways and 0.6km of restricted byways). With regards to energy consumption, through our Annual Monitoring Report we are seeking to develop our monitoring framework for renewable energy generation. The only other information concerning energy consumption has been at a national level (see: http://www.statistics.gov.uk/STATBASE/ssdataset.asp?vlnk=7287).

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Countryside Agency	11/09/2006	Sustainable Objectives - We support particularly the objectives 11 "To protect, enhance and make accessible for enjoyment, the District's countryside and historic environment", and the objectives 6 and 12. Overall, we endorse the environmental objectives. However, we think that a reference to achieving high quality of design that respects and enhance local distinctiveness is missing.	The District Council consider that in achieving sustainability objective 11 there will be a need to achieve high quality design that respects and enhances local distinctiveness. However, it is considered difficult to measure how this is achieved in terms of the setting of an indicator(s) that is practical to monitor.
Countryside Agency	11/09/2006	Objective 11 - the indicators for the protection, enhancement and accessibility of the countryside are not enough developed: There is indeed scope for using the Landscape Character Assessment as a basis to make judgments whether change is positive or negative. Other indicators more focused on design could also be developed. We recommend also identifying meaningful indicators on the accessibility to countryside and open spaces and on open spaces, as for example the average distance of households from open spaces, the length of undisrupted footpaths/ cycle routes, the Net Gain and level of use of open space.	The District Council are endeavouring to expand on the range and number of suitable indicators to use when undertaking the Sustainability Appraisal process and the monitoring on the effectiveness of the Local Development Framework. We will seek to obtain baseline data for the indicators suggested and set up a suitable monitoring procedure, where practical.
Countryside Agency	11/09/2006	The Countryside Agency, together with English Nature and English Heritage, has analysed and mapped the distinctive features of the whole of the English countryside to produce the "Countryside Character" series of volumes which provides a national framework for more detailed assessments by local authorities and others. Information regarding the Character Areas in South East is contained in Volume 7 of the Countryside Character series (South East & London) (publication reference CA13). A further tool which the Countryside Agency considers is crucial in planning for landscape level change is Landscape Character Assessments (LCA), see "Landscape Character Assessment: Guidance for England and Scotland" April 2002 (CAX 84). The website of the Countryside Character Network www.ccnetwork.org.uk exists to share good practice in LCA and provides a valuable tool for accessing a database of each Character Assessment as well as relevant publications, research studies, Management Plans, GIS information and other baseline data.	The District Council has undertaken a Landscape Character Assessment and a Historic Landscape Characterisation, which, as identified in Appendix A of the Scoping Report, have and will be used in developing the Core Strategy. Other documents and pieces of work identified in this representation will be considered in preparing the Core Strategy and where they have influenced the development of this document they will be documented in the Sustainability Appraisal Report.

Respondent	Date received	Comment	District Council Response
Countryside Agency	11/09/2006	To the extent that this plan significantly affects the character or quality of landscapes, whether in the countryside or in more urban settings, this impact should be assessed. Countryside Quality Counts www.countryside-quality-counts.org.uk is a national project bringing together existing datasets which describe aspects of our rural areas, as well as developing and measuring indicators of change in countryside and landscape quality for England. The next phase will see the development of the database and methods of analysing the significance of the change. This information provides data and methodologies, which can inform SEAs.	The impact of the Core Strategy on the character or quality of landscapes will be assessed through the Sustainability Appraisal process. In doing this the District Council will seek to utilise the work identified by the Countryside Agency as a useful tool in measuring change in countryside and landscape quality.
Countryside Agency	11/09/2006	In addition, you should consider whether in your area there is land designated as conditionally exempt from capital taxes on the grounds of outstanding scenic, scientific or historic interest. These are considered to be designated landscapes of national importance and the impact of your plan on these should be assessed where appropriate. An up to date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm .	The Sustainability Appraisal process will consider the impact of the emerging Core Strategy on the designated landscapes of national importance within the District Council (the two Areas of Outstanding Natural Beauty). This will be done through sustainability objective 11.
Countryside Agency	11/09/2006	Access and Recreation - Potential impacts on access land, public open land and rights of way should be fully considered. The Countryside Agency has a statutory duty under the Countryside and Rights of Way Act 2000 to prepare maps of all open countryside and registered common land in England which have new rights of open access. The access rights for mapping area 1, which cover Kent, East and West Sussex and the outer London Boroughs (south of the Thames), have been in force since 19th September 2004. Further information can be found on the Agency's web-sites www.countryside.gov.uk and www.openaccess.gov.uk or call our Open Access Contact Centre on 0845 100 3298.	As previously mentioned the District Council are currently trying to obtain data on rights of way and cycle routes. Once we have received data on this we will seek to establish an indicator for sustainability objective 11 that will assess the impact of the Core Strategy on these assets.
Countryside Agency	11/09/2006	General - Annual State of the Countryside Reports, both national and regional, are available on our website. Relevant background data can also be accessed from our Data Hub. This may assist you with further baseline information. All of this work aims to capture and quantify the current state of England's rural areas, in order to inform and help manage future plans, policies and changes in order to retain the unique aspects of our countryside. Therefore we would wish to see these methodologies incorporated within the SEA where appropriate as part of the identification of the baseline indicators which will be used to monitor changes. We would also expect details of the frequency with which monitoring and assessment of these indicators will take place.	The development of the Core Strategy, including the Sustainability Appraisal process, will consider the content of these documents and background data. Where they have influenced the content of the Core Strategy they will be included in Appendix A, or equivalent, of the Sustainability Appraisal Report. Where the data can usefully be applied to forming the baseline characteristics of Mid Sussex, as well as adding appropriate indicators, it will be documented in the Sustainability Appraisal Report.