

Sustainability Appraisal of Marine Walk Masterplan SPD **Sustainability Statement**

Final Report
June 2010



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Sustainability Statement June 2010

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1 Introduction

1.1 Marine Walk Masterplan

Sunderland City Council formally adopted the Marine Walk Masterplan Supplementary Planning Document (SPD) on 3rd February 2010. Alongside the preparation of the SPD the Council has carried out a parallel process of appraising and consulting on a Sustainability Appraisal (SA).

The SA seeks to identify the economic, social and environmental impacts of the SPD and suggests ways to avoid or minimise negative impacts and maximise positive ones.

When a plan or programme is adopted, the SEA Directive requires the body responsible for preparing it to make information available on how environmental, or in this case sustainability considerations and consultation responses were reflected in the plan or programme and how its implementation will be monitored in the future.

1.2 Sustainability Appraisal

Councils are required to undertake strategic environmental assessment of Plans under the European Parliament Directive 2001/42/EC. Article 9 of the Directive states that when a Plan is adopted authorities must inform specific environmental consultees and the public with a statement summarising how environmental considerations have been integrated into the Plan, how the environmental report (i.e. Sustainability Appraisal Report) and the result of consultations on the report have been taken into account, and the reason for choosing the plan in the light of other reasonable alternatives. In this context, the specific environmental consultees are Natural England, the Environment Agency and English Heritage.

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public “are informed and the following items are made available to those so informed:

- (a) the plan or programme as adopted;**
- (b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and**
- (c) the measures decided concerning monitoring [of the plan]**

(Annex 9(1))

1.3 Sustainability Statement

This document has been prepared to address the following points:

- Section 2 - this sets out the principal findings of the SA and recommendations to Sunderland City Council for changes to the SPD.
- Section 3 – how the findings of the SA have been taken into account in finalising the SPD including the reasons for choosing various alternatives.

- Section 4 – how the responses to consultation received during the evolution of the SPD 2 – including comments on the provisional (draft) plan and SA Report - were taken into account in finalising the SPD.
- Section 5 – how implementation of the SPD will be monitored in the future.

2 SA Findings

2.1 Introduction

Scott Wilson was appointed by Sunderland City Council to appraise and produce the SA of the Marine Walk Masterplan SPD. The SA was undertaken and supported the SPD throughout its preparation.

By undertaking a systematic and iterative process the SA has been used to:

- develop and refine the SPD;
- assess both the positive and negative effects of the proposals;
- and revise some of the proposals and consider mitigation measures that address the effects and achieve more sustainable outcomes;

The SA started with the production of a Scoping Report and Context Review which were subject to consultation with the designated Consultation Bodies for the SEA (English Heritage, the Environment Agency and Natural England) for a period of five weeks.

In order to assess the contribution of the SPD to future sustainable development, a series of 14 sustainability objectives for the area were developed – see Table 2.1 below. The sustainability objectives provided the benchmark for undertaking the SA. Sub-criteria were used to facilitate the evaluation of the proposals against these sustainability objectives.

Table 2.1: The SA Framework

Sustainability Objective	Sub criteria
Safeguard and enhance the region's environmental infrastructure	Protect and enhance sites and habitats designated for their biodiversity value
	Enhance biodiversity in green spaces and amongst developments in urban areas
	Bring biodiversity into the day-to-day lives of Sunderland's residents by promoting the qualities of designated sites
Secure safe waste recovery / disposal without endangering health or harming the environment	Protect and enhance sites and habitats designated for their geodiversity value
	Protect the human health and environment of the seafront area by producing less waste and by using it as a resource
Protect water sources from contamination and minimise the release of harmful products into the environment.	Ensure that designated coastal bathing waters along the seafront regain 'excellent' status
	Improve the water quality of river, ground and coastal waters that are considered to be 'at risk' of not meeting Directive objectives
	Ensure that there current water and sewage capacity can accommodate the impact of new development and regeneration strategies
Ensure surface water run-off is managed in a sustainable manner	Ensure surface water run-off is managed in a sustainable manner
	Ensure development supports efforts to reduce all forms of pollution, and in particular the effects of motor vehicles
Minimise polluting activities and contain air pollution to within acceptable limits	Ensure development supports efforts to reduce all forms of pollution, and in particular the effects of motor vehicles

Sustainability Objective	Sub criteria
Adapt to and mitigate against climate change	Make an equitable contribution to helping the UK cut its carbon dioxide emissions by 60% by 2050
	Reduce the cause and impacts of flooding Address the risk and impacts of coastal erosion
Promote, enhance and respect the region's culture and heritage	Preserve the character of the coast
	Protect and enhance historic built environment by ensuring viable uses
	Prevent new development which is at odds with the character of the site
	Improve the seafront and public realm Preserve the historic environmental infrastructure
Improve health and well-being while reducing inequalities in health	Encourage recreation that will contribute to the health of residents and visitors
	Improve pedestrian and cycle routes to promote healthy modes of transport
Build sustainable communities	Promote and encourage community involvement and participation
	Stem the declining population by reducing out-migration Reduce instances of petty crime and vandalism
Establish a strong learning and skills base	Maintain levels of educational attainment
Strengthen the regional economy	Strengthen the local economy by encouraging local businesses to locate to the area
	Build the local tourist economy by attracting more visitors to the seafront
Develop a more sustainable employment market	Establish a more diverse local economy
Develop sustainable transport and communication	Reduce the reliance on the private car as a preferred mode of transport
	Reduce congestion along the A183 corridor
	Improve public transport links between the seafront and key services in the city
	Improve pedestrian and cycle routes to promote healthy modes of transport

2.2 What will the situation be with the masterplan?

2.2.1 Environment

It is considered that the masterplan will increase accessibility and enhance the local landscape and environment. This will undoubtedly add to the sense of stewardship of the waterfront environmental infrastructure and local built heritage by the population of Sunderland. However, this accessibility may also place stress on the local wildlife with waste generation and noise disturbance of the local area. This is particularly relevant to European wildlife sites which lie within the vicinity of the masterplan area, namely Northumbria Coast Special Protection

Area (SPA) and Durham Coast Special Area of Conservation (SAC). Pollution in the coastal zone may also compromise the ability of Roker beach to maintain its blue flag status and cause localised impacts to local air quality.

2.2.2 Community

The masterplan has at its core the intention to create an area that will provide opportunities to enjoy the promenade, coast and beach at Roker. The proposals will encourage education and enjoyment of the marine environment, heritage and geology of the local area and will contribute to improving health. These environmental improvements also make a valuable contribution to the creation of sustainable communities.

2.2.3 Economy

The seafront regeneration will be of benefit to the wider Sunderland community as a whole which can boost Sunderland's tourism economy providing opportunities for access to culture, leisure heritage and attractive natural environments. In the long term, with an increased reputation of the Roker seafront as a regional tourist destination for tourists there may be an impetus for new businesses to move into the area. There will also be opportunities to improve the evening economy, for example through new cafes and restaurants attracted to the area. This will stimulate the local job market providing local employment opportunities.

3 How the SA findings have been taken into account

3.1 Introduction

The SPD was subject to SA at key stages during plan preparation, both through an iterative approach during development, and once the proposals underwent public consultation.

The findings of the appraisal of the SPD were documented in the SA Report, which accompanied the plan during the public consultation stage.

3.2 Amendments to the SPD

In light of the findings of the Sustainability Appraisal the Council made the following changes to the SPD before completing the consultation draft.

- Reference was made to improved waste management facilities and sufficient dog waste disposal facilities in street furniture (**section 5.6 of the SPD**) and maintenance (**section 6.4 of the SPD**).
- Reference was made to sustainable water treatments and SUDS (**section 6.1 of the SPD**).
- Reference was made to exploring opportunities to improve public transport links, walking, cycling and improved signage from metros in sustainability (**section 6.1 of the SPD**).
- Made it clearer cycle storage will be provided in street furniture (**section 5.6 of the SPD**).
- Made it clearer the masterplan will create an area for all members of the community in key spaces (**section 5.2 of the SPD**) and equality and diversity (**section 6.2 of the SPD**).

3.3 Changes to the SA

3.3.1 Environment

Improved and increased waste management facilities will lessen the impacts of litter created from increased visitor numbers. This will permit a cleaner and more pleasurable seafront for the visitors and lessen harmful effects associated with waste disposal on the coastal environment. Furthermore, provision of sustainable water treatments will prevent harmful contamination of water resources and the marine environment with contaminated surface runoff and waste water. Increased provisions for cyclists and increased public transport links will minimise any increase in pollution associated with increases in vehicular traffic.

3.3.2 Community

Increased provision and promotion of public transport links will in turn provide greater accessibility to the people of Sunderland to see local environment and built heritage sites. Increased cycling provisions promote sustainable and healthy transport along the seafront.

4 Commentary on decision making and responses to consultation

4.1 Introduction

Under the SEA Directive, this statement should set out how 'how environmental considerations have been integrated into the plan or programme' and how the 'opinions expressed' as a result of consultation on the draft plan or programme and the accompanying environmental report (in this case SA Report) have been taken into account. Three factors therefore need to be explicitly taken into account in finalising the SPD:

1. the findings of the SA;
2. the findings of consultation on the plan; and
3. the findings of consultation on the SA Report.

In relation to the SA findings, Section 3 details changes to the SPD proposed by the Council in light of the SA Report.

In relation to the consultation on the SPD, Section 4.2 outlines the consultation process employed during the preparation of the emerging plan. Detailed information on the responses received, and schedules outlining the resultant changes to the document can be obtained from the Council.

In relation to comments on the SA Report, Section 4.3 sets out responses to the SA Report and how these have been taken into account in finalising the SPD. Section 4.4 details how the SA Scoping Report (prepared at the beginning of the SA process) was amended in light of consultation.

4.2 Approach to Consultation

The Marine Walk Masterplan SPD – Statement of Consultation, produced by City of Sunderland Council in January 2010 provides details on the various stages of consultation that were carried out on the SPD and accompanying documents.

4.2.1 Pre-production Involvement on the SPD

The council carried out a first stage city wide consultation on regeneration options for the seafront between 16 February and 3 April 2009. A number of different consultation methods were used including:

- Letters including consultation forms and freepost envelopes were sent to all residents and businesses in the seafront study area informing them of the consultation;
- Memos were sent to all Councillors and Heads of Service within the Council;
- Workshops;
- Drop-in sessions;
- A dedicated consultation website and online consultation form;

- City-wide exhibitions;
- Articles in various publications.

4.2.2 Formal Consultation

The Council are required to issue a SPD for formal public consultation for a period of four to six weeks, in line with Regulations 17 and 18 of the Town and Country Planning (Local Development) (England) Regulations 2004. The consultation period for the SPD ran from 8 August to 18 September 2009 and consisted of a number of consultation methods including:

- Letters were sent to Natural England, English Heritage, the Environment Agency and other key stakeholders with a CD containing the draft SPD, a full Sustainability Appraisal and Appropriate Assessment for comment.
- Articles were published in various publications seeking the views and comments of the public and other interested parties on the SPD.
- A number of consultation events, exhibitions and workshops took place during the six week consultation period from 8 August to 18 September 2009 at a number of venues across the city.
- Letters were sent to all residents and businesses in the seafront study area informing them of the consultation;
- Memos were sent to all Councillors and Heads of Service within the Council;
- A dedicated consultation website and online consultation form;

4.3 Consultation Responses relating to the SPD and SA Report

A number of comments were made on the SPD and the accompanying SA Report during the consultation period. The Marine Walk Masterplan SPD – Statement of Consultation includes full details of the responses received at each stage of the plan preparation process. Appendix 1 outlines the comments received from the consultation bodies on the sustainability appraisal process, and the subsequent changes that have been made to the SA Report.

4.4 Consultation Responses relating to the SA Scoping Report

The SEA / SA process comprise five stages (A – E). Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the plan in question can be assessed – together with the evidence base that will help to inform the appraisal.

Stage A for the SEA / SA of the SPD was documented in a Scoping Report. In line with the regulations implementing the SEA Directive¹, this report was subject to consultation with the four designated Environmental Consultation Bodies² and other organisations for a period of five weeks. It should be noted that the Scoping Report applied to the Regeneration Options for the Seafront at Roker and Seaburn.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

² The Countryside Agency, English Heritage, English Nature and the Environment Agency

Several consultation responses were received and a series of changes to the document were subsequently made – see Appendix 2. However, none of these changes necessitated alteration of the sustainability objectives used to assess the SPD in the SA.

5 Post Consultation Alterations

5.1 Changes to the Masterplan

The consultation gave rise to a number of changes which require assessment before the plan can be adopted. The main changes to the masterplan included:

5.1.1 Environment

The masterplan now shows consideration of the natural environment at both the strategic level and for planning considerations. This will greatly limit the impact on the local environmental infrastructure. Sustainable design is incorporated right through the proposals with green innovation being championed throughout the plan. This includes locally sourced materials as well as renewable and low energy technologies and sustainable drainage systems. This holistic approach has a number of benefits to the environment not just in limiting the damage to environmental infrastructure but also limiting pollution as a result of the proposals in the coastal zone. Furthermore, the promotion of active measures to enhance local biodiversity will add to the rich natural environment present on Marine Walk.

Furthermore, the promotion of sustainable transport serving Marine Walk and the incorporation of renewable technologies into sustainable design of developments as part of the SPD proposals will have implications on both local and regional air quality.

5.1.2 Community

Flood and coastal erosion protection measures are incorporated into planning considerations. This will lessen the effects of extreme climatic events particularly given the proximity to the ocean.

The promotion of sustainable transport provision to Marine Walk will ensure a reduction in the reliance on private vehicles serving the area. Design methods including local materials, low and renewable energy solutions, SUDS and green roof technology will all contribute to a local sustainable environment. Furthermore, the proposals will ensure a rejuvenation of the area bringing increased facilities for local communities.

5.1.3 Economy

The development principles outlined in the plan will give strength to leisure and tourism proposals including cafes, restaurants and bars. This will provide an increase in the attractiveness of Marine Walk as a national tourist destination.

The impetus towards leisure and tourism proposals outlined in the SPD will enhance the attractiveness to businesses. This will in turn stimulate local employment opportunities in the hospitality sector.

6 Monitoring

6.1 Introduction

The SEA Directive includes a specific requirement for monitoring the significant environmental effects of plans and programmes and the Environmental Report (incorporated within the SA Report for the SPD) should include a description of the measures envisaged for monitoring the plan. The SEA Statement should then include details of the measures decided concerning monitoring (see Section 1).

The ‘Environmental Report’ required under the SEA Directive should include:

“a description of the measures envisaged concerning monitoring in accordance with Article 10”

Annex 1(i)

“Member States shall monitor the significant environmental effects of the implementation of plans and programmes...”

(Article 10(1))

Monitoring allows the significant environmental effects of the plan’s implementation to be identified and dealt with early on if necessary. It also helps to assess the actual effects of the plan against those predicted in the SA and can provide baseline information for future plans.

6.2 Monitoring Framework

Sunderland City Council undertakes annual monitoring in line with legislative requirements, which form the basis of continually monitoring the performance of the Local Development Framework (LDF) against environmental effects. Table 5.1 sets out the key significant effects of the SPD identified through the appraisal process alongside suggestions for monitoring. It will be up to the Council to consider the practicalities of monitoring and what might be achievable. Monitoring should be undertaken through the Annual Monitoring Report for the Councils LDF. In addition, some areas of the masterplan development will require planning permissions/consents, therefore going through a process that will review and establish suitable and acceptable levels of development in respect of their potential impact.

Table 5.1 Significant effects of the SPD identified through the SA process and monitoring suggestions.

Significant Effect	Monitoring suggestion
Uncertainty exists as to the impacts of the SPD on wildlife within the local environmental designations (The significance of this effect may be influenced by further work on the HRA).	Natural England closely monitors all SSSIs. The local environmental designations are all encompassed within Durham Coast SSSI which is in particularly monitoring for its role in supporting purple sandpiper.

Significant Effect	Monitoring suggestion
Decreases in local air quality as a result of increase vehicle use and congestion	The Local Development Framework Annual Monitoring Report monitors specific “hotspot” areas of Sunderland for air quality. There is no specific monitoring station at Roker, and is not currently identified as a “hotspot”, or problem area. Monitoring of traffic numbers overtime, may assist in indicating if comparable to other “hotspot”, the numbers are likely to cause problems.
Increases in waste generation associated with the increased visitor numbers.	Waste is monitored at a city wide level by Sunderland City Council and it is difficult to isolate waste generation in small areas. Waste disposal will continue to be part of the Councils responsibilities and localised monitoring may be undertaken by other Council services.
There is a need to monitor the impacts of the SPD on the coastal water quality to remove the risk of compromising the beaches blue flag status.	It will be important to work closely with the Environment Agency who monitor coastal waters particularly with respect to bathing water quality. This information is available annually from the Environment Agency.
Stimulation of the local tourism economy.	The Local Development Framework Annual Monitoring Report monitors the number of planning applications approved in tourism and cultural related developments.
Greater opportunity for pedestrians and cyclists	The Local Development Framework Annual Monitoring Report monitors the number of cycling trips made within the city.

7 Further Information

Copies of the Adopted Marine Walk Masterplan, the full SA Report and all of the related documents can be downloaded from the City Council's website:

<http://www.sunderland.gov.uk/seafont>

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Appendix 1 Analysis of Representations Received on the SA Report

Consultation Authority	Section/Paragraph	Comments	Response
Environment Agency	General	SA must also identify indicators to inform any monitoring scheme to be implemented, which is currently not the case.	Indicators have been identified in the scoping report for information purposes. However, the SA report a methodology which allows for more subtle yet significant effects to be discussed within each objective led chapter heading, as it can be difficult to set specific target indicators in areas of sustainability. This report should be read alongside the scoping report.
Northumbria Water	5.4.4	The end of the paragraph implies that the loss of the blue flag status after the heavy rains in 2007 was due solely to the storm discharges from the sewerage system, whereas in fact the heavy rainfall also increased the amount of surface water run-off from both agricultural and urban areas and any or all these contributed to bacteriological impact on the bathing water quality. It would be helpful to amend the paragraph by mentioning all of these factors, which would tie in with the stated aims in section 6.1 of the Marine Walk Masterplan and other parts of the documents to adopt sustainable water treatments to prevent flooding and pollution from all sources of surface water.	Agreed – amendments have been made to the text (see section 5.4.4).
Natural England	3.4.6	It would be useful to show the extent of the SSSI in Figure 3.1	Agreed – figure has been amended to include the SSSI.
	3.6	This SEA/ SA should both identify issues and identify how adverse impacts can be overcome with the solutions embedded in the masterplan.	Sufficient recommendations have been made in sections 3.7 and 3.8 to inform the masterplan.

Consultation Authority	Section/Paragraph	Comments	Response
	3.6.2 and 3.7.1	Habitat enhancement should be appropriate to the area including benefiting existing features and not create an unnecessarily complex fragmented mosaic.	Agreed – text amended to stress the importance of locally native planting and local habitat enhancement.
	3.6.3	This should include addressing protected species as well as habitats and recognised sites.	Agreed- as above.
	3.7.2/ 4.7	Control and management of waste must be embedded in the masterplan. It should also be recognised that seaborne waste can also adversely affect the environment. However any beach cleaning should not remove natural materials such as seaweed and life on the beach that provides food for coastal birdlife.	Disagree – the masterplan should make reference to the local waste strategy. This should ensure adequate provisions for waste disposal in light of the regeneration proposals. Text amended to reflect this.
	3.8.1	Likely impacts on the European sites are not all clearly identified and addressed in the HRA which should ensure the masterplan is drafted to avoid any adverse effects on the integrity of these sites. The SEA should recognise that these issues have been identified and also set out how they are overcome in the plan.	Agreed – the text has been amended in light of the changes to the HRA.
		To avoid permanent impact on wildlife management and maintenance should be appropriate and on ongoing in the long term rather than 'constant'; for example mowing regimes should complement the flowering and seeding of grassland and to provide feeding areas for birds in winter, rather than be constant mowing creating a short cut sward of little wildlife value.	Agreed – text amended.
	Sections 5 & 6	Does not recognise issues of sediment load in coastal waters, increased turbidity or river and coastal waters as a pollution / contaminant which can affect aquatic and marine life.	Agreed – reference made to sediment loading in section 5.5.1.

Consultation Authority	Section/Paragraph	Comments	Response
	Section 7	Addresses causes of climate change but overlooks addressing impacts and enabling adaptation, including of the natural environment, beyond flood risk.	It is considered that flood risk from the ocean and coastal erosion is the primary impact that climatic changes will have on Marine Walk and consequently it is these issues which the SA addresses. Furthermore, the SPD places an onus on incorporation these considerations into the design of both the masterplan area and individual development proposals.

Appendix 2 Analysis of Representations Received on the SA Scoping Report

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
Northumbrian Water	4.3.5	NWL notes the reference to a number of areas of concern, one of which is that the southern part of the City's coastline "was affected by "domestic and industrial effluent". This information was taken from the Sunderland UDP 1998 and as such is out of date. A new sewage treatment works has been operating since 2000 and there has been a major improvement programme on the sewerage network. Whilst it is correct that discharges may occur at times of heavy rainfall, the investment by NWL in the sewerage system has greatly improved the situation and it is suggested this reference in the last sentence is removed or amended for clarity.	Agreed – Changes have been made
	4.4.1	NWL acknowledge that new development could lead to more contamination of coastal waters; this would be the case if more surface water (SW) run-off was allowed into the sewerage system and accordingly NWL would suggest another "locally distinctive sub-criteria" be added to Table 12.1: SA Framework, to "ensure SW run-off is managed in a sustainable way by diverting and discharging SW to the sea wherever possible". These sub-criteria would support the high level SA objectives to live within our environmental limits and to adapt to and mitigate against climate change.	Agreed – Table updated to read "Ensure surface water run-off is managed in a sustainable manner"
		NWL suggest their representations should be read, where appropriate, in conjunction with the Company's previous existing and previous representations relating to Sunderland City's Core Strategy DPD (and associated Core Strategy topic paper – utilities infrastructure 1.18), Housing Allocations DPD (and associated SHLAA evidence base); and the various SPDs produced (including Stadium Village and Central Area).	Noted for consultation in SA
English Heritage – North East Region	<i>1 Introduction</i>		
	1.2 SA and SEA	Paragraph 1.2.7 contains Table 1.1. It advises that the likely significant effects of the strategy on matters such as cultural heritage will follow in the SA Report. There should, however, be some understanding of possible or likely effects at the Scoping Stage to be able to scope the appraisal properly. To some extent it must be an	Noted and agreed. The table does however set out the requirements for the Environmental Report rather than the Scoping Report.

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
		iterative process.	
	1.3 The Seafront Masterplan Context	English Heritage welcomes recognition of the cultural and historic importance of Roker and Seaburn in paragraph 1.3.2. They welcome, too, the acknowledgement of the area's 'vast natural and historic character' in Paragraphs 1.3.4-6 dealing with the Vision for the Seafront.	Noted for consultation in SA
	1.5 Consultation	I am pleased to note that the County Archaeologist has been consulted on this Scoping Report.	Noted for consultation in SA
<i>7 Heritage and Landscape</i>			
	7.2 Context	<p>This section contains a review of key sustainability objectives and messages. It is worth noting that –</p> <ul style="list-style-type: none"> • The Heritage Protection Bill is currently on hold, not having been included in the Queen's Speech towards the end of last year. EH re nevertheless hopeful that in a year or so it will find a new slot. • A draft PPS15 on heritage conservation to replace PPG15 and PPG16 is imminent, and expected to be subject to a six month consultation period. • As well as buildings, areas and landscapes, protection should also be afforded to (archaeological) features and structures. • English Heritage also advocates the use of Historic Landscape Character Assessment, as well as various other forms of assessment to best cover different sizes and types of area. 	<p>Noted – Heritage Protection Bill will replace proposals set out in Heritage White Paper Review 2007.</p> <p>Noted for potential inclusion in the SA.</p> <p>Agreed and amended</p> <p>Noted for consultation in SA</p>
	7.3 The Current Baseline	Paragraph 7.3.7 contains Table 7.1 outlining in numerical terms the heritage assets in Sunderland. For the purposes of this strategy document and its sustainability appraisal it is necessary to have information regarding the type and number of heritage assets within the study area. Furthermore, it is important for the appraisal to contain an understanding of the <i>condition</i> of those assets, and the	Noted – at this stage we do not have detailed information regarding the condition of these assets. The numbers quoted in the text refer to a table in the Sunderland City Councils "State of the Historic Environment Report" (2009).

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
		extent to which they are improving or otherwise.	
		The table states that there are no locally important heritage assets in Sunderland. This figure needs some explanation, in that there are none because there is no list, not because there are no locally important buildings in the city.	Agreed and amended – this is now removed to avoid confusion
		Paragraph 7.3.10 refers to grade I and grade II listed buildings at risk. This should be grade I and II* listed buildings, and scheduled monuments. Although 'F' Pit Museum in Washington is listed grade II, it appears on the Register because of its scheduled status. As far as EH are aware the Council has no information on grade II buildings at risk, although they would opine that is should.	Agreed and amended
		EH are concerned that insufficient (sic) is currently known of the extent and condition of the heritage of the study area for the appraisal to be able (with any degree of certainty or authority) to assess the likely significant affects of the Regeneration Strategy on this historic environment. Given the importance attached to the cultural heritage of the area in the Options Report this is a potentially serious weakness in the sustainability appraisal.	Detailed descriptions of the study areas are included in the Scoping Report. Information contained within the management strategies published for both the conservation areas have now been included in this section.
	7.4 Likely Future baseline	Future baseline should focus particularly on the historic environment of the study area itself, and in particular heritage of all types considered at risk. It might also usefully track schemes approved which positively/constructively utilise heritage assets in ways that respect their special interest, the extent to which inappropriate/unlawful changes are enforced against, and project which help secure other objectives – social and economic.	Agreed – management strategies published for both the conservation areas have now been included in this section
	7.5 Sustainability Issues	Paragraph 7.5.1 identifies key issues, problems and constraints. As drafted, we appear to be encouraged to think of heritage as a constraint, rather than an opportunity to add value. We advocate 'constructive conservation'.	Agreed – this section has been altered to highlight 'constructive conservation opportunities' for the masterplan.
	7.6 Data Limitations	English Heritage is moving towards a GIS based mapping system for heritage assets, but they have no timetable to offer.	Noted for consultation in SA
	<i>11 Overarching Sustainability Issues</i>		
	11.2 Key Issues	Again, this section implies that designated sites and assets are a	Disagree – this section highlights the heritage

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
		constraint, not an opportunity.	areas which can and should be enhanced in the masterplan. Additional text has been added.
	<i>12 The Assessment Framework</i>		
	12.2 The SA Framework	<p>This section contains Table 12.1 and the SA Framework. Under the heading of 'safeguard and enhance the region's environmental infrastructure' there is regrettably no reference to the historic component of environmental (or 'green') infrastructure. The historic environment is a finite resource, in the sense that once lost it is lost forever. That said, EH welcomes the inclusion of an SA Objective dealing with culture and heritage.</p> <p>The associated indicator confines itself to the number of designated assets. This is insufficient to provide a full picture of the state of the historic environment of the study area. [EH have attached notes on the scoping of SA/SEA which provides a more comprehensive suite of indicators to best monitor the situation some of which relate to the achievement of other SA objectives in a cross-cutting manner]</p>	<p>Disagree – This objective refers to natural heritage reference to the historic environmental infrastructure has been added to the objective dealing with heritage.</p> <p>Agreed – now includes number and % of designated assets at risk</p>
	<i>14 Appendix 1 – Context Review</i>		
	14.6 Culture and Landscape	Provides information with regard to heritage and landscape. NE attach notes which provide a comprehensive suite of other relevant plans, policies and programmes for consideration.	Noted – some relevant policies were incorporated into culture and landscape section of the context review.
Environment Agency	12.2 Assessment Framework	Flood Risk – suggest the following indicators be added to monitor SEA Objective relating to adapting to climate change: 'Area of new development (in ha) at risk of flooding' and 'number and % of new developments incorporating SUDS.'	Agreed – table amended
	Appendix A	Although referenced within earlier sections of the SEA, CSC note that the River Basin Management Plan (available in draft form at http://www.environment-agency.gov.uk/research/planning/33250.aspx) and the Shoreline Management Plan 2 (http://www.environment-agency.gov.uk/research/planning/105014.aspx) have not been	Agreed – table modified to include these references
Sunderland City Council – Development and	<i>4 Water Quality</i>		
	4.2 The Current	Highlight that the baseline data at Whitburn North achieved a pass	Agreed and amended

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
Regeneration Directorate	Baseline	status in bathing water quality because of a waiver imposed due to abnormal weather during Summer 2008. Consequently it is suggested that the existing drainage system in the north of the study area cannot cope with high rainfall.	
	<i>6 Climatic Factors, Flooding and Energy Resources</i>		
	6.2 Context Review	The context review should reference the Climate Change Action Plan by Sunderland City Council and the Sunderland Strategy which details a 26% reduction target in carbon emissions by 2022.	Agreed and amended
	6.3.10-11 Current Baseline	Should refer to the consultation draft and not the final version. The figures, trends and data should be updated with the following link: http://www.sunderland.gov.uk/climatechange/actionplan.asp .	Agreed and amended
	6.3.12	Should be removed as it is very unlikely that energy from waste plant will go ahead in Sunderland. Suggest that other key interventions from the Climate Change Action Plan should be included	Agreed, however reference to interventions from the Climate Change Action Plan have been made in paragraph 6.3.21
6.3.23	Suggests incorporation of the "Climate Change Adaptation on the River Wear" study which contains more locally specific climate projections and analyses of risks from climatic changes.	Agreed – the predicted effects are incorporated into the current baseline section with the likely outcomes incorporated into the future baseline.	
RSPB	<i>Biodiversity, Flora and Fauna</i>		
	2.3.9	It is worth mentioning here that the Durham Coast SSSI is notified for nationally-important populations of sanderling and knot, as well as for the SPA/Ramsar site interest features of purple sandpiper and turnstone. Sanderling prefer sandy shorelines and therefore are likely to spend time foraging along the undesignated parts of the shore.	Agreed – comments incorporated into text.
	2.5.1	'Habitat degradation' is too general. An additional bullet is required here: - Disturbance to wintering waders resulting from a wide range of recreational activities, including dog-walking and water-sports	Agreed and amended
<i>Climatic Factors, Flooding and Energy Resources</i>			

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree	
	6.3.18	This is a key issue for the SA to consider. Will the options brought forward within the Seafront Regeneration Strategy allow the SMP2's policies to be fully delivered, particularly the proposed realignments at The Bents and Parson's Rock?	Noted	
	6.5.1	An additional bullet is required here: - Coastal squeeze of the shoreline will occur due to the combination of fixed coastal defences and sea level rise	Agreed and amended	
	<i>Overarching Sustainability Issues</i>			
	11.2.1	The key sustainability issues have been captured here. We suggest 'habitat degradation <u>and disturbance to designated bird populations</u> ' for the third bullet point.	Agreed and amended	
	SA Framework			
	Table 12.1	For the first objective, we suggest 'Trends in wintering wader populations' as an additional indicator. For the fifth objective, we suggest 'Loss of intertidal habitat (ha)' as an additional indicator.	Agreed and amended	
Durham Biodiversity Partnership	<i>Biodiversity, Flora and Fauna</i>			
2.2 Context Review	There is no mention of the duty placed on the Council under s. 40 of the Natural Environment and Rural Communities Act (2006) under Context Review. There should be further expansion of the details on the Sites of Nature Conservation Importance, as these are representative of local priority habitats.	Agreed and added	Reference document did not provide further expansion beyond what was quoted in the text. Further desk based searches did not yield any additional information.	
2.3.7 Current Baseline	Questions sudden reference to the effects of climate change in paragraph 2.3.7, which will have a lot broader effect than on just the three habitats listed.	Disagree – this provides the context behind why these areas are classified as a priority.		
General	Scoping Report should take account of the North East Climate Change Biodiversity Study, which is currently being produced on behalf of the North East Environment Forum.	This reference could not be located through internet searches and no reference to it could be found. Noted for consideration in the SA.		
2.4 Likely Future	The assumption that the baseline of favourable condition would	Agreed and amended		

Consultation Authority	Section/ Para	Comments	Response/Action - Agree/Disagree
	Baseline	continue should be with the caveat that this can only happen with a continued resource for ongoing management of sites	
		DBP welcomes the recognition that coastal erosion as a result of climate change will be a significant problem for the priority habitats and species in the area. However this is not reflected or taken towards (sic) in the Regeneration Options Report, which should assess the constraints of this against each of the proposed options.	Not relevant to scoping report – for consideration in options report
Natural England	Provided very general comments about what information and sources should be included in a scoping report relevant to the north east of England		Agreed – all the relevant documents recommended by Natural England are now referenced in the report