

APPENDIX I

Summary of Consultation Responses on SA Scoping Report

- Key stakeholders were consulted on the Partial Review Scoping Report alongside the Draft Project Plan for the Apportionment of Primary Aggregates and Statement of Public Participation in March 2007. Question 5, Section B of the consultation questionnaire asked for comments specifically on the Scoping Report:

“Do you have any specific comments on the Sustainability Appraisal Scoping Report? For example, is the proposed framework fit for the purpose of carrying out the Sustainability Appraisal of the partial review or is there any additional baseline data which should be included?”

- SEERA received 74 responses to the consultation, 48 of which had no comment to make on the Scoping Report. **Table AI** shows the remaining comments, the organisation represented and how the comment has been addressed in the sustainability appraisal and production of the SA Report.

Table AI: Summary of consultation responses on the SA Scoping Report and how they have been addressed within the SA Report

Organisation	Comment	Response
Comments on Question 5, Section B		
Iford Parish Meeting	Cannot assess.	No response required.
Graffham Parish Council, West Sussex	If aggregates are extracted mainly from the sea bed, sustainability should not be a problem during the plan period.	Noted, however this is an issue for the SEERA and the South East Plan as a whole. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.
Buckland Parish Council	Not enough attention to water supply. In Buckland, the Sutton and East Surrey Water Company have had to sleeve boreholes because of landfill water pollution towering off the water table by the sand extraction process at Tupwood and Park Pit in endangering Reigate Health ROOB and surrounding countryside. Please review detailed CAMEL reports.	Noted. The effects of water abstraction due to mineral extraction were considered during this SA and this is discussed in the SA Paper relating to IRF Objective 18 in Appendix 2. In addition, sustainable water use is a key issue that should be taken into account at the local level by MPAs through site selection during production of their MDF and in granting planning permission for mineral extraction sites.
Lymington & Pennington Town Council	More data on secondary and recycled materials is required.	Noted, however this is an issue for the SEERA and the South East Plan as a whole. The use of alternative recycled and secondary aggregates was addressed in a similar apportionment exercise used to develop Policy M2 in the draft South East Plan, which sets targets for all MPAs for the provision of sites to encourage the use of these materials. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.

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Pulborough Parish Council	Don't understand the question, why not use good quality English instead of bureaucracy speak?	No response required with regard to the sustainability appraisal.
Castle Point Borough Council	The framework appears to be fit for purpose.	Noted.
Midhurst Town Council	Re: Sustainability Scoping Report. The baseline data is very comprehensive but we are particularly concerned with IRF objectives 1 and 2 relating to minerals.	Question needs clarification to ascertain concerns.
Betchworth Parish Council	We are disturbed by table 4.4 which refers to 'sales' making it difficult to compare with production figures elsewhere. We are also concerned by the rapid reduction of soft sand sales in 2005. This decline needs clarification and should reflect in the apportionment.	This question is more relevant to the method used to develop the sub-regional apportionment options for the Partial Review, which is described in a separate report ²³ .
SEEDA	The Regional Economic Strategy is no longer 'draft'. It is now the RES 2006-16 (see page 13 of your documents).	Noted. This has been updated in the list of relevant plans within this SA Report (see Table 4.2).
Wallingford Town Council	Framework very comprehensive.	Noted.
Arun District Council	See Annex 6.	LUC has not seen the original consultation response and its Annex 6, and is unable to comment.
Parish Council Monk Sherborne	All these houses must be looked at from all aspects in the most eco-friendly way.	Noted, however, this SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.
Duncton Parish Council	Although stated objectives have highlighted environmental and transportation issues, we feel that environmental considerations should be more strongly addressed at the onset of deliberations. Further consideration should be taken on these issues prior to the designation of potential sites. Too much is left until the planning application stages, inevitably leading to an undermining of the protection of the environment. Particular issue should be taken with the lack of consideration given to long term cumulative effect of large extended sites in local rural areas, especially in AONB's.	The purpose of the SA at this strategic level is to ensure that issues such as environmental considerations are taken into account at the regional spatial planning stage, and it has included factors such as the area of a mineral planning authority that is constrained by AONB (see SA Paper for Objective 14 in Appendix 2). The SA process itself, both at the regional and local level aim to address these concerns, and the SAs undertaken by the MPAs during preparation of their site allocation DPDs for minerals sites should help to address this concern, and reduce the amount of decision-making left to the planning application stage.
Woking Borough Council	Not fit for purpose as no reference to the need for assessment of any proposal that may have an effect on the conservation objectives of Natura 2000 sites (e.g. Thames	The potential impacts of the apportionment options on Natura 2000 sites are assessed through IRF Objective 13 on conserving and

²³ Primary Aggregates Sub-Regional Apportionment in South East England. Final Report. Prepared for SEERA by Land Use Consultants, November 2007.

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	Basin Heaths Special Protection Area)	enhancing the region's biodiversity within the SA process. However, a full assessment of the potential for significant impacts on Natura 2000 sites is undertaken in the parallel process of Habitats Regulations Assessment, which is presented in a separate report ²⁴ .
New Forest National Park Authority	IRF Objective 14 should make reference to the New Forest National Park. The objectives should include ensuring that a future sub-regional apportionment is developed which takes account of the environmental capacity of the sub-regions. The document could be clearer about the mechanism for development of options and how the sustainability appraisal will be applied to it.	Noted. Both the Sub-regional Primary Aggregates Apportionment Report and this SA Report of the apportionment options fully explain the methodologies used and how the environmental capacity (including National Parks) of the MPAs has been taken into account during both the development of the options and their subsequent appraisal.
Alliance Environment and Planning Ltd	The appraisal methodology should include economic considerations and those targeted to the achievement of sustainable construction methods, including local supply, carbon emissions, reduced waste, efficient construction practices and availability of resources to meet regional growth requirements.	All of these issues have been considered during the appraisal. Local supply, carbon emissions and, in part, efficient construction practices are taken into account through the 'proximity' IRF Objectives. The reduction of waste and availability of resources to meet growth demand are issues for SEERA and the South East Plan as a whole to address. The use of alternative recycled and secondary aggregates was addressed in a similar apportionment exercise used to develop Policy M2 in the draft South East Plan, which sets targets for all MPAs for the provision of sites to encourage the use of these materials. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.
Medway Council	Very comprehensive and fit for purpose.	Noted.
Faringdon Town Council	Objective 11 (pg18) states "Motor vehicles and aviation are the main source of pollutant emissions, although industrial/energy generation activities can cause pollution hotspots." The Government figures for 2005 for energy consumption in thousands of tonnes of oil equivalent (to enable direct comparison) give: Industry 33095; Transport 59225; Of which: Air 13856; Road 42390; Other 67207 (Mainly space heating) Of which: Domestic 47979	Noted. However, with regard to the minerals industry and extraction of primary aggregates, the transportation of aggregate is the main user of energy and producer of emissions. The effects of domestic energy use would be addressed within the wider SA of the draft South East Plan as a whole.

²⁴ Partial Review of the Draft South East Plan: Policy M3. Habitats Regulations Assessment Screening Report. Prepared for SEERA by Land Use Consultants, November 2007.

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	clearly showing that biggest polluter is domestic energy use; mainly in space heating. We wish to point out this flawed approach to sustainability issues.	
Runnymede Borough Council	Need to ensure that baseline data is robust by being relevant, accurate and up to date	Noted, this has been attempted during this SA, and the sources of data used are given on all relevant maps and tables.
Whitehill Town Council	Pleased to see inclusion of biodiversity, reuse of buildings and urban renaissance	Noted.
Portsmouth Water Ltd	Appears OK	Noted.
The Environment Agency	We have been unable to consider the scoping report in detail but would like to make some further comments. These are already prepared but greater than the space available, (but are only 1 side of A4,) so please can you contact me with an e-mail address so that I can submit them. First point as an example is included in other comments below. Regards John Gower	The Environment Agency (EA) provided their further comments directly to LUC. These were discussed in person at a meeting between the SA team and the EA officer who wrote the comments in June 2007. Subsequently, the same EA officer became a key member of the SA Steering Group, and their comments on the Scoping Report have now been addressed through the approach to the SA and the findings.
Castle Point Borough Council	The framework appears to be fit for purpose.	Noted.
Oxfordshire County Council	Table 4.3 - not clear why East of England RSS is included, but not London Plan or other adjoining RSSs. Table 4.6, Objective 10 - not clear what the relevance of C&D waste recycling is. Table 4.6, Objective 12 - delete 'increased' before traffic in columns 2 & 3. Table 4.6, Objective 13 - add positive implications of potential biodiversity increases through working & restoration. Table 4.6, Objective 14 - delete Green Belt; not a constraint on mineral working.	Noted, the London Plan and draft South West Regional Spatial Strategy have been added to the list of relevant regional plans in Table 4.2 of this SA Report. The relevance of Objective 10 has been discussed within this SA Report (including discussion about why C&D waste recycling has not been addressed in this SA Report.) The suggested changes to the key issues for Objectives 12 and 13 have been made in Table 5.1 of this SA Report. Green Belt was not used as a factor within the development of the apportionment options. Green Belt was considered within this SA and this is discussed in the SA Paper for Objective 14 in Appendix 2.
Newton Longville Parish Council	The budget seems inadequate	Noted.
Oxfordshire Architectural & Historical Society and Nautical Archaeology Society	I have recently come across the consultation about the draft scoping report for the minerals partial review but see the consultation period has recently closed. I chair the Oxfordshire Architectural and Historical Society and the Nautical Archaeology Society, both of whose	Noted. A representative of English Heritage was on the Steering Group for both the development of the sub-regional apportionment options, and this SA of the options. He also expressed similar concerns, but has agreed with the approach taken in the

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	<p>interest in the archaeological heritage and historic land/seascape are affected by terrestrial and marine minerals exploitation. I am very concerned that the scoping document does not cover the archaeological heritage as required under SEA Regulations. Nor does its outline of relevant policies and possible impacts on the heritage cover all the issues required by SEA. The archaeological heritage is not identified as a key conservation issue and there is no indication that any archaeological data will be gathered in the baseline studies. The proposed objectives and indicators will do absolutely nothing to record on behalf of the public the state of the archaeological heritage which is one of the key principal environmental impacts of minerals operations.</p> <p>It will not be possible to monitor the actual impact of minerals on the historic environment through the use of an indicator limited to the number of grade I and II* buildings at risk. Under PPG16 - not even mentioned in the scoping report - minerals companies have to pay for archaeological recording and they need to know strategically where the risks are greatest and where there are remains that are of national importance which need to be preserved in situ under PPG16. The Thames gravels and other mineral resources in the SE are major areas of ancient settlements and hence highly sensitive to minerals exploitation. The failure to address these matters with the full rigour of the SEA as well as SA requirements is likely to render the report liable to legal challenge. How may I still convey comments on the utterly inadequate scope of the SA of this review?</p>	<p>SA to address heritage issues for this regional scale policy (described in the SA Paper for Objective 14 in Appendix 2). It was not possible to consider the potential impacts of the sub-regional apportionment options on individual areas of archaeological heritage as Policy M3 does not specify locations for where mineral extraction must occur to meet the apportionment tonnages within each MPA.</p> <p>Archaeological impacts of potential minerals sites will be taken into consideration by the MPAs when determining which sites to allocate within their Minerals Development Frameworks, and potential impacts will need to be monitored as part of their lower-tier sustainability appraisals and annual monitoring reports.</p>
Additional General Comments relevant to the SA		
Maresfield Parish Council	It is essential to ensure that appropriate transport infrastructure is in place for the lorry traffic out from and back to the quarries and other sites. There should be no adverse effect in this regard on rural parishes.	Transport implications of the sub-regional apportionment options have been addressed for this regional scale policy within the SA Paper for Proximity related objectives in Appendix 2). It was not possible to consider the potential impacts of the sub-regional apportionment options on site-specific transport infrastructure requirements as Policy M3 does not specify locations for where mineral extraction must occur to meet the apportionment tonnages within each

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		<p>MPA.</p> <p>Transport infrastructure for potential minerals sites will be taken into consideration by the MPAs when determining which sites to allocate within their Minerals Development Frameworks, and potential impacts will need to be monitored as part of their lower-tier sustainability appraisals and annual monitoring reports</p>
<p>East Horsley Parish Council</p>	<p>My council considers that too much emphasis is given in materials planning to secure additional sources of supply. My council believes that much more emphasis should be placed on recycling and re-using construction and demolition waste, also to recycling other waste streams for construction industry use. These measurements would reduce the need to new minerals extraction sources to be identified and the environmental pollution which they create.</p>	<p>Noted, however this is an issue for the SEERA and the South East Plan as a whole. The use of alternative recycled and secondary aggregates was addressed in a similar apportionment exercise used to develop Policy M2 in the draft South East Plan, which sets targets for all MPAs for the provision of sites to encourage the use of these materials. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.</p>
<p>Member of Parliament</p>	<p>My only comments on the draft Project plan and the Sustainability Appraisal Scoping Report concerns the issue of marine dredging. Marine extractions can have serious implications on both coastal protection and biodiversity. I recommend that consideration be given to these potentially negative environmental impacts in any future drafts. The effects marine dredging might have on leisure activities and the visual habitat must also be considered.</p>	<p>Noted, however this is an issue for the SEERA and the South East Plan as a whole. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, this is beyond the scope of this SA.</p>
<p>Wendlebury Parish Council</p>	<p>The Parish Council is impressed with the objectives of the appraisal scoping report. We are particularly interested in the anti-flooding proposals.</p>	<p>Noted.</p>
<p>Thrupton Parish Council</p>	<p>Hampshire* as a County has 'lost' some £30-million of central Government funding. Therefore scarce resources are being used to conduct a minimal value survey such as this at the expense of really worthwhile and important issues reflected in IRF objectives 4 and 5. *Other Counties in the Region have lost as much, if not more.</p>	<p>Question needs clarification to ascertain concerns. This SA is dealing with the Partial Review of Policy M3 on the apportionment of land-won primary aggregates only. As such, IRF Objectives 4 and 5 were not considered relevant.</p>
<p>Haslemere Town Council</p>	<p>The Town Council accepts and fully understands the need for the Partial Review in the light of the perceived requirements of the economy and for building more houses in the South East with appropriate infrastructure. The Town Council also holds the view that in our very small country and in the crowded and busy South East in</p>	<p>Noted. Both the Sub-regional Primary Aggregates Apportionment Report and this SA Report of the apportionment options have taken landscape into account during both the development of the options and their subsequent appraisal. This is discussed in the SA Paper for Objective 14 within</p>

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	particular, every possible care should be taken to protect the environment. It accordingly expresses the hope that any amendments to apportionments will be closely scrutinised by the Regional Assembly where they may have any bearing on key areas in our beautiful South East Landscape.	Appendix 2.
Portsmouth Water Ltd	Our concern would be that any extraction of aggregates causes no contamination of water sources. We have a number of chalk borehole sources for public water supply within Hampshire and West Sussex; and in addition our springs at Havant and Bedhampton are fed from the chalk aquifer of the South Downs. Each site has an aquifer protection zone within which certain types of development (ie. gravel extraction) are prohibited if there is a perceived risk to the ground water. The Environment Agency as statutory consultees with regards planning permissions are “guardians” of these zones.	Noted. The effects of water pollution due to mineral extraction were considered during this SA and this is discussed in the SA Paper relating to IRF Objective 18 in Appendix 2. In addition, contamination of water sources is a key issue that should be taken into account at the local level by MPAs through site selection during production of their MDF and in granting planning permission for mineral extraction sites.
Whitfield Parish Council	Concern was raised regarding any adverse effects on water supply, especially as there are plans for major new housing developments in the South East. Pleased with efforts to use sustainable methods of transport.	Noted. The effects of water abstraction due to mineral extraction were considered during this SA and this is discussed in the SA Paper relating to IRF Objective 18 in Appendix 2. In addition, sustainable water use is a key issue that should be taken into account at the local level by MPAs through site selection during production of their MDF and in granting planning permission for mineral extraction sites.

