

# Core Strategy Focused Review

## SUBMISSION DOCUMENT

Statement of Representations for  
Sustainability Appraisal  
Regulation 27 Proposed Submission

March 2012



**Report by: (David McHardy – Planning Policy Officer)**

**Reported at: 2<sup>nd</sup> March 2012 at 11:35am**

**NOTES:**

The role of the SAR is to identify the potential benefits and problems that may arise from policies and proposals and to suggest ways in which these may be mitigated. It is intended to be a help to local planning authorities in producing Sustainable LDF documents and not to be used in a prescriptive way to prevent development. The rating system used in the Sustainability Appraisal is intended to be indicative and to draw attention to issues arising from policies that should be addressed either in the main document or through policies in other relevant documents.

The ratings applied to policies in the Core Strategy set out in Appendix A of the SA Note Focused Review are appropriate in the judgement of the appraisal consultants who have experience over a wide range of LDF documents for a large number of local authorities. There is therefore a high level of consistency in their judgement, which has been formed independently from the Council. There may be some debate around whether, for example, any effect on a particular objective merits a (++) rather than a (+) rating, particularly where effects are cumulative and dependent upon several different factors. The value of the SAR is in the independent oversight that suggests ways of improving the sustainability of the document's policies rather than the precise rating given to particular indicators.

The Sustainability Appraisal Note for the Core Strategy Focused Review has been carried out by the same consultants as the SA Report for the SAAP and therefore with the knowledge of the detail proposals in that document. However this SA Note relates to the contents of the Core Strategy Focus Review and the adopted Core Strategy that it amends, not to the contents of the SAAP. This may result in more generalised comments than would be appropriate to the SAAP, which contains detailed proposals that can be more clearly assessed.

This may also result in less positive ratings than expected being recorded in relation to Core Strategy because the full benefit depends on the integration of detail proposals in the SAAP rather than in the Core Strategy. For example - see comment in the SA Note -Appendix Table A3 – (ENV 8.2 & 9.1); where it states that *“This issue needs to be carefully addressed at the lower tier documents level – Site Allocations and AAP DPDs and as part of the project level planning application.”*

Events: Core Strategy Focused Review Regulation 27 Proposed Submission – Sustainability Appraisal

Person ID	Given Name	Family Name	Position	Company / Organisation	Number	Summary	Soundness - Do you consider the DPD is sound?	Legal compliance - Do you consider the DPD is legally compliant?	Reasons for compliance and soundness - Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.	Officers' Recommendation
595459	Andrew	Hodgson	Associate	Savills LP Ltd  On behalf of Broom & Partners  (Part Owners of Mill Lane Employment Allocation)	CSFR ProSub SAR 01	Consider that the SA is overly simplistic in relation to the Mill Lane proposal.	Not Specified	Not Specified	Consider that the SA is overly simplistic in relation to a number of its conclusions. We consider there are a number of impacts which are suggested as being negative when actually the affect of Policy FC3 would be positive.	The SA note to the Focus Review of the Core Strategy is based on a comparison of the proposed new CS Policy FC3 with the existing Core Strategy Policy CS11 taking into account of all the existing unchanged C/S policies. The major difference is the allocation at Mill Lane and (unusually) a development brief already exists for the site in the SAAP and is referenced in Policy FC3.  However this SA Note relates to the contents of the Core Strategy and its focused review not to the contents of the SAAP. This may result in more generalised and less positive comments than would be appropriate to the SAAP. See Notes above and response to CSFR ProSub SAR03 below.

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										No Change
					CSFR ProSub SAR 02	S1.2 & 1.3 - the impacts of policy FC3 should be (++)	Not Specified	Not Specified	S1 suggest that the affect of provision of development would be minimal in terms of peoples' health. There is considerably evidence regarding the positive impact on health of people being in employment, and of poor health among those who are disadvantaged and out of work. We would suggest that the impacts of FC3 on S1.2 and S1.3 should be ++.	Current rating is 1.2 = 0, and 1.3 = (+). Agree that employment has a positive impact on health in general but for 1.2 to specifically attribute any lower death rate in the future to the allocation of a site in Stowmarket would be difficult to substantiate. The rating for S1.3 is the consultant's judgement – see notes above and response to CSFR ProSub SAR03 below No Change
					CSFR ProSub SAR 03	S4 – should be accorded a score of (++)	Not Specified	Not Specified	We consider that the affect policy on objective S4 would be overwhelmingly positive and this should be accorded a score of ++	The current rating is (+). The reason being that the Core Strategy policy only takes one so far. The significance of the positive effect will be further enhanced by other measures in the SAAP (rather than the Core Strategy) to connect the poorest areas to the site via walking cycling and public

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										transport. This is recognised in the 'SA Final Main Report for the SAAP April 2011' (paragraph 7.59, page 225) <i>"With additional criteria to improve accessibility and connectivity within and around the town for pedestrians and cyclists and by public transport, this revised component (employment) is now likely to have strong positive effects against SA objectives 2 (education and skills), 4 (poverty and social exclusion), and 6 (employment)."</i> No Change
					CSFR ProSub SAR 04	S7.3 & 7.4 – should be minor (+) affects	Not Specified	Not Specified	In relation to S7.3 and S7.4 we consider there are likely to be minor positive affects – increased employment opportunities are likely to increase the affordability of housing and provide funding for investment in existing stock.	This is a question of judgement as to the impact of the Focus Review Policy independent of the delivery mechanisms in the SAAP. See for example 'CSFR ProSub SAR03' above. No change
					CSFR	S8.2 – should	Not	Not Specified	The provision of 39.5 Ha of	This is a question of judgement

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					ProSub SAR 05	achieve a score of (++)	Specified		new open space at Mill Lane is a substantial provision. Accordingly 8.2 should achieve a score of ++	as to the impact of the Focus Review Policy independent of the delivery mechanisms in the SAAP. See for example 'CSFR ProSub SAR03' above. No Change
					CSFR ProSub SAR 07	ENV 1.2 & 6.2 score should appear as (+)	Not Specified	Not Specified	A key purpose behind the allocation is to locate employment close to housing and reduce out-commuting. This out-commuting currently largely takes place by car, resulting in significant carbon dioxide emissions. Major benefit of employment development at Stowmarket will be reduced greenhouse gas emissions compared to the situation without development. We consider that under the Environmental objectives 1.2, and 6.2 the score should appear as +	This is a question of judgement as to the likely impact of the Focus Review Policy after balancing local and overall effects. Benefits may more certainly arise from the policies of the SAAP than directly from the Core Strategy Review. No change
					CSFR ProSub SAR 08	ENV 2.1 there is only a very limited or a neutral affect	Not Specified	Not Specified	With regards loss of greenfield land, if development does not take	This comment is based on a degree of supposition and assumption. No Change

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									place at Stowmarket on greenfield land it is likely to take place in other locations on greenfield land given the nature of East Anglia. The Sustainability Appraisals should consider the affects of the policy against the situation without policy. We contend therefore that in terms of impact on greenfield land, there is only very limited or a neutral affect given that development will take place on greenfield land in any event.	
					CSFR ProSub SAR 09	ENV 3.1 – the assessment should be (+)	Not Specified	Not Specified	In terms of impact on minerals, we consider the assessment should be (+). Development at Mill Lane avoids areas of mineral resource, whilst if development is located in other locations it may put pressure on such resources.	This comment appears to be based on somewhat tenuous grounds. No Change

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					CSFR ProSub SAR 10	ENV 5.1, 5.2, 5.3 – the effects will be positive	Not Specified	Not Specified	In terms of traffic volumes, we consider again that locating development at Stowmarket will reduce travel to more distant locations and the effects will be positive.	This is a question of judgement as to the impact of the Focus Review Policy independent of the delivery mechanisms in the SAAP. See response to 'CSFR ProSub SAR03' above. No Change
					CSFR ProSub SAR 11	ENV 8.2 – development is an opportunity	Not Specified	Not Specified	In relation to habitats, development at Mill Lane includes significant new habitat and open space provision. Development is an opportunity to enhance habitats rather than to detract.	The SA Note (Dec 2011) identifies an area of concern and suggests that the solution rest more in the detail of 'lower tier' documents than in the Core Strategy Focus Review. No Change
					CSFR ProSub SAR 12	ENV 9.1, 9.2, 9.3 – It is incorrect for the SA to assume the impacts will be negative	Not Specified	Not Specified	In terms of impact on heritage and geological resources, we would suggest that development at Mill Lane has no significant impact which can be determined at this stage. It is incorrect therefore for the SA to assume it will be negative.	The SA Note identifies the potential for harm and suggests that the solution rests with the way that existing Core Strategy Policy CS5 is applied through the detail of 'lower tier' documents rather than in the Core Strategy Focus Review. No Change
					CSFR	EC 2.2 – We	Not	Not Specified	We disagree that	The SA Note identifies the

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					ProSub SAR 13	disagree that development would have a negative impact on town centres.	Specified		development would have a negative impact on town centres (Ec2.2). Employment Generation at Mill Lane will support town centre investment by bringing additional income and expenditure to Stowmarket	potential for harm if town centre business moves to edge of town locations. A similar question has been raised in relation to the meaning of the term "other Commercial" in policy FC3. The Council notes that both National and Local Policy seek to prevent such movements and is offering a revised glossary to clarify the term used in the Policy. Revise glossary to Core Strategy.
					CSFR ProSub SAR 14	EC 3.1 – consider that a score of (++) should be awarded for reducing outcommuting	Not Specified	Not Specified	We consider that a score of ++ should be awarded for reducing out-commuting.	This is a question of judgement as to the impact of the Focus Review Policy independent of the delivery mechanisms in the SAAP. See for example 'CSFR ProSub SAR03' above.