

From: Matthew King
Sent: 02 May 2017 12:39
To: 'Carole Crookes'
Cc: Fiona Riley
Subject: Local Plan Scoping Report and Information for the Inspector
Attachments: HLP01_23 LP Scoping Report 2014 (amended Aug 2014).pdf

Importance: High

Good Afternoon Carole,

I hope you are well and have enjoyed the long weekend.

Apologies for the delay in responding in regards to the Scoping Report – we had had some issues with loss of data on our network which was why we had missed it off in the first place – I have attached the revised Scoping Report (which was amended following the Consultation between May and July 2014 with the Issues and Options Report). All Statutory Consultees had a chance to comment but comments were only received from English Heritage (at the time) which were incorporated into the revised version.

My colleague has looked at the Scoping Report, the Issues & Options Consultation Statement and the Publication Sustainability Appraisal document to identify where reference has been made to the issues the Inspector has raised in his e-mail and have set these out below.

Hopefully this helps identify where we have already covered an issue and where we need to expand on an issue or where there are elements missing.

The SA part of the Inspector's e-mail is broken down into the various issues he has asked us to address. Any other comments the Inspector has made in relation to that point are set out below the heading in italics, and the corresponding parts of the abovementioned documents that I have found are highlighted in green.

Sustainability Appraisal (SA)

PINS: I am unclear having read the iterations of SA as to how the SEA requirements have been addressed. I appreciate the Scoping Report may well contain this. The areas I am particularly keen to assess include (essentially Stage B in the flow diagram on p5 of HLP003 – see also PPG ID 11-017-20140306 and 11-018-20140306):

- **Whether there was any engagement with the prescribed SEA bodies (Natural England, Environmental Agency and Historic England) on the sustainability issues in the Borough and establishing the framework criteria?**

HBC: - Relationship between SA and SEA Directive in **5.3 of SA Scoping Report**
 - Brief reference to English Heritage engagement at **4.2 of Sustainability Appraisal**
 - Reference to meeting the requirements of the SEA Directive at **4.9 of Sustainability Appraisal**
 - Statutory consultees referenced in **2.2 of SA Scoping Report**
 - Reference to SEA Quality Assurance in **8.3 of SA Scoping Report**
 - Consultees set out within **Appendix 2 of Issues & Options Consultation Statement**
 - Summary of representations received to SA Scoping Report (English Heritage only) and HBC response set out at **pp. 260-262 of Issues & Options Consultation Statement**

- **What is the environmental baseline and what are those environmental characteristics likely to be significantly affected?**

HBC: - Baseline information at **7.0 of SA Scoping Report**
 - Baseline data used to inform development of sustainability issues in **Appendix B of SA Scoping Report**
 - Baseline conditions and key sustainability issues in Hartlepool at **5.24 of Sustainability Appraisal**

- **If there are potential significant adverse effects, how are these to be prevented, reduced and as fully as possible offset?**

HBC: - Commentary and recommendations on how to prevent, reduce, offset or mitigate adverse effects, enhance positive effects and how policy could be amended set out on an individual policy basis within **Appendix One of Sustainability Appraisal**

- **Is mitigation or amendment to policy required?**

HBC: - Commentary and recommendations on how to prevent, reduce, offset or mitigate adverse effects, enhance positive effects and how policy could be amended set out on an individual policy basis within **Appendix One of Sustainability Appraisal**

- **Can positive effects be enhanced?**

HBC: - Commentary and recommendations on how to prevent, reduce, offset or mitigate adverse effects, enhance positive effects and how policy could be amended set out on an individual policy basis within **Appendix One of Sustainability Appraisal**

- **How does the SA record this?**

HBC: - Commentary and recommendations on how to prevent, reduce, offset or mitigate adverse effects; enhance positive effects; and how policy could be amended set out on an individual policy basis within **Appendix One of Sustainability Appraisal**

- **Does SA inform how the policy should be monitored?**

HBC: The Sustainability Appraisal may be useful in monitoring the policy, however the Scoping Report, at section 6, sets out the policies will be monitored through the Annual Monitoring Reports (now Authorities Monitoring Reports)

- **How is this evaluated against other options?**

HBC: Whilst the various options for growth haven't been evaluated within the various SA's through the process, there has been work on the SHLAA process and also in terms of consideration of options for the bypass which have considered alternative options / sites. We will bring this information together into a document for the Inspector to make these assessments clear and the reasons why they were discounted in favour of the growth scenario set out in the Publication Document. These alternative scenarios or growth options were consulted on as questions within the Issues and Options Consultations, but are limited due to the Geography of Hartlepool.

PINS: Issues around SA can be addressed through an Addendum. I would be looking for a report that consisted of the following:

- **Non-Technical Summary;**

PINS: I note the SA has a non-technical summary as required. It should be expanded to briefly summarise "key sustainability issues, problems and opportunities" as well as "likely significant effects" in terms of the key issues (objectives).

HBC: - Non-technical summary of sustainability appraisal at **3.0 of Sustainability Appraisal**

- Key sustainability issues at [4.0 of SA Scoping Report](#)
- Baseline conditions and key sustainability issues in Hartlepool at [5.24 of Sustainability Appraisal](#)

- **Chapter on consultation on the SA**

HBC: - Consultation on Scoping Report at [chapter 2.2 of SA Scoping Report](#)

- **Chapter setting out the scope and purpose of the appraisal and including an overview of the emerging Local Plan;**

HBC: - Introduction to Sustainability Appraisals at [1.1 and 2.1 of SA Scoping Report](#)
 - Introduction to the Local Plan at [1.5 of SA Scoping Report](#)
 - Purpose of the sustainability appraisal report at [2.0 of Sustainability Appraisal](#)

- **Chapter detailing the evolution of the Local Plan;**

PINS: *I note the narrative at paragraphs 6.2-6.18 of document HLP003 (similar to 6.2 – 6.13 of the document HLP017) in terms of the evolution of the preferred options.*

HBC: - Issues and Options and Preferred Options summary at [6.2 of Sustainability Appraisal](#)

- **Chapter summarising the key objectives of other plans and programmes and socio-economic and environmental issues relevant to the Local Plan;**

HBC: - Links with other plans at [3.0 of SA Scoping Report](#)
 - Key sustainability issues at [4.0 of SA Scoping Report](#)
 - Review of Policies, Plans and Programmes in [Appendix A of SA Scoping Report](#)
 - Links with other policies, plans and programmes at [5.3 of Sustainability Appraisal](#)
 - Baseline conditions and key sustainability issues in Hartlepool at [5.24 of Sustainability Appraisal](#)

- **Chapter setting out the approach to appraisal and any difficulties encountered;**

HBC: - The development of the sustainability appraisal options at [5.0 of SA Scoping Report](#)
 - Proposed framework for the SA at [6.0 of SA Scoping Report](#)
 - Next steps in developing the SA report at [8.1 of SA Scoping Report](#)
 - Limitations and difficulties at [8.2 of SA Scoping Report](#)
 - Assessment sheet for officers at [Appendix C of SA Scoping Report](#)
 - Methodology for the sustainability appraisal at [4.0 of Sustainability Appraisal](#)
 - Sustainability appraisal objectives at [5.55 of Sustainability Appraisal](#)

- **Chapter outlining the likely effects of the implementation of the Local Plan and reasonable alternatives, including cumulative effects, mitigating measures, uncertainties and risks. Reasons for selecting the preferred Local Plan options and rejection of alternatives should be identified; and**

PINS: *I have looked at the "proposed recommendations" not taken forward as set out in Section 6 of both documents.*

PINS: *SA should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives, with the aim of establishing that the plan is the most appropriate. Reasonable alternatives are the different options considered in developing the policies; they must be sufficiently distinct to enable comparisons to be made of their different sustainability implications, and they must be realistic and deliverable.*

PINS: *Reasonable alternatives need to be considered on a "like-for-like basis".*

PINS: *It is also necessary that there is a clear audit trail which explains why certain unrealistic or unreasonable alternatives have been rejected and not appraised. I am not persuaded that Sections 6 and 7 or Appendix 2 of HLP003 adequately does this. Again, if another document has done this critique it would be helpful to be pointed to it.*

PINS: *From what I have read I will need reassurance from the Council that reasonable alternatives, including a "do nothing" (as required under SEA), have been appraised through SA.*

PINS: *With this in mind, a number of representations on the published plan advocate alternative locational strategies, policy thresholds/criteria and/or alternative development proposals/sites. The section on "proposed recommendations" in HLP003 and HLP017, together with Section 7 in HLP003, does not cover all the alternatives suggested through the representations.*

HBC: - Options and policies which have been considered at earlier stages, and changes to policies through the process of developing the Hartlepool Local Plan at [6.0 of Sustainability Appraisal](#).
 - Discussion of alternatives at development of the Preferred Options Document at [6.6 of Sustainability Appraisal](#).
 - Proposed Recommendations not taken forward and reasoning for this at [6.19 of Sustainability Appraisal](#).
 - Changes between Preferred Options and Publication Document at [7.0 of Sustainability Appraisal](#).

- **Chapter presenting views on implementation and monitoring.**

HBC: The Sustainability Appraisal may be useful in monitoring the policies, however the Scoping Report sets out the policies will be monitored through the Annual Monitoring Reports (now Authorities Monitoring Reports) – [Section 6 of Scoping Report](#)

We are continuing to work through the Inspectors letter and will form a response by next Monday as requested by the Inspector to answer queries and set out additional work which is necessary prior to the Examination. We will also form a view on the likelihood of undertaking the additional work and still meeting the proposed date of the end of June / early July or whether, as proposed by the Inspector, we delay until after the summer holidays.

Kind Regards

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