



Executive
13th November 2006

**Report from the Director of
Environment and Culture**

For Action

Wards Affected:
Queen's Park & Kilburn

**Queen's Park Station Area Supplementary Planning
Document**

Forward Plan Ref: E&C -06/07 012

1.0 Summary

- 1.1 This report seeks approval for public consultation on a Supplementary Planning Document (SPD) for the Queen's Park Station Area (Salisbury Road car park & associated sites) a draft of which is attached and the accompanying Sustainability Appraisal and Consultation Strategy (both of which will be supplied to members separately). A non technical summary of the Sustainability Appraisal Report for this document is also attached at appendix 2.
- 1.2 The report sets out and considers 3 options for the development of the site, but it is recommended that only the comprehensive development option should be included in the SPD.

2.0 Recommendations

- 2.1 That the draft SPD (set out in appendix 1) Sustainability Appraisal and Consultation Strategy be agreed for the purposes of public consultation.
- 2.2 The Members instruct the Director of Environment and Culture to bring forward proposals for an architectural competition on the site.
- 2.3 The authority to make any minor changes to the final consultation draft to the above documents be delegated to the Director of Planning.

3.0 Detail

3.1 Genesis Housing Group proposed a 26 storeys tower on the Keniston Press Site and Queen's Park Station car park site in 2005, responding to a planning brief adopted by the Council in 2003 which supported the idea of a landmark building. This application was withdrawn and the Planning Service were charged with 2 objectives:-

- Setting up of a Stakeholder Group to consider how the sites around the roundabout should be developed; and
- Latterly, how a new planning brief should give clearer guidance on how the site should be developed and be explicit in terms of the scale, height and massing of any building.

3.2 The work by the Planning Service in the Stakeholder Group has defined some very important principles that the new planning brief must address and which were supported by the Council's Executive:

- The layout of the site is determined by the bus proposals and after lengthy discussions these have been agreed with TfL;
- The proposals work best on a courtyard type development, the form of which suits the site and provides an optimal form of development;
- The development needs to provide somewhere between 200-270 units to be viable and this requires a 12 storeys element to the design; and
- The development must be designed to a high quality, sustainable and comprehensive.

3.3 The Council's Executive Committee on 23rd August 2006 agreed to the production of a new draft SPD for the Queen's Park Station Area and to withdraw the existing Planning Brief for the site which was adopted in 2003. This course of action was considered necessary due to the following reasons:

- The 2003 Planning Brief may give rise to a form of development that when tested by a planning application in 2005 (later withdrawn) proved to be environmentally unsustainable;
- The 2003 Planning Brief does not fully reflect the Council's and the London Plan's policies on sustainability and needs to be updated;
- Subsequent work shows a clear preference for a form of development (courtyard) that is set out in the draft SPD; and
- The 2003 Planning Brief proposed development over the station concourse which is now regarded as impractical and unviable.

3.4 The Council set up a Stakeholder Group earlier this year which met three times to discuss the development options for the site. This work has resulted in a preferred layout for the site, which is reflected in the draft SPD attached at Appendix 1.

3.5 The Sustainability Appraisal Report sets out the assessment of the SPD in line with the existing Sustainability Indicators established in the Unitary

Development Plan 2004. The Sustainability Appraisal Report includes a comparison of the social, environmental and economic effects of the options; how social, environmental and economic issues were considered in choosing the preferred options; and any proposed mitigation measures.

3.6 The Consultation Strategy sets out how the local authority has consulted on the preparation of the draft SPD and how it intends to consult over the formal public participation process of the SPD.

3.7 The draft SPD, Consultation Strategy and SA Report have been prepared in line with the process required by the Planning & Compulsory Purchase Act 2004.

Pre-production Consultation

3.8 Your officers carried out consultation prior to the drawing up of the draft SPD to gauge the likely support for an SPD and to include any concerns from local residents and businesses. As outlined earlier, the Stakeholder Forum, (made up of local residents, LBB planning officers and Genesis Housing Association (the former applicant)) met three times to discuss the development options for the site, with particular focus on the layout of the site including the road layout, the height of the potential scheme and the options for the massing and design of the site. Architects Munkenbeck and Marshall were commissioned by the Council to study options for developing the site and to produce illustrative materials for discussion at the group's meetings. These images and notes of the meetings were subsequently all available on the Council's web pages and the representatives that attended the meeting were responsible for disseminating information to the areas/groups they represented and to bring the local residents views back to the forum.

3.9 A model and posters illustrating the work carried out in this group were taken to Queen's Park Day on 11th September and displayed in the Community Tent. The majority of the people were keen to see this area redeveloped and supported a courtyard form of development across the whole SPD area.

3.10 Officers from the Planning Service presented at the Kilburn & Kensal Area Consultative Forum held on 19th September, where most of the residents seemed to be broadly in favour of the concepts reflected in the SPD although concerns were raised over the impact of car parking provision on the site.

3.11 A public meeting was held on the 19th October, to update local residents and stakeholders on the progress of the stakeholder group and to present the preferred concepts resulting from the stakeholder group's work. Those that attended the meeting were generally in support of the new layout and massing concepts presented at the meeting and saw them as a vast improvement on the previous scheme proposed for the site.

Site Description & History

3.12 The SPD site is bounded by Claremont Road to the west, Kilburn Lane to the south, Salusbury Road to the east and the Silverlink/Bakerloo railway line to

the north and is approximately 0.58 Ha in size. The area includes the following sites:

- Premier House & Keniston Press
- Falcon Pub & Cullen House
- Council public car park

Development of the SPD

Policy Context

- 3.13 The SPD site falls within the South Kilburn New Deals for the Community (SKNDC) area, which is a Major Estate Regeneration Area in the adopted Brent UDP (2004). Under policy H7 the Council seeks the comprehensive regeneration of the area through refurbishment and or redevelopment. A masterplan was developed for the area in 2004 in conjunction with SKNDC. The overarching aim of this plan is to create a sustainable place. Following this a SPD for the area was approved in April 2005 which supports the masterplan and sets out the future expectations for the regeneration of the area.

Issues to be considered

SPD options

- 3.14 Three options were considered in the formulation of the SPD. These were:
- A) Development of the whole site comprehensively
 - B) Development of the northern part of the site
 - C) No development, leave the site as it is
- 3.15 From the assessment of these options through the sustainability appraisal process, your Officers consider that the only option that would produce environmentally sustainable regenerative benefits is option A, which is to develop the whole site comprehensively.
- 3.16 In order to make significant regenerative change to this site, the Council should, in your Officers view, make it clear that it will use its Compulsory Purchase (CPO) powers. This is particularly important for this site in order to assemble a site for the necessary comprehensive development. The Council should consider CPO powers as a last resort to achieve its redevelopment objectives and it is the intention to secure sites by negotiation wherever possible. CPO powers will only be exercised where a development partner meets all the cost of acquisition and so indemnifies the Council. Should these be required, Officers will seek authority from the Executive.

Sustainability Appraisal

- 3.17 A Sustainability Appraisal (SA) was carried out during the pre-production phase of the SPD. The process informs the development of the SPD to ensure that sustainability issues are comprehensively considered in drawing up the SPD. Representatives from Housing, Transportation, Environmental Health, the PCT and the Directorate all provided input into the assessment and discussed the main issues at a meeting. Following this meeting a draft Sustainability Appraisal Report was drawn up which will accompany the draft

SPD for public consultation purposes. In agreeing to consult on the SPD, members are consenting to public consultation on the SA report also which will be sent to the Executive under separate cover.

- 3.18 The main issue raised was the sustainability of the provision of car parking for residents. There were a number of reasons for this change. The new administration considers that residential car parking should be provided on the site. Car parking would assist in the saleability of any for sale units and this is important to assist the viability and attractiveness of the South Kilburn redevelopment project. Members were also concerned that in terms of equity, those on lower incomes should not always be denied parking while those existing residents, often on larger incomes, have parking spaces. The withdrawn scheme was a car free scheme with some limited parking for local shoppers. The Sustainability Appraisal points out that increased parking will generate more traffic, increase building costs, exacerbate air quality problems and generally reduce the sustainability and environmental benefits of a scheme on the site. However, in view of its role in the early phase of the development, the planning objectives in this instance override these concerns.

Summary of SPD contents

- 3.19 The SPD sets out the following objectives:

1) Secure comprehensive development A comprehensive development will be sought which will enable a more effective use of land in the area. The removal of the road through the centre of the site will enable the development of a larger site, and allow for a courtyard layout creating improved pedestrian links from Kilburn Lane to Queen's Park station.

2) Achieve a scale of development appropriate to the area The development of very high buildings on the SPD site would impact negatively on the surrounding areas. Therefore development should be limited in height to a level that will still ensure regenerative development and also would not undermine the regeneration proposals for South Kilburn.

3) Secure a mixed use scheme The uses should include retail at ground level and a significant element of residential above. A high quality mixed use scheme may also assist in 'kick starting' the regeneration of the South Kilburn area.

4) Develop to a very high quality of design and sustainability A very high quality design scheme will be sought on the site, a benchmark for the borough, reflecting the site's location. Development should also be an exemplar in terms of sustainability such as the use of renewables and inclusion of recycling facilities and achieve BREEAM's Eco Homes excellent standard.

5) Achieve a mix of tenure A mix of both private housing and affordable housing on the site are essential to meet the housing needs of the area, and particularly in the context of the regeneration of South Kilburn.

6) Secure public transport and interchange improvements In particular development should allow access to the station (potentially a second access) and provide an appropriate solution to the bus route layouts and interchange requirements on the site.

7) Resolve and rationalise traffic impact and community severance A comprehensive development would allow for the redesign of the road layout to move the traffic around the site rather than through the centre of it. This creates a safer and more attractive environment for residents and pedestrians.

8) Ensure new and replacement community facilities New and replacement community facilities will be sought as part of the development to address the needs of the local area.

9) High quality landscaping and public spaces There is the opportunity to create high quality landscaping and public spaces, including a central courtyard on the site. These should provide an attractive space for residents and visitors alike.

10) A safe, secure and well maintained development A development that is safe and secure, well managed and maintained will be sought.

11) Ensure there is a satisfactory solution to off road servicing and parking The site is at the junction of two busy roads which carry significant volumes of traffic throughout the day. It is therefore important to ensure that any development addresses the servicing and parking needs appropriately.

3.20 Developers would be required to enter into a Section 106 Agreement with the Council to provide the following:

- 50% Affordable housing (split between rented and shared ownership);
- Transport improvements including an improved junction between Carlton Vale, Kilburn Lane and Salusbury Road, station access improvements in the form of a second access to the station unless another scheme could be agreed and Station/Bus interchange facilities;
- Sustainable transport measures and improvements;
- Support of a Car Club;
- Travel Plan;
- Minimum of 10% of the site's energy needs should be met by on-site renewables;
- Sustainable construction techniques and registration to the considerate contractors scheme;
- Units built to Eco Homes Excellent rating;
- Waste management measures implemented through an agreed Waste Management Strategy;
- Use of Sustainable Urban Drainage Systems;
- A high level of noise and vibration attenuation;
- Inclusion of community facilities;

- Measures to minimise the effect of poor air quality and use of non-toxic materials to improve the quality of indoor air quality;
- Financial contributions towards air quality management and monitoring in the area;
- Open Space/public realm contribution including contributions for CCTV installation, operation etc and maintenance of landscaping & trees;
- Provision of publicly accessible toilets;
- Contribution to education provision;
- Job training depending on employment balance sheet: e.g. contributions to job training;
- Public Art;
- Public access to the courtyard between 6am and midnight; and
- Council legal fees in preparing the S106.

Architectural Competition

3.21 Your officers recommend that an architectural competition is undertaken in order to achieve the aspirations of a landmark building. While any planning document could only suggest an architectural competition, the Council could as landowner make it a requirement on selling the land. It is our recommendation that this would be required.

3.22 In order to progress quickly we suggest selecting from a limited number of architects (usually around 3 or 4 firms) and invite them to submit proposals to be judged by a panel. The panel would consist of a panel of advisors consisting of officers from Planning, Housing and South Kilburn NDC and a panel choosing the final architect which could comprise of:

- 2 Council Members
- 2 Members of the South Kilburn NDC board
- 1 representative from QPARA
- 1 representative from Stop the Tower
- 1 representative from Westminster and
- representatives from Hyde Housing Association

4.0 Financial Implications

4.1 The SPD is designed to establish the framework for determining an application(s) for the site. The assessment of the planning application will be undertaken in the normal way with costs contained within existing budgets.

4.2 There are, however, wider implications arising from any possible development. The associated Section 106 Agreement will secure funding and benefits which will mitigate the impact of the development and contribute to the regeneration of the South Kilburn area and wider surrounding area.

4.3 The Council would look to dispose of Cullen House land as part of the South Kilburn redevelopment proposals as part of its contribution to the South Kilburn redevelopment. The Council also owns the land used as the station short stay car park. It also owns the highway which could also be built on. Development proposals that limit development potential will affect any Capital receipt that the Council may secure for the sale of these assets. In addition to

this, your Officers recommend that the Council as landowner restricts inappropriate uses on the site by covenant or other legal agreement when selling the land. This is proposed to be formally recommended at a later stage and will be brought before the Executive in more detail.

- 4.4 The Council's capital disposals programme as approved by Full Council on 6th March 2006 includes a forecast gross receipt of £750k associated with this site. The capital disposals programme details the individual disposals that are forecast in each year and contribute towards the achievement of the general fund capital receipts target within the resource section of the Council's Capital Programme. If the sums included in the disposals programme are not achieved, then this could significantly impact on the potential to realise the capital receipts target currently included in the capital programme and therefore put additional strain on the Council's ability to fund the approved expenditure.
- 4.5 Members should note that the forecast gross receipt of £750k was based on the previous planning brief and this will need to be reviewed in the light of the proposed new planning brief. An updated forecast will have to take into such considerations as changes to Council owned properties identified for disposal, changes in proposed land use and the identification of any associated enabling costs.
- 4.6 Significant reductions in heights on the car park site will affect the numbers of dwellings that can be built on Albert Road. Reducing the numbers significantly here will undermine the whole of the South Kilburn development proposals and place demands on the Council's capital budget.
- 4.7 It should be made clear that the Planning Brief must be considered on its planning merits and the Council's position as land owner should not influence any decision made on planning grounds.

Other financial implications

- 4.8 The estimated cost of the consultation undertaken so far is approximately £17,000 and these expenses have been shared between the planning service and the housing department with contributions from Genesis Housing Group. Future consultation costs would be limited and borne by the planning service.
- 4.9 The cost of undertaking an architectural competition for the site is estimated to be in the region of £15,000 and we will seek support from Hyde Housing Association.

5.0 Legal Implications

- 5.1 The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Unitary Development Plans and Supplementary Planning Guidance will be replaced by a Local Development Framework. Since there are no provisions under the Act to produce SPGs the council must now produce SPDs.

- 5.2 Planning Policy Statement 12 'Local Development Frameworks' sets out the procedural policy and process of preparing Local Development Documents including Supplementary Planning Documents. The SPD has been produced in accordance with the guidance contained within PPS12 and in accordance with Brent's adopted Statement of Community Involvement (June 2006). PPS12 requires a Sustainability Appraisal and a consultation strategy to accompany a draft Supplementary Planning Document for public consultation.
- 5.3 Supplementary Planning Documents are not subject to independent examination and will not form part of the statutory development plan. However they should be subjected to rigorous procedures for community involvement.
- 5.4 Supplementary Planning Documents are not statutory documents in the same way as the UDP but are material considerations to be taken into account when determining individual planning applications.

6.0 Diversity Implications

- 6.1 The Statement of Community Involvement identifies how the public are to be engaged in the preparation of SPDs in general. An inclusive approach is suggested to ensure that different groups have the opportunity to participate and are not disadvantaged in the process.

7.0 Staffing/Accommodation Implications (if appropriate)

- 7.1 None

8.0 Environmental Implications

- 8.1 A Sustainability Appraisal has been undertaken on the draft SPD. This will accompany the draft SPD for public consultation purposes.

Background Papers

- Executive Committee Report 23rd August 2006
- Queen's Park Station Area SPD Sustainability Appraisal Scoping Report
- Sustainability Appraisal
- Consultation Strategy

Any person wishing to inspect the above papers should contact:

Mary-Ann Bye
Planning Service
Brent House
349 High Road
Wembley
Middlesex HA9 6BZ
Telephone: 020 8937 5368

Richard Saunders
Director of Environment & Culture

Chris Walker
Director of Planning

APPENDIX 1

**DRAFT QUEEN'S PARK STATION AREA
SUPPLEMENTARY PLANNING DOCUMENT**

APPENDIX 2

DRAFT SUSTAINABILITY APPRAISAL REPORT
NON TECHNICAL SUMMARY

Queen's Park Station Area Draft Supplementary Planning Document

Sustainability Appraisal Report Non-Technical Summary

1. Introduction

1.1 This is a non-technical summary of the Queen's Park Station Area Supplementary Planning Document (SPD) Sustainability Appraisal Report. It sets out the Sustainability Appraisal (SA) process that was followed and what changes it has brought about. It also provides contact details and how to comment on the document during the public consultation period. For further details reference should be made to the main SA Report. Note that the main SA Report incorporates an Environmental Report under the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633.

2. Background

- 2.1 The Queen's Park Station Area SPD, will set out the requirements of the council for the regeneration of the site and will be a material consideration in determining planning applications on Queen's Park Station Area (Salisbury Road car park, Cullen House, Premier House, and the Falcon Public House).
- 2.2 The objective of the SPD will be to ensure long term physical, social and environmental regeneration through the comprehensive development of the site. Therefore, the purpose of the SPD is to establish the principles and parameters to guide and control future development and against which future proposals can be assessed.
- 2.3 The purpose of the Sustainability Appraisal (SA) is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of the Queen's Park Station Area SPD. The SA considers the SPD's implications, from a social, economic and environmental perspective, by assessing options and the draft SPD against available baseline data and sustainability objectives.
- 2.4 SA is mandatory for SPDs under the requirements of the Planning and Compulsory Purchase Act (2004). SAs of SPDs should also fully incorporate the requirements of the European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive. This Directive is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 – the SEA Regulations.

3. The appraisal methodology

- 3.1 The approach adopted to undertake the SA was based on the process set out in the Government guidance on SA of Regional Spatial Strategies and Local Development Frameworks (November 2005).
- 3.2 The level of detail and the scope that the SA covered was agreed at an early stage by key stakeholders involved in the SA process as part of consultation on the SA Scoping Report. This report was produced to set out the initial context and findings of the SA and the proposed approach to the appraisal process.
- 3.3 The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship with these other documents and requirements are explored to enable the London Borough of Brent to take advantage of any potential synergies and to deal with any inconsistencies

and constraints. The plans, programmes and sustainability objectives that need to be considered include those at an international, national and regional and local scale.

- 3.4 Preparatory work for the SPD had already considered a number of planning policies and guidance documents, however to meet the SA's requirements a broader range were considered, in particular those with environmental protection and / or sustainability objectives.
- 3.5 In general no major inconsistencies between policies were identified, although several plans were the source of policies, conditions, etc that provided the context within which the SPD had to be framed. The key links identified were with the adopted Brent Unitary Development Plan (UDP), the London Plan: Spatial Development Strategy for Greater London, the Sustainable Development Framework for London, Brent's Regeneration Strategy, Supplementary Planning Guidance 17: Brent Design Guide for New Development and Supplementary Planning Guidance 19: Brent Sustainable Design, Construction and Pollution Controls amongst others.

4. Baseline

- 4.1 The collection and assessment of information and data about the current and likely future state of the Queen's Park Station Area was used within the SA to help identify sustainability problems and predict the SPD's effects. Baseline topics and subtopics, covering the economic, social and environmental dimensions of sustainability, focused on the key issues facing the Queen's Park and South Kilburn areas and the potentially significant effects the SPD could have. Where available key trends and targets were identified, along with any difficulties and limitations in the data.
- 4.2 Where historic data was available, the socio-economic data highlights the significant differences between the prosperity of the two wards of Queen's Park and Kilburn. In terms of retailing, Queen's Park town centre has seen an increase in comparison retail floorspace and a decrease in service floorspace.

5. The sustainability framework

- 5.1 The establishment of SA objectives and criteria is central to the SA process and provide a way in which sustainability effects can be described, assessed and compared. The sustainability objectives used for the SA of the SPD were based on those already developed and agreed following consultation for the appraisal of the adopted Brent UDP, although they were modified slightly to reflect the particular needs and issues identified in Queen's Park Station Area. There were 23 objectives used in total organised under the three dimensions of sustainability: social; environmental; and economic. They covered a broad range of topics such as: to promote prosperity and social inclusion; to minimise the production of waste and use of non-renewable materials; and to offer everybody the opportunity for rewarding and satisfying employment.

6. Key sustainability issues and problems

- 6.1 Many of the sustainability issues of Queen's Park Station Area have previously been identified within existing documents and strategies such as through the Sustainability undertake to inform the South Kilburn SPD (2005). Further issues have emerged through the SA process, which has also sought to identify the evidence to support the selection of key issues from the baseline data.
- 6.2 Some of the key sustainability issues and problems facing the local community as a whole include: relatively low incomes; below average health (Kilburn ward); medium to high incidence of street crime; a relatively high

level of rented accommodation (the majority in Kilburn being social rented); lack of green space, trees and wildlife habitats; the poor quality of the townscape and public realm in parts of the South Kilburn area and poor air quality (falls within an Air Quality Management Area).

7. Appraisal of strategic options

- 7.1 A key requirement of the SA is to consider reasonable alternatives as part of the assessment process. The options that were assessed were formulated based upon adopted UDP (2004) policies and from feedback resulting from initial consultations with local stakeholder groups. There was a perceived need to comprehensively redevelop the site in a way that could improve traffic flow, improve the environment and maintain and enhance the competitiveness of the Queen's Park town centre and improve the retail provision of the South Kilburn area. These were:
- Option A – Comprehensive redevelopment of the whole site;
 - Option B – Partial redevelopment of the northern half of the site; or
 - Option C – No development.
- 7.2 The key changes and the sustainability strengths and weaknesses of each option were identified. This concluded that the preferred option was the comprehensive redevelopment of all the sites as a whole (Option A) as this would result in the most sustainable development overall.

8. Appraisal of draft development principles

- 8.1 The SA provides a record of the prediction and assessment of the potential effects of the draft SPD, and in particular the development principles (i.e. land use principles and design and development principles) which are especially relevant at the strategic level. The principles were scored on a five point scale (major positive, minor positive, neutral, minor negative and major negative and an uncertain category) against each of the sustainability objectives. Details of proposed mitigation measures and recommendations as to how principles could be improved and criteria/conditions added to the planning requirements and implementation of any planning permission were also suggested. The appraisal of the principles was an iterative process and the proposed mitigation measures and recommendations were incorporated as far as possible into revisions of the draft SPD.
- 8.2 Generally the draft SPD performed very well against the sustainability objectives and the majority of effects identified were very positive. There were some potential negative effects identified under certain objectives, mainly under the environmental dimension of sustainability. One of the issues that was raised, which lowers the sustainability score of the draft SPD was the requirement for on site residential car parking. The site was regarded as a suitable site for car free housing, due to its high transport accessibility rating, and the provision of car parking was believed to have potential negative impacts on air quality and an increase in traffic generation.
- 8.3 Another issue raised was the importance of attracting quality shops and uses to the development, and the preference for a grocery retailer on the site as this would be positive in terms of sustainability and health. The importance of high quality sustainable design was also highlighted, with concerns raised over the sort of landscaping undertaken (i.e. plants should be drought resistant) and excessive glazing on the buildings as this can overheat buildings in the summer. Other issues raised tended to be limited to certain criteria and measures have been identified in the draft SPD to either manage or mitigate many of these potential negative effects via planning requirements.

9. Implementation and monitoring

- 9.1 A key part of the SA process is establishing how the significant sustainability effects of implementing SPD will be monitored. Some potential indicators with targets where they exist have been proposed as a starting point for developing the SPD and sustainability monitoring programme. The majority of the indicators proposed are from readily available data sources. It is envisaged that the monitoring would be on an annual basis, although updates of some indicators will not be available that frequently.
- 9.2 Details are provided in the SA Report of the process that will be followed after the public consultation alongside the draft SPD.

10. Difference the process has made

- 10.1 The SA process and the development of the SPD has been initiated to promote the regeneration and redevelopment of the Queen's Park Station Area sites. Following the appraisal of strategic options some negative effects were identified but there were also opportunities for mitigation and further enhancement. By incorporating suggested social, environmental and economic mitigation measures the SA has generally found that implementing the draft SPD would have major positive benefits on sustainability.
- 10.2 It has not been possible or appropriate to undertake detailed appraisal of the individual sites included in the draft SPD and therefore it has been necessary to include recommendations in the 'Planning Requirements' section of the draft SPD for these to be undertaken at the outline planning application stage as part of its accompanying Environmental Impact Assessment (EIA) or other assessments.