



Ribble Valley Borough Council
Publication Core Strategy
Sustainability Appraisal Report

Non-Technical Summary

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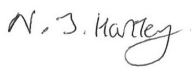
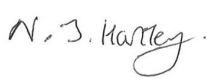


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1 INTRODUCTION AND BACKGROUND

Ribble Valley Borough Council has prepared a Publication Core Strategy to guide development within the borough up to 2028. The Core Strategy is the most important planning document that the council will produce and, together with other documents, it will replace the existing Local Plan. The Core Strategy will be the main consideration when determining planning applications. It will set out broad areas where new homes and employment land should be located together with the important areas of our natural and built environment which are to be protected.

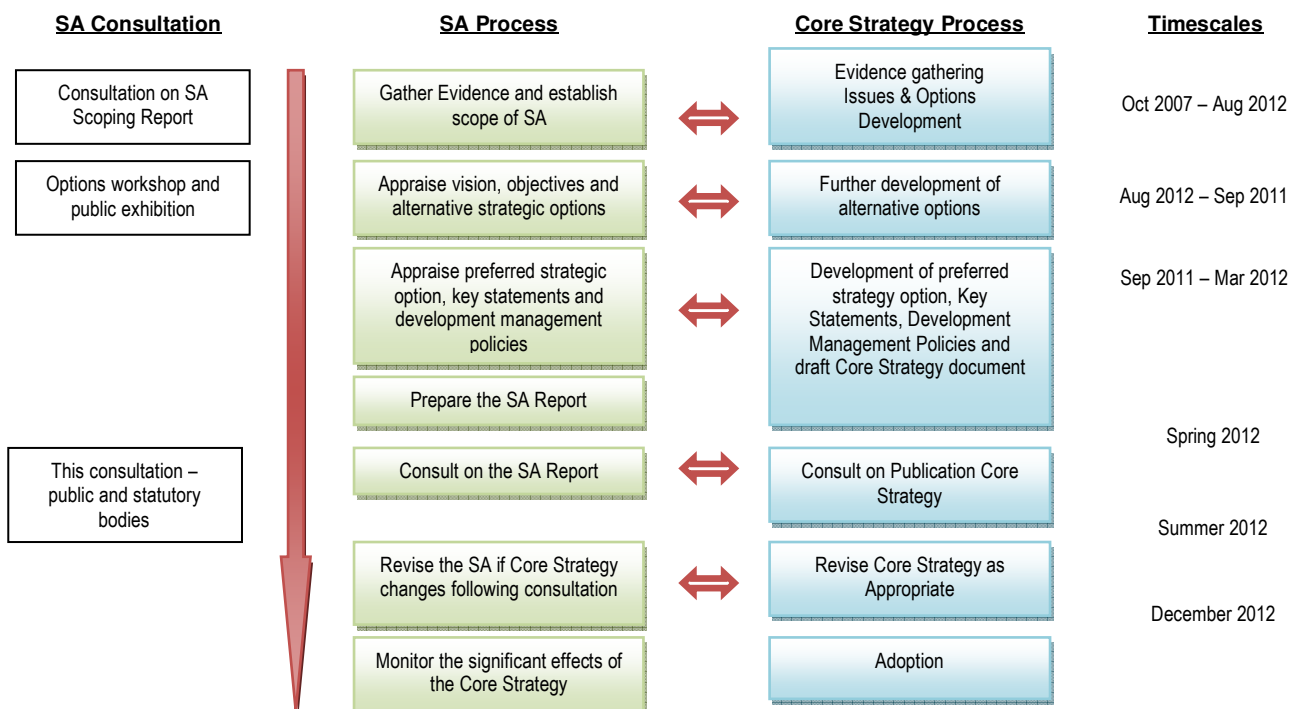
When preparing the Core Strategy it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. Independent consultants, Hyder Consulting Ltd., have undertaken the SA during the Core Strategy’s development. This report provides a summary of the findings. The detailed reports can be viewed at the council offices or on the website.

2 WHAT IS SUSTAINABILITY APPRAISAL?

SA is a process for assessing the social, economic and environmental impacts of a Core Strategy as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European Strategic Environmental Assessment Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Natural England, English Heritage and Environment Agency) and the public is also required at key stages.

A high-level chart showing the SA stages undertaken alongside the plan-making stages is presented below. It also indicates the timeline and key consultation points.



3 SCOPE OF THE APPRAISAL

The scope of the SA was determined through collecting information on the environmental, social and economic characteristics of the borough. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies in 2007 and then again in 2010 (following updates).

Existing characteristics and issues in Ribble Valley

To ensure that a robust assessment of the emerging Core Strategy is undertaken, it is necessary to understand the existing conditions and characteristics of the borough, for example, the location of key environmental features like Sites of Special Scientific Interest, Scheduled Ancient Monuments, population dynamics including migration patterns, health, employment, schools capacity and the condition of housing stock and its affordability. These are detailed in the SA Report. Table 3-1 below identifies the sustainability topics covered in the SA and summarises some of the key characteristics and issues under each.

Table 3-1 Summary of key existing characteristics and issues in Ribble Valley

| SA Topic | Summary of key existing characteristics and issues in Ribble Valley |
|---------------------------|--|
| Population | The population is small, ageing and spread out. This has implications for access to rural services, elderly health care and housing for the elderly. Many young people leave the borough for education and jobs. |
| Education | Educational attainment is good and the borough has a number of good schools although there will be limited capacity in some primary and secondary schools. Job-related training could be improved and there is a need to retain young people in the borough. |
| Health | Health is generally very good although there are some pockets of poorer health. There is good access to outdoor recreation. The elderly population may put pressure on care facilities. |
| Crime | Crime levels are generally low although anti-social behaviour can cause fear of crime in towns. |
| Water | Water quality is very good although agricultural pollution poses a risk to this. A number of areas are also at risk of surface water flooding. |
| Soil and Land | There is relatively little brownfield or contaminated land in the borough. The majority of the area is Grade 3, 4 and 5 agricultural land. Some areas are designated for their geological value. |
| Air Quality | Whilst air quality is generally very good, congestion in Clitheroe has led to an Air Quality Management Area being designated. |
| Energy and Climate Change | Energy use in Ribble Valley is above average and carbon dioxide emissions per head are the highest in Lancashire, largely due to the Castle Cement works. There are no major renewable energy schemes. |
| Biodiversity | There is a very high quality natural environment in the borough, which needs to be preserved and enhanced. This includes numerous sites designated nationally and internationally for nature conservation importance. |
| Cultural Heritage | The borough contains a large number of historic sites and buildings including many small settlements with distinctive historic characters. These offer tourism potential and should be protected. |
| Landscape/Townscape | The borough's high quality landscape and townscapes are a very important resource for attracting visitors and enhancing the quality of life for residents. Most of the borough is designated as an Area of Outstanding Natural Beauty. |
| Minerals and | The major strategic landfill site for the Borough is located in a neighbouring authority and Ribble Valley is |

SA Topic Summary of key existing characteristics and issues in Ribble Valley

| | |
|---------------------|---|
| Waste | therefore an exporter of waste. |
| Transport | The borough has good road connections to other parts of Lancashire and the national motorway network. There are also rail links to other key settlements in the region. Car dependence is very high given the rural nature of the borough and opportunities should be sought to encourage public transport use and reduce car dependence through the planning system. |
| Economy | Although the recent economic downturn has affected all areas, historically, the borough's economy has performed well. There is a small number of large employers and increasing the range of skills and jobs would be beneficial. There are high skills levels amongst the population although many people work outside the borough. Whilst the residents are generally affluent, there are households with lower than average incomes and low skills levels. |
| Deprivation | Whilst largely an affluent borough with low levels of deprivation, issues exist with regard to access to services in rural parts and the ability for rural facilities to remain viable. |
| Housing | There is a shortage of affordable housing across Ribble Valley partly made worse through an influx of wealthy in-migrants. There is also a need to improve housing stock which is vacant or unfit and there is increasing need for specialist housing for the elderly. Opportunities exist for higher levels of sustainable construction in new homes. |
| Cross-border issues | Over half of the borough's population out-commute daily for employment reasons. Waste disposal is a strategic issue for all of East Lancashire with the main waste disposal site being located in Hyndburn. There are limited adult education training facilities in the Borough and therefore people may be commuting out of the Borough for educational reasons. There is also a perception that many secondary school pupils out-commute to schools in adjacent areas. |

Policy context

A review of other international, national, regional and local plans and programmes that could influence the development of the SA and the Core Strategy was undertaken and is recorded in the SA Report. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the SA and the Core Strategy. Over 100 documents were reviewed including the World Summit on Sustainable Development, Johannesburg (2002), relevant European Directives, the UK Sustainable Development Strategy, National Planning Policy Guidance and Statements, the Forest of Bowland Management Plan and the Ribble Valley, Sustainable Community Strategy amongst others.

Which aspects of the Core Strategy were appraised?

The following aspects of the Core Strategy were appraised through the SA:

- The strategic vision and objectives.
- The strategic spatial strategy and its alternative options.
- The Development Management Policies and Key Statements – both draft and final versions.

Following the appraisal of the above, recommendations were presented to the plan-makers to adapt the choice of strategy or policy wording in order to minimise adverse effects and maximise benefits.

4 ALTERNATIVE OPTIONS APPRAISAL

In total, eight options were appraised through the SA. In addition to this, a Do-Minimum or 'business as usual' option was also appraised for comparison. These are as follows (the percentage of the overall amount of development per area is given in brackets unless otherwise stated):

Table 4-1 Summary description of strategic spatial options

| Option | Description |
|------------|---|
| 1 | Development will be directed towards the service centres comprising Clitheroe (45%), Longridge (5%) and Whalley (30%). Limited development (20%) will be accommodated through appropriate village growth. |
| 2 | Longridge (20%) will be viewed as a strategic growth area. Other growth would be spread amongst Clitheroe (24%), Whalley (23%) and village expansion where appropriate (23%). |
| 3 | 22% of growth would be focussed on Clitheroe, 3% in Longridge and 15% in Whalley. 60% of development will be accommodated through the strategic release of sites in other unspecified settlements. |
| A | Whilst the majority of development will be in Clitheroe (52%), Longridge (27%) and Whalley (11%), 10% will be spread across all the borough's smaller settlements at a small scale individually. |
| B | As option A but with a larger focus on other settlements as follows: Clitheroe (45%), Longridge (25%), Whalley (10%) and other settlements (20%) |
| C | Development will be distributed across the borough, to allow an appropriate scale of development within all the borough's settlements. No specific breakdown is given. |
| D | Development will be focussed towards a single strategic site located to the south of Clitheroe, towards the A59 (50%). The remaining 50% will be permitted at other locations in the borough to meet identified needs in accordance with option C. |
| E | Development will be focused towards land located at a single strategic location at Barrow (65%). The remaining 35% will be permitted at other locations in the borough to meet identified needs distributed in accordance with option C. |
| Do-Minimum | The Do-Minimum option would broadly comprise a continuation of the spatial strategy outlined in the Districtwide Local Plan adopted in June 1998. This focuses the majority of development in the main urban areas of Clitheroe, Longridge, Billington and Wilpshire. Modest development would occur within the urban areas of Mellor Brook, Read and Simonstone. Small scale infill or conversions in other rural villages could also occur together with other small scale development outside settlement boundaries in accordance with policy. |

Each alternative option was appraised through the SA and recommendations were made to the plan-makers. The assessment concluded the following high-level spatial priorities required to contribute towards a sustainable development pattern:

- A primary focus of development on key market towns to maximise access to services, public transport linkages and jobs, notably in Clitheroe and to a lesser extent in Longridge and Whalley. This also helps to avoid large amounts of development in the most environmentally sensitive areas of the borough.
- A degree of development in rural settlements to meet local needs.
- This provision of a balanced strategy would minimise the effects upon the transport network and would enable realistic levels of growth to be achieved in major centres to

retain their vibrancy whilst also encouraging growth in rural areas to preserve their viability and reduce the need to travel.

- Specific reference to areas rather than broad statements such as 'borough-wide' in order to reduce levels of uncertainty.
- The need to avoid development in sensitive environmental areas, notably the Area of Outstanding Natural Beauty (unless tightly controlled) and nature conservation designations. Similarly, the need to avoid a cumulative erosion of rural character through excessive rural development.
- Whilst there are merits to developing strategic sites, especially within reach of existing centres, there should be strict guidance as to how such sites are developed, and how they can incorporate an appropriate level of self-sustainability, together with addressing their transport infrastructure needs.

Option 1 performs strongly with respect to focussing development in market towns whilst also giving support to rural needs and minimising adverse effects upon the natural environment. However, it misses an opportunity to capitalise locating homes, jobs and services in together in Longridge and potentially places too much pressure on services and traffic infrastructure in Whalley. Option 2 also performs well in terms of focussing on market towns and includes more development in Longridge. However, it is considered that more development would be appropriate in Clitheroe than is proposed here and potentially too much pressure could be put on services in Whalley. Option 3 would provide a lower level of growth in the market towns, thereby not fulfilling the potential to co-locate homes and services, jobs and transport infrastructure. Instead, a large proportion of development is proposed for rural areas which has the potential to erode rural character, the natural environment and encourage a greater dependence upon the private car. The highways infrastructure in these areas is inadequate to accommodate this level of development.

Option A provides the majority of development in the three main market towns including over 50% in Clitheroe. This level of development has potential to put considerable pressure on services in Clitheroe. Only 10% is earmarked for rural areas which is seen as relatively limited compared to other options. Option B provides a more balanced approach with 80% of development focussed in the market towns where there is good access to services and transport connections. 20% is focussed in rural areas to provide support to local needs. Option C proposes borough-wide housing depending upon local needs. There is very little guidance with this option which gives rise to the possibility that significant amounts of inappropriate development may occur, including in environmentally sensitive areas. This may put too much pressure on services in some areas and other areas which are in need of investment may miss out.

Option D proposes half the growth in a strategic site south of Clitheroe and half spread across the remaining borough. The strategic site presents a number of opportunities if its design and implementation are tightly controlled, for example, it would provide good access to amenities and jobs in Clitheroe and is close to the strategic transport network, it would avoid the most environmentally sensitive areas of the borough and there are opportunities to implement high-levels of sustainable design. However, the scale of the strategic site has potential to result in local landscape and visual intrusion and it would require considerable highways infrastructure improvements to ensure against potentially significant effects upon the strategic transport network. The 50% borough-wide development presents a great deal of uncertainty regarding where this may go. Option E proposes a strategic site at Barrow to take 65% of the borough's growth over the plan-period. As with Option D this presents an opportunity to create a high-quality sustainable new settlement if its design and implementation are tightly controlled. There is also an opportunity for rural needs to be met through the 35% borough-wide development, although there is some uncertainty regarding this. However, as with option D, the scale of the

strategic site has potential to result in local landscape intrusion and it would put significant pressure on the highways network, although this could potentially be mitigated at the local level.

Following the appraisal, consultation feedback and further analysis by the council, a preferred option was chosen which was essentially a hybrid of options B and D promoting 34.6% of growth at the strategic site south of Clitheroe, 11.6% in Clitheroe itself, 18.6% in Longridge, 8% in Whalley and 27% in other settlements for local needs. There is also a strong focus on provision of employment land.

5 APPRAISAL RESULTS

The SA process determined that the Core Strategy Vision and Strategic Objectives were in line with the principles of sustainable development and seek to address the key sustainability issues in the borough in terms of environmental protection, economic development and an improved living environment. A number of recommendations have been made to further improve the Vision and Strategic Objectives, principally with regard to the need for access to sustainable transport, climate change adaptation and mitigation, environmental enhancement, energy and resource efficiency, labour skills development and some more specific references to protecting environmental assets of international importance.

The appraisal results below summarise the SA of the preferred development strategy, Development Management Policies and Key Statements collectively against a range of sustainability topics.

Crime and Safety

The Core Strategy is unlikely to have a significant effect on levels of crime or fear of crime simply through identifying broad areas for development, although there remains some certainty about this at the local level. However, Policy DMG1 ensures that all new development must incorporate the principles of secured by design which should help improve levels of safety. Indirectly, the benefits that the Core Strategy would bring in terms of creating vibrant town centres and providing access to amenities could help make the borough a safer, more attractive place to live.

Education

The Core Strategy focuses the majority of new housing development in areas close to existing primary and secondary schools, notably in the Clitheroe area, Longridge and Whalley, enabling easy access to education. However, there will be a long-term shortage of primary school places in Clitheroe, Whalley and the new Standen expansion and a shortage of secondary places in Longridge, Whalley and the Standen Estate. Additional schools infrastructure will therefore be required, particularly as part of the new Standen Estate proposals. The identification of employment land close to existing employment areas including at the Salmesbury Enterprise Zone has potential to help create knowledge zones and generate opportunities for job-related training and up-skilling schemes.

Physical and mental health and wellbeing

There is access to open space, public transport and walking/cycling routes in Clitheroe and Longridge which provide opportunities for the pursuit of healthier lifestyles. The strategic site provides an opportunity to create a development which can include green spaces, walking and cycling infrastructure and good quality, affordable homes, all of which can be designed to maximise health and well-being benefits for its residents. Furthermore, the supporting policies seek to ensure no loss of open spaces, playing fields and areas that are important for people of

all ages to pursue healthy lifestyles together with providing protection for the borough's natural environmental assets. Where possible it recommends that enhancements are made to natural resources together with important considerations for traffic safety and former coal mining risks. The Core Strategy does not identify any developments which are envisaged to result in significant adverse health effects to the population.

Housing needs

The Core Strategy has been developed with the intention of providing sufficient housing to meet the needs of the borough over the plan period. The supporting policies on housing ensure that this housing is only available for local populations and restricts the development of holiday homes. The policies will ensure populations that wish to, can remain within the Borough. Accommodation for the elderly is a consideration of the policies and extensions to developments for care of elderly relatives will be permitted.

Community spirit and cohesion

The Key Statements for housing development will ensure that new residential property is close to existing settlements, helping to build communities and improve access to key services, including in rural areas. Development and conversions within the countryside will need to be connected to existing settlements or groups of housing, ensuring the protection and connection to local small communities. The policies will ensure that people are able to work and live within the same area, helping to promote a sense of belonging to an area. The strategic site at Standen has some potential to become an isolated development in its own right. As such it is important that it not only has elements of self-sufficiency but is also well integrated into Clitheroe through transport and infrastructure connections.

Access to basic goods, services and amenities

There is good access to services and public transport links in Clitheroe, Longridge and Whalley. Clitheroe offers major retail, leisure opportunities and basic services. The centre of Longridge offers a number of amenities and basic services. There are also secondary schools and a number of primary schools in Clitheroe and Longridge although additional capacity will be required to accommodate the level of growth proposed. The strategic site at Standen provides an opportunity to create a development which can draw upon the existing amenities in Clitheroe whilst also providing an element of self-sustainability. 27% of growth in other settlements may help to meet rural housing needs and secure services in those areas depending upon local needs, wants and regeneration requirements. The policies will ensure that existing amenities (e.g. open space) are protected and that the potential for future amenity improvements is not affected by development. Social facilities and services will be provided for within and beyond the settlement boundaries on a needs basis, with an increase in tourism and recreational development on the small scale being permitted. Improvements in transport facilities and access, coupled with more vibrant and viable town centres should increase access to services, including for persons of restricted mobility.

The Economy

The Core Strategy is expected to help encourage employment opportunities in Whalley, Clitheroe and Longridge with the latter settlements being well-placed to benefit from this given the existing employment infrastructure present. It would reduce the distance to travel to work by putting homes and jobs closer together in Clitheroe and Longridge. Clitheroe also contains some of the more economically deprived parts of the borough. The strategic site would also include some employment provision. Growth would benefit retail in Clitheroe and Longridge. Transport connections are strongest in Clitheroe and Whalley. Employment land would also be directed towards the Salmesbury Enterprise Zone and existing Barrow Enterprise Site. The

27% provision for other settlements could help to improve viability of rural services and businesses.

The supporting policies will encourage business and farm diversification and generally seek to encourage inward investment to boost the local economy. This in turn will increase employment opportunities and could help to reduce out-commuting from the borough for employment reasons. The planned improvements to strengthen the visitor economy, in line with the provisions of the Forest of Bowland Management Plan would also create some employment opportunities and should be supported by the environmental protection policies elsewhere in the Core Strategy. Strengthening the tourism industry is likely to involve some rural enterprises which will also contribute to supporting and diversifying the rural economy. Investment in employment should create new jobs and increase the skills base of the area.

Nature conservation

Focussing over half of the proposed growth in an extension at Standen would result in development avoiding statutory nature conservation designations. No development is proposed in areas of designated nature conservation value. However, it is not possible to say if localised adverse effects may occur to biodiversity, particularly at the strategic site given its scale and green field location. Cumulatively, it is likely that there will be a minor loss of biodiversity across the borough as a result of the increase in development although this would not form a significant risk to wildlife connectivity. The policies generally seek to protect biodiversity across the Borough, including habitats and species, designated sites and landscape features which also provide for a variety of habitats. Of particular importance is the protection given to international sites designated under European legislation. The SA process also recommended that policies included nature conservation enhancements and they have now been included within the Core Strategy.

Landscape and urban character

Focussing 34.6% of the proposed growth in an extension at Standen would result in development avoiding the Forest of Bowland AONB, however, it would affect a large area of greenfield land which would have localised landscape effects and would be visible from the AONB. The supporting policies generally provide good protection of the landscapes of the Borough. The Landscape Key Statement clearly identifies the requirement for the borough's landscape to be protected and enhanced. The preservation of the Green Belt will also help to protect this. Development in the countryside and AONB will be of a small scale and aim to protect, conserve and enhance the landscape character. The policy also highlights that new developments must consider the potential cumulative effects with any developments and how that could potentially affect landscape character. Policy DME3 identifies townscape as an important landscape feature that should be protected, and states that development proposals that harm such features will be refused. A high standard of design which is sympathetic to surrounding land will help to preserve the character of settlements. The use of previously developed sites will protect other undeveloped areas from further impacts.

Heritage

The borough contains a wide range of heritage assets including built heritage, archaeology and historic landscapes and townscapes. It is not possible to say that heritage constraints will be avoided with any certainty at this scale. However, the supporting policies will generally seek to ensure new development is in keeping with the existing settlement and preserve heritage assets and their setting. Policy DMG1 makes specific reference to the historic environment and the need to protect heritage assets.

Water resources

The strategic site would be developed on a large area of greenfield land. As with all greenfield development, there is a possibility of ground water pollution, increased surface run-off risk. However, Policy DME6 directly ensures that development will not be permitted where it will cause pollution to surface and groundwater resources. Some protection to water resources is also given indirectly through the protection of landscape features, such as ponds and riverine designations. There is an uncertainty related to the renewable energy policy as the type of acceptable technologies and locations are not specified as there may be concerns for water quality if certain technologies are employed.

The option largely avoids floodplain although there is some uncertainty regarding exactly where development may be located in Whalley. Policies related to sustainable development, renewable energy and water management actively provide for inclusion of sustainable drainage. Policy DMG1 recommends the use of sustainable construction techniques where possible which would indirectly ensure protection of water resources, and there are other policies in the Core Strategy addressing issues relating to water management, it is felt that this issue should be raised in policy DMG1. Growth will also result in an increased demand on water resources although significant effects are not envisaged.

Contamination and land

The strategic site would be developed on a large area of greenfield land. This represents a less sustainable use of land, however, the availability of previously developed land for housing is relatively limited in the borough. Other areas for development are, where possible, directed towards brownfield sites. None of the policies acknowledge the intrinsic value of soils and the importance of the protection from development.

Climate change and Air quality

There are good public transport links in Clitheroe, Whalley and to a lesser extent in Longridge thereby helping to reduce private car use and hence adverse air and CO₂ emissions. Also, including a spread of rural development can encourage rural service viability thereby reducing the need to travel longer distances for essential services. Policies related to sustainable development, renewable energy and water management actively provide for inclusion of sustainable drainage, renewable energy and reduction of carbon emissions across the Borough. Furthermore, policies which introduce low carbon technologies and improve energy efficiency will indirectly reduce greenhouse gas emissions from new developments.

Whilst air quality is generally good across the borough, the Air Quality Management Area in Clitheroe may be put under pressure if traffic is routed through the town centre. Traffic associated with the strategic site is also likely to generate additional movements on the strategic highway network that may extend outside the borough and some localised increases in traffic emissions may occur near to the site. The policies do not directly aim to improve air quality although the need to reduce travel is addressed in other parts of the Core Strategy. Policies which introduce low carbon technologies and improve energy efficiency will indirectly reduce greenhouse gas emissions from new developments.

Energy, waste and resources

New developments on a large scale such as the strategic site at Standen have potential to utilise a high degree of sustainable construction methods, energy efficiency and potentially renewable energy sources such as CHP or district heating schemes. It can also be easier to develop recycling schemes in urban areas. At this stage, it is not known for certain whether or not the site will be encouraged to be developed with an emphasis upon achieving high sustainability standards. The Core Strategy could provide more detail regarding how this could

be delivered. Elsewhere in the Core Strategy, the sustainable development key statement encourages development to optimise energy efficiencies through design and technology. Key Statement DME5 addresses renewable energy schemes and whilst this supports this objective it is considered that the Key Statement could be broader in its scope – it is currently selective in relation to the impacts that need to be assessed for such developments. Such development may also require Environmental Impact Assessment and this could also be referenced in the policy. The sustainable development key statement encourages development to incorporate recycled and reclaimed materials.

Sustainable transport

There are good public transport links in Clitheroe, Whalley and to a lesser extent in Longridge thereby helping to reduce private car use. Also, including a spread of rural development can encourage rural service viability thereby reducing the need to travel longer distances for essential services. Policy DMG3 will indirectly encourage a modal shift in transport by providing for a variety of transport options located conveniently to new development. The policy encourages walking and cycling, as well as investment in the railways. This will aim to reduce the use of private cars, encourage walking and cycling, and encourage the use of public transport. The Transport Considerations Key Statement supports sustainable transport options and travel plans will ensure that alternative transport becomes a real alternative to the private car in the long term. The inclusion of green infrastructure in new developments will also promote cycling and walking.

6 MONITORING

Monitoring is an ongoing process, integral to the implementation of the Core Strategy and a requirement of the SA process. The proposed monitoring framework was designed to focus mainly on significant sustainability effects identified during the SA, including effects:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

A monitoring framework is presented in the SA Report which identifies the factors that should be monitored, by whom and when. It also identifies how remedial action should be taken if unforeseen effects occur. Monitoring should occur throughout the lifetime of the Core Strategy.

7 WHAT NEXT?

The Preferred Options Core Strategy along with the SA Report and associated appendices will be consulted upon for a minimum of six weeks. Following the end of the consultation period the Proposed Submission Core Strategy will be prepared and the SA Report will be updated accordingly.

If you would like to comment on the SA, please contact:

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